

WÜRTH COMPLIANCE MANAGEMENT SYSTEM

Würth has a Risk Management and Compliance Program – the Compliance Management System (“CMS”) - that reflects our commitment to compliance with the laws and regulations that govern business activities and is in accordance with the highest ethical principles. The CMS is designed around the Würth Group’s Code of Compliance and is tailored to address the requirements our businesses, and its employees, have related to compliance basics like:

- fair competition,
- information handling,
- trade compliance,
- conflict of interest,
- anti-bribery and corruption,
- harassment,
- occupational safety and health administration (OSHA), and
- State and Federal privacy laws.

CMS covers all employees of any Würth Group company, and is designed to provide guidelines for how Würth does business and establishes an avenue to assist employees in reporting any compliance issues of concern. The Würth Group has appointed a Business Unit Compliance Officer (“BUCO”) at the WUGONA level to provide oversight, reporting, and compliance for the Program. The BUCO has further appointed a local Company Compliance Officer (“CCO”) within every Würth operating company. The CCO is a company employee knowledgeable about and engaged in the company and serves as the local point of contact for all compliance related issues. The CCO is responsible for communicating CMS information, coordinating all CMS related training, and assisting with compliance investigations. To further support compliance across the WINA collective of companies, there is also a WINA Compliance Officer (“WCO”) responsible for the overall participation of the WINA companies within the CMS, and to provide support to the CCO and BUCO.

Employee Responsibility

Compliance with our legal and ethical obligations is the responsibility of every employee of the Würth Group. Each person is responsible to maintain compliance with the Würth Group Code of Compliance and the guidelines of the CMS, and report any potential or suspected violation.

Individuals are encouraged to follow the protocol detailed below, and report concerns of potential violations or inappropriate behaviors as immediately as is possible after experiencing or knowledge about such an incident:

1. A report should first be made, if possible, to your immediate supervisor, or any member of the operating company management team;
2. If it is not possible to report an occurrence to your supervisor or member of management, or if further concerns exist, reports can be made to the local CCO;
3. If the incident requires further escalation, or if you are not comfortable with reporting the incident at the company level, the incident can be reported to the WCO; or

The Company realizes it is not always comfortable, or possible, to report inappropriate behavior to management, therefore, the Würth Group has arranged, with an independent third party vendor, to provide an online reporting tool,



the BKMS System, (available 24 hours a day, 7 days week), which allows you to communicate concerns without fear of retaliation.

<https://www.bkms-system.net/wuerth>

RESOURCES/TRAINING AVAILABLE

Title	Type of Resource	Where Do I Find this Training?
Wurth Code of Compliance	Booklet	http://www.wurthindustry.com/en/wina/about_us/corporate_responsibility/compliance/compliance.php
Preventing Corruption	E-Learning	Contact your local CCO, or the WCO
Handling Information	E-Learning	Contact your local CCO, or the WCO
Compliance Basics	E-Learning	Contact your local CCO, or the WCO
Fair Competition	E-Learning	Contact your local CCO, or the WCO
Harassment Training	E-Learning	Contact your local CCO, or the WCO
Import/Export Basics	In Person	Contact WINA-ITC@wurthindustry.com to schedule a time that works best for you.
Employee Handbook	Booklet	Contact your company's HR representative.
Company Policies	Booklet	Contact your company's HR representative.

CONTACTS

Confidential reporting

<https://www.bkms-system.net/wuerth>

Company Compliance Officer

Adams	Bobbie Fischer	bfischer@wurthadams.com	(763) 493-0864
Des Moines Bolt	Ryan Eischeid	ryaneischeid@dmbolt.com	(515) 299.6078
House of Threads	Jennifer Deavers	jdeavers@houseofthreads.com	(205) 949-4103
Marine	Brian Meskill	brian.meskill@marfas.com	(407) 321-2995
Northern Safety	Martha Moorehead	mmoorehead@northernsafety.com	(315) 404-5187
Oliver Van Horn	Brad Skeen	brad-skeen@ohvanhorn.com	(504) 210-3090
Revcar	Rick Corcoran	rcorcoran@revcar.com	(540) 278-1977
Service Supply	Brian Modlin	bmodlin@servicesupply.com	(317) 704-8440
Snider	Connie Evans	cevans@wurthsnider.com	(502) 810-0836
Timberline	Debra Wolfe	dwolfe@etimberline.com	(303) 312-8465
Weinstock	Chris Hempel	chempel@wcbolt.com	(516) 284-5887
Wurth Industry of Canada	Pauline Ciolko	pauline.ciolko@wurthindustry.ca	(519) 756-9700
Wurth Industrie de Mexico	Abi Mallen	amallen@wurthindustry.mx	521 812 731 6674

Wina Compliance officer

Danielle Riggs compliance@wurthindustry.com

(651) 425-1725

Business unit compliance officer

Maxine Freeman maxine.freeman@wurgona.com

(201) 587-6581