



# Code of Conduct

## Dillinger Fabrik Gelochter Bleche GmbH

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### 1. Introduction

Dillinger Fabrik Gelochter Bleche GmbH is committed to environmental and human rights respecting corporate governance and is committed to corporate sustainability and ethical business practices. We also expect our employees to observe the principles of ecological, social and ethical conduct and to integrate them into the corporate culture.

We consider these values as an essential cornerstone for our activities. We therefore undertake to observe the following regulations as binding minimum requirements for our business activities. Where applicable law imposes stricter requirements, the stricter statutory regulation shall of course apply.

The Code of Conduct is based on national laws and regulations, in particular the Supply Chain Sourcing Obligations Act (LkSG), as well as international conventions such as the United Nations Universal Declaration of Human Rights, the Guidelines on Children's Rights and Business Conduct, the United Nations Guiding Principles on Business and Human Rights, and the international labor standards of the International Labor Organization.

### 2. Voluntary commitments

#### a. Human rights and occupational safety

- **Respect for human dignity**

Dillinger Fabrik Gelochter Bleche GmbH respects general personal and human rights. Violence, intimidation, bullying and sexual harassment do not take place.



- **Prohibition of child labor**

Children under the age of 15 or those who are still of school age are not employed. If children are encountered at work, Dillinger Fabrik Gelochter Bleche GmbH will take steps to remedy the situation and allow the children to attend school.

Employees under the age of 18 will be employed only on work that is permitted and harmless to their health, safety or morals. Special protective regulations are observed.

- **Exclusion of forced labor and slavery**

Forced labor, slave labor, or work of a similar nature are prohibited. All work is voluntary and without threat of punishment.

Employees may terminate work or employment at any time, and the withholding of sensitive documents or wages does not occur.

In addition, there shall be no unacceptable treatment of workers, such as psychological hardship, sexual or personal harassment, or humiliation.

There shall be no hiring or use of security personnel if, in the course of their employment, persons are treated or injured in an inhumane or degrading manner or if freedom of association is impaired.

- **Occupational health and safety**

Dillinger Fabrik Gelochter Bleche GmbH ensures a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may arise in connection with the activity. Excessive physical or mental fatigue is prevented by appropriate measures. In addition, employees are regularly informed about applicable health and safety standards and measures and receive verifiable training.

- **Freedom of association and freedom of association**

The right of employees to form and join organizations of their choice and to engage in collective bargaining and strike is respected.

Workers shall not be discriminated against on the basis of forming, joining or being a member of such an organization.

- **Prohibition of discrimination**

Discrimination - i.e. any disadvantage, degradation and unequal treatment, for example on the basis of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief - will not take place unless it is based



on the circumstances of the employment. Dillinger Fabrik Gelochter Bleche GmbH respects the personal dignity, privacy and personal rights of each individual.

- **Fair compensation**

Dillinger Fabrik Gelochter Bleche GmbH pays a fair wage and does not pay unequal remuneration for work of equal value.

The remuneration shall be at least equal to the national statutory minimum wage or the industry minimum standards, whichever is higher. Dillinger Fabrik Gelochter Bleche GmbH shall endeavor to ensure that the remuneration is sufficient to cover the costs of ordinary living and to build up a minimum level of reserves.

Employees are provided with all benefits required by law. Wage deductions as punitive measures are not permitted.

- **Preservation of natural resources**

Dillinger Fabrik Gelochter Bleche GmbH shall not, in violation of legitimate rights, deprive people of land, forests, or waters whose use provides livelihoods. Harmful soil changes, water and air pollution, noise emissions and excessive water consumption are refrained from if this harms the health of persons, significantly impairs the natural basis for the production of food or prevents the access of persons to safe drinking water or sanitary facilities.

- **Fair working hours**

Working hours comply with applicable laws or industry standards and do not exceed 60 hours per week, including overtime. Employees are entitled to at least one day off in a seven-day week and vacation days in accordance with legal requirements.

## **b. Environment**

- **Handling of mercury and persistent organic pollutants**

Dillinger Fabrik Gelochter Bleche GmbH undertakes to comply with the obligations of the Minimata Convention regarding mercury of October 10, 2013 and the Stockholm Convention on Persistent Organic Pollutants (POP Convention) of May 23, 2001, as stipulated by the LkSG.



- **Dealing with air emissions**

Emissions from operations (air and noise emissions) comply with legal limits. They are analyzed prior to release, routinely monitored, reviewed, and treated as necessary to make the emissions non-hazardous. Dillinger Fabrik Gelochter Bleche GmbH strives to find economical solutions to minimize emissions.

- **Wastewater Treatment and Discharge**

Wastewater from operations, manufacturing processes, and sanitary facilities is analyzed, monitored, reviewed, and treated as needed prior to discharge or disposal so that the wastewater does not cause adverse impacts to people or the ecosystem. In addition, Dillinger Fabrik Gelochter Bleche GmbH strives to reduce the generation of wastewater.

- **Waste Handling**

Dillinger Fabrik Gelochter Bleche GmbH follows a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste. Harmful impacts on the environment and employees are avoided wherever possible. The prohibitions on the export of hazardous wastes in the Basel Convention of March 22, 1989, as amended, are observed. Chemicals or other materials that pose a hazard when released into the environment are identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse, and disposal.

- **Handling of Hazardous Substances**

Substances that cause acute harm to human health or are hazardous to the environment are handled and disposed of in such a way that they do not have any harmful effects on people or the environment.

- **Consumption of raw materials and natural resources**

Dillinger Fabrik Gelochter Bleche GmbH reduces or avoids the use and consumption of resources of all kinds, including water and energy, wherever possible. This is done either directly at the point of origin or through processes and measures, for example by changing production and maintenance processes or procedures in the company, by using alternative materials, through savings, through recycling or with the help of the reuse of materials.

Dillinger Fabrik Gelochter Bleche GmbH strives to improve energy efficiency and minimize energy consumption.

Dillinger Fabrik Gelochter Bleche GmbH ensures that the materials used come from responsible sources.

## c. Ethics

### • Fair Competition

Dillinger Fabrik Gelochter Bleche GmbH is committed to fair, merit-based competition and adheres to the standards of fair business, fair advertising and fair competition, including applicable antitrust laws. In particular, Dillinger Fabrik Gelochter Bleche GmbH does not participate in collusion or other activities that affect prices or terms, nor does Dillinger Fabrik Gelochter Bleche GmbH participate in collusion intended to restrict customers' freedom to autonomously determine their resale prices and other terms.

### • Confidentiality/Data Protection

Dillinger Fabrik Gelochter Bleche GmbH is committed to meeting the reasonable expectations of its customer, suppliers, customers, consumers and employees regarding the protection of confidential information. Dillinger Fabrik Gelochter Bleche GmbH complies with data privacy and information security laws and government regulations in the collection, storage, processing, transfer and disclosure of personal information.

Company data, trade and business secrets are kept strictly confidential and protected from unauthorized access.

### • Intellectual property

Intellectual property rights are respected; technology and know-how transfers are made in a manner that protects intellectual property rights and customer information.

### • Integrity, corruption, taking advantage

The highest standards of integrity are applied in all business activities. Dillinger Fabrik Gelochter Bleche GmbH has a zero tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement and the acceptance or giving of gifts.



### 3. Implementation of the voluntary commitments

With this document, Dillinger Fabrik Gelochter Bleche GmbH undertakes to comply with the above requirements and to communicate them to employees, agents and subcontractors in a manner that they can understand.

- **Grievance Mechanisms**

Dillinger Fabrik Gelochter Bleche GmbH will provide employees with access to grievance procedures that guarantee them confidentiality of identity and effective protection against discrimination.

- **Control of compliance**

Dillinger Fabrik Gelochter Bleche GmbH strives to identify risks within its supply chains as well as to take appropriate action. In the event of suspected violations and to safeguard supply chains with increased risks, Dillinger Fabrik Gelochter Bleche GmbH will inform affected clients of the facts and the measures taken.