

DAHLINGER

Code of Conduct

Code of Conduct for production partners and suppliers (partners)

- 1 Introduction / Preamble 1
- 2 Requirements to the suppliers..... 2
 - 2.1 Social responsibility..... 2
 - 2.2 Ecological responsibility..... 4
 - 2.3 Ethical business behavior 5
- 3 Implementation of the requirements 6
- 4 Acknowledgement and Consent of the supplier 6

1 Introduction / Preamble

Dahlinger GmbH is convinced that social commitment, environmental awareness and fair cooperation are the supporting pillars of our society. To harmonize economic, ecological and social responsibility in a sustainable way is the goal of the Dahlinger company and thus commits itself to an ecologically and socially responsible corporate management. We expect the same behaviour from all our suppliers. We also expect our employees to observe the principles of ecological, social and ethical behaviour and to integrate them into our corporate culture. Furthermore, we strive to continuously optimize our corporate actions and our products in terms of sustainability and ask our suppliers to contribute to this in terms of a holistic approach.

For future cooperation, the contractual partners agree on the validity of the following regulations for a common code of conduct. This agreement shall apply as the basis for all future deliveries. The contractual partners undertake to comply with the principles and requirements of the Code of Conduct and to endeavour to contractually obligate their suppliers to comply with the standards and regulations listed in this document. This agreement becomes effective upon signature. A failure to comply with this Code of Conduct may ultimately be grounds and cause for the company to terminate the business relationship, including all associated supply contracts.

The Code of Conduct is based on national laws and regulations such as 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, the international labour standards of the International Labor Organization (hereinafter ILO), and the United Nations Global Compact.

We consider it our duty to ensure that suppliers pass on the agreed requirements to their own suppliers.

2 Requirements to the suppliers

In the respective production sites, the applicable national and international laws and regulations, minimum industrial standards, ILO and UN conventions and all other relevant provisions (hereinafter collectively referred to as "Standards") shall be complied with, whereby those Standards shall be applied which impose the most stringent requirements.

Compliance with this Code, as well as consisting of the principle above and the standards listed below, may not be circumvented by employment contract agreements or comparable measures.

2.1 Social responsibility

- Exclusion of forced labour

No forced labour, slave labour, or work comparable in this way may be used. All work must be voluntary and without threat of punishment. Employees must be able to terminate work or employment at any time. In addition, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment, and humiliation. The contracting or use of security guards shall be refrained from if, during their use, persons are treated or injured in an inhumane or degrading manner or if freedom of association is impaired.

In accordance with ILO Conventions 29 and 105.

- Prohibition of child labour

Child labour and any exploitation of children and young people will not be tolerated by Dahlinger. The minimum age for admission to employment must not be below the age at which compulsory schooling ends and in no case below 15 years of age. National standards for the protection of children and young people in employment must be observed and given priority. The exceptions of the ILO apply. Compliance with the prohibition of child labour and the restriction of youth employment must be ensured. In particular, adolescents must not be exposed to dangerous, unsafe or unhealthy situations. In the event of a violation of the prohibition, the supplier shall immediately initiate suitable remedial measures for the children and adolescents. The corrective measures shall be documented. In addition, such measures and procedures are to be taken which serve the rehabilitation and social integration of the children concerned and enable them to obtain a general school-leaving qualification in accordance with national standards.

In accordance with ILO Conventions 79, 138, 142, 182 and ILO Recommendation 146.

- Fair remuneration

The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher. In any case, the remuneration for overtime must exceed the remuneration for regular hours. Insofar as the remuneration is not sufficient to cover the costs of ordinary living and to build up a minimum level of reserves, the supplier shall be obliged to increase the remuneration accordingly. Employees shall be provided with all benefits prescribed by law. Deduction of wages as a punitive measure shall not be permitted. The supplier shall ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

In accordance with ILO Conventions 26 and 131.

- **Fair working hours**

Working hours shall comply with applicable law, industrial standards, or relevant ILO conventions, whichever is more stringent. The maximum permissible weekly working hours apply in accordance with national legislation, but on a regular basis these may not exceed 48 hours and, including overtime, may not exceed 60 hours.

In other respects, the relevant national and international standards, in particular the ILO exceptions, shall apply to individual trades and forms of employment and in the event of serious disruption of regular operations. Employees shall be entitled to at least one day off after six consecutive working days. day off. Overtime worked shall be paid separately in accordance with national norms and shall be remuneration and must be performed on a voluntary basis.

In accordance with ILO Conventions 1 and 14.

- **Freedom of association**

The right of employees to form and join organizations of their choice and to bargain collectively and to strike shall be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of workers for the purpose of collective bargaining shall be provided. Employee representatives shall be protected against discrimination Employees shall not be discriminated against based on forming, joining or being a member of such an organization. Their employee representatives must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner.

In accordance with ILO Conventions 87, 98, 135 and 154 and ILO Recommendation 143.

- **Prohibition of discrimination**

Discrimination Unequal treatment of employees in any form is inadmissible unless it is justified in the requirements of employment. This applies, for example, to discrimination based on gender, race, caste, national, ethnic or social origin, skin colour, disability, health status, political conviction, origin ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

In accordance with ILO Conventions 110, 111 and 159.

- **Health protection, safety at work**

The supplier is responsible for 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 shall be prevented by appropriate measures. In addition, employees shall be regularly informed and trained on applicable health and safety standards and measures. The supplier shall document the above. Employees shall be provided with access to drinking water in sufficient quantity as well as access to clean sanitary facilities. If dormitories are provided, they must be clean and safe and meet basic requirements.

In accordance with ILO Conventions 155 and 164.

- **Preservation of the natural foundations of life**
The supplier shall not, in violation of legitimate rights, deprive land, forests or waters, the use of which secures the livelihood of persons. He shall refrain from harmful soil changes, water and air pollution, noise emissions, and excessive water consumption, 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.
- **Complaint mechanisms**
Complaints or indications of violations of this Code can be reported to Dahlinger at any time - also in anonymous form. The report can be made via our company website. The supplier is required to pass on to his employees the information provided by Dahlinger regarding accessibility, responsibility and the implementation of a complaint's procedure in an appropriate manner. The reporting person is required to report only those complaints and notices about which he/she is in good faith as to the accuracy of the corresponding report. The complaint procedure must be accessible to employees while maintaining confidentiality of identity and effective protection against discrimination. All suppliers shall guarantee to refrain from taking any adverse action or disciplinary action against the person making the report.

This mechanism is in accordance with the LkSG.

- **Disciplinary measures**
All employees are to be treated with dignity and respect. Sanctions, fines, other penalties or disciplinary measures may only be taken in accordance with applicable national and international standards and internationally recognized human rights. No employee shall be subjected to verbal, psychological, physical, sexual and/or physical violence, coercion or harassment.
- **Documentation of the employment**
The business partners guarantee the written documentation of the working conditions (e.g. start and duration of the employment relationship, working hours, wages and bonuses) of their employees in relation to the production phases directly affecting them. The name, date and place of birth, and, if possible, the home address of the employee shall be recorded. The direct business partners also guarantee the corresponding documentation for the other agents they use. Circumvention of applicable national labour and social security standards is prohibited.

2.2 Ecological responsibility

- **Treatment and discharge of industrial wastewater**
Wastewater from operations, manufacturing processes, and sanitary facilities should be characterized, monitored, inspected, and treated as necessary prior to discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.
- **Managing air emissions**
General emissions from operations (air and noise emissions) and greenhouse gas emissions shall be characterized, routinely monitored, verified and treated as necessary prior to their release. The supplier is also responsible for monitoring its emission control systems and is required to find economic solutions to minimize any emissions.

- **Handling waste and hazardous substances**
The supplier shall follow a systematic approach to identify, handle, reduce, and responsibly dispose of or recycle solid waste. Chemicals or other materials that pose a hazard when released into the environment shall be identified and handled in a manner that ensures safety during their handling, transport, storage, use, recycling or reuse and disposal.
- **Consumption of raw materials and natural resources**
The use and consumption of resources during production and the generation of waste of any kind, including water and energy, shall be reduced or avoided. This is done either directly at the point of origin or through procedures and measures, for example by changing production and maintenance processes or procedures in the company, by using alternative materials, by savings, by recycling or with the help of the reuse of materials.
- **Dealing with energy consumption/efficiency**
Energy consumption is to be monitored and documented. Economic solutions are to be found to improve energy efficiency and minimize energy consumption.

2.3 Ethical business behaviour

- **Fair competition**
The standards of fair business, fair advertising and fair competition must be observed. In addition, the applicable antitrust laws must be applied, which in particular prohibit agreements and other activities that influence prices or conditions when dealing with competitors. Furthermore, these regulations prohibit agreements between customers and suppliers aimed at restricting customers' freedom to determine their prices and other conditions autonomously when reselling.
- **Confidentiality/data protection**
The supplier undertakes to meet the reasonable expectations of its client, suppliers, customers, consumers and employees with regard to the protection of private information. The supplier shall observe the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting and disclosing personal information. Any indications of corrupt behaviour should be reported to Dahlinger. See the point Complaint Mechanisms.
- **Intellectual property**
Intellectual property rights are to be respected; technology and know-how Transfer of technology and know-how must be carried out in such a way that intellectual property rights and customer information are protected.
- **Integrity/Bribery, Taking Advantage**
The highest standards of integrity must be applied in all business activities. The supplier shall have a zero-tolerance policy in prohibiting all forms of bribery, corruption, extortion and embezzlement. Procedures for monitoring and enforcing standards shall be applied to ensure compliance with anti-corruption laws.

3 Implementation of the requirements

We expect our suppliers to identify risks within their supply chains and to take appropriate measures. In the event of suspected violations and to safeguard supply chains with increased risks, the supplier will inform the company promptly and, if necessary, regularly about the identified violations and risks as well as the measures taken. The company documents compliance with the standards and regulations listed in this document with the help of a self-assessment questionnaire annually, as well as through several visits during the year and regular exchanges. Dahlinger asks its suppliers to pass on this Code of Conduct to its suppliers and to act accordingly.

This procedure is in accordance with the LkSG.

4 Acknowledgement and Consent of the supplier

By signing this document or accepting the contents as a contractually effective annex to the supplier contract, the supplier undertakes to act responsibly and to comply with the principles/requirements listed. The supplier undertakes to communicate the contents of this code to employees, agents and subcontractors in a manner understandable to them and to take all necessary precautions for the implementation of the requirements.

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