

Supplier Code of Conduct

Würth Norge

(Based on the SCOC of Würth Group, and translated and adapted in accordance with Norwegian national requirements and Ethical Trade Norway's guidelines, February 2026)

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INTRODUCTION

For Würth Norge and also for the entire Würth Group, compliance with applicable legislation is a fundamental principle. We place great importance on the values that govern our conduct with each other and with our business partners. Mutual trust, reliability, honesty and straight forwardness, shown both inside our companies and to the public, are the fundamental principles deeply ingrained in the corporate culture of Würth Norge. Furthermore, the way we run our business shall be in harmony with humanity and the environment, thereby contributing greatly to our long-term corporate success.

We consider these values to be a cornerstone of our supplier relationships. This Supplier Code of Conduct is issued by Würth Norge, in line with the standards of the Würth Group and incorporating applicable Norwegian laws and regulations. It sets binding minimum requirements that all suppliers of Würth Norge have to implement and comply with. "Suppliers" refers to any individual or entity engaged by, on behalf of, or acting as a representative of supplier.

In the main, the Supplier Code of Conduct of Würth Norge is based on the Universal Declaration of Human Rights and the principles laid down in internationally accepted standards of responsible company governance. These include the UN Global Compact, the fundamental principles at work of the International Labour Organization (ILO) and the Rio Declaration on Environment and Development.

It goes without saying that any kind of entrepreneurial action must comply with applicable national laws and requirements. Should any laws or legal requirements of a particular country, business field, or market differ from the requirements laid down in the Supplier Code of Conduct of Würth Norge, the stricter requirements shall apply.

We expect our suppliers and business partners to work purposefully and systematically to comply with our Supplier Code of Conduct, including the principles for sustainable business practices. This includes meeting fundamental requirements related to human rights, labor rights, anti-corruption, animal welfare, and environmental protection. Suppliers shall:

- Comply with this Supplier Code of Conduct for their own business practices and throughout their supply chain, including the principles for sustainable business practices.
- Actively conduct due diligence, including identifying and assessing risks of negative impacts on people, society, and the environment, and taking appropriate measures to prevent, mitigate, and cease such impacts. The effectiveness of these measures shall be monitored, evaluated, and communicated to affected stakeholders. Where the supplier has caused or contributed to an adverse impact, the supplier shall be responsible for appropriate remediation.
- Demonstrate commitment and ability to continuously improve conditions for people, society, and the environment through cooperation.

- Provide documentation upon request by Würth Norge, demonstrating compliance with the requirements of this Supplier Code of Conduct, including compliance by sub-suppliers where applicable.

Suppliers shall implement risk-based due diligence in line with the OECD Due Diligence Guidelines and applicable European due diligence legislation.

REFERENCES

Universal Declaration of Human Rights

[OHCHR | Universal Declaration of Human Rights - English](#)

The Ten Principles / UN Global Compact

[The Ten Principles | UN Global Compact](#)

ILO core labor standards

[ILO 1998 Declaration EN.pdf](#)

Rio Declaration on Environment and Development

[Rio Declaration on Environment and Development](#)

Ethical Trade Norway

[Declaration-of-principles-2022.pdf](#)

Transparency Act

[Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions \(Transparency Act\)*](#)

*(This is an unofficial English translation provided for information purposes only. Legal authenticity remains with the Norwegian version as published in Norsk Lovtidend. In case of discrepancies, the Norwegian version shall prevail.)

I. HUMAN RIGHTS AND SAFETY AT WORK

1.1 Respect of human rights

The supplier respects all general personal and human rights. Violence, intimidation, bullying, sexual harassment and/or other assaults are prohibited. Furthermore, the supplier shall ensure that any security personnel associated with its operations act in accordance with these standards and do not engage in such misconduct.

Ban on discrimination

Human dignity is inviolable. It must be respected and protected. Discrimination, that is, any discrimination, degradation and unequal treatment on the basis of gender, gender identity, social or ethnic origin, nationality, age, language, skin color, religion, sexual identity, physical or mental impairment, disability, political conviction or other personal characteristics will not be tolerated in any way. Equal treatment and equal opportunities must be guaranteed throughout the entire employment relationship. We also expect our suppliers to actively prevent discrimination and promote inclusion.

Inhumane and harsh treatment

Mental and physical abuse, as well as inhumane treatment, are strictly prohibited. This includes, but is not limited to, violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, and verbal abuse of workers. Threats of any such conduct are also prohibited.

Condemnation of forced labor, modern slavery, and human trafficking

Any kind of forced labor, modern slavery, and/or human trafficking is prohibited. All employees contribute their labor or services to a company on a voluntary basis. Any type of punitive threat such as isolation, restriction of movement, exploitation, physical violence, intimidation, excessive levels of overtime, withholding of identification documents and other sensitive documents, or withholding of wages is prohibited. If a third party is engaged to hire employees of the supplier, any costs may not be transferred to employees.

1.2 Prohibition of child labor

Würth Norge does not tolerate any child labor nor any form of exploitation of children and adolescents. In Norway, employees must not be younger than 15 years old in accordance with national law. Suppliers must not employ any underage individuals and must comply with their national law or ILO Convention 138, whichever sets the higher minimum employment age. The minimum employment age may not be lower than the school leaving age applicable in the country in which the supplier operates. No person under the age of 18 shall be

engaged in labor that is hazardous to their health, safety, or morals. Documentation of the age of all employees must be available from the supplier upon request.

1.3 Protection of employees in need of protection

Employees in need of protection include expectant mothers, people with physical or mental challenges, and children and adolescents under the age of 18. These employees must be protected against excessive strain and health risks and must not perform work that could harm their health, safety, or moral well-being, including night work. Regulations governing limited working hours and possible types of occupation must be established and implemented for these groups of employees.

1.4 Freedom of Association and the Right to Collective Bargaining

In conformity with national law and applicable international conventions, employees must be granted the right to freedom of association and assembly. This includes the unconditional right of employees to join or establish trade unions of their own choosing and to engage in collective bargaining. Employees' representatives shall not be discriminated against and shall have access to carry out their representative functions in the workplace. Würth Norge fully supports employees' rights to freedom of association and other forms of democratically elected worker representation, and all our suppliers are expected to uphold and implement these same principles throughout their operations.

1.5 Appropriate working conditions

The supplier shall ensure that the working environment is safe, hygienic, and humane, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Hazardous chemicals and other substances shall be carefully managed. Employees shall be provided with access to adequately clean sanitary facilities, and that the company and offices are cleaned regularly to guarantee workplace hygiene.

Company apartments

If the commute from the company's location to the nearest private accommodation is unreasonably long, it would be desirable if the supplier established staff accommodation, which the employees may use on a voluntary basis. Such accommodation must uphold fundamental human dignity and be clean, safe, and equipped with hygienic sanitary facilities and access to clean drinking water.

Regular Employment

We require our suppliers to safeguard employees' rights in accordance with international conventions and national legislation concerning regular employment. Temporary employment,

such as short-term contracts, contract labor, day labor, or other employment arrangements, may only be used where permitted by law and must not be used to circumvent obligations to employees. All employees must receive contracts in a language they can understand, ensuring they are fully aware of their rights and conditions. Apprenticeship programs must be clearly defined in both duration and content.

1.6 Occupational Safety

The supplier must be aware of all possible workplace hazards and implement all measures required to prevent and reduce accidents, emergencies, fires, and other workplace incidents. Actions must be therefore made to ensure employees have a safe and healthy working environment. The necessary measures and steps shall be taken to prevent accidents and injuries to health arising out of, associated with, or occurring in, the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the work environment.

Safety Training

Employees must receive the required health and safety training before starting to operate machinery or equipment or taking up hazardous work as well as general training on emergency situations and fire safety. Such training must be repeated as required by local law or whenever changes occur in the workplace. Training must be documented.

Personal Protective Equipment

Following a risk assessment, the areas in which to wear personal protective equipment must be specified and communicated. The supplier shall provide their staff with sufficient quantities of fully functional personal protective equipment free of charge.

Devices and safety equipment must be serviced and checked for proper functioning at regular intervals. Machinery emergency stops must function properly and be readily accessible at all times.

Substitution and alternatives assessment

The utilization of hazardous substances must be kept to a minimum. Hazardous substances must be subjected to a substitution and alternative assessment. If equally suitable for the respective application, substances that are least harmful to humans and the environment shall be used.

A safety data sheet (SDS) and/or material safety data sheet (MSDS) must be presented for every chemical used. Material safety data sheets contain information on the correct handling, storage, transport, and disposal of the substance in question, as well as critical and important substance data and information on possible risks and suitable first-aid measures.

Emergency planning and fire safety

The supplier shall have general procedures for handling emergencies, accidents, unwanted incidents, and fire safety within its company. Disaster and fire drills must be held regularly and documented.

The company must be equipped with fire detection and evacuation alarms. Depending on the type and risk evaluation of each work task, the size of the building and the number of stories, as well as the number of staff working at the location, the company must provide a sufficient number of fire extinguishers that are accessible to all employees at all times. A sufficient number of employees must be trained to use the fire safety equipment. Where required by applicable national law, industrial safety systems must be established for companies that fall under the applicable criteria for mandatory industrial emergency responses^{*1}.

Emergency exits and escape routes

Emergency exits, escape routes, and assembly points are clearly marked and must not be obstructed in any way at any time. The number of emergency exits and escape routes depends on the number of staff, the size of the workplace or facility, and the layout of workplaces and must guarantee the safe and quick evacuation of all employees.

First aid equipment

A sufficient quantity of suitable and fully functional first aid equipment must be accessible to all employees on all floors of the workplace during all shifts. The kind and quantity of equipment must be appropriate to the specific type of risk and the company's size. A sufficient number of qualified first aiders must be available during every shift to ensure the capacity to act in the event of an accident.

1.7 Working hours

Suppliers shall comply with all applicable national laws and regulations regarding working hours, overtime, and rest periods. The statutory maximum working hours must not be exceeded. In accordance with Norwegian national law, weekly working hours shall not on a regular basis be more than 48 hours per week. The total working time, including overtime, may not exceed 60 hours per week. Overtime shall be limited and voluntary. Employees shall receive overtime pay for all hours worked over and above the normal working hours, minimum in accordance with relevant legislation. All employees are entitled to at least one day off per seven-day calendar week. The number of leave days paid must amount to at least the applicable statutory leave entitlement in each country. The supplier must grant their staff appropriate breaks, at least one 30-minute break per six working hours and an overall 45-minute break from nine working hours unless stricter regulations are required by local law.

¹ *This refers to Industrivern, which is a mandatory in-house emergency response organization required for certain companies under Norwegian Industrial Safety Organization (NSO). Detailed information is provided at [English - Næringslivets sikkerhetsorganisasjon](#).

1.8 Remuneration

All employees must be paid adequate remuneration, but no less than the statutory minimum wage required by local law. If no statutory minimum wage is in place in a particular country, wages must be sufficient for the employees and their families to make a living (i.e. be able to pay for accommodation, food, education, and technology). Wages have to be paid regularly and in legal tender. All employees must be provided with a written and comprehensive contract outlining agreed terms and conditions, wages, and method of payment before entering employment. Using wage deductions as a disciplinary measure is prohibited. The supplier must comply with any regulations on national insurance contributions.

1.9 Respect for the rights of local communities, marginalized populations, and Indigenous Peoples

As part of their business operations, suppliers shall take into account local impacts on communities and Indigenous Peoples. In particular, potentially negative impacts on livelihoods, including access to land, water or forest, security, and health of local communities, marginalized populations, and Indigenous Peoples must be avoided. Production and the use of natural resources shall not contribute to the destruction or degradation of the resources and income base for affected parties, such as through claiming large land areas or the use of water and other natural resources on which these populations depend. Customary rights to land and natural resources must be respected. We reject forced eviction and similar practices.

II. ENVIRONMENT

All applicable national laws, regulations, and standards limiting and preventing environmental impact must be adhered to. Negative environmental impacts shall be identified, prevented, mitigated, and reduced throughout the value chain. If the supplier's operations pose a risk of soil contamination, water, or air pollution, the supplier must implement adequate prevention and mitigation measures.

The production and use of natural resources must not contribute to destruction or degradation of the resources and income base of Indigenous Peoples or other marginalized populations, for example by seizing large areas of land or through unsustainable use of water or other natural resources on which these groups depend.

Animal welfare shall be respected at all times. Suppliers shall implement appropriate measures to prevent and to minimize any negative impacts on the welfare of livestock and working animals. All applicable national and international animal welfare laws and regulations shall be strictly observed.

2.1 Emissions

Emissions can be defined as substances discharged by the supplier's facilities, including air pollutants, noise, vibration, light, heat, radiation, and other forms of environmental impact, that due to their nature, extent and duration, may cause damage or severe disturbance and be of great disadvantage to people, animals, plants, soil, water, atmosphere, and any cultural or other assets.

The supplier shall classify and analyze any emissions, including, but are not limited to, emissions from volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals and combustion by-products generated from operations, and adequately treat them to render such emissions harmless.

The noise produced must not exceed the specified maximum permissible noise level.

2.2 Water usage

The acceptable quality and availability of water in water bodies and as groundwater is one of the basic preconditions on which human, animal, and plant life depends. Therefore, the supplier must not compromise water quality and availability. Water must be used carefully in a resource-efficient manner in all processes. Industrial facilities are encouraged to implement recirculation systems to ensure the reuse of water wherever technically and economically feasible.

Wastewater

Wastewater is used water from any combination of domestic, industrial, commercial, agricultural, or other activities that have changed the quality of the water.

The supplier must ensure that wastewater from business operations, manufacturing processes and sanitary facilities is adequately treated before being discharged to the groundwater. The concentration of hazardous substances in the water, such as salts, heavy metals and their compounds, oxidizable substances, nitrogen, phosphorus, organic halogen compounds, and other chemicals, must be so low as not to have any negative impact on human health, animal welfare, and/or the ecosystem.

If the facility does not have a suitable infrastructure for wastewater treatment, the supplier must commission qualified companies with wastewater transport and treatment.

2.3 Waste

Waste shall include any substance that is discarded by its owner or that the owner intends or is required to discard.

Hazardous waste is waste that poses a substantial or potential threat to public health and/or the environment and that has one or more of the following characteristics: flammable, oxidizing, explosive, irritant, corrosive, infectious, toxic upon contact or production of toxic gases, carcinogenic, infected, reprotoxic or ecotoxic.

General handling

The handling, storage, transport, and disposal of waste material must be performed by suitably qualified staff and may not have any negative impact on the air, soil and water quality nor on the health of the employees. Explosions, spontaneous ignition, and any other sudden dangerous events must be prevented through the implementation of sufficient and appropriate preventive measures.

The supplier must take proactive measures to avoid, minimize, and manage waste in line with applicable environmental laws.

Handling of hazardous material

Hazardous waste must be clearly labeled and disposed of properly. Hazardous waste may only be handled using appropriate and sufficient personal protective equipment. Hazardous waste must be kept separate from non-hazardous waste.

Disposal and recycling

Recycling of waste must be preferred over waste disposal, such as landfilling. The supplier separates waste material in preparation for the best possible recycling method.

Material recycling must be prioritized over energy recovery whenever it is economically and technologically feasible. Material recycling uses waste as a raw material substitute to produce a new product, whereas energetic recycling burns waste material in an incineration plant to produce energy.

2.4 Chemicals and other hazardous material

Hazardous material includes any substances, mixtures, and products that are flammable, explosive, and that cause severe harm to human health, wildlife, or the environment. Examples include chemicals, asbestos, radioactive materials, welding fumes, and other hazardous substances.

General handling

The handling, storage, transport, and disposal of hazardous material must be performed by suitably qualified staff and must not have any negative impact on public health, animals and plants, nor on the air, soil and water quality, on the atmosphere or on cultural or other assets. Explosions, spontaneous ignition and any other sudden dangerous events must be prevented.

The supplier must document the number and type of chemicals and other hazardous substances available and/or used at the plant.

Storage

Hazardous material must be stored separately from each other and in closed containers.

The floor of the storage area must be so designed as not to absorb or react with hazardous substances. The supplier shall use collection trays sufficiently sized to collect liquids. All storage tanks for hazardous liquids must be checked regularly to prevent leakage.

When handling substances or when engaging in processes producing toxic gases, the employees must use the required personal protective equipment provided by the supplier. Employees must be trained in the proper use of protective equipment.

Disposal

Hazardous substances must be disposed of properly. Hazardous substances that may react with each other must be disposed of separately.

Labeling

Containers for chemicals and hazardous substances must be clearly labeled with safety-relevant information regarding the risks they pose. They must also be labeled in accordance with the United Nations' Globally Harmonized System of Classification (GHS) and Labelling of Chemicals (GHS).

2.5 Natural resources and raw materials

Natural resources are resources that exist without any involvement of humankind, including raw materials, environmental media, energy sources, and physical space.

The supplier must use resources economically and considerately, keeping the consumption of resources as low as possible.

This is to be achieved either directly at the point of creation or by processes and measures, such as an improved production and maintenance process or other operating processes, the use of alternative resources, the efficient use of resources, recycling and the re-use of resources.

Responsible sourcing of raw materials

The supplier implements measures to guarantee and improve the transparency and traceability of the raw materials used in a product throughout the supply chain. The purpose is to ensure that the raw materials used are sourced responsibly.

Special emphasis shall be placed on ore, concentrates, and metals that are sourced from conflict-affected and high-risk areas, as well as metal that contain tantalum, tin, tungsten, cassiterite, coltan, and gold. These areas include, but are not limited to, mining regions that have been the scene of armed conflict, that are in a fragile post-conflict state, or that are characterized by institutional weakness and by limited or non-existent national security, and which are characterized by systematic violations of international law and human rights.

Sourcing of raw materials must not contribute to human rights abuses or the financing of armed groups. In order to meet this requirement, the supplier must exercise due diligence as to the origin and tracing of the minerals sourced in accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and disclose these due diligence measures to Würth Norge upon request.

Should the above list of critical product ingredients be extended in the future, the supplier shall implement proper due diligence measures for the added substances as well.

In order to keep ecosystems and biodiversity intact, resources must not be exploited from nature reserves.

OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

III. ETHICAL BEHAVIOR

3.1 Anti-corruption

Würth Norge does not tolerate any form of corruption or bribery. The supplier must ensure that no personal dependencies or obligations to customers, suppliers, or other business partners occur based on bribes or any other form of illegal payment. Conflicts of interest must be avoided at all times.

In line with this principle, corruption in any form is strictly prohibited. This includes, but is not limited to, bribery, extortion, kickbacks, and any improper private or personal benefits provided to customers, agents, contractors, suppliers, employees of any such party, or government officials.

The supplier will neither accept nor offer any presents, invitations, or other gratuities, which can reasonably be expected to have an impact on business decisions.

Irrespective of legal consequences, the supplier will hold any employees violating the above principles accountable.

3.2 Fair competition

The supplier stands in support of fair, performance-based competition and does not take part in any arrangements with other market participants that are restrictive of competition. In particular, this means that it does not participate in cartels or other restrictive or unfair practices, including, but not limited to price fixing, market sharing, bid rigging, or the unlawful use of intellectual property.

3.3 Ban on money-laundering and financing from illegal sources

The supplier must obtain their financial resources from lawful sources. The supplier must not directly or indirectly support terrorism or organized crime, including bribery, human trafficking, drug trafficking, arms trading, etc.

3.4 Compliance with applicable laws on export controls and customs regulations

When engaging in international commerce, the supplier shall comply with all export bans, sanctions, and embargoes.

3.5 Data protection and data security (GDPR)

The supplier must protect the personal data of all customers, suppliers, other business partners, and employees, complying with national and international data protection regulations (GDPR). Personal data must be protected from access or improper use by unauthorized third parties or individuals. Personal data must not be misused or processed in a manner that harms the rights or interests of the data subjects.

The supplier must treat in the strictest confidence any corporate data, business and operating secrets and any other confidential information and only use such information for the supplier's business dealings with Würth Norge. Confidential data must be protected from unauthorized access, disclosure to colleagues or any other third party who are not involved, as well as from deletion and unauthorized modification.

Suppliers must implement appropriate technical and organizational measures to ensure the security and confidentiality of personal and business data.

IV. COMMUNICATION AND CONSEQUENCES

The supplier shall communicate Würth Norge's Supplier Code of Conduct and measures for its implementation to all relevant stakeholders, including, but are not limited to, all employees, upstream suppliers and downstream suppliers, and take suitable measures to comply with its regulations.

4.1 Complaints procedure

The supplier must inform its employees about and grant them access to internal and/or external tools for lodging complaints. In this context, the grievance mechanism must enable all potentially affected parties within the supply chain to point out human rights or environment-related risks as well as violations of human rights-related or environment-related obligations. Technical or language barriers must be eliminated. In addition, complaint channels must support anonymous reporting for all potentially affected parties within the supply chain.

All employees of the supplier are welcome to use the Würth Group's anonymous reporting hotline - SpeakUp - to report any breaches:

www.bkms-system.net/wuerth

4.2 Documents and compliance checks

All documents shall be duly prepared, properly stored, and protected against unauthorized access, modification, and destruction. Any papers, documentation, approvals, reports, etc. must be correct, trustworthy, and transparent. These documents must be provided to Würth Norge upon request. The supplier shall inform Würth Norge about any issues that do not conform to Würth Norge's Supplier Code of Conduct without being requested to do so.

Würth Norge reserves the right to perform unannounced audits to verify compliance with the Supplier Code of Conduct. To that end, auditors shall be granted full and unrestricted access to relevant facilities, personnel, and documentation. Würth Norge reserves the right to entrust a third party with the performance of the audits.

4.3 Consequences

Würth Norge's Supplier Code of Conduct is an integral part of any contract concluded between Würth Norge and the supplier and must be adhered to in its entirety. If a breach of the Würth Norge Supplier Code of Conduct is suspected, the supplier must promptly investigate and clarify the matter and inform Würth Norge.

In case of a breach, Würth Norge will take appropriate action depending on the severity of the breach. Preferably, the supplier must remedy any shortcomings immediately. However, Würth Norge does reserve the right to claim damages and terminate the contract with the supplier for cause without prior notice.

#ourResponsibility

“Our responsibility” – this means that all of us, as a company, as people and as employees, we behave considerately towards our fellow human beings and cultivate harmonious cooperation and act responsibly and sustainably towards our environment.

We are grateful to all suppliers for standing up for responsible and ethical action in business together with us.

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