

1<sup>st</sup> January 2024

## **Global Code of Conduct and Compliance Foreword by the Managing Directors**

Dear employees,  
Dear business partners,

The DMB Dr. Dieter Murmann Beteiligungsgesellschaft mbH is an independent, family-run and owned holding company.

As a diversified group, we are active in various business areas with different groups of companies. Our holdings operate independently of each other in their respective markets, yet under the common umbrella of this Code of Conduct and Compliance.

We act in accordance with the law in all countries in which we operate and have high ethical standards.

Integrity, reliability and loyalty towards our colleagues, partners, shareholders and traditions are a common strength of our social responsibility.

We do respect environment and offer safe and fair workplaces.

Our Code of Conduct and Compliance is a binding instrument for all companies belonging to our holding company and provides a framework for acting with integrity. All our employees and business partners are required to be familiar with this Code and to apply it in their daily work.

This version replaces all previous versions.

Hendrik Murmann  
Managing owner

Dr. Martin Golücke  
Managing director

**DMB**

DR. DIETER MURMANN  
BETEILIGUNGSGESELLSCHAFT MBH

## **Global Code of Conduct and Compliance**

1 January 2024

The *masculine form* is used to improve the legibility of personal designations and personal words. It applies to *all genders*.

### **Preamble**

Ethical behaviour is the basis for professionally sound and legally correct business relationships. For this reason, DMB and its corporate groups (hereinafter collectively referred to as the "Company") have established this Code of Conduct and Compliance (hereinafter referred to as the "Code") and request all employees, directors and representatives of the Company to comply with it.

It is the Company's intention that the names of DMB and its groups of companies are synonymous with the highest standards of business. The company and all its employees conduct their business according to high moral and ethical principles and in compliance with applicable law. Integrity, honesty and legality govern every action and every decision made in all internal and external relationships with shareholders, suppliers, dealers, customers, competitors, government officials and the public. Our business relationships are based on transparent decisions. Criteria such as price, quality, reliability, financial stability, innovative strength and sustainable behaviour are decisive for us.

The DMB Code of Conduct is general in nature. Although the Code does not apply to every possible situation, it does provide guidance. Every employee is expected to follow this Code to the best of his or her ability in situations not specifically addressed. The Company has already adopted internal policies and guidelines and may adopt others that supplement this Code as they deal more specifically with certain activities. Every employee is expected to be familiar with these principles and guidelines and to comply with them.

As a global company, we operate in many different countries where laws, business practices and customs may differ significantly. It is the company's policy to comply with the national and local laws of the countries in which we operate. It is also our intention to comply with local customs and practices, provided they do not conflict with any policy in this Code or applicable laws or regulations.

## **1. Competences and responsibilities**

This Code applies to the company and all its business units and subsidiaries worldwide. All employees are required to familiarise themselves with this Code, comply with it and report any actual or potential violations of this Code.

The directors/managers of the local units are required to inform their employees about this Code and the company's requirements for high ethical standards and compliance with the law and to implement appropriate procedures for support and to ensure compliance.

## **2. Confirmation**

Compliance with this code must be confirmed to DMB once a year by the subsidiaries. The headquarters and DMB are responsible for administration.

## **3. Reporting cases of possible non-compliance**

All exceptions, deviations, violations or suspected violations of this Code must be reported objectively, factually and without judgement. There are conventional ways of doing this, such as direct communication with the line manager, the works council, the HR department or the managing directors of the company concerned. In addition, reports can also be submitted - anonymously - to the addresses and channels listed on the homepages of the subsidiaries. The company makes it clear that compliance with this Code is a top priority worldwide.

There must be no retaliation for making a report. The identity of individuals who make a report will be kept confidential. A person who reports a possible violation in good faith shall not be subject to disciplinary action, provided that he or she is not involved in a violation of the Code.

We fully comply with the EU Whistleblower Protection Directive.

## **4. Violations of the Code**

Violations of this Code may result in disciplinary action, up to and including dismissal, in accordance with the applicable conditions under works constitution law and the relevant works agreements. Disciplinary action will be taken against any person who directs, authorises, condones, participates in or conceals any action that is found to be in violation of this Code and against any person who directly or indirectly retaliates or incites others to retaliate against an employee who reports a violation of this Code.

## **5. Compliance with laws**

We comply with the applicable laws in the countries in which we do business. In the event of legal doubts about their own behaviour and in relation to the working environment, employees can contact their direct line manager, the relevant specialist departments, the HR department and the management for information.

## **6. Financial control and correctness of records**

Company funds, assets and services may not be used for non-Company purposes, nor may they be used for any unlawful purpose or for any purpose other than that described in the payment vouchers. Under no circumstances may undisclosed or unrecorded funds be established or maintained.

The Company's worldwide business transactions must be properly authorised and fully and accurately recorded in the Company's books and records in accordance with generally accepted accounting practices and the Company's established financial policies. The Company prohibits false or misleading entries in its books and records or in governmental filings for any reason.

The storage or proper disposal of the company's documents is carried out in accordance with the established company guidelines and the applicable statutory and legal requirements.

## **7. Export and import controls**

Employees must comply with the export and import controls set out in the laws and regulations of the countries in which the company does business. The company may not violate the law by importing, exporting or re-exporting goods or technical data. The same applies to the installation of such items in other devices. Employees may not take any actions that would cause the company to violate the law.

Directors should appoint individuals responsible for establishing export and import control procedures and applying for export licences required for contracts, agreements and foreign sales.

## **8. Antitrust laws and competition practices**

Employees must comply with the antitrust laws of the countries in which the company operates and which prohibit agreements with competitors on prices, terms of sale or the allocation of products, business markets, customers or territories. Employees who deal directly or indirectly with a competitor must familiarise themselves with the applicable antitrust laws and comply with them. The company ensures that employees are informed accordingly through training.

Disclosure of certain information to competitors may, under certain circumstances, violate the law. To avoid any appearance of impropriety or illegality, any discussion or communication with a competitor about prices, production, marketing, inventories, product development, sales territories and targets, market studies and proprietary or confidential information should be avoided.

The Company and its employees will not engage in illegal or improper activities to obtain trade secrets, customer lists, information about facilities, technical developments or operations of a competitor. The Company and its employees will not approach or pay anyone to obtain confidential information or pressure employees or customers of competitors to disclose anything that could be considered confidential.

## **9. Conflict of interest**

Every employee must take care to avoid situations in which personal interests conflict or appear to conflict with the interests of the company, its shareholders, customers or suppliers. A conflict of interest is a situation in which an employee, officer or board member or their family members or friends benefit or appear to benefit personally at the expense of the best interests of the company.

A conflict of interest or the appearance of a conflict of interest may arise, for example, if an employee has a financial interest in or serves in a business capacity for an outside company that does or seeks to do business with the Company or is a competitor of the Company; serves as an intermediary in favour of a third party in transactions involving the Company; uses Company confidential information or other Company assets for personal gain; conducts business for another company during normal working hours; or uses Company property to conduct business for another company. An employee should report any situation that he or she considers to be a conflict of interest or a potential conflict of interest, see point 3.

## **10. Political commitment**

Employees are encouraged as individuals to participate in public affairs and appropriate political and charitable activities as long as they make it clear that their views and actions are not those of the Company. Under no circumstances may an officer or employee make a contribution (money, services or use of Company property) in support of a political party or candidate on behalf of the Company. The Company will not reimburse executives or employees for the cost of political contributions/participation.

## **11. Money laundering**

The company strictly adheres to the laws and regulations issued to combat money laundering. Money laundering is the recognition of money or other assets derived from a criminal offence and their introduction into the regular economic cycle. Therefore, the company will only do business with reputable customers who are involved in legitimate business activities and whose funds come from legitimate sources. No employee shall act in a manner that violates the money laundering laws and regulations of the countries in which the Company conducts business.

## **12. Prohibition of bribery**

Company employees and representatives may not make or offer payments to or bribe public officials to influence, obtain or retain business for the Company or otherwise secure an improper business advantage over competitors. The payment of bribes or the granting of other illegal inducements to public officials, political parties or candidates or to other persons who could influence an official act or decision may not be authorised, offered or made.

## **13. Dealing with business partners**

Conducting business with business partners requires care in order to avoid ethical and legal problems. We do not endeavour to gain an unfair competitive advantage through undue influence. Our actions do not even give the appearance of unauthorised activity.

All payments to the company's business partners must be made in the normal course of business in accordance with established review and approval procedures. Kickbacks, unauthorised rebates or other unjustified payments in the form of money, property or services to business partners and their employees are prohibited.

Reciprocity exists when two companies buy each other's products. This practice is common and acceptable.

However, no employee may purchase or accept another company's products as a condition of selling the Company's products or services or require a business partner to purchase our products in order to sell products or services to the Company.

Employees and their immediate family members may not solicit, accept or give gifts of money, gratuities, loans, services, holidays, entertainment or other favours of any kind when dealing with existing or potential business partners. However, employees and their immediate family members may accept or give gifts (other than money) within the framework of the company's internal guidelines in order to honour appropriate business courtesies.

Employees may offer and/or accept hospitality related to business, but only if the hospitality is reasonable, arises in the ordinary course of business, does not involve unreasonably excessive expenditure and does not place the recipient(s) under any obligation.

Agreements with the Company's business partners must be in writing and clearly and accurately describe the services to be provided, the basis for all compensation and the actual commission or fee to be paid. Payments must be reasonable and not higher than local commercial practice.

Any doubt about the appropriateness of accepting a gift or hospitality should be dispelled by informing the employee's line manager before acceptance, where possible.

All payments to the Company's business partners should be made directly to the contracting party or its accounts in the country in which the contracting party is domiciled or has its registered office. Payments to accounts in another country may result in charges of aiding and abetting or violating tax or exchange control laws. The only exceptions to this are cases in which a payment to another country or to another account is demonstrably justified and the contracting party proves that these payments do not violate applicable tax, exchange control or other laws.

#### **14. Internet use**

The Company recognises that the Internet is a valuable resource to support our business. All IT-related resources, including the Internet and e-mail, are made available for business matters only and must not be used for personal matters during working hours. Unauthorised access to information and information systems is prohibited. All users agree not to use the Internet unethically or illegally and to strictly adhere to copyright laws. Non-work-related use of company IT resources to download, access or store material is prohibited.

## **15. Use and protection of information**

The company is a market leader in the development, manufacture and sale of a wide range of technical products in its business area. These technology-based products require considerable investment, including research and development costs, as well as expertise. Information about these products and their development, like other information held by the company, is critical to the company's success. Like tangible assets, information assets require care and protection. Therefore, all users must protect the confidentiality, integrity and availability of such information.

Unauthorised disclosure of information or failure to properly control our technology has serious consequences and could cause irreparable harm to the company. Unauthorised disclosure can have significant business, legal and economic consequences and is prohibited.

Just as we protect our own business information, the company respects the intellectual property rights of others. It is therefore forbidden to bring confidential information from previous employers into the company or to accept or use confidential information from third parties. Third party copyrights and patents must be respected at all times.

## **16. Drug and alcohol consumption**

The company complies with all applicable laws and regulations regarding the possession or consumption of alcohol or drugs. Company policy prohibits the illegal use, sale, purchase, transfer, possession or presence of drugs on Company premises, with the exception of medically prescribed drugs. Likewise, company policy prohibits the consumption, sale or purchase of alcoholic beverages by employees on company premises unless authorised by the company.

## **17. Employee relations**

The Company is committed to a policy of equal employment opportunity for qualified individuals regardless of race, religion, colour, national origin, age, gender, sexual orientation or disability. This policy applies to all phases of the employment relationship, including the hiring of new employees, promotions, selection for training/performance programmes and compensation.

When dealing with colleagues, we always act with integrity, honesty, fairness, impartiality and care and are always open in our dealings. We are polite and respect the rights and dignity of others. In particular, we do not tolerate any form of undesirable behaviour. By "undesirable behaviour", we mean any form of behaviour that verbally, physically or non-verbally violates the personal integrity of the other person. This includes bullying, discrimination, sexual harassment, racism, aggression and (verbal and non-verbal) violence.

## **18. Health and safety in the workplace**

The health and safety of all employees is very important to us. We are convinced that every accident at work is preventable. We are committed to designing workplaces that offer safe and healthy working conditions. Compliance with safety regulations is essential. Regular training courses help to raise the awareness of our employees.

The company is committed to providing a drug-free, safe and healthy work environment. Each employee is responsible for complying with environmental, health and safety laws and regulations.

## **19. Climate protection and the environment**

We are committed to the climate protection goals of the United Nations and use resources responsibly. We are strongly committed to conducting all our activities with a high level of respect for the environment and expect the same commitment from all internal and external partners.

## **20. Modern slavery and child labour**

Slavery, human trafficking and forced labour do not exist in our company. We are aware of the growing potential risk of modern slavery and human trafficking in the world. We are committed to ethical and lawful employment in accordance with ILO Convention 29 (Forced Labour Convention). We firmly reject such activities both in our own company and with our business partners.

We are against any kind of child labour in our company and demand this from all our business partners. We are committed to complying with the ILO Convention (182 Worst Forms of Child Labour Convention).

## **21. Corporate social responsibility**

We recognise that our business activities and processes can have an impact on social, economic and environmental issues outside the workplace. We are committed to ensuring and maintaining socially responsible behaviour in our company.

## **22. Summary**

Each employee must apply ethical standards and principles of integrity, honesty and legality in everything he or she does for the company. Everyone must avoid conflicts of interest, apply ethical principles in dealing with business partners, maintain books and records to acceptable standards and comply with all policies relating to competitive practices.

All employees are expected to adhere to this Code, even if this results in a loss of business or lower profitability. Ethical behaviour is not only the right thing to do, it is mandatory and has a long tradition within the company. Non-compliance with this Code must be reported.