

SUPPLIER CODE OF CONDUCT

Ethical and legal rules
for the suppliers of Dockweiler AG



1 Foreword

Dockweiler strives to manufacture and market high quality products that meet the quality requirements of our customers. It is a matter of course for us to conduct all global activities in accordance with professional business practices. Values such as respect, commitment, quality and sustainability are basic requirements for us in our own operations and our supply chain.

Our suppliers and service providers (hereinafter referred to as „suppliers“) are responsible for behaving in accordance with the principles set out in the Code of Conduct and for helping to ensure that these principles are practiced in day-to-day dealings within the company

The following rules of conduct form the foundation of our Supplier Code of Conduct:

- Respect for **human rights**
- fair, honest and **ethically correct behavior**
- Compliance with the relevant **legal requirements, standards and regulations**
- Responsibility towards the **environment**

Accordingly, Dockweiler AG is also committed to the United Nations Global Compact, the OECD (Organization for Economic Cooperation and Development) Guidelines for Multinational Enterprises and the Code of Conduct of the Electronic Industry Citizenship Coalition (EICC).

In January 2025

The Management Board of Dockweiler AG

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2. Introduction

We support the United Nations International Bill of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention against Corruption in accordance with the ten principles of the United Nations Global Compact, in which we participate. We are committed to complying with these principles as well as the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. We expect the same from our suppliers.

We encourage our suppliers to continuously improve and to introduce, implement and maintain recognized management systems and standards in relation to the areas described in this Supplier Code of Conduct (herein also the "Code"). Risk assessments, implemented policies, processes and programs, clearly communicated roles and responsibilities, appropriate training and instructions, the establishment and evaluation of measurable objectives and functioning control systems form the basis for successful implementation of the Supplier Code of Conduct. Employees must have the right to report concerns about compliance with laws or company policies/regulations to their employer without fear of retaliation.

Implementation and compliance

When reviewing whether a supplier complies with the Supplier Code of Conduct, Dockweiler considers the scope and applicability of the requirements in relation to the nature of the supplier's business and the associated risks. Additional supplier-specific sustainability requirements and targets may be defined in business agreements. If the supplier denies Dockweiler the right to verify compliance with the Supplier Code of Conduct or fails to correct identified violations within a reasonable period of time, this constitutes a material breach of the Supplier Code of Conduct. In this case, Dockweiler is entitled to terminate the contractual relationship with the supplier.

All business relationships between Dockweiler and its suppliers should be based on honesty, trust and cooperation. By accepting the Supplier Code of Conduct, the supplier undertakes to comply with these requirements in its operational processes and in its supply chain. This is to be achieved through transparent cooperation with Dockweiler. Suppliers must also be able to demonstrate compliance with the requirements upon request. Dockweiler may verify whether the supplier complies with the requirements of the Supplier Code of Conduct through discussions, self-assessment questionnaires or on-site audits. This includes Dockweiler's right to interview employees and obtain access to accurate and complete documents and records related to the Supplier Code of Conduct. Any audits or inspections conducted by Dockweiler at the supplier's supplier shall be conducted in consultation with the supplier. The supplier must ensure that its suppliers comply with the requirements of the Supplier Code of Conduct or similar requirements and must review and monitor its supply chain compliance. If a supplier finds itself in a situation that is or appears to be inconsistent with the Supplier Code of Conduct or applicable law, Dockweiler must be informed promptly. The situation can be jointly assessed and possible solutions for compliance with the Supplier Code of Conduct can be agreed so that Dockweiler can continue to act as an ethical and sustainable company. Violations of the Supplier Code of Conduct must be reported to Dockweiler either via the purchaser at Dockweiler, the compliance contact person (compliance@dockweiler.com) or via our whistleblower office at www.dockweiler.com. Dockweiler treats all business and personal information we receive responsibly and takes reasonable measures to ensure the confidentiality of this information.

3. Compliance with legal regulations

Suppliers shall ensure that all their officers, employees, subcontractors and third parties they use to perform their duties for Dockweiler are aware of and comply with the legal requirements applicable to all their activities. In addition, they will establish a robust monitoring system to ensure compliance with all legal and ethical requirements of working for Dockweiler. This is the basis for compliance with the Supplier Code of Conduct.

3.1 Measures to ensure compliance

The Supplier Code of Conduct of Dockweiler AG contains the standards for conducting business in legal and ethical terms as determined or adopted by Dockweiler AG (hereinafter referred to as „Dockweiler“).

Suppliers must always be informed about and comply with national and regional laws as well as relevant and applicable international regulations and conventions that relate to the areas covered by the Supplier Code of Conduct.

Suppliers must be able to recognize when a national regulation or its implementation violates international human rights standards and must ensure that generally accepted human rights are respected.

If the requirements of the Supplier Code of Conduct are more stringent than local applicable laws, the requirements of this Supplier Code of Conduct shall prevail. In the event of actual or potential inconsistencies between the Supplier Code of Conduct and applicable laws and regulations, suppliers must inform Dockweiler.

Suppliers must create an internal, risk-based compliance system that meets the requirements for effective monitoring of compliance with legal requirements based on the respective risk. This includes training, regular checks and documentation of violations and the measures taken to rectify them.

In the event of infringement and non-compliance with the Supplier Code of Conduct, Dockweiler may demand remedial action and terminate the supplier relationship in the event of non-compliance. In this case, Dockweiler reserves the right to claim damages.

Examples of violations and non-compliance with the Supplier Code of Conduct are:

- General violations of the Code or other company guidelines;
- Inciting third parties to violate the Code or other company policies;
- Failure to promptly report known or suspected violations of the Code or other company policies;
- Measures to conceal or cover up known or suspected violations of the Code or other company policies;
- Knowingly spreading false facts or suspicions;
- Measures to the detriment of third parties who report or suspect violations of the Code or
- Violations of the respective legislation or actions that result in civil or criminal consequences for Dockweiler (claims for damages or fines or fines or prison sentences).

4. Occupational health and safety

Dockweiler's principle is „Zero Injuries“ (no human life is harmed).

Suppliers must ensure a safe and healthy working environment and take all feasible measures to prevent accidents and injuries.

Suppliers are required to take an appropriate, risk-based approach to health and safety, e.g. by providing relevant instructions and trainings that are easily understood by all employees.

Employees must be able to refuse a work situation if they have reasonable grounds to believe that it poses an immediate and serious risk to their health and safety.

To ensure compliance with fire safety and hygiene regulations, all workplaces, and in some cases also accommodation and canteens, must be inspected regularly.

If accommodation is provided, each employee has the right to their own bed and a separate sleeping area for the gender with which they identify.

5. Human and labor rights

Respect for human and labor rights is of great importance to Dockweiler. This includes the fair, humane and respectful treatment of employees. At the same time, we must avoid violating human and labor rights or contributing to their violation.

5.1 Human rights due diligence

Suppliers must consider the human rights impacts that they cause or contribute to, or that are directly linked to their business practices, products and services, and take action to address these impacts.

5.2 Child labor

Dockweiler does not tolerate any form of child labor. Suppliers must ensure that no child labor is used in their operations and supply chain and that the working conditions for young employees comply with legal requirements.

If child labor is detected, corrective measures must be taken for the benefit of the child.

Employees must be at least 15 years old (or 14 years old if this is permitted under national law) or older if national law prescribes a higher minimum age.

Young employees (under the age of 18) may not perform any work that poses a risk to their psyche, body, social environment or morals or that prevents them from fulfilling their compulsory education. Young employees are not permitted to work the night shift.

5.3 Modern slavery

Dockweiler does not tolerate any form of modern slavery, including forced labor, debt bondage, servitude, employment under false pretenses, chattel slavery and human trafficking. This refers not only to any form of involuntary labor, but also to cases of coercion, mental and/or physical threat or abuse, abuse of power and deception.

Suppliers and their personnel service providers or other third parties involved may not participate in or tolerate the following activities:

- Restrictions on freedom of movement;
- Excessively high agency fees or cash payments;
- Confiscation of identity documents and/or passports;
- Withholding of wages;
- Unacceptable working conditions;
- Debt bondage;
- Violence;
- Any form of forced, compulsory or illegal labor, including human trafficking, prison labor, child slavery or debt bondage or
- Any other form of exploitation or abuse.

5.4 Discrimination, coercion and rough or inhumane treatment

Dockweiler does not tolerate discrimination in the workplace. Inclusive and diverse teams contribute to better performance and better results for the company.

Suppliers must respect the personal dignity, privacy and rights of every employee and must not tolerate any physical or psychological harassment or abuse, whether verbal or non-verbal.

Suppliers must prohibit behavior, language and physical contact that is sexual, coercive, threatening, violent or exploitative.

Suppliers shall not unjustifiably discriminate in hiring or during employment on the basis of age, nationality or ethnic origin, religion, political opinion, sexual orientation, gender identity or expression, physical ability or any other characteristic protected by law or ILO conventions, either actively or through passive support.

Suppliers must offer effective whistleblower opportunities.

5.5 Working hours and remuneration

Reasonable working hours and fair pay are essential components of decent working conditions. Sufficient rest breaks and time away from work prevent injuries in the workplace and increase efficiency.

Working hours, overtime, breaks and vacation must comply with the applicable statutory or collectively agreed provisions. Excessive overtime must not become the rule. As a minimum requirement, employees must be paid wages and benefits in accordance with the applicable statutory provisions or collective agreements. Employees must be informed about their working conditions, including their rights and obligations, in their native language or in a language they understand. This may take the form of a written employment contract, for example. Suppliers are encouraged to create family-friendly working conditions that enable a healthy work-life balance, e.g. by providing childcare facilities and leisure activities where appropriate.

5.6 Freedom of association and collective bargaining

Dockweiler promotes freedom of association and the right to organize and bargain collectively peacefully and in accordance with the law. We encourage our suppliers to engage in dialog with their employees to promote and support participation in the workplace.

Suppliers must recognize and respect the right of their employees to freely associate, organize and bargain collectively as provided by law in the countries in which they are employed. Suppliers must recognize the importance of open communication and direct participation between employees and management. Suppliers must allow workers to appoint independent worker representatives and communicate openly with management about working conditions without fear of coercion, intimidation, sanctions, negative influence or retaliation. In turn, the decision of employees not to participate in employee organizations must be respected.

5.7 Land acquisition, procurement of resources and use of property

The importance of land and land rights for the eradication of poverty, income disparities and gender inequalities is undisputed. They also contribute to food supply, peace and security.

Suppliers must be legal owners or users of the land on which they operate.

Suppliers must avoid negative social, health, environmental or economic impacts resulting from the acquisition of land or the procurement of resources. This also applies to forced resettlement or restrictions on use.

In the event of expropriation or forced resettlement, suppliers must ensure that a plan of action is negotiated transparently, particularly with regard to appropriate compensation. The aim should be to preserve the livelihoods and living standards of the people affected.

6. Environment

Dockweiler attaches great importance to protecting the environment, mitigating climate change and promoting the circular economy. The impact of business activities on the environment should be minimized and the environmental balance continuously improved. This includes the protection of biodiversity and ecosystems, the sustainable use of resources, the responsible ownership and acquisition of land and the responsible use of land.

Suppliers must introduce, implement and maintain risk assessments to reduce or minimize the negative impact of their activities, products and services on the environment.

Suppliers are obliged to take preventive measures if it can be assumed that an action may harm the environment or public health. They must endeavor to develop and promote environmentally friendly practices in their products, processes, designs and choice of materials.

Suppliers must pay for the social, ecological and economic costs arising from environmental damage caused by their business activities. Suppliers must monitor, measure, document and plan their activities in order to minimize the environmental impact of their business activities, particularly in the following areas:

- Greenhouse gas emissions;
- Circular economy;
- Chemicals and hazardous substances;
- Waste;
- Other emissions to air, water and soil;
- Energy consumption or
- Water consumption

Dockweiler encourages its suppliers to set greenhouse gas reduction targets that are in line with the Paris Agreement. These targets should be based on scientific evidence. Suppliers with a potentially significant impact on Dockweiler's overall greenhouse gas emissions must inform Dockweiler accordingly.

7. Business ethics

Dockweiler aims to maintain business relationships with a high level of ethical integrity. This includes compliance with competition law, protection of privacy and compliance with customs and export control regulations. This is also what we expect from our suppliers.

7.1 Fair trade

All employees must endeavor to deal with customers, suppliers and competitors in a fair and trustworthy manner. Unfair behavior through manipulation, embezzlement, misuse or misrepresentation of confidential or sensitive information or other unfair practices to the detriment of third parties must be avoided. Manipulation also includes bribery or material or financial influence to obtain business deals.

7.2 Competition law

Suppliers must always negotiate contracts in accordance with the principles of fair competition and with the utmost care, regardless of the form of contract. Suppliers may not enter into any formal or informal contracts or agreements that have the purpose or effect of hindering or restricting competition. Furthermore, no contracts or agreements may be concluded that violate applicable competition or antitrust law. If suppliers have a special market position or other special opportunities to exert influence, they may not use these unjustifiably without objective reason.

7.3 Protection of personal data

Suppliers must comply with all applicable personal data protection principles and may only use personal data when it is lawful and necessary for legitimate business purposes.

7.4 Anti-corruption and money laundering

Suppliers must comply with local laws and international anti-corruption conventions and must not engage in or involve Dockweiler in any form of corruption. Suppliers must not offer anything of value to Dockweiler employees or third parties, such as subcontractors or government officials, for the purpose of improperly influencing them. Suppliers must avoid conflicts of interest when working with Dockweiler and inform Dockweiler of any potential conflicts of interest that cannot be avoided. Suppliers must participate in Dockweiler's due diligence process for suppliers and ensure transparency, quality and speed.

The same applies to the training and strict monitoring of all persons and companies involved in the process with regard to the prevention of money laundering. Suppliers undertake to take all standard precautions to avoid participating in money laundering. This in turn includes training and monitoring measures.

7.5 Trade compliance

Suppliers must maintain and disclose accurate trade data and documentation related to their products. Suppliers must comply with local laws and international sanctions regulations and must not participate in sanctions violations or cause Dockweiler to participate in sanctions violations.

Suppliers undertake to keep themselves informed with regard to sanctions, goods and embargo lists, to introduce control mechanisms and to react immediately to any irregularities. Suppliers shall comply with all applicable export and import regulations. Suppliers shall inform Dockweiler immediately of any problems, in particular their own inclusion in sanctions lists. In this case, Dockweiler may terminate the cooperation immediately.

8. Acceptance of the supplier

Acceptance of the supplier

I/We, the undersigned and authorized representative(s) of the Supplier, hereby confirm that the Supplier accepts and complies with the Supplier Code of Conduct.

Full name of the company:	
Address of the company:	
VAT ID / VAT number:	
Location:	
Date:	
Name:	Name:
Position:	Position:
e-mail:	e-mail:
Signature:	Signature:
Stamp of the company:	

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