

# **WinGD Supplier Code of Business Conduct**

**WIN GD**



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As a global company we recognise our responsibilities with regards to sustainable business. As such, we consider ethically, socially, and environmentally responsible practices as a fundamental pillar of our relationships and a key part of our business success.

For the purpose of this code "Suppliers" refer to all suppliers, incl. subcontractors, agents, consultants and their affiliates which supply goods and/or services to WinGD.

This Supplier code of conduct reflects the standards which we expect all WinGD Suppliers of goods and services to adhere to and pass on to their suppliers to operate in a responsible and compliance manner.

Suppliers to WinGD are required to acknowledge and commit to the adherence of the reasonable business principles as outlined in this code.

Together, we can ensure that the quality standards and sustainable supply chain practices of our global supplier base are consistent with our own and those of our customers.

We are committed to working with our Suppliers on their compliance and sustainability journey and expect full transparency as a basis for our business relationships.

WinGD expects suppliers to adhere to the principles listed below when supplying goods or providing services to a WinGD company.

**WINGD**

# General commitments

## Suppliers are required

- to comply with all applicable laws, rules, statutes, and regulations, including but not limited to all applicable anti-corruption, anti-bribery, antitrust, competition (including unfair competition), modern slavery, tax evasion, money-laundering, export controls and criminal laws.
- to respect internationally proclaimed human rights such as but not limited to not using child labor, forced labor, or any other form of slavery.
- to promote supply chain transparency and integrity especially with regards to "conflict minerals".
- to not discriminate in respect of employment and respect the personal dignity, privacy and rights of each individual and prohibit behavior that is coercive, sexual, threatening, abusive or exploitative.
- to act responsibly regarding worker safety and provide fair and favorable working conditions by supporting freedom of association, collective bargaining and fair wages;
- to act responsibly and in line with applicable regulations and conventions regarding the environment to prevent environmental pollution and manage hazardous substances (incl. chemicals) and waste as well as persistent organic pollutants.
- to take all appropriate and reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks of any personal data which it receives and collects from WinGD.
- to keep accurate business and financial records of all transactions related to their business with WinGD and be ready to provide such records upon request.
- to protect and ensure that all information provided by WinGD is kept confidential and

safeguard and process intellectual property in the best interest of WinGD.

- to act in compliance with the requirements of all applicable export control-laws, including but not limited to respecting the obligation of obtaining all required authorizations or licenses for the export or re-export of any goods or technology.

## Suppliers shall further

- ensure that comparable standards are implemented by its suppliers and sub-suppliers.
- grant WinGD and WinGD's customers the right to carry out audits incl. access to relevant supplier and sub-suppliers' documents.
- acknowledge having read and understood this Supplier Code of Business Conduct and commit to adhering to its principles.
- In the spirit of full transparency, WinGD offers employees and any other interested parties affected by the operations of our supply chain access to WinGD's grievance mechanism. All concerns can be submitted anonymously and will be treated in a confidential manner (for everyone: [compliance@wingd.com](mailto:compliance@wingd.com); for WinGD employees: compliance reporting platform on WinSpace).

# Specific commitments

## Labor and Human Rights

- WinGD expects Suppliers to respect internationally proclaimed human rights and to work towards creating and sustaining a working environment where workers are treated with dignity and respect and without discrimination.

## Child Labour

- Suppliers must not use or tolerate the use of child labour. Suppliers must not employ children who are below the local minimum working age, the age of compulsory education or the ages set out in the International Labour Organization Core Conventions (whichever is higher).
- Suppliers must ensure that workers, including trainees, under the age of 18, do not undertake nightshift work or work overtime or carry out work that is hazardous or harmful to their physical or mental development.

## Freely Chosen Employment

- Suppliers must not engage in any form of forced labour or human trafficking, use or benefit from any kind of forced or involuntary, bonded or indentured labour and should refrain from practices that can give rise to a risk of involuntary labour.

## Employment Contracts

- Suppliers must ensure that employment terms and conditions, including payment terms, are clearly understood by workers, and provided in a written contract in a language they understand prior to the start of their work, as per local regulations and aligned to the provisions of this Code as a minimum.

## Compensation

- Suppliers must adhere to relevant national laws relating to minimum wages, overtime wages and legally mandated benefits.
- If no national statutory minimum wage applies, Suppliers must ensure that the remuneration is fair in the context of the local circumstances and sufficient to meeting workers' basic needs.
- Suppliers must ensure that salary deductions that are allowed by applicable local legislation are fair and reasonable and not punitive. Pay slips must be provided in writing.

## Working Hours

- Suppliers must comply with appropriate working hour requirements including (voluntary and compensated) overtime, breaks, and rest periods – as established by national law, relevant collective agreements, and international standards.
- Suppliers must adhere to relevant national laws, industry standards and international standards for paid sick leave, paid annual leave, and paid parental leave.

## Freedom of Association

- Suppliers must respect the workers' right to associate freely and join or not join trade unions in accordance with national laws and international conventions.



## Discrimination and Harassment

- Suppliers must provide equal opportunities and support to all workers and must not discriminate against anyone based on any grounds such as age, gender, sexual orientation, gender identity or expression, ethnicity, race, physical appearance, culture, religion, national or social origin, political views, marital status, pregnancy, dependents, bodily/mental ability or trade union membership.
- Suppliers must treat all workers with respect and dignity. The work environment should be free from bullying, intimidation, coercion, corporal punishment or harassment in any form.

## Ethics, Business Integrity and Governance

- WinGD does not tolerate any form of corruption, including extortion and bribery, and expects the Suppliers to conduct their businesses with integrity.

## Anti-corruption

- Suppliers must avoid participation in, or knowingly benefit from, any kind of corruption, extortion or bribery.
- Suppliers must establish and enforce a written policy against illegally influencing or bribing public officials, business partners or customers and promote workers' awareness of the same.
- Suppliers must be transparent about commercial, financial or any other significant direct or indirect links to government agencies or departments, political parties and public/government owned entity officials.
- Suppliers must not present any invitations or gifts to our employees so as to gain any form of influence or inappropriate advantages. Any

invitations or gifts extended to WinGD employees or related parties, if any, must be reasonable and suitable, i.e., they must be of a low financial value and reflect ordinary local business custom.

- Suppliers must record and report any offer, receipt, or request to give bribes or facilitation payments. Suppliers must also challenge any request to make or receive bribes or facilitation payments, which must be actively refused unless there is a threat to personal safety.

## Data Ethics & Cyber security

- Suppliers must protect data generated or entrusted to them to deliver services to WinGD and our customers and commit to only using such data responsibly and for the intended purpose and to comply with the terms of the applicable non-disclosure agreements/terms.
- Suppliers must comply with all applicable regulatory requirements, including data protection and information security laws relating to the processing, transmission, or disclosure of such data and information.
- Suppliers must safeguard all WinGD data and information from unauthorized access, disclosure, or use, and adhere to confidentiality and data protection requirements specified in agreements.
- When operating technology or infrastructure in support of WinGD business operations, Suppliers must keep such technology secure and protected against unauthorized access that may compromise confidentiality, integrity, availability or safety.
- Suppliers must ensure personnel are trained in the correct usage and protection of data and information in compliance with the above and in the appropriate notification and response in the case of a breach.

## Competition law

- Suppliers must adhere to anti-trust and other competition laws and regulations.
- Suppliers must always independently compete for business, set prices, and terms of purchase or supply to vendors and customers.
- Suppliers must never enter into illegal agreements with competitors that may restrict or distort competition, such as price fixing, market and customer division or bid rigging.
- Suppliers must never unlawfully provide, request, or discuss commercially or competitively sensitive information.

## Sanctions and Export Controls

- Suppliers must adhere to national and international sanctions and export control laws, in particular UN, US, EU, and CH, pertaining to business transactions with countries, companies and persons, and the transfer of goods and services, software or technology between countries and any re-exports.
- Suppliers must not engage with any sanctioned person or company in relation to any business dealings with WinGD.
- Suppliers must not provide any restricted services or goods that may involve WinGD.
- Suppliers must conduct due diligence when selecting suppliers of goods and services, software and technology to ensure compliance with sanctions and export control laws.

## Conflict of interest

- Suppliers must adopt the highest standards of ethical behavior by preventing and avoiding any potential, actual or perceived conflicts of interest. Suppliers must take decisions based on objective criteria only. Any factors that might

influence Suppliers' decisions due to private, business or other conflict of interest must be prevented. The same applies to relatives and other related parties.

- Suppliers must immediately disclose to WinGD any potential, actual or perceived conflict of interest.
- Suppliers must not engage with any sanctioned person or company in relation to any business dealings with WinGD.
- Suppliers must not provide any restricted services or goods that may involve WinGD.
- Suppliers must conduct due diligence when selecting suppliers of goods and services, software and technology to ensure compliance with sanctions and export control laws.

## Conflict Minerals

- WinGD will periodically evaluate its exposure to sourcing or processing of "conflict minerals" (Tin, Tungsten, Tantalum, Gold). When applicable, WinGD supports the ethical sourcing of minerals and metals, promotes supply chain transparency and integrity. It follows the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas based on its position in the supply chain.
- Suppliers must provide WinGD with the conflict minerals related information as requested by WinGD.

## Occupational Health & Safety (OHS)

WinGD expects its Suppliers to strive to provide a safe, healthy and secure workplace to all workers at all times.

- Suppliers must ensure compliance with applicable laws and regulations regarding occupational health and safety.
- Suppliers must develop and implement effective occupational health and safety management systems.
- Suppliers must ensure the protection of their workforce by providing basic personal protective equipment appropriate to the nature of work and relevant training on health and safety systems.
- Suppliers must empower workers to report unsafe practices without fear of reprisal.
- Suppliers must have a clear set of procedures in place to respond to any potential emergency situations, including worker notification and evacuation procedures, first-aid supplies, fire detection/control equipment and clear and unrestricted exits from the site.

## Environment

WinGD commits to acting responsibly regarding the environment.

- Suppliers shall comply with all applicable local, national and international environmental laws and regulations.
- Suppliers shall take precautionary measures to prevent environmental pollution and react quickly when hazardous substances and waste or persistent organic pollutants could harm the environment and consequently pose a risk to public health.
- Suppliers must enable WinGD to control, measure, and document the environmental impact of operations, including the advancement of supply chain transparency

regarding the carbon footprint.

- Suppliers must develop and implement an effective environmental management system.

## Quality Management System (QMS)

WinGD commits to follow its QMS system.

- Suppliers must develop and implement a quality management system
- Suppliers shall take necessary corrective actions for deficiencies identified and ensure continuous improvement.
- Suppliers are fully and solely responsible for the quality of the products and services supplied by them, whether manufactured or provided by them or their sub-suppliers.
- Supplier shall ensure that training have been performed to workers which address the expectations outlined in this Code.

## Remedies for non-compliance of WinGD Code of Conduct

WinGD reserves the right to verify compliance of its Suppliers and sub-suppliers with this Code and in case of violations, take appropriate measures which can involve remedial action plans, business suspensions or the termination of business with the respective Supplier.

March 2025