

The Wolf Code of Conduct is one of the ways we put Wolf's values into practice. It's built around the recognition that everything we do in connection with our work at Wolf will be, and should be, measured against the highest possible standards of ethical business conduct.

This Code and Wolf's values, when followed in good faith, and always bearing in mind that each of us has a personal responsibility to incorporate, and to encourage others in the Wolf pack to incorporate the principles of the Code and values into our work.

And if you have a question or ever think that one of your fellow Wolf pack or the company as a whole may be falling short of our commitment, don't be silent. We want – and need – to hear from you.

Who Must Follow Our Code?

We expect all of our employees to know and follow the Code. Failure to do so can result in disciplinary action, including termination of employment. Moreover, while the Code is specifically written for Wolf employees and Board members, we expect Wolf contractors, consultants, and others who may be temporarily assigned to perform work or services for Wolf to follow the Code in connection with their work for us. Failure of a Wolf contractor, consultant, or other covered service provider to follow the Code can result in termination of their relationship with Wolf.

I. Serving our Customers

Our users value Wolf not only because we deliver great products and services, but because we hold ourselves to a higher standard in how we treat users and operate more generally. Keeping the following principles in mind will help us to maintain that high standard:

1. Earning Trust

Trust is earned and it takes consistent behavior. Our reputation as a company that our customers can trust is our most valuable asset, and it is up to all of us to make sure that we continually earn that trust. All of our communications and other interactions with our users should increase their trust in us. Be honest, be clear and manage expectations.

2. Usefulness

Across any business that we serve we have one guiding principle: “Is what we are offering useful?” and when dealing with each other “Am I being useful?”. If we are not being useful we are not adding value, and adding value to our customers is the reason we exist as a business.

3. Freedom of Expression

Wolf is committed to advancing privacy and freedom of expression for our staff. We do business in diverse markets, and work with all manner of people. We insist on everyone's ability to speak their mind, but this must be done whilst maintaining decorum and respect. The ability to freely express views and provide new information to each other allows us to make better and more informed decisions.

4. Responsiveness

Part of being useful and honest is being responsive: We recognize relevant feedback when we see it, and we do something about it. We take pride in responding to communications, whether questions, problems, or compliments. If something is broken, fix it. We do today's work TODAY!

5. Take Action

Any time you feel our customers aren't being well-served, don't be hesitant - let someone in the company know about it. Continually improving our manufacturing and services takes a conscious effort from all of us, and we're proud that Wolf takes the initiative to step forward when the interests of our users are at stake. This is especially important when it comes to quality management.

6. Quality Management

We live and die by our delivery of Quality. Quality encapsulates, the reliable delivery of quality workmanship, within promised deadlines, within budget, with no rework and to our customer's specification, with 100% consistency. Our ISO9001:2015 accreditation does not mean our quality management journey is over, it means we have only just begun. It is imperative that the processes and policies embedded in our Quality Management System are followed without exception. Where opportunities for improvements are identified it is every person's duty to escalate this opportunity for improvement so that it gets actioned. We do not wait for NCRs to improve our systems.

II. Support Each Other

We are committed to a supportive work environment, where employees have the opportunity to reach their fullest potential. Members of the Wolf Pack are expected to do their utmost to create a workplace culture that is free of harassment, intimidation, bias, and unlawful discrimination.

1. Equal Opportunity Employment

Employment here is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of race, sexual orientation, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, medical condition or any other characteristics protected by law.

2. Harassment, Discrimination, and Bullying

Wolf condemns and prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual. If you believe you’ve been bullied or harassed by anyone at Wolf, or by a Wolf partner or vendor, we strongly encourage you to immediately report the incident to your supervisor. Similarly, supervisors and managers who learn of any such incident should immediately report it to a director. We will promptly and thoroughly investigate any complaints and take appropriate action.

3. Drugs and Alcohol

Our position on substance abuse is simple: It is incompatible with the health and safety of our employees, and we don’t permit it. Consumption of alcohol is not banned at our offices, but use good judgment and never drink in a way that leads to impaired performance or inappropriate behavior, endangers the safety of others, or violates the law. Illegal drugs in our offices are strictly prohibited. If a manager has reasonable suspicion to believe that an employee’s use of drugs and/or alcohol may adversely affect the employee’s job performance or the safety of the employee or others in the workplace, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee’s appearance, behavior, or speech.

4. Safe Workplace

We are committed to a violence-free work environment, and we will not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should anyone bring a weapon to work. If you become aware of a violation of this policy, you should report it immediately. In case of potential violence, contact Security.

5. Family Policy

Wolf’s regard for the importance of family is part of our business culture. Spouses, partners, better halves and children are all welcome just as long as they adhere to our Occupational Health and Safety Policy.

III. Avoid Conflicts of Interest

When you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Wolf or our users, you may be faced with a conflict of interest. All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

When considering a course of action, ask yourself whether the action you're considering could create an incentive for you, or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at the expense of Wolf. If the answer is "yes," the action you're considering is likely to create a conflict of interest situation, and you should avoid it.

1. Friends and Relatives; Co-Worker Relationships

Avoid participating in management of or decision-making regarding potential or existing Wolf business relationships that involve your relatives, spouse or significant other, or close friends. This includes being the hiring manager for a position for which your relative or close friend is being considered or being a relationship manager for a company associated with your spouse or significant other.

To be clear, just because a relative, spouse/significant other, or close friend works at Wolf or becomes a Wolf competitor or business partner doesn't mean there is a conflict of interest. However, if you are also involved in that Wolf business relationship, it can be very sensitive. The right thing to do in that situation is to discuss the relationship with your manager.

Finally, romantic relationships between co-workers can, depending on the work roles and respective positions of the co-workers involved, create an actual or apparent conflict of interest. If a romantic relationship does create an actual or apparent conflict, it may require changes to work arrangements or even the termination of employment of either or both individuals involved.

2. Accepting Gifts, Entertainment, and Other Business Courtesies

Accepting gifts, entertainment, and other business courtesies from a Wolf competitor, customer or business partner can easily create the appearance of a conflict of interest, especially if the value of the item is significant.

Generally, acceptance of inexpensive "token" non-cash gifts is permissible. In addition, infrequent and moderate business meals and entertainment with customers and infrequent invitations to attend local sporting events and celebratory meals with customers can be appropriate aspects of many Wolf business relationships, provided that they aren't excessive and don't create the appearance of impropriety. Before accepting any gift or courtesy, be aware that you may need to obtain manager approval.

IV. Preserve Confidentiality

Certain kinds of company information, if leaked, can hurt our customers, eliminate our competitive advantage and prove costly in other ways. Our responsibilities extend beyond not revealing Confidential Wolf material – we must also:

- properly secure, label, and (when appropriate) dispose of Confidential Wolf material;
- safeguard Confidential information that Wolf receives from others under non-disclosure agreements;
- take steps to keep our trade secrets and other confidential intellectual property secret.

1. Confidential Information

Our OEM customers trust us and legally bind us to safeguard their information, especially where technical engineering drawings are concerned. Make sure that information that is classified as “Need to Know” or “Confidential” is handled in accordance with Wolf’s Data Security Policy. At times, a particular project or negotiation may require you to disclose Need to Know or Confidential information to an outside party, this is especially true for machining and profile cutting: Disclosure of that information should be on an “only as needed” basis and only under a non-disclosure agreement. Be sure to conduct the appropriate due diligence and have the appropriate agreement in place before you disclose the information.

2. Wolf Partners

Just as you are careful not to disclose confidential Wolf information, it’s equally important not to disclose any confidential information from our partners. Don’t accept confidential information from other companies without first having all parties sign an appropriate Non-disclosure Agreement approved by Legal. Even after the agreement is signed, try only to accept as much information as you need to accomplish your business objectives.

3. Competitors/Former Employers

We respect our competitors and want to compete with them fairly. But we don’t want their confidential information. The same goes for confidential information belonging to any Wolf’s former employers. If an opportunity arises to take advantage of a competitor’s or former employer’s confidential information, don’t do it. Should you happen to come into possession of a competitor’s confidential information, discard it.

4. Outside Communications

You should ensure your outside communications (including online and social media posts) do not disclose confidential proprietary information or represent (or otherwise give the impression) that you are speaking on behalf of Wolf unless you're authorized to do so by the company. The same applies to communications with the press and unions.

V. Protect Wolf's Assets

Our future depends on how well we conserve company resources and protect company assets and information.

1. Intellectual Property

You must never use Wolf's (or its affiliated entities') logos, marks, or other protected information or property for any business or commercial venture.

Likewise, respect the intellectual property rights of others. Inappropriate use of others' intellectual property may expose Wolf and you to criminal and civil fines and penalties. Please seek advice from management before you solicit, accept, or use proprietary information from individuals outside the company or let them use or have access to Wolf proprietary information. You should also check with Legal if developing a product that uses content not belonging to Wolf.

2. Company Equipment

Wolf gives us the tools and equipment we need to do our jobs effectively, but counts on us to be responsible and not wasteful with the Wolf equipment we are given. Nobody's going to complain about the trivial but company funds, equipment, and other physical assets are not to be requisitioned for purely personal use. If you are not sure if a certain use of company assets is okay? Please ask your manager.

3. Physical Security

If you're not careful, people may steal your belongings. Always secure your cellphones, laptop, important equipment, and your personal belongings, even while on Wolf's premises. Don't tamper with or disable security and safety devices. If you don't recognise someone, please ask for identification (and, as appropriate, direct the person to a manager for assistance). Promptly report any suspicious activity to Wolf Security.

4. Use of Wolf's Equipment and Facilities

Anything you do using Wolf's electronic facilities (e.g., our computers, mobile devices, network, etc.) or store on our premises (e.g., letters, memos, and other documents) might be disclosed to people inside and outside the company. For example, Wolf may be

required by law (e.g., in response to a subpoena or warrant) to monitor, access, and disclose the contents of corporate email, voicemail, computer files, and other materials on our electronic facilities or on our premises. In addition, the company may monitor, access, and disclose employee communications and other information on our corporate electronic facilities or on our premises where there is a business need to do so, such as protecting employees and customers, maintaining the security of resources and property, or investigating suspected employee misconduct.

5. Employee Data

We collect and store personal information about our staff. Access this data only in line with local law and Wolf internal policies, and be sure to handle employee data in a manner that is consistent with the laws of the land.

VI. Ensure Financial Integrity and Responsibility

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. This is more than accurate reporting of our financials, though that's certainly important. The money we spend on behalf of Wolf is not ours; it's the company's and, ultimately, our shareholders'. Each person at Wolf – not just those in Finance – has a role in making sure that money is appropriately spent, our financial records are complete and accurate, and internal controls are respected and complied with. This matters every time we hire a new vendor, expense something to Wolf, sign a new business contract, or enter into any deals on Wolf's behalf.

To make sure that we get this right, Wolf maintains a system of internal controls to reinforce our compliance with legal, accounting, tax, and other regulatory requirements in every location in which we operate.

Stay in full compliance with our system of internal controls. What follows are some core concepts that lie at the foundation of financial integrity and fiscal responsibility here at Wolf.

1. Time is Money

We do not wish to run our business like a concentration camp, and expect our staff to manage their time responsibly. The personal use of cellphones during working hours is a privilege that should not be abused. We have lives outside of our work and sometimes the outside world needs our attention, but too much time spent on personal issues in working

hours can lead to uncomfortable discussions that we would prefer not to have, but will if forced to do so. Please be mature in how you use your privileges.

2. Spending Wolf's Money

A core Wolf value has always been to spend money wisely. When you submit an expense for reimbursement or spend money on Wolf's behalf, make sure that the cost is reasonable, directly related to company business, and supported by appropriate documentation. Always record the business purpose (e.g., if you take someone out to dinner on Wolf, always record in our expense reimbursement tool the full names and titles of the people who attended as well as the reason for the dinner) and comply with other submission requirements. If you're uncertain about whether you should spend money or submit an expense for reimbursement, check with your manager. Managers are responsible for all money spent and expenses incurred by their direct reports, and should carefully review such spend and expenses before approving.

3. Signing a Contract

Each time you enter into a business transaction on Wolf's behalf, there should be documentation recording that agreement, approved by the Legal Department. Signing a contract on behalf of Wolf is a very big deal. Never sign any contract on behalf of Wolf unless all of the following are met:

- You are authorized to do so. If you are unsure whether you are authorized, ask your manager
- The contract has been approved by Legal. If you are using an approved Wolf form contract, you don't need further Legal approval unless you have made changes to the form contract or are using it for other than its intended purpose
- You have studied the contract, understood its terms and decided that entering into the contract is in Wolf's interest

All contracts at Wolf should be in writing and should contain all of the relevant terms to which the parties are agreeing – Wolf does not permit “side agreements,” oral or written.

4. Recording Transactions

If your job involves the financial recording of our transactions, make sure that you're fully familiar with all of the Wolf policies that apply, including our Revenue Recognition Policy and our Purchasing Policy.

Immediately report to Finance any transactions that you think are not being recorded correctly.

5. Reporting Financial or Accounting Irregularities

It goes without saying (but we're going to say it anyway) that you should never, ever interfere in any way with the auditing of Wolf's financial records. Similarly, you should never falsify any record or account, including time reports, expense accounts, and any other Wolf records.

If you suspect or observe any of the conduct mentioned above or, for that matter, any irregularities relating to financial integrity or fiscal responsibility, no matter how small, immediately report them to Ethics & Compliance.

6. Hiring Suppliers

As Wolf grows, we enter into more and more deals with suppliers of equipment and services. We should always strive for the best possible deal for Wolf. This almost always requires that you solicit competing bids to make sure that you're getting the best offer. While price is very important, it isn't the only factor worth considering. Quality, service, reliability, and the terms and conditions of the proposed deal may also affect the final decision. Please do not hesitate to contact the Purchasing Team if you have any questions regarding how to procure equipment or services.

7. Retaining Records

It's important that we keep records for an appropriate length of time. Keep in mind that legal requirements, accounting rules, and other external sources sometimes specify longer retention periods for certain types of records, and those control where applicable. In addition, if asked by Legal to retain records relevant to a litigation, audit, or investigation, do so until Legal tells you retention is no longer necessary. If you have any questions regarding the correct length of time to retain a record, contact Legal.

VII. Obey the Law

Wolf takes its responsibilities to comply with laws and regulations very seriously and each of us is expected to comply with applicable legal requirements and prohibitions. While it's impossible for anyone to know all aspects of every applicable law, you should understand the major laws and regulations that apply to your work. A few specific laws are easy to violate unintentionally and so are worth pointing out here:

Most countries have laws – known as “antitrust,” “competition,” or “unfair competition” laws – designed to promote free and fair competition. Generally speaking, these laws prohibit 1) arrangements with competitors that restrain trade in some way, 2) abuse of intellectual property rights, and 3) use of market power to unfairly disadvantage competitors.

Certain conduct is absolutely prohibited under these laws, and could result in your imprisonment, not to mention severe penalties for Wolf.

Examples of prohibited conduct include:

- agreeing with competitors about prices
- agreeing with competitors to rig bids or to allocate customers or markets
- agreeing with competitors to boycott a supplier or customer

Other activities can also be illegal, unfair, or create the appearance of impropriety. Such activities include:

- sharing competitively sensitive information (e.g., prices, costs, market distribution, etc.) with competitors
- entering into a business arrangement or pursuing a strategy with the sole purpose of harming a competitor
- using Wolf's size or strength to gain an unfair competitive advantage

Although the spirit of these laws is straightforward, their application to particular situations can be quite complex.

Wolf is committed to competing fair and square. Any personnel found to have violated Wolf's Antitrust Policies will, subject to local laws, be disciplined, up to and including termination of employment. If you suspect that anyone at the company is violating the competition laws, notify Ethics & management immediately.

2. Anti-bribery Laws

Like all businesses, Wolf is subject to lots of laws that prohibit bribery in virtually every kind of commercial setting. The rule for us at Wolf is simple – don't bribe anybody, anytime, for any reason.

3. Non-government relationships

You should be careful when you give gifts and pay for meals, entertainment, or other business courtesies on behalf of Wolf. We want to avoid the possibility that the gift, entertainment, or other business courtesy could be perceived as a bribe, so it's always best to provide such business courtesies infrequently and, when we do, to keep their value moderate. Consult Wolf's Non-Government Related Gifts and Client Entertainment Policy before providing any business courtesies and contact Ethics & Compliance if you have any questions.

4. Dealing with government officials

Offering gifts, entertainment, or other business courtesies that could be perceived as bribes becomes especially problematic if you're dealing with a government official. "Government officials" include any government employee; candidate for public office; or employee of government-owned or -controlled companies, public international organizations, or political parties. Several laws around the world, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, specifically prohibit offering or giving anything of value to government officials to influence official action or to secure an improper advantage. This not only includes traditional gifts, but also things like meals, travel, political or charitable contributions, and job offers for government officials' relatives. Never give gifts to thank government officials for doing their jobs. By contrast, it can be permissible to make infrequent and moderate expenditures for gifts and business entertainment for government officials that are directly tied to promoting our products or services (e.g., providing a modest meal at a day-long demonstration of Wolf products). Payment of such expenses can be acceptable (assuming they are permitted under local law) but may require pre-approval from Ethics & Compliance under Wolf's Anti-Bribery and Government Ethics Policy.

Before offering any gifts or business courtesies to a government official, you should consult Wolf's management. Carefully follow the limits and prohibitions explained to you, and obtain any required pre-approvals.

VIII. Conclusion

Wolf aspires to be a different kind of company. It's impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another's good judgment to uphold a high standard of integrity for ourselves and our company. We expect all members of the Wolf pack to be guided by both the letter and the spirit of this Code. Sometimes, identifying the right thing to do isn't an easy call. If you aren't sure, don't be afraid to ask questions of your manager.

And remember... our reputations are our most important asset, and if you see something that you think isn't right – speak up!

Yours Sincerely,



Jan Hendrik Buys & Ivan Uttley – 28th May 2019