DEHN Code of Conduct

Basic principles and rules of conduct



Contents

Foreword		3
1.	Working environment	5
2.	Prevention of corruption	6
3.	Avoiding conflicts of interest	7
4.	Free and fair competition	8
5.	Import and export	9
6.	Anti-money laundering measures and financial integrity	10
7.	Data protection and protection of business and trade secrets	11
8.	Environmental protection and sustainability	12
9.	Corporate responsibility	13
10.	Responsibilities	14
11.	Reporting suspected breaches	15
	Basic rules of conduct .	16

Foreword

Dear Employees,

"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, partners and staff. [1)]

This motto also means protecting the law – both for our own protection and that of the company! Because the success of our company is based not just on the quality of our products but, above all, on our reputation and the trust placed in us. Remember at all times that the behaviour and conduct of every one of us contributes to the reputation and good name of our company. As a company, we are therefore committed to integrity, sustainability, fairness, respect and responsibility in all our business dealings.

The DEHN brand is a hallmark for high-quality, innovative products and solutions worldwide. Passion, rigorous quality standards, dedication, commitment and strong customer and market orientation have always guided how we act and have made us the global market leader we are today.
For decades, we have been forging new developments with vision and pioneering spirit, enthusiasm and expertise; not only are we a trusted partner for our clients, other also a reliable and forward-thinking solution provider.

In this Code of Conduct we have defined our guiding principles to protect both the company and our staff from compliance breaches. These principles are a set of minimum standards. They apply to management and employees alike.
Each and every one of us must take responsibility, show commitment to these principles and act accordingly. The object of this Code of Conduct is to provide guidance in our day-to-day work; clearly, however, it cannot cover every conceivable law, regulation

[1)] All expressions below that are formulated in the singular of course refer to male and female members of DEHN staff.

or situation. If you have any comments on it or suggestions on how it could be improved, please feel free to contact your direct superior, our compliance officer or the executive management at any time.

Remember: compliance can only succeed if we act as team players, if we all join forces and pull in the same direction, putting our values into practice. Compliance with laws and internal rules must be a matter of course for each and every one of us – both for our own protection and that of the company! In this endeavour we are counting on your support: always act as you would expect from others:
with honesty, fairness and integrity.

The Executive Board of DEHN SE.

1. Working environment

We treat each other with respect, honestly, openly and fairly. We value the work of our staff and colleagues and will give them whatever support they need to enable DEHN to achieve its goals!

Our employees are our key asset. Which is why we are unreservedly committed to cultivating a spirit of responsibility, fairness and cooperation. We see ourselves as team players and display tolerance, respect and appreciation towards our colleagues at all times.

DEHN provides its staff with a safe working environment. It goes without saying that it complies with applicable labour, accident prevention and health requirements in order to prevent accidents, injury and work-related illnesses.

As an expression of our appreciation and as a contribution to employee satisfaction and a successful work-life balance, in addition to fair and performance-related pay we offer flexible working hours and flexitime models to better enable our employees to meet the challenges of balancing work and family. The performance and expertise of our staff are crucial, which is why continuing personal and professional development of existing staff and measures to actively further the younger members of our team are a key element of our corporate philosophy. We regard qualification measures for motivated and high-performing employees at all levels as an investment in the future. Systematically furthering and developing our staff, who are our greatest asset, forms an essential component of our human resources policy.

We expect all members of our staff to treat colleagues, business partners and third parties with courtesy and respect. We operate a zero-tolerance policy with regard to all forms of discrimination – whether psychological, physical, sexual or verbal, on the grounds of gender, age, religion, ethnicity, origin, culture, ideology or sexual identity and to any form of harassment or personal attacks.



2. Prevention of corruption

We will not tolerate corruption!

We firmly believe that our products can hold their own against rival products on their own merits. We reject any form of bribery and corruption – even if only attempted. Corrupt market players face severe sanctions worldwide, including damages, being barred from tenders, heavy fines or several years' imprisonment.

This is why we do not allow anyone to accept or offer bribes such as financial payments, gifts or other benefits of material value from or to contracting entities, business partners or other third parties when initiating, placing or executing an order/contract. This applies to any gifts or benefits which could influence a business decision.
Gifts and benefits may occasionally be permitted on condition that there is no suspicion whatsoever of corruption, for example, where they fall into the category of a common courtesy, where they are socially adequate and generally accepted (such as low-value promotional gifts, invitations to a normal business meal). Particular caution must be exercised with respect to public officials, who are subject to particularly strict rules.

We only engage in business with trustworthy customers, suppliers, commercial agents, planners, advisors and other intermediaries whose business conduct is legally impeccable. When placing a contract, it is imperative to ensure that the other party has made a clear commitment to preventing corruption.

For further details on this topic and practical examples, please see our Policy for Avoiding Corruption and Conflicts of Interest.



3. Avoiding conflicts of interest

Any decisions or actions that we take must be guided solely by the interests of the company and not our own personal interest!

We maintain professional business relationships with all market participants. Business decisions are based on the Interests of DEHN and may not be influenced by the personal interests or considerations of individuals. Conflicts of interests harm our company and must be avoided. If you identify a conflict of interest notify your direct superior or compliance officer without undue delay. Conflicts of interest are likely to arise in case of private contact with employees of business partners or competitors of the DEHNgroup, a significant stake in such business partners or competitors, or activities performed by them or on their behalf.

Further details and examples of conflicts of interest can be found in our Policy for Avoiding Corruption and Conflicts of Interest.

4. Free and fair competition

We observe the principles of 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. We will never jeopardise the trust of our business partners and customers through unfair business practices. Therefore, we will never enter into any anti-competitive agreements with competitors, for example on prices, dividing up markets or territories, taking part in tenders or other economically sensitive issues. Likewise, we will never exchange any competition-related information with competitors, e.g. on current/future prices or sales conditions. The principles of fair competition must be observed with regard to our customers and suppliers; in particular no stipulations shall be made regarding selling prices.

Further information and illustrative examples on this subject can be found in our Competition Law Policy.



5. Import and export

We comply with all national and international (EU & US) import and export rules!

Increasing internationalisation of our business as a result of globalisation, the harnessing of new markets and the growing complexity in international trade make it imperative to comply with all relevant national and international (EU & US) laws and regulations on customs and export controls (embargo rules). In accordance with our internationally recognised certification as an authorised economic operator (AEO C&S), DEHN SE is recognised to be an especially trustworthy and reliable partner within the international supply chain. As such, we are always aware that breaches of any type may result in criminal penalties, being barred from simplified export and import procedures and may therefore adversely affect our company's success; such breaches must be avoided. In particular we comply consistently and rigorously with the increasingly stringent anti-terrorism measures so as not to jeopardise our certified status as a "known consignor". For further details, please consult our internal procedural instructions on customs procedures and export control.

6. Anti-money laundering measures and financial integrity

We oppose all forms of money laundering!

DEHN avoids any involvement in money laundering and will do whatever is necessary to prevent it. 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. We are aware of this risk and, in our business dealings, are always alert to possible warning signs such as insistence on cash payments or withholding full information. Our internal structures and processes ensure that we only enter into business relationships with serious partners whose financial resources originate from legal sources. Particularly with large contracts, we screen potential business partners beforehand, obtaining information on the partners themselves, their business backgrounds and the deal in question.

Our bookkeeping and accounting systems also ensure that cash flows are transparent and open. Our financial records are always accurate and drawn up within the prescribed deadlines in compliance with applicable accounting rules.

7. Data protection and protection of business and trade secrets

We exercise great care with data and business and trade secrets which have been entrusted to us!

We operate a system which guarantees protection of confidential information, notably personal data of employees, customers and third parties and compliance with all applicable data protection requirements. Personal data are only collected, processed or used for clearly defined and legitimate purposes; they are stored and transmitted in a secure manner. The manner in which we use data is transparent. Data subjects are able to exercise their

information, objection, blocking and erasure rights.

The future and success of our company depends on our creativity, vision and pioneering spirit; innovation and technical advancement are the key to DEHN's success. Protecting the value of our research and development work, particularly our business and trade secrets and intellectual property, is paramount to secure a cutting-edge over our rivals, preserve our competitive advantage and ensure continuing success. This is why we treat all company facts, information and internal procedures (such as production processes, samples, business strategies, product and marketing plans) confidentially and will never disclose them to third parties.

Likewise, we respect and protect the intellectual property of others. We exercise great care in ensuring that third-party property rights are not infringed, and that confidential information is not obtained or used without proper authority.

For this reason, our employees are bound to secrecy accordingly.



8. Environmental protection and sustainability

Environmental protection and sustainability are important components of our corporate philosophy and prevent the destruction of natural resources through environmental pollution!

Our products serve to protect people and property. Sustainability in the sense of sustainable protection of human beings and the environment is therefore a central element of our corporate philosophy. As a manufacturing company we are aware of our responsibility for the environment, which is why we have adopted a holistic approach to ecological issues. We therefore attach great importance to using resources wisely, taking account of quality and environmental factors at all times. We comply with the bans on the import and export of hazardous waste (Basel Convention) and the bans on the use of mercury (Minamata Convention) and persistent organic substances (Stockholm Convention). Our certified environmental management system incorporates defined targets and rules of conduct which guarantee that environmental protection is built in to all processes at all levels. We also take measures to inform staff and raise awareness on environmental issues.



9. Corporate responsibility

We are committed to our corporate responsibility and act accordingly!

As part of our corporate social responsibility, we respect human rights, freedom of association and categorically reject any form of child labour or forced labour. We also ensure that our suppliers and partners share this commitment. We also explicitly oppose illegal employment, slavery and undeclared labour - both at our company and our subcontractors. We remit taxes and social contributions in full and promptly and ensure fair working conditions. We require our subcontractors to act likewise. We expressly reject the commissioning of security forces that violate human rights and the unlawful violation of land rights.

10. Responsibilities

This Code of Conduct sets out the principles by which we perform our daily work. We abide by them without exception!

The principles set out in this Code of Conduct form an indispensable element of our corporate culture. Only by working together can we succeed in putting these values into practice and safeguarding them in a sustainable manner. All employees, management staff and board members pledge to abide and live by this Code of Conduct. If you have any questions, please contact your direct superior or our compliance officer.

Key employees and managers at all levels bear a special personal responsibility for the employees in their charge. They must act as role models by acting with integrity in everything they do and say. We expect both them and the executive management to lead by example at all times, to ensure compliance with law and legislation in their respective fields of responsibility by appropriate supervisory and organisational measures; they must make it clear that any compliance breaches will be followed up and may have legal consequences.

DEHN stands for fairness, responsibility and integrity in all its business dealings.We expect the same from our business partners.We therefore only do business with partners who abide by generally acknowledged standards of social responsibility, who share our values and principles of integrity and who comply with the applicable legal regulations, in particular health and safety at the workplace, environmental protection and anti-corruption. We expect our business partners to ensure that their suppliers also apply these principles and that, as far as possible, compliance breaches are avoided throughout the entire supply chain.

11. Reporting suspected breaches

We report any suspected compliance breaches immediately!

Breaches of law and the principles contained in this Code of Conduct can have far-reaching consequences both for individuals and the company as a whole. They will not be tolerated. In identifying compliance breaches, we rely on the support of all members of our staff. Only then can we remedy any shortcomings and make whatever adjustments may be necessary to the system.

We therefore encourage all members of our staff to immediately report any breaches of this Code of Conduct or the law that they observe or suspect. The same applies if you personally are asked to act in a manner contrary to the Code of Conduct. Our employees are encouraged to report any such occurrences and breaches – openly or anonymously – through the reporting channels set up by DEHN specifically for this purpose. Secure and reliable submissions of reports are ensured by the internal reporting channels. The various reporting channels are listed at http://de.hn/3ke6d.

Each report will be considered carefully, confidentially and appropriate measures will be taken. The anonymity of the whistle-blower, the individuals the report concerns and any third parties mentioned in it is safeguarded. Their identity is known exclusively by persons responsible for receiving reports or for taking follow-up measures. No-one who reports a (suspected) breach in good faith need fear any adverse repercussions irrespective of whether the suspicion is ultimately proved justified. In particular, we will not tolerate any discrimination or retaliatory measures against such employees. Should this be the case, our response will be resolute and robust and we will, if necessary, impose appropriate sanctions. After completing an investigation of a report, the whistle-blower and the individuals the report concerns will be informed of the result of the investigation, provided there are no factual reasons preventing such notification. The whistle-blower will receive a reply three months following receipt of the notification at the latest; especially regarding the initiation of an investigation or other possible follow-up measures.

Basic rules of conduct

1. We treat others with respect and fairness!
2. We will not tolerate corruption!
3. Any decisions or actions that we take must be guided solely by the interests of the company and not our own personal interest!
4. We observe the principles of free and fair competition!
5. We comply with all national and international (EU & US) import and export rules!
6. We oppose all forms of money laundering!
7. We exercise great care with data and business and trade secrets which have been entrusted to us!
8. Environmental protection and sustainability are important components of our corporate philosophy!
9. We are committed to our corporate responsibility and act accordingly!
10. This Code of Conduct sets out the principles by which we perform our daily work.We abide by them without exception!
11. We report any suspected compliance breaches immediately!

If you have any questions about compliance or if you suspect a compliance breach, please do not hesitate to contact your direct superior, the executive management or our compliance officer:

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You can find more information on submitting anonymous reports at: **de.hn/a2iTk**

http://de.hn/8YpFa

Surge protection
Lightning Protection / Earthing
Safety Equipment

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