DEHN Code of Conduct for Business Partners

Content

Preamble 3

1. Scope 4

2. Cornerstones of responsible corporate governance 4

2.1. Compliance with the law and regulations 4
2.2. Prevention of corruption 4
2.3. Avoiding conflicts of interest 5
2.4. Free and fair competition 5
2.5. Anti-money laundering measures and financial integrity 5
2.6. Protection of intellectual property rights 5
2.7. Protecting confidential information und data protection 6
2.8. Embargoes and sanctions lists 6

3. Corporate social responsibility 7

3.1. Human rights and social and working conditions 7
3.2. Anti-discrimination 8
3.3. Protection of livelihoods 8
3.4. Responsible use of private security forces 8
3.5. Responsible procurement of raw materials 8
3.6. Compliance with applicable environmental standards 9
3.7. Environmental product requirements 9
3.8. Careful use of water 10
3.9. Protecting natural ecosystems 10
3.10. Hazardous substances and waste 10
3.11. Climate protection 11
3.12. Reducing the demands on natural resources 11

4. Reporting breaches 12

5. Compliance, monitoring and Sanctions 12

Preamble

Dear Sir or Madam,

„"DEHN protects" – this short, concise motto reflects the promise that has served both as an obligation and an incentive to our company, which has now been run by the Dehn family for four generations. A promise which we keep day after day with passion and expertise – for our customers, business partners and staff.[1)]

In line with our motto, the DEHN brand name stands for high-quality and innovative products and solutions worldwide. Passion, the highest quality standards, a willingness and ability to perform and a strong customer and market orientation define our actions. These characteristics have made us a global market leader. With vision and a pioneering spirit, enthusiasm and expertise, we are driving forward developments in our areas of activity and want to continue to be not only a competent and honest partner for our customers in the future, but also a reliable and forward-looking solution provider.

In order to meet the increasingly complex challenges of a globalised world, such as the procurement of raw materials, changes in natural living conditions and climate change, we see it as our ever-growing responsibility to ensure that our products and solutions are based on ethical, legal and socially responsible action throughout the entire value chain.

We adhere to high standards and expect the same from our partners. Our basic requirements for an honest, fair and responsible business relationship can be found in the following DEHN Code of Conduct for Business Partners. We look forward to building and expanding our business relationships with you according to these standards.

The Executive Board of DEHN SE

1) So as not to cause any offence and in the interests of inclusion, we have avoided the use of gendered pronouns and references in this document.

1. Scope

The DEHN Code of Conduct for Business Partners applies to all branches and business units of the signatory business partner worldwide, insofar as it applies to the respective business activities of the business partner.

Unless the following provisions contain stricter regulations, the undersigned business partner is obliged to take appropriate action to ensure compliance with the contents in this code, also by its partners and along the supply chain.

2. Cornerstones of responsible corporate governance

2.1. Compliance with the law and regulations

Our business partners comply with the laws applicable to them in their own business areas and in their business relationships with their suppliers and subcontractors.

2.2. Prevention of corruption

We firmly believe that our products can hold their own against rival products on their own merits. We reject all forms of bribery and corruption. Corrupt market players must expect considerable sanctions worldwide. Our business partners therefore ensure that they comply with applicable corruption laws and regulations and that they refrain from directly or indirectly accepting or offering advantages to business partners and public officials, regardless of apparent local customs, even if the granting of an advantage might only appear to unfairly influence business decisions or official actions. Furthermore, our business partners assure that they do not commit any other criminal offences in connection with the business relationship with DEHN.

2.3. Avoiding conflicts of interest

We cultivate professional business relationships with all market participants. Business decisions are only orientated towards corporate success if they are not influenced by the personal interests or considerations of individuals. We therefore require our partners to base their decisions on objective considerations and not be guided by personal interests. In the event of conflicts of interest that may affect the business relationship between us and our partners, we expect our partners to inform us immediately.

2.4. Free and fair competition

It goes without saying that DEHN adheres to the rules of free and fair competition and complies with the associated provisions of antitrust and competition law. For this reason, our business partners undertake to respect fair competition and to comply with the applicable competition and antitrust laws.

2.5. Anti-money laundering measures and financial integrity

We oppose all forms of money laundering. Money laundering – i.e. smuggling money from illicit sources into/through legitimate financial channels to give the appearance of legality – is a criminal offence in almost all countries owing to the serious economic consequences and carries severe penalties for all those involved. DEHN avoids any involvement in money laundering and will do whatever is necessary to prevent it. Our business partners must therefore ensure that they comply with the relevant statutory provisions on the prevention of money laundering and fulfil their reporting obligations properly.

2.6. Protection of intellectual property rights

We expect our business partners to respect both our intellectual property and that of third parties, to comply with all nationally and internationally applicable laws on the protection of intellectual property and to have all necessary rights of use in order to avoid infringements of intellectual property rights.

2.7. Protecting confidential information und data protection

Innovation and technical advancement are a key factor to DEHN's success. In order to protect the value of our research and development activities in the best possible way, our business partners must treat all facts, information, procedures and processes relating to the company (e.g. production methods, samples, product plans) confidentially and must never disclose them to third parties without authorisation.

We ensure the protection of confidential information and in particular the personal data of employees, customers and third parties by taking the necessary measures and complying with the applicable data protection regulations. Our business partners support us in this by ensuring that the sensitive data of our employees, customers and third parties is collected, processed, secured and deleted appropriately. Confidential information may not be published, passed on to third parties or made available in any other form without authorisation.

2.8. Embargoes and sanctions lists

Many jurisdictions have trade control laws and regulations that restrict or prohibit the crossborder transfer of goods, services and technology as well as certain cross-border capital transactions. Our business partners comply with the applicable legal provisions and carry out the necessary checks on the basis of the currently valid sanctions lists and regulations.

3. Corporate social responsibility

3.1. Human rights and social and working conditions

As part of our corporate social responsibility, we respect human rights and applicable labour and social standards as well as the Supply Chain Sustainability Act. We categorically reject any form of child or forced labour, modern slavery and human trafficking as well as illegal employment and undeclared work. If no higher age limit is specified by law, no person of compulsory school age or under the age of 15 may be employed unless the exceptions of the ILO Convention on the Minimum Age for Admission to Employment (ILO Convention No. 138) are fulfilled.

Our business partners guarantee fair remuneration, comply with the applicable regulations on minimum wage and working hours and also ensure safe and fair working conditions in compliance with the applicable labour, health and fire protection laws as well as the complete and timely payment of all taxes and social security contributions.

The fundamental right of all employees to form trade unions and employee representative bodies must be recognised. If local laws restrict freedom of association, we expect our partners to promote alternative options for employee representation.

In addition, we require our partners who supply products with potentially negative effects on human rights in the value chain to take appropriate due diligence measures in connection with human rights.

3.2. Anti-discrimination

We expect professional, friendly and respectful behaviour. Our business partners must not discriminate against employees, be that psychologically, physically, sexually or verbally, on the basis of their gender, age, religion, (ethnic) origin, culture, ideology, sexual identity, disability or (chronic) illness. Similarly, a working environment free from harassment and personal attacks must be ensured.

3.3. Protection of livelihoods

We do not tolerate our business partners' involvement in the unlawful removal of land, forests and water or unlawful forced relocations, nor do we tolerate potentially harmful impacts of our business partners' operations on the health, safety and livelihoods of people affected. This also includes respect for the natural foundations for the preservation and production of food, access to safe drinking water and sanitary facilities.

3.4. Responsible use of private security forces

Our business partners ensure that no human rights violations (e.g. injury, torture or fatality) occur through the commissioning or use of private or public security forces.

3.5. Responsible procurement of raw materials

Conflict minerals – i.e. raw materials such as gold, tin, tantalum, tungsten, cobalt and mica from conflict and high-risk areas – as well as other raw materials, such as lithium and copper, always harbour an increased risk of human rights violations. We expect our business partners who import conflict minerals directly into European Union (EU) member states to establish policies and procedures that prevent human rights abuses and the direct or indirect financing of armed conflict, and to pass this commitment down the supply chain. When supplying so-called conflict minerals in raw form or the corresponding ores, the business partner is expected to create transparency about the supply chain by completing the "Conflict Minerals Reporting Template" (CMRT) upon request.

3.6. Compliance with applicable environmental standards

Our products serve to protect people and property. Environmental protection is therefore also a central element of our corporate philosophy. With the help of our certified management systems for the environment and energy, we ensure that the associated requirements are implemented in all functions and at all levels through specific targets and rules of conduct. Our attention is also focussed on our business partners. As a manufacturing company, we expect them to organise their processes (especially production processes) in accordance with the applicable national and international standards and to comply with the applicable requirements under environmental and energy law. This also includes compliance with bans on the import and export of hazardous wastes under the Basel Convention, bans on the use of persistent organic pollutants under the Stockholm Convention and bans on the use of mercury under the Minamata Convention.

3.7. Environmental product requirements

Product-related environmental protection is of central importance to DEHN. Ensuring compliance with substance bans/restrictions, such as RoHS and REACH, as well as other legal requirements is a high priority. We therefore require our partners to comply with the environmental product requirements set out in our environmental guideline:
As part of our due diligence obligations and to fulfil the requirements of our customers, we occasionally contact our business partners and ask for confirmation of certain regulations and/or materialspecific data.

3.8. Careful use of water

Unfortunately, the use of water cannot be avoided in various production processes. For this reason, our suppliers must take suitable organisational and technical precautions to prevent the contamination of surface or ground water in their own manufacturing process or in product procurement and to use water sparingly wherever possible and economically justifiable.

3.9. Protecting natural ecosystems

Our business activities should not contribute to the destruction of natural ecosystems. We therefore require our business partners to take appropriate due diligence measures to identify risks to the alteration of natural ecosystems and to contribute to the long-term protection of these ecosystems.

3.10. Hazardous substances and waste

It is essential for environmental protection that during the development, manufacture, utilisation phase and subsequent recycling of products, the hazards posed by chemicals and other hazardous substances, in particular air, soil and water pollution, are avoided. Using suitable technical precautions and waste management systems, our business partners must ensure that hazardous substances and waste of all kinds are properly stored and disposed of in accordance with the applicable regulations. At the same time, the use of chemicals and other hazardous substances must be reduced as far as possible and, where possible and economically viable, these should be replaced by less hazardous substitutes.

Environmental Guideline DEHN SE
http://de.hn/6uJa3

3.11. Climate protection

DEHN is expressly committed to the Paris Climate Agreement. We therefore expect our partners to take measures in line with the requirements of the Paris Climate Agreement that aim to reduce their greenhouse gas emissions and those of their upstream supply chain. As part of our duty of care and in order to fulfil the requirements of our customers, we request information on the carbon footprint of the products supplied if required.

3.12. Reducing the demands on natural resources

An elementary component of sustainable management is to handle natural resources with care; i.e. to reduce their use as far as possible from an economic point of view. Only in this way can we counteract the increasing scarcity of resources and maintain our prosperity in the long term. For this reason, we also call on our business partners to endeavour to reduce the use of natural resources within the bounds of what is economically justifiable. This also includes the economical use of energy, the switch to renewable energy sources and the development of recycling concepts.

4. Reporting breaches

Violations of this code of conduct must be reported to us immediately. To this end, we have set up various reporting channels, which you can access at **DEHNspeakup** and which guarantee the secure, confidential and, if necessary, anonymous submission of a report.

DEHNspeakup
http://de.hn/bFmTd

5. Compliance, monitoring and sanctions

Our business partners ensure compliance with this code of conduct in their company. In order to fulfil our self-imposed duties of care, legal requirements (e.g. in the context of reporting obligations) and the expectations of our customers, we will monitor compliance with this code by our partners in an appropriate manner. For this purpose, DEHN is authorised to approach business partners with questions and to request information and documents insofar as these are relevant and necessary to verify compliance with the requirements set out in this code. If necessary, DEHN must also be given the opportunity to meet with managers, executives and employees in a timely manner, and DEHN employees or authorised representatives must be permitted to carry out on-site inspections following advance notice.

Violations of this code of conduct must be corrected within a reasonable period of time on the customer's own responsibility and free of charge for DEHN. If infringements are not corrected in due time, DEHN is entitled to withdraw from or terminate without notice all or only part of the contracts concluded with the business partner, unless the business partner proves that it is not at fault. In the event of serious culpable infringements, DEHN is entitled to withdraw from the contract immediately or to terminate it without notice.

We hereby declare our agreement with the regulations contained in this code and assure compliance with them. We also undertake to make our best efforts to enforce compliance with these or comparable obligations among our own suppliers and other upstream business partners in the supply chain.

Company stamp

Place

Date

Signature of the business partner

http://de.hn/7YC6k

Surge Protection
Lightning Protection / Earthing
Safety Equipment

DEHN SE
Hans-Dehn-Straße 1
92318 Neumarkt
Germany

Phone +49 9181 906-0
info@dehn.de

Technical changes, misprints and errors are reserved. The illustrations are non-binding.

DS307/EN/0524
© Copyright 2024 DEHN SE

DEHN protects.
www.dehn-international.com