

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

Dear Employees,  
Dear Business Partners,

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

As a diversified group, we operate through various corporate groups in different areas of business. Our affiliated companies act independently in their respective markets, while sharing this Code of Conduct as a common framework.

In every country in which we operate, we act in accordance with applicable laws and uphold high ethical standards.

Integrity, reliability and loyalty toward our colleagues, partners and shareholders, as well as respect for our traditions, are a shared strength underpinning our social responsibility.

We respect the environment and provide safe and fair workplaces.

Our Code of Conduct and Compliance is a binding instrument for all companies belonging to our holding group and provides a framework for ethical conduct. All employees and business partners are requested to familiarize themselves with this Code and apply it in their day-to-day work.

This version supersedes all previous versions.

Hendrik Murmann  
Managing Shareholder

Dr. Martin Golücke  
Managing Director

# Global Code of Conduct and Compliance

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1 January 2024

*For ease of readability, masculine forms are used for personal designations and person-related terms. They apply to all genders.*

## Preamble

Ethical conduct is the foundation of professionally sound and legally compliant business relationships. For this reason, DMB and its corporate groups (hereinafter jointly referred to as the “Company”) establish this Code of Conduct and Compliance (hereinafter referred to as the “Code”) and require all employees, managing directors and representatives of the Company to observe it.

It is the Company’s intention that the names of DMB and its corporate groups be synonymous with the highest standards of business conduct. The Company and all its employees conduct business in accordance with high moral and ethical principles and in compliance with applicable law. Integrity, honesty and legality guide every action and every decision taken in all internal and external relationships with shareholders, suppliers, distributors, customers, competitors, government representatives and the public. Our business relationships are based on transparent and comprehensible decisions. Criteria such as price, quality, reliability, financial stability, innovative strength and sustainable conduct are decisive for us.

The DMB Code is general in nature. Although the Code does not address every possible situation, it provides guidance. Every employee is expected to follow this Code to the best of their knowledge and conscience in situations that are not specifically addressed. The Company has already adopted internal principles and policies and may adopt further ones that supplement this Code by addressing particular activities in greater detail. Every employee is expected to be familiar with and comply with these principles and policies.

As a global company, we operate in many different countries in which laws, business practices and customs may differ significantly. It is a principle of the Company to comply with the national and local laws of the countries in which we operate. We also intend to observe local customs and practices, provided they do not conflict with a provision of this Code or with applicable laws or regulations.

## 1. Scope, Duties and Responsibility

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

The managing directors/managers of the local entities are requested to inform their employees about this Code and the Company’s requirements regarding high ethical standards and legal compliance, and to introduce appropriate support and compliance-assurance procedures.

## 2. Annual Confirmation

The affiliated companies must confirm compliance with this Code to DMB once per year. Administration is handled by the headquarters and DMB.

## 3. Reporting Potential Non-Compliance

All exceptions, deviations, violations or suspected violations of this Code must be reported objectively, factually and without judgment. Conventional reporting channels include direct communication with a supervisor, the works council, the human resources department or the managing directors of the company concerned. Reports may also be submitted, including anonymously, through the addresses and

channels listed on the websites of the affiliated companies. The Company makes clear that compliance with this Code is a top priority worldwide.

No retaliatory action may be taken in response to a report. The identity of persons making a report will be treated confidentially. A person who reports a possible violation in good faith may not be subject to disciplinary action for doing so, provided that person was 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 measures up to and including dismissal, in accordance with the applicable works-constitution requirements and relevant works agreements.

Disciplinary measures will be taken against any person who directs, authorizes, tolerates, participates in or conceals conduct proven to violate this Code, and against any person who directly or indirectly retaliates against an employee who reports a violation of this Code or encourages others to retaliate.

#### **5. Compliance with Laws**

We comply with the applicable laws in the countries in which we conduct business. If employees have legal doubts concerning their own conduct or their working environment, they may seek guidance from their direct supervisor, the relevant specialist departments, the human resources department or management.

#### **6. Financial Controls and Accuracy of Records**

Company funds, assets and services may not be used for purposes unrelated to the Company, for any unlawful purpose or for any purpose other than that described in the supporting payment documentation. Under no circumstances may undisclosed or unrecorded funds be established or maintained.

The Company's worldwide business transactions must be properly authorized and recorded fully and accurately 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 government documents, regardless of the reason.

Company records must be retained or properly disposed of in accordance with established Company policies and applicable statutory and legal requirements.

#### **7. Export and Import Controls**

Employees must comply with export and import controls established by the laws and regulations of the countries in which the Company conducts business. The Company must not violate the law in connection with the import, export or re-export of goods or technical data. The same applies to incorporating such items into other equipment. Employees may not take any action that would cause the Company to violate the law.

The managing directors should appoint persons responsible for establishing export and import control procedures and for applying for the export permits required for contracts, agreements and foreign sales.

#### **8. Antitrust Laws and Competitive Practices**

Employees must comply with the antitrust laws of the countries in which the Company operates. These laws prohibit agreements with competitors concerning prices, terms of sale or the allocation of products, business markets, customers or territories. Employees who deal directly or indirectly with a competitor must familiarize themselves with and comply with the applicable antitrust laws. The Company will ensure that employees are appropriately informed through training.

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

The Company and its employees will not engage in illegal or improper acts to obtain a competitor's trade secrets, customer lists, information about facilities, technical developments or operating processes. The Company and its employees will not approach or pay anyone to obtain confidential information, nor pressure employees or customers of competitors to disclose anything that could be considered confidential.

## **9. Conflicts 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, executive or advisory-board member, or their family members or friends, personally benefits or appears to benefit at the expense of the Company's best interests. A conflict of interest, or the appearance of one, may arise, for example, if an employee holds a financial interest in, or performs a business function for, an outside company that does or seeks to do business with the Company, or that competes with the Company; serves as an intermediary for the benefit of a third party in transactions involving the Company; uses confidential Company information or other Company assets for personal benefit; 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 considered to be a conflict of interest or a potential conflict of interest; see Section 3.

## **10. Political Activities**

Employees are encouraged, in their private capacity, to participate in public affairs and appropriate political and charitable activities, provided they make clear that their views and actions are not those of the Company.

Under no circumstances may an executive or employee make a contribution - whether money, services or use of Company property - in support of a political party or candidate on behalf of the Company. The Company does not reimburse executives or employees for political donations or participation.

## **11. Money Laundering**

The Company strictly complies with laws and regulations enacted to combat money laundering. Money laundering means accepting money or other assets derived from criminal activity and introducing them into the regular economic cycle. The Company will therefore conduct business only with reputable customers engaged in legitimate business activities and whose funds come from legitimate sources. No employee may 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**

Employees and representatives of the Company may not make or offer payments to public officials, or bribe them, in order to influence, obtain or retain business for the Company or otherwise secure an improper business advantage over competitors. The payment of bribes or the provision of other illegal incentives to public officials, political parties or candidates, or to any other persons who could influence an official act or decision, may not be authorized, offered or made.

### **13. Business Partners**

Conducting business with business partners requires care in order to avoid ethical and legal problems. We do not seek to obtain an unfair competitive advantage through improper influence. Our actions must not even create the appearance of improper conduct.

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

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

However, no employee may purchase or accept another company's products as a condition for 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 grant cash gifts, benefits, loans, services, vacation or entertainment trips, or other advantages of any kind in dealings with existing or potential business partners. To allow for reasonable business courtesies, employees and their immediate family members may, however, accept or present gifts other than cash in accordance with internal Company policies.

Employees may offer and/or accept business-related hospitality only if it is reasonable, arises in the ordinary course of business, does not involve improper or excessive expense, and does not place the recipient under any obligation.

Agreements with the Company's business partners must be in writing and must clearly and accurately describe the services to be provided, the basis for all compensation and the commission or fee actually payable. Payments must be reasonable in amount and may not exceed customary local commercial levels.

Any doubt about whether accepting a gift or hospitality is appropriate should, where possible, be resolved by informing the employee's supervisor before acceptance.

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

### **14. Internet Use**

The Company recognizes that the internet is a valuable resource supporting our business activities. All IT-related resources, including internet and email, are provided solely for business matters and may not be used for personal matters during working hours. Unauthorized access to information and information systems is prohibited. All users undertake not to use the internet unethically or illegally and to comply strictly with copyright laws. Non-business use of Company IT resources to download, retrieve or store material is prohibited.

### **15. Use and Protection of Information**

In its business sector, the Company is a market leader in the development, manufacture and distribution of a wide variety of technical products. These technology-based products require substantial investment, including research and development costs, as well as specialist expertise. Information about these products and their development, like other Company information, is critical to the Company's success.

Like tangible assets, information assets require care and protection. All users must therefore protect the confidentiality, integrity and availability of such information.

Unauthorized disclosure of information or failure to control our technology properly has serious consequences and could cause irreparable harm to the Company. Unauthorized disclosure may 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 prohibited to bring confidential information from previous employers into the Company or to accept or use confidential information belonging to third parties. Third-party copyrights and patents must be respected at all times.

## **16. Drug and Alcohol Use**

The Company complies with all applicable laws and regulations concerning the possession or use of alcohol or drugs. Company policies prohibit the illegal use, sale, purchase, transfer, possession or presence of drugs on Company premises, except for medication prescribed by a physician. Company policy likewise prohibits employees from consuming, selling or purchasing alcoholic beverages on Company premises unless authorized by the Company.

## **17. Employee Relations**

The Company is committed to a policy of equal employment opportunity for qualified persons, regardless of ancestry, religion, skin colour, national origin, age, sex, sexual orientation or disability. This policy applies to all stages of employment, including hiring new employees, promotions, selection for training/performance programs and compensation.

In our dealings with colleagues, we always act with integrity, honesty, fairness, impartiality and care, and we communicate openly. We are courteous and respect one another's rights and dignity. In particular, we do not tolerate any form of unwanted conduct. "Unwanted conduct" means any verbal, physical or non-verbal behaviour that violates another person's personal integrity. This includes bullying, discrimination, sexual harassment, racism, aggression and verbal or non-verbal violence.

## **18. Workplace Health and Safety**

The safety and health of all employees are of great importance to us. We are convinced that every workplace accident is preventable. We are committed to designing workplaces that provide safe and healthy working conditions. Compliance with safety regulations is essential. Regular training helps to raise employee awareness.

The Company is committed to creating a drug-free, safe and healthy working environment. Every employee is responsible for complying with environmental, health and safety laws and regulations.

## **19. Climate Protection and the Environment**

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

## **20. Modern Slavery and Child Labour**

Slavery, human trafficking and forced labour have no place in our Company. We are aware of the growing potential risk of modern slavery and human trafficking worldwide. We are committed to ethical and lawful employment in accordance with ILO Convention No. 29 (Forced Labour Convention). We firmly reject such activities both within our own Company and among our business partners.

We oppose all forms of child labour in our Company and require the same of all our business partners. We are committed to compliance with ILO Convention No. 182 (Worst Forms of Child Labour Convention).

## **21. Corporate Social Responsibility**

We recognize that our business activities and processes may have an impact on social, economic and environmental matters beyond the workplace. We are committed to ensuring and maintaining socially responsible conduct within our Company.

## **22. Summary**

Every employee must apply ethical standards and the principles of integrity, honesty and legality in everything they do for the Company. Everyone must avoid conflicts of interest, apply ethical principles in dealings with business partners, maintain books and records in accordance with acceptable standards, and comply with all policies relating to competitive practices.

All employees are expected to comply with this Code even where doing so results in lost business or reduced profitability. Ethical conduct is not only right; it is mandatory and forms part of a long-standing Company tradition. Any failure to comply with this Code must be reported.