

# Code of Conduct for Corporate Social Responsibility

## DBK David + Baader Group

### Preamble

DBK David + Baader Group (hereinafter called "DBK") affirm their Corporate Social Responsibility as a part of their global business activities (internationally known as "CSR™"). DBK's Code of Conduct for Corporate Social Responsibility" (hereinafter called "CoC") acts as a guideline to enhance the quality of life for individuals and safeguard the livelihoods of current and future generations through economically, ecologically, and socially responsible actions. This sense of responsibility is ingrained in our Corporate Policy, and our endeavours to act in an economically sound and responsible manner benefit both, society, and the environment.

DBK is fully committed to upholding internationally recognized human rights and social standards throughout its value chain. The social and environmental standards and practices outlined in this document are founded upon the Ten Principles of the United Nations Global Compact, the International Bill of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

Our business partners play a crucial role in achieving these objectives. We consider a shared commitment to ethical values and sustainable practices to be essential for our collaboration.

This CoC and its requirements and principles are integral to contractual obligations and the collaboration between our business partners and DBK. Therefore, our business partners are obligated to adhere to and promote the following principles of this CoC. They are also expected to provide regular and suitable training to their workforce to ensure compliance. Furthermore, the contents of this CoC shall be fully applicable to suppliers and other third parties engaged by our business partners to fulfil contracts with DBK. Hence, our business partners must incorporate requirements consistent with this CoC into their own respective contracts. We anticipate their diligent efforts in ensuring that their suppliers and other third parties also adhere to these requirements.

### 1. Where the CoC applies

This CoC is in effect for all of the undersigned company's branches and business units worldwide.

The undersigned company commits to promote adherence to the content of this CoC at every point it can for its suppliers and in other parts of the value chain.

### 2. Core Values for Social Responsibility in Corporate Management

The undersigned company will proactively work to ensure that the values mentioned below are put into practice and adhered now and in the future.

#### 2.1. Adherence to Laws

The undersigned company will abide by the laws in effect and other legal requirements of the countries where it is in business. For countries that have a weak institutional framework, the company will carefully examine what good company practices from their

home country should be applied to enable supportive, responsible company management.

This includes the timely payment of taxes and customs duties, compliance with fair competition and antitrust laws, the prohibition of corruption and money laundering, adherence to state-of-the-art practices, obtaining all necessary official authorizations, compliance with export control regulations, and the avoidance of infringement upon the legal rights of third parties, as well as laws protecting social and environmental standards.

## 2.2. Integrity and Organizational Governance

The undersigned company gears its activities towards universally held ethical values and principals, especially integrity, honesty, respect of human dignity, openness and non-discrimination based on religion, ideology, gender and ethnicity.

The undersigned company rejects corruption and bribery as stated in the relevant UN Convention. It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability.

The undersigned company pursues clean and recognized business practices and fair competition. In regard to competition, it focuses on professional behaviour and high standards of quality for work. It fosters partnership and trusting interaction with the supervisory authorities. Additionally, it will hold to the parameters of the "Guide for our Association Activity - Instructions for Compliance with Competition Law in the ZVEI".

## 2.3. Forced Labor

The undersigned company is strictly committed to the principle of freely chosen employment. Therefore, it rejects any form of forced labor, which includes practices such as human trafficking, torture, slavery and any other form of forced labor. These principles must be respected and upheld.

## 2.4. Human Rights, Health and Safety

The undersigned company is committed to promote human rights by consistently uphold and actively protect internationally recognized standards for human rights. The United Nations Guiding Principles on Business and Human Rights serve as the foundation for this commitment. This includes safeguarding the rights of local communities, indigenous peoples, and human rights defenders.

Furthermore, ensuring health and work safety, especially the guarantee of a safe and health-promoting work environment and hygiene standards, avoiding accidents and injuries is obligatory. The undersigned company follows the rules and regulations on occupational health and safety. It strives to improve the working environment with regard to health and safety at work and continuously takes appropriate measures to this end.

## 2.5. Child Labor

The undersigned company pledges to respect and to uphold the dignity and rights of children and does not tolerate any form of child labor. Compliance with ILO Conventions No. 138 on the Minimum Age for Employment and No. 182 on the Elimination of the Worst Forms of Child Labor is mandatory. Therefore, the company commits to only employ individuals who have reached the minimum legal age for work (as set out in the relevant laws in their respective countries).

## 2.6. Freedom of association

The undersigned company respects the fundamental right of employees to form and join employee representation bodies or trade unions of their own free choice. Membership in those organizations must not result in unjustified discrimination. The right to engage in



collective bargaining to settle disputes related to working conditions, as well as the right to strike, must be granted in accordance with the applicable statutory provisions and in alignment with ILO Convention No. 98.

#### 2.7. Fair treatment and equal opportunities

The company hereby firmly opposes any kind of discrimination, encompassing race, ethnicity, age, nationality, social background, disability, sexual orientation, gender, religious affiliation, political beliefs, or engagement in trade union activities. Likewise, any form of harassment is strictly condemned. It is imperative to uphold the principle of equal pay for work of equal value, regardless of gender, if the job requirements and tasks are comparable. Adherence to pertinent ILO conventions is required. These guiding principles are also the basis of the recruiting policy.

#### 2.8. Fair working conditions

The undersigned company pays their employees a reasonable wage and provides social benefits that meet or exceed the rates prescribed by national or regional authorities, legal standards, or other labor agreements. Furthermore, it guarantees the right to fair working conditions as defined by the applicable ILO conventions. Compliance with minimum wage regulations in respective countries, as well as adherence to regulations regarding working hours, breaks, and vacation entitlements, is expected.

#### 2.9. Work Climate, Prohibition of Bullying and Sexual Harassment

In accordance with the principles of law and equity, any form of bullying, sexual harassment and comparable conduct are expressly prohibited. Every employee is required to refrain from such conduct.

Bullying is the systematic hostility, harassment or discrimination of employees against each other, by supervisors or by the employer. The assessment of whether bullying has occurred in a specific individual case is based on an evaluation of the overall circumstances.

Sexual harassment in the workplace is any intentional, sexually oriented behavior that violates the dignity of employees in the workplace. This includes sexual acts and modes of negotiation that are punishable under criminal law, as well as other sexual acts and requests for such acts, sexually explicit physical touching, remarks of a sexual nature, and the display and visible attachment of pornographic images that the person concerned recognizably rejects.

#### 2.10. No forced eviction and land deprivation

The undersigned company undertakes not to engage in unlawful evictions and not to participate in any unlawful taking of land, forests or waters by acquisition, development or other use.

#### 2.11. Ban of the use of security forces

The undersigned company commits to not utilize or employ private or public security personnel if there is a risk of violating the prohibition of torture, cruel, inhuman, or degrading treatment, endangering life or limb, or infringing upon the freedom of association due to a lack of instruction or control on the part of the company.

### 3. **Environment**

Conscious dealing with our environment and people is our responsibility. We are undertaken to protect the environment and minimize the impact of our operations through

sustainable measures. We target to ensure minimal impact on the complete environment to improve animal welfare, soil quality and reduce land use and deforestation.

Regarding to the use of resources, especially water and (fossil) energy, we are committed to use them carefully and will constantly increase our energy-efficiency. Furthermore, we target to increase the use of renewable energy, reduce Greenhouse gases (GHG)- and noise-emissions and promote decarbonization, re-use of materials, reduction of waste and recycling in our business processes wherever possible.

Access to sanitary facilities and drinking water is granted without exception. Materials are saved and or reused wherever possible. We also expect this kind of resource management in a business relationship.

As a matter of principle, we undertake to enforce with all applicable statutory provisions and authorities' requirements regarding air and soil quality, material disposal and prohibition or restriction of specific substances.

#### **4. Business Relations**

##### **4.1. Avoidance of conflicts of interest**

The undersigned company (including its employees) avoids any conflicts of interest between personal interests and the interests of the company. It discloses any potential conflicts promptly and takes appropriate actions to resolve them. Business decisions are based solely on objective criteria and avoid favoritism or bias. If a business partner becomes aware of a potential conflict of interest, they should take internal measures to address the conflict and promptly notify DBK.

##### **4.2. Financial responsibility**

The undersigned company is committed to financial responsibility and has implemented an accurate records policy to ensure proper documentation of all financial transactions. This policy is essential to maintain the integrity of the financial reporting and ensure the compliance with all applicable laws and regulations.

##### **4.3. Fair Business Practices**

The undersigned company competes fairly and ethically in the marketplace. It does not engage in anti-competitive practices, such as price-fixing, bid-rigging, or market allocation. It respects our competitors, customers, and suppliers and foster mutually beneficial relationships based on fairness, transparency, respect for intellectual property rights and strict ban of counterfeiting. Behavior in accordance with all applicable statutory regulations is binding.

##### **4.4. Anti-Corruption**

The undersigned company commits to comply with anti-corruption laws and regulations. It must ensure that it's employees, subcontractors, or representatives reject and prevent all forms of corruption, including what are known as facilitation payments (payments to speed up the performance of routine tasks by officials). They do not grant, offer or accept bribes, kickbacks, improper donations or other improper payments or benefits to or from DBK, customers, officials or other third parties.

##### **4.5. Anti-Money Laundering**

The undersigned Company ensure compliance with the applicable legal provisions against money laundering within their business operations.



#### 4.6. Conflict minerals

The undersigned company refrains from any activities that directly or indirectly contribute to the financing of armed groups. Therefore, the supply chain must be free of raw materials extracted in conflict or high-risk areas.

#### 4.7. Data privacy and security

Our partners commit to respect the right to informational self-determination, ensuring the privacy of personal data, and maintaining the security of all business information and personal data in accordance with applicable laws and regulations governing privacy and information security.

The undersigned company handles personal data and sensitive information with the utmost care, in compliance with applicable privacy laws and regulations. It protects the privacy and confidentiality of personal information entrusted to it and ensures appropriate security measures are in place to prevent unauthorized access, loss, or misuse of data.

#### 4.8. Customs and import-/ export control regulations

The undersigned company undertakes to comply strictly with all applicable customs and import- /export control regulations / - sanctions and proactively share foreign trade-related information to ensure a secure supply chain. Business partners ensure that all taxes, duties, and royalties levied in connection with the mining, trade and export of minerals in conflict and high-risk areas are remitted in accordance with respective applicable law.

### 5. **DBK Whistleblower System**

We encourage all business partners, their employees and affected parties to report any suspected cases or violations of this Code of Conduct. Such reporting helps mitigate the consequences of violations and prevents future misconduct. Business partners should establish their own whistleblower systems or participate in an industry-wide system. DBK can be notified via email or phone. <https://dbk.hinweisgeberexpertemeldeplattform.de/en>.

### 6. **Compliance with the CoC**

We know and understand our Code of Conduct. Act in accordance with them and thus contribute to fair business conduct. Compliance with our Code of Conduct is the base for any kind of cooperation.

It represents a standard not only for us, but also for our customers, suppliers, and business partners. DBK reserves the right to review the Code of Conduct as appropriate. Both internal and external audits of customers, suppliers and business partners are possible. Violations or even a dereliction of the Code of Conduct must be reported immediately. A violation generally constitutes a breach of contract. The party violating the obligation of the conduct undertakes to submit an appropriate action plan to effectively end the violation.

Rülzheim, 19.09.2023



Dr. Stratmann, managing director