

# I. Mission statement of Dorstener Drahtwerke

The Dorstener Drahtwerke Group of Companies (hereinafter referred to as DDD) is a global network of specialized companies with a high level of expertise in wire and its diverse applications.

“Expect more” stands for our unconditional will to exceed expectations. We have been working enthusiastically to achieve this day after day for more than 100 years. We supply more than just the right wire or the right mesh. We offer top quality, unique service and a wide variety of products and solutions. We score with advice, expertise and passion.

## **Expect**

- ...more products
- ...more solutions
- ...more quality
- ...more service
- ...more passion

DDD stands for tradition, customer proximity, innovation and competence worldwide. We focus on profitable growth, independence and long-term orientation. Trust and mutual respect are the basis for our internationally successful entrepreneurial activities. Despite our global presence, we operate as a medium-sized company in a spirit of partnership and are aware of our local social responsibility.

**Tradition & innovation:** We have been manufacturing top-class wire products since 1918. We have developed our long-standing tradition and experience in wire production to develop high-quality niche products for our target markets. By working sustainably, we are committed to taking responsibility for the future.

**Customer proximity:** Our network of production facilities in Europe, North and South America enables us to manufacture products locally and find economically viable logistics models for international customers. We work together with our customers in a spirit of trust and partnership.

**Competence & improvement:** Our diverse customers from all industries value our service and our consulting skills to solve current and future problems. Our processes are constantly kept up to date in order to meet the quality requirements of our global clientele with economical production.

**Social responsibility:** We are aware of our social responsibility and support local projects. A particular focus is on the education and support of socially disadvantaged children and young people as well as the promotion of local youth and popular sports.

Based on our successes to date, we are striving for continuous further development. Our strategic goal is profitable growth and securing our independence. We take the interests of our business partners, employees and shareholders into account and strive to do justice to them within the framework of our corporate strategy.



Figure 1: Quality police

## II Preamble Code of Conduct

We are aware of our special responsibility in view of our global presence and act accordingly. Throughout our supply chain, we expect the same social and environmental standards that we follow.

The Code of Conduct is intended to ensure that employees within the DDD supply chain are employed under conditions that uphold their respect and dignity. The requirements set out in the Code of Conduct represent minimum standards. If local law stipulates higher requirements, the applicable law takes precedence.

Our Code of Conduct explains DDD's position on human rights and environmental due diligence and the behavior we expect from our employees as well as from our suppliers and their subcontractors.

# 1. General principles

We recognize our social responsibility and commit ourselves and our suppliers to live up to this responsibility in all our business activities. Our activities, actions and decisions always follow the principle of legal compliance, i.e. compliance with the relevant legal and official requirements and regulations.

We are also guided by the principles of the United Nations (UN Global Compact):

- Human Rights (in accordance with the Universal Declaration of Human Rights): Protection of human rights, no complicity in human rights violations
- Labor (in accordance with the principles of the ILO): e.g. protect freedom of association, abolish forced labor, child labor and discrimination
- Environment: Support ecological and responsible action, promote environmentally friendly technologies
- Anti-corruption: avoid corruption in all forms, including extortion and bribery.

## 2. Social affairs

### 2.1 Labor & human rights

As an internationally active group, DDD is aware of its responsibility in dealing with its employees and makes an active contribution to the protection and safeguarding of human rights. The human rights of all employees must be observed and protected in accordance with the principles of the United Nations Global Compact, the United Nations International Bill of Human Rights, the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights and the core labor standards of the International Labor Organization (ILO). Physical and psychological harassment and the threat of physical and psychological harassment are fundamentally rejected.

### 2.2 Working conditions

Employees' freedom of movement must not be unreasonably restricted. Entering and leaving the work facility or common rooms must not be unreasonably restricted. Employees must have access to safe drinking water and sanitary facilities at all times. This must not be restricted. During pregnancy, the health of mother and child must be protected in accordance with international standards.

DDD respects the right of its employees to freedom of association and assembly within the framework of the applicable rights and laws. The company complies with labor standards with regard to the maximum permissible working hours and remuneration, in particular with regard to the level of remuneration, in accordance with the applicable laws and regulations. These include in particular the 5 principles of the International Labor Organization (ILO for short): Freedom of Association, Forced Labor, Child Labor, Discrimination and Occupational Health and Safety. The resulting 10 ILO core labor standards, which are intended to guarantee social standards within the framework of the World Trade Organization for decent working conditions and adequate occupational health and safety, are listed here with the number of the corresponding international convention:

1. ILO 29 Forced Labor (1930)
2. ILO 87 Freedom of Association and Protection of the Right to Organize (1948)
3. ILO 98 Right to Organize and Collective Bargaining (1949)
4. ILO 100 Equal Remuneration (1951)
5. ILO 105 Abolition of forced labor (1957)
6. ILO 111 Discrimination (work & occupation) (1958)
7. ILO 138 Minimum age of employees (1973)
8. ILO 182 Prohibition of the harmful effects of child labor (1999)
9. ILO 155 Occupational health and safety and working environment (1981)
10. ILO 187 Promotional framework for occupational health and safety (2006)

### 2.3 Child and forced labor

DDD does not tolerate child, forced and compulsory labor, modern slavery and human trafficking throughout its supply chain in accordance with internationally recognized standards. Children under the age of 15 may not be employed. The minimum age for employees is permanently observed and the regulations for the employment of minors are complied with.

### 2.4 Wages and social benefits

Employees' wages must be paid in compliance with the regulations and laws on minimum wages, overtime, bonuses and statutory social benefits. If employees are seconded or work is outsourced and in the case of temporary work, the locally applicable law must be observed.

## **2.5 Working hours and rest periods**

The weekly working hours shall comply with the maximum number of hours and vacation days in accordance with the locally applicable law. Appropriate and sufficient rest periods between working days must be ensured. In the event of pregnancy, the locally applicable law on maternity protection and maternity leave must be observed and complied with.

## **2.6 Equal treatment and non-discrimination**

No harassment of employees or unlawful discrimination is tolerated throughout the supply chain. Employees must not be discriminated against on the basis of race, ethnic origin, gender, religion or belief, disability, age or sexual identity. This list does not claim to be exhaustive. Working documents and information are provided in generally understandable language in order to avoid language barriers and the associated risks.

## **2.7 Freedom of association**

The right of employees to join trade unions and form works councils must be granted in accordance with local legislation. Trade unions may exercise the right to strike and the right to collective bargaining within the framework of local legislation.

## **2.8 Cooperation with employees and employee representatives**

For DDD, close and trusting cooperation with all employees and employee representatives is a key component and proven cornerstone of corporate policy. Joint teamwork is the basis of our success. The basis for this is mutual trust and cooperative cooperation. We maintain an open and constructive dialog characterized by mutual respect. We also expect this respectful approach from our suppliers.

## 3. Health and safety

### 3.1 Health protection and workplace safety

DDD ensures occupational health and safety in the workplace within the framework of national regulations, including mandatory compliance with the relevant national regulations on occupational health and safety. The company supports continuous development to improve occupational health and safety and expects this along the entire supply chain.

Emergency exits and fire alarm systems must be in place and subject to regular maintenance. If employees are exposed to potential safety or health hazards, these risks must be minimized through appropriate measures. These include technical and administrative controls, preventive maintenance, adherence to safe working practices and ongoing staff training. If it is not possible to eliminate the risks through the above methods, employees must be provided with the necessary personal protective equipment. It is important that employees are encouraged to raise safety concerns to promote an open and proactive safety culture.

### 3.2 Work area

The handling of chemical, biological, ergonomic or physical risks such as noise or extreme weather must be identified, evaluated and continuously monitored. Adequate control mechanisms and preventive measures must be implemented to minimize exposure to working materials. If the risks cannot be completely eliminated by the aforementioned measures, it is necessary to provide employees with appropriate personal protective equipment.

### 3.3 Emergency preparedness

In order to protect all employees in the supply chain, an efficient system for reporting emergencies must be implemented and established. Clear procedures must be established for evacuation in the event of an emergency. Ensure regular training and drills for employees to be prepared for emergencies. Appropriate fire detection and suppression equipment must be available and kept in working order. Additional necessary measures shall be taken if they are deemed necessary.

### 3.4 Occupational accidents and diseases

To ensure safety in the workplace, it is essential that occupational accidents and illnesses are prevented through established procedures and systems. In the event that incidents do occur, clear guidelines for handling, monitoring and reporting must be in place. Ensure that medical care is accessible and that employees who work with hazardous substances receive regular and free medical examinations. Incidents must be thoroughly investigated, and corrective action taken promptly to address the causes.

A safe working environment must be maintained for employees and safety precautions must be continuously improved.

### 3.5 Machine safety

It is essential that hazards that can emanate from plant and machinery are identified, assessed and continuously monitored. Appropriate instructions must be provided to reduce safety risks as far as possible. If the risks cannot be adequately mitigated by the above measures, appropriate guards, locks and barriers must be installed and maintained to ensure safety.

### **3.6 Personal protective equipment**

It must be ensured that every employee has personal protective equipment that is specially adapted to the respective work requirements. This includes protective footwear, gloves and, if necessary, suitable protective clothing such as heat protection suits, as well as head and eye protection. If required due to emissions, respiratory protection must also be provided. The protective equipment must be accessible to employees at all times. In addition, the handling and correct use of the equipment must be clearly communicated to everyone.



## 4. Environment

### 4.1 Environmental protection

Sustainable environmental and climate protection and resource efficiency are important to DDD. Compliance with legal regulations is an essential part of environmental protection. In addition, we ensure that all impacts on the environment and climate are kept to a minimum, both in the development of new products and services and in the operation of production facilities. It is the responsibility of all employees to avoid hazards to people and the environment, to minimize the impact on the environment and to use resources sparingly. It is necessary to implement environmental protection measures that cover the entire product range and all manufacturing processes. All phases of the product life cycle must be taken into account, from the procurement of raw materials, development and production through to disposal, recycling and noise reduction.

### 4.2 Environmental permits and reporting

All necessary environmental permits, approvals and registrations must be obtained in accordance with local regulations. It must be ensured that all official, legal and internal company requirements and reporting obligations are observed.

### 4.3 Conservation of resources

Efforts should be made to minimize the use of resources such as water and energy and to avoid the production of waste. In this context, it is important to train staff and raise their awareness of the sustainable use of resources.

### 4.4 Handling hazardous substances

It must be checked and assessed whether materials are used in the manufacturing process (e.g. chemicals) that are potentially harmful to health or the environment. All stages of the production process must be considered, including transportation, storage, processing, use, treatment and disposal. It must be ensured that only authorized and trained personnel work with these materials. In accordance with legal requirements, a list of hazardous substances must be kept and the obligation to provide signs must be complied with. We and our suppliers undertake to comply with all relevant legal provisions (Minamata Convention, POP Convention, Basel Convention). When using certain ingredients in products or in the manufacturing process that are restricted or prohibited by applicable laws, regulations or customer requirements, prior identification, verification and compliance must be carried out. Labeling requirements for disposal and recycling must be followed. Hazardous ingredients in products must always be labeled.

### 4.5 Waste treatment and recycling

The disposal of waste and by-products must at least comply with local laws and should be recycled as far as possible. Wastewater must be treated or, if not otherwise possible, disposed of separately from contaminated water. The efficiency of wastewater treatment plants must be checked regularly.

### 4.6 Emissions

Emissions of substances such as chemicals, caustics, particulates, aerosols and combustion products should be minimized and monitored in accordance with local legislation. Existing exhaust gas purification systems must be regularly and professionally maintained, repaired and, if necessary, replaced. Emissions must be kept as low as possible. The goals of the Paris Climate Agreement are

actively supported by systematically avoiding or reducing greenhouse gas emissions. The goal of climate neutrality by 2050 must be pursued along the entire supply chain. On request, suppliers provide reports on their carbon footprint in accordance with the GHG Protocol Corporate Standard Scope 1-3.

#### **4.7 Water protection**

It must be ensured that rainwater run-off is not contaminated. To this end, it must be ensured that no illegal discharges take place in the operating facilities and that no leaked liquids enter the wastewater system. Appropriate instructions must be posted and employees must be adequately informed.

#### **4.8 Forced evictions**

Unlawful forced evictions and the unlawful seizure of land, forests or bodies of water are prohibited. The purchase, development or use of land, forests and waters is also prohibited if these are necessary for people's livelihoods.

## 5. Market behavior

### 5.1 Business integrity

We strictly reject all forms of corruption, bribery, money laundering, extortion and embezzlement. When dealing with business partners and state institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Decisions are made free of extraneous considerations and personal interests. The applicable criminal law on corruption must be observed. Among other things, the following must be observed:

The granting of personal advantages by the company and its employees to domestic or foreign public officials (such as civil servants or employees in the public sector) with the aim of obtaining advantages for the company or themselves or third parties is not permitted. Personal benefits of monetary value in return for unfair preferential treatment in business dealings between companies may not be offered, promised, granted or approved. Similarly, personal advantages of value may neither be demanded nor accepted in exchange for unfair preferential treatment in business dealings with business partners.

### 5.2 Disclosure

Disclosures and records must comply with local laws, data protection regulations and standard industry practices. Business processes must be clearly and accurately presented in the documents.

### 5.3 Protection of intellectual property

Intellectual property rights must be respected and protected. Any transfer of knowledge must be designed in such a way that intellectual property rights and all customer information are protected (e.g. through confidentiality agreements, encrypted data transfer). It is ensured that all products and services along the supply chain are authentic and that their development, production and use do not infringe any third-party rights, in particular intellectual property rights.

### 5.4 Confidentiality and insider knowledge

DDD shall respect and protect the business and trade secrets of others. Confidential information and confidential documents may not be passed on to third parties without authorization or made accessible in any other way. Unless an authorization has been granted, the information is publicly accessible or an enforceable decision by an authority or court compels it. All relevant laws and regulations on insider trading must be observed and complied with.

### 5.5 Antitrust and competition law

DDD respects fair competition. Therefore, the applicable laws that protect and promote competition are observed, in particular the applicable antitrust laws and other laws regulating competition. In dealing with competitors, these regulations are intended in particular to prohibit agreements and other activities that unfairly influence prices or conditions, unlawfully allocate sales territories or customers or unlawfully impede free and open competition. These regulations also prohibit unfair agreements between customers and suppliers that are intended to restrict customers in their freedom to determine their own prices and other conditions for resale (price and condition fixing). Any existing dominant market position is not exploited.

### 5.6 Whistleblowers

Programs are in place to protect whistleblowers and ensure the anonymity and confidentiality of their information. Whistleblowers are persons who provide information about improper or unethical behavior

by employees of a company or public officials. Employees can raise concerns within the framework of local legislation without fear of reprisals.

### **5.7 Conflict Minerals**

Programs are maintained that regulate the appropriate sourcing of minerals such as gold, tantalum, tungsten, tin, cobalt, mica and their derivatives from conflict-affected or high-risk areas without being involved in conflict, financing of armed groups, serious human rights abuses, money laundering or fraud. The procurement of minerals and raw materials must comply with local laws and the requirements of the international community and be carefully monitored. Monitoring measures must be disclosed upon request.

### **5.8 Data protection and cyber security**

Confidential information about DDD and business partners may not be disclosed to third parties without prior consent. All employees are obliged to keep this information confidential. When using confidential data, data protection and security of business and personal data as well as trade secrets must be ensured. Data processing systems must be protected against unauthorized access. DDD expects suppliers to comply with local legal requirements for data security. Data protection requirements must be updated regularly.

### **5.9 Fair international trade**

DDD is a globally active group of companies that must comply with regulations restricting the free movement of goods in its worldwide business activities. Compliance with international and national laws and regulations governing international trade and financial transactions, including export and import controls, embargoes and regulatory approval requirements, is mandatory. Responsible employees must know and comply with all relevant laws and regulations. To prevent violations and ensure punctual deliveries, all relevant data must be submitted correctly and on time. In the absence of national export control laws, orientation to US export control regulations is recommended.

### **5.10 Business accounting**

All financial transactions must be entered accurately and properly in the books and records. No erroneous or fictitious entries may be made for any reason whatsoever.

## 6. Responsibility within the supply chain

### 6.1 Responsibility in the supply chain

The supplier recognizes its responsibility in the supply chain and acts accordingly.

### 6.2 Transfer of obligations

The supplier undertakes to fulfill the human rights, environmental and other obligations set out in this Code and to ensure that these are also observed by its agents, subcontractors or other third parties in its area of responsibility. It shall bind its direct suppliers to compliance with these requirements by means of contracts.

### 6.3 Dealing with violations

In the event of violations or reasonable suspicion, the supplier shall inform DDD immediately. This shall also apply if there are indications that a direct or indirect supplier or another company in the supply chain is in breach of the obligations set out in the Code. In such cases, appropriate investigations and corrective measures must be initiated immediately and DDD must be informed. DDD will follow up on these indications and initiate, demand and monitor the necessary corrective measures. The supplier shall fully support DDD in this.

### 6.4 Documentation and risk management

The Supplier shall document compliance with the above obligations and retain this information for an appropriate period (at least seven years). This information shall be available to DDD on request at any time, preferably in German or English. In addition, the supplier shall cooperate fully with DDD, even if authorities or customers request information from DDD. The supplier is obliged to carry out regular checks and to implement an appropriate risk management system. This should be capable of identifying risks, taking measures, dealing with them and documenting them appropriately. Upon request, the supplier must report to DDD on these measures to the necessary extent.

Dorsten, 24<sup>th</sup> September 2024