

## Code of Conduct

### I. General regulations

#### 1. Scope of application

This code of conduct applies to all branches and production facilities of the company.

#### 2. Laws, conventions, norms and industry standards are adhered to

The company complies with the laws and standards of the respective countries in which it operates. It is based on the generally applicable ethical values and principles, in particular integrity, righteousness and human dignity. This also includes conventions, industry standards and other national regulations in the areas of business integrity, human rights, environmental protection, labor standards, occupational safety, health protection and environmental protection.

#### 3. International trade agreements and sanctions

Restrictions such as embargoes or economic sanctions that are recognized and imposed by international organizations and governments and that are recognized and instructed by the German government are respected and followed by the company. The restrictions may apply to countries or individuals and may affect specific business transactions. The company does not transact or do business in any goods or technology subject to such restrictions.

#### 4. Business partners, authorities and consumers

The company practices according to generally accepted business practices of fairness and honesty. It maintains a trusting relationship with the authorities. Consumer protection standards are observed.

#### 5. Trade secrets

Business secrets of business partners are treated confidentially by the company and its employees. Passing on confidential information to third parties or making it publicly available is prohibited. This also applies to company employees after the employment relationship has ended.

#### 6. Intellectual property

Intellectual property is recognized in the form of a patent, trademarks and copyrights, designs, models, samples and business information such as expertise or information given in confidence by customers or suppliers. All employees and business partners must ensure that intellectual property is protected from access by unauthorized employees and third parties.

#### 7. Counterfeit parts

The company obliges its suppliers to develop, implement and maintain effective methods and processes in order to identify and minimize the risk of introducing counterfeit parts and materials into our supply chain. If detected, suppliers are expected to put in place effective procedures to remove the product and inform recipients of counterfeit products.

### II. Antitrust and competition law requirements

#### 1. Antitrust law

The company is committed to fair competition. Laws protecting competition, in particular antitrust law and

other laws regulating competition, are observed.

Inadmissible agreements on prices or other conditions, sales areas or customers as well as an abuse of market power are contrary to the principles of the company.

## **2. The integrity of the company is guaranteed**

The company undertakes to proactively counteract any form of corruption, bribery or extortion.

The employees must ensure that there are no personal dependencies or obligations to customers or suppliers. In particular, company employees are not allowed to accept or give gifts which, on a reasonable basis, can be assumed to influence business decisions.

If gifts are customary and polite in a country, it should be noted that this does not result in any mandatory dependencies and the national legal standards are complied with. Infringements are generally punished with measures under labor law.

The company guarantees that employees who give internal or external information or make a complaint are protected from threats, harassment or other negative measures. You have no consequences under labor law to fear.

## **III. Global guidelines**

### **1. Human rights**

The internationally recognized human rights are expressly and sustainably supported.

Any physical abuse or discipline, deprivation of liberty, physical or psychological punishment, threats of violence, sexual and other harassment and verbal abuse as well as other forms of intimidation are prohibited. Even in the case of disciplinary measures, all company employees are to be treated with dignity and respect. Such measures may only be carried out in accordance with the applicable national and international standards and internationally recognized human rights.

Employees are expected to respect human rights in their area of responsibility and the company's suppliers and other business partners to the same extent Demand respect.

### **2. Child labor**

The company is committed to complying with the UN regulations on the rights of children. In particular, they undertake to comply with the minimum age for admission to employment and to prohibit exploitative child labor or to take immediate action against it.

### **3. Forced labor**

No company employee is employed against his or her will or forced to work, directly or indirectly, through violence or intimidation. Any form of forced labor, bondage, serfdom and slave labor or involuntary prison labor, as well as any other physical or mental pressure, is prohibited.

### **4. Remuneration, employee rights**

All employees should receive a fair wage for full-time employment that is at least sufficient to cover the basic requirements. The payment of the nationally fixed minimum wages is guaranteed. The wages, social benefits, overtime and other allowances paid correspond at least to the applicable laws or binding collective bargaining provisions. Wages must be paid in accordance with local practice. Unauthorized salary deductions and deductions as disciplinary measures are not permitted. The right of employees to freedom of association, freedom of assembly and collective bargaining, insofar as this is legally permissible and possible in the respective country, is respected.

## **5. Working hours**

The company is committed to ensuring that work and break times comply with applicable national laws or industry standards. Overtime or extra work is voluntary, is not demanded to an excessive degree and is remunerated.

## **6. Health and safety at work**

The national and international regulations to ensure health and safety in the workplace are observed. Appropriate and preventive steps are taken to provide employees with safe, healthy and hygienic working conditions in order to prevent accidents at work or health impairments associated with work. This includes regular health and safety training for employees.

## **7. Environmental protection**

The company observes the goals of sustainable environmental protection and ensures that all applicable laws and regulations for the protection of the environment are observed. In addition, we want to systematically implement effective and preventive measures to reduce environmental impact. We achieve this in particular through the careful and efficient use of natural resources, e.g. reducing the consumption of water and the emission of pollutants in water and air (reduction of CO<sub>2</sub> emissions). This also includes responsible chemicals and hazardous substances management and initiatives to promote environmental awareness among customers, suppliers and employees.

# **IV. Ethical and social principles**

## **1. Non-discrimination**

The company recognizes and observes the right of every person to equal opportunities in all aspects of employment such as recruitment, remuneration, admission to further education and training, promotion, termination of the employment relationship or retirement, regardless of his or her ethnic and social origin, nationality, Religion, age, marital status, gender, sexual orientation, disability, political beliefs, union membership or other personal characteristics.

## **2. Harassment**

The company condemns physical, psychological or sexual violence.

## **3. Freedom of expression**

The right to freedom of expression and expression is guaranteed.

## **4. Privacy**

The privacy is respected.

# **V. Compliance with the code of conduct**

The company informs its members of the company about this code of conduct in a suitable manner and at specified time intervals and ensures compliance with it.

gez. D. Vogt  
Geschäftsführer

Dittmar GmbH  
Werl, den, 26.01.2024