

STATEMENT OF ETHICS

The Würth Group is one of the largest global trading groups operating in the fastenings and assembly materials industry. Globally, the group has some 400 companies operating in 80 countries and over 88,000 employees.

As member of the Würth Group, we at Würth UK Ltd. pride ourselves on our reputation for acting fairly and ethically wherever we do business. Our reputation is built on our values as a company, the values of our employees and our collective commitment to acting with integrity throughout our organisation.

Würth UK condemns corruption in all its forms and will not tolerate it in our business or in those we do business with.

Our Anti-Corruption and Whistleblowing Policies set out in detail how you should behave and what you should do if you are confronted with corruption. Würth UK expects that all of you will embrace these policies and their values.

The policies are for your benefit as much as for Würth. If you are convicted of a bribery offence, you could face up to ten years in prison. The potential harm done by bribery, both to Würth and to you, is long term and hugely outweighs any potential short-term gain. Bribery is just not worth the risk.

If you have any doubts about anything at all, refer to the anti-corruption policy or you can speak to a member of the Management Board in complete confidence. We are committed to eradicating corruption, and we will stand by you in acting ethically.

- Responsibility. You are responsible for your actions. If you break the law, you will have to face the consequences - which could mean a fine, imprisonment, or both.
- Integrity. Don't compromise your integrity. If you think something is wrong, ALWAYS report it. If you aren't sure, consult the Anti-Corruption Policy. Don't ever let yourself be forced into doing something you know, or suspect is wrong.
- Genuineness. Always pay genuine prices for genuine goods and services. Excessive payments are obvious and will always be uncovered. Never pay over the odds. Do not make offers which are not supported by Würth policies, and never make personal payments.
- Honesty. Act honestly and in good faith at all times and in all aspects of your work.
- Transparency. Keep accurate records of everything that you do, especially in relation to the payments you make and are made for goods sold by you on behalf of the Company. Full and accurate records demonstrate complete transparency and that you have nothing to hide.



Felix Piazza
Managing Director
Würth UK Ltd
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1. Policy Statement

- 1.1 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.
- 1.2 We will uphold all laws relevant to countering bribery and corruption. We remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.
- 1.3 The purpose of this policy is to:
- 1.3.1 set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and
 - 1.3.2 provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.
- 1.4 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.
- 1.5 We have identified that the following are particular risks for our business:
- risks that may result from supplier or service provider relationships.
 - risks that may result from customer relationships.
 - risks that may result from personal relationships, in- and outside the business.
- To address those risks we have:
- established internal processes that govern the purchasing and supplier selection activities.
 - established internal processes that govern customer relationships as regards incentives, promotions, and hospitality.
 - established the relevant policies and processes that govern potential conflicts of interest.
- 1.6 In this policy, third party means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

2. Who Is Covered by The Policy?

This policy applies to all individuals working at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed term or temporary), consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as workers in this policy).

3. What Is Bribery?

A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage.

Examples:

Offering a bribe

You offer a potential client tickets to a major sporting event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer.

Receiving a bribe

A supplier gives your nephew a job but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official

You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process, such as clearing our goods through customs.

The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

4. Gifts And Hospitality

- 4.1 This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. Please obtain the approval of your line manager before incurring any expenditure for hospitality.
- 4.2 The giving or receipt of gifts is prohibited, unless the following requirements are met:
- 4.2.1 it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits.
 - 4.2.2 it complies with local law.
 - 4.2.3 it is given in our name, not in your name.
 - 4.2.4 it does not include cash or a cash equivalent (such as gift certificates or vouchers), unless this forms part of an authorised and approved incentive scheme, records of which are maintained and kept by the Company.
 - 4.2.5 it is appropriate in the circumstances. For example, a small gift to be given at Christmas time.
 - 4.2.6 taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time.
 - 4.2.7 it is given openly, not secretly; and

- 4.2.8 gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties.
- 4.2.9 Its value of £40 or less.
- 4.3 We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered. If you wish to receive or give a gift outside the above rules, you must obtain the approval of your line manager before doing so.

5. What Is Not Acceptable?

- 5.1 It is not acceptable for you (or someone on your behalf) to:
 - 5.1.1 give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
 - 5.1.2 give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure.
 - 5.1.3 accept payment from a third party that you know, or suspect is offered with the expectation that it will obtain a business advantage for them.
 - 5.1.4 accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return.
 - 5.1.5 threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
 - 5.1.6 engage in any activity that might lead to a breach of this policy.

6. Facilitation Payments and Kickbacks

- 6.1 We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK but are common in some other jurisdictions.
- 6.2 If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your line manager.
- 6.3 Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

7. Your Responsibilities

- 7.1 You must ensure that you read, understand and comply with this policy.
- 7.2 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- 7.3 You must notify your manager or the management board as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in the The Schedule.
- 7.4 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

8. Record-keeping

- 8.1 We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.
- 8.2 You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.
- 8.3 You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.
- 8.4 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.

9. How To Raise a Concern

You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with your line manager or the compliance manager. Concerns should be reported by following the procedure set out in our Whistleblowing Policy. A copy of our Whistleblowing Policy can be obtained upon request or may be found in the Employee Handbook or the Company's Intranet.

10. What To Do If You Are a Victim Of Bribery Or Corruption

It is important that you tell your line manager or the management board as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.

11. Protection

- 11.1 Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

11.2 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats, or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

12. Training and Communication

12.1 Training on this policy forms part of the induction process for all new workers. Where appropriate all existing workers will receive regular, relevant training on how to implement and adhere to this policy.

12.2 Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

13. Who Is Responsible for The Policy?

13.1 The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

13.2 The management board has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.

14. Monitoring And Review

14.1 The management board will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness.

Any improvements identified will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

14.2 All employees are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.

14.3 Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the compliance manager.

14.4 This policy does not form part of any employee's contract of employment, and it may be amended at any time.

The Schedule

Potential Risk Scenarios: "red Flags"

- 1.1 The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to your manager or the management board or using the procedure set out in the whistle-blowing policy:

- 1.2 you become aware that a third party engages in, or has been accused of engaging in, improper business practices.
- 1.3 you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials.
- 1.4 a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us or carrying out a process for us.
- 1.5 a third-party requests payment in cash and/or refuses to provide an invoice or receipt for a payment made.
- 1.6 a third-party request that payment is made to a country or geographic location different from where the third party resides or conducts business.
- 1.7 a third party requests an unexpected additional fee or commission to "facilitate" a service.
- 1.8 a third-party demand.
- 1.9 entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- 1.10 a third-party request that a payment is made to "overlook" potential legal violations.
- 1.11 a third-party request that you provide employment or some other advantage to a friend or relative.
- 1.12 you receive an invoice from a third party that appears to be non-standard or customised.
- 1.13 you notice that goods are repeatedly returned from third parties who claim not to have ordered them.
- 1.14 a third party refuses to put terms agreed in writing.
- 1.15 you notice that we have been invoiced goods or services that appears large given the goods or services stated to have been provided.
- 1.16 a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.
- 1.17 you are offered an unusually generous gift or offered lavish hospitality by a third party.