

Sustainability Guidelines Vorwerk Group

Vorwerk commits to integrity and high standards of moral and ethical behaviour in accordance with applicable laws and ILO conventions. We expect all employees, representatives and subcontractors that they observe these sustainability guidelines globally.

Business Ethics / Social Responsibility

a) Forced labour

Vorwerk does not tolerate any kinds of forced or involuntary labour, as also requisitioned or bonded labour globally.

b) Child labour

Vorwerk prohibits child labour in its operations. The term "child" refers to all persons under the age of 15 years or under the minimum age for earning eligibility in the relevant country of the site, if this is the higher.

c) Human Trafficking

Vorwerk prohibits globally to employees, sub-contractors, and agencies from engaging in human trafficking related activities and will investigate suspect cases stringently.

d) Discrimination and harassment

Vorwerk provides a working environment, free from harassment and unlawful discrimination. We don't tolerate any discriminant behaviour against any person on grounds of personal characteristics or of faith, including ethnic origin, colour, religion, origin, sex, sexual orientation, age, or disabilities.

e) Anti-Bribery, - Extorsion and - Corruption

Vorwerk does not provide, accept, offer or pay bribes or participates in other corrupt practices against legal entities or private persons as extorsion. We do comply with and follow all applicable laws against bribery in the countries in which we operate.

f) Privacy

Vorwerk respects the right to privacy of its entire workforce. The business conduct is at all levels free from attacks upon honour and reputation of every employee. Personal data are processed according to General Data Protection Regulations.

g) Financial Responsibility

Vorwerk adheres to national legal and internal requirements for financial and non-financial reporting and ensures accurate records.

h) Disclosure of information

Vorwerk adheres for its sites / entire corporation to legal requirements for non-financial reportings.

i) Health and Safety

Vorwerk provides a working environment which promotes and respects Health and Safety Regulations in all areas. Each employee is obliged to follow special and general rules and regulations laid out at each site.

j) Working hours

Vorwerk complies with local laws regulating hours of work at all sites/subsidiaries.

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k) Wages and benefits

Wages and benefits of employees at Vorwerk group are consistent with applicable laws regarding minimum wages, overtime hours and legally mandated benefits.

l) Freedom of Association / Collective Bargaining

Vorwerk protects the right of its employees to associate freely and to join labour unions according to local regulations. The company allows collective bargaining according to local regulations.

m) Compliance with competition laws

Vorwerk complies to anti-trust and competition laws and does not tolerate contracts or agreements horizontally or vertically with competitors or partners, which contrast with free and fair competition practices.

n) Conflict of interest

Vorwerk employees are obliged to act faithfully on behalf of the company. Any personal beneficial behaviour is not tolerated. The adherence of this business principle is monitored by the organization / management.

o) Protection of Identity and Non-Retaliation

Vorwerk ensures at all sites the protection against any form of retaliation of employees, who report a case according to the Vorwerk Anti-Corruption Policy.

p) Counterfeit parts

Vorwerk products carry unique identifications and are traceable within the supply chain. Vorwerk will notify its OEM and tier customers immediately and take appropriate legal actions to protect the market in the event of becoming aware of any counterfeit parts being circulated.

q) Intellectual property

Vorwerk respects intellectual property of its customers and market followers and clarifies patent protection and utility registrations to avoid any breach of regulations for its products.

r) Export controls and economic sanctions

Vorwerk respects restrictions of exporting of goods and trading with countries, which are sanctioned by international laws and regulations.

s) Other Statutory Stipulations

Vorwerk complies with all applicable laws, which are not set out in greater detail in these guidelines. "Applicable Laws" are all laws, codes, rules and regulations, as well as valid contracts at the local, state, country and national levels.

t) Data Protection

Vorwerk protects confidential information of our employees, company and our customers according to internal and external regulations and applies restrictions of access to data and confidential areas. Non-disclosure agreements are followed with customers and suppliers.

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Environmental sustainability

a) **Air Quality**

To protect the environment, we obey air quality goals according to laws and regulations and to strive for reduction of air emissions.

b) **Energy consumption and greenhouse emissions**

Energy saving technologies, as internal heat exchange techniques, application of renewable energies and green house emission reduction targets are integrated in our environmental policies and activities.

c) **Natural resources management and waste reduction**

We apply rules for responsible sourcing of raw materials in our company with the target to reduce the use of primary materials, recycle and / or re-use of secondary materials, if possible, to protect natural resources.

d) **Water quality and consumption**

Integral part of our environment targets is the reduction of consumed water and the conservation of water quality by minimizing the risk of contamination and controlling emitted waste waters from processes to the environment.

e) **Responsible chemical management**

Our global operations control chemicals in accordance with safety and environmental legislations. Our environmental policy and activities focus on the reduction or substitution of high impact / hazardous chemicals.

f) **Environment Protection Laws**

We operate our global sites adhering to the global / regional / local environment protection aspects and laws and regulations for our products and processes.

Put in force in May 2019,

Dr. Juergen Moeller
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CEO Vorwerk Drivetec GmbH