



# BETTER ORIENTATION

Dieffenbacher  
Code of Conduct

**DIEFFENBACHER**  
MOVE FORWARD. TOGETHER.

## FOREWORD BY THE MANAGEMENT BOARD

Dear colleagues,

Dieffenbacher has been an independent family business since 1873. We see our long-term focus and our reliability across generations as our unique strengths. This tradition is reflected in our trusting and stable cooperation with our customers and business partners, our striving for efficient and sustainable processes and products, and our legally compliant and value-oriented conduct.

This Code of Conduct brings together these fundamental rules and principles, according to which we work together, in one document and serves as a guide in our day-to-day work. Together with other policies and specifications drawn up by the Management Board, it forms the framework of our compliance organization.

The Code of Conduct applies equally to all of us, to directors, managers, and all employees, to our conduct towards each other and to business partners and the public. Breaches of the Code of Conduct can cause enormous damage to the reputation of our company and therefore to all of us.

We ask that you read this Code of Conduct carefully and use it together with us as a guideline for our daily conduct.

We would like to thank you in advance for your commitment and dedication to our company.



Christian Dieffenbacher



Lukas Langer



Volker Kitzelmann



Lothar Fischer

# CONTENTS

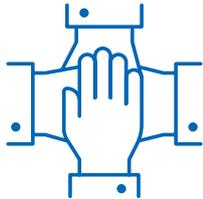
|   |           |
|---|-----------|
| <b>01 DIEFFENBACHER VALUES AS A FOUNDATION</b>  | <b>4</b>  |
| <b>02 THE STANDARD FOR DEALING WITH EACH OTHER</b>  | <b>6</b>  |
| 1. Appreciation, trust, and entrepreneurial spirit as the cornerstones of cooperation         | 7         |
| 2. Safe and healthy working environment   | 7         |
| 3. Protection of human rights and employee rights   | 8         |
| 4. Protection of the environment, climate, and natural resources                              | 8         |
| 5. Protection of the company and IT systems, confidentiality                                  | 9         |
| 6. Protection of privacy and personal rights  | 9         |
| 7. Lawful conduct   | 9         |
| 8. Compliance with anti-corruption, competition, antitrust, export, and money laundering laws | 9         |
| 9. Invitations and gifts  | 10        |
| 10. Avoidance of conflicts of interest  | 10        |
| <b>03 COMPLIANCE WITH THE CODE OF CONDUCT</b>   | <b>11</b> |
| <b>04 SUBMITTING A COMPLAINT</b>  | <b>13</b> |
| <b>05 CONTENT DISCLAIMER</b>  | <b>15</b> |

# 01 DIEFFENBACHER VALUES AS A FOUNDATION



# 01 DIEFFENBACHER VALUES AS A FOUNDATION

The Dieffenbacher Code of Conduct supports the implementation of our Dieffenbacher values:



## PARTNERSHIP

For us, this means:

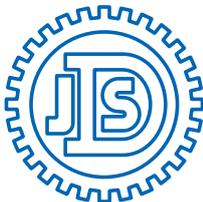
Understanding the needs and expectations of our customers with foresight and entering into long-term relationships with customers, suppliers, and other business partners through our global presence and reliability. We are reliable and honest with our business partners and in our daily interactions with all employees and managers.



## PROGRESSIVE

For us, this means:

Not standing still in a constantly changing world, but to always move forward with our customers in line with our motto "Move Forward. Together." through a constant willingness to learn and an innovative corporate culture.



## TRADITIONAL

For us, this means:

Our cross-generational stability as a family business and our long-term approach – geared towards the life cycle of our plants – ensure that we will remain a pioneer in the market and a trend-setter for our customers in the future.



## SUSTAINABLE

For us, this means:

We work every day to continuously improve the environmental footprint of our plants and therefore of our customers' products, making a positive contribution to leaving a healthy environment worth living in for future generations.

Alongside our management principles, these values form the foundation for the long-term economic success of the Dieffenbacher Group.

# 02 THE STANDARD FOR DEALING WITH EACH OTHER



## 02 THE STANDARD FOR DEALING WITH EACH OTHER

The Dieffenbacher Code of Conduct stands alongside other policies and specifications established by the Management Board and forms the standard not only for the interaction of all employees with each other, but also in relation to customers, business partners, and the public.

The contents of the Code of Conduct are communicated to employees when they start employment and subsequently in regular training sessions. We expect all employees of the Dieffenbacher Group to make this Code of Conduct part of their daily work behavior.

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**1.**

### **APPRECIATION, TRUST, AND ENTREPRENEURIAL SPIRIT AS THE CORNERSTONES OF COOPERATION**

We respect the personal dignity and personal rights of every individual regardless of ethnic origin, culture, religion, age, disability, skin color, sexual identity, ideology, or gender. We see diversity as an opportunity, not a threat.

Every employee is important and jointly responsible for the long-term success of our company and the impact that our company has on the world. We encourage and live a working environment that is characterized by mutual appreciation and trust. We evaluate ourselves and our business partners solely on the basis of our dealings with each other and our performance, not for other, extraneous reasons.

We are convinced that excellent results can only be achieved as a team. We value initiative, courage, and new ideas. We are open to change and continuously strive for improvement, both in our company processes and in ourselves.

We communicate reliably and honestly with each other, support each other, take responsibility, and encourage the assumption of responsibility. We always put the goals of the company above the goals of individual locations, departments, or people.

We do not tolerate any threats, intimidation, sexual harassment, bullying or discriminatory behavior (e.g. harassment, exclusion) or other attacks on groups of people or individuals, and take consistent action against such behavior using all means at our disposal in accordance with the applicable laws of the countries in which we operate.

**2.**

### **SAFE AND HEALTHY WORKING ENVIRONMENT**

The safety and protection of all employees is our top priority. We ensure a safe and healthy working environment and protect the privacy and personal rights of each individual. It is the responsibility of all managers in particular to ensure that the laws and regulations on safety in the workplace and the protection of health are complied with.

Our understanding of occupational safety exceeds the legal regulations. We take a proactive approach to safety risks and see safe working as a core responsibility of all employees. Accidents at work, near-accidents and potential hazards and risks must be reported immediately to the responsible manager. All employees are jointly responsible for their own health and safety and for the health and safety of their fellow employees and business partners.

### **3. PROTECTION OF HUMAN RIGHTS AND EMPLOYEE RIGHTS**

Dieffenbacher respects internationally recognized human rights and fundamental freedoms in accordance with the declarations of the United Nations and the European Convention for the Protection of Human Rights and Fundamental Freedoms, in particular the right to life, liberty, and security, the right to protection of health, the right to equal treatment, freedom of expression, the right to privacy, and the right to education, fair working conditions or an adequate standard of living.

Dieffenbacher does not participate in the development, production, or distribution of weapons of mass destruction, biological warfare agents, or other products intended to harm people.

We reject child labor, forced or compulsory labor and any form of modern slavery, human trafficking, and other exploitative conditions. This applies not only within our company, but also to cooperation with our business partners. In particular, we expect our suppliers to also commit to respecting human rights along the supply chain and do not maintain business relationships with suppliers who act contrary to human rights requirements.

We respect the fundamental right of all employees to form associations and democratically elected employee representatives to regulate working conditions and strive for constructive cooperation with employee representatives and their bodies in the interests of both parties. We ensure compliance with the working conditions guaranteed under national regulations, in particular minimum wages, working hours, and employee rights.

### **4. PROTECTION OF THE ENVIRONMENT, CLIMATE, AND NATURAL RESOURCES**

For us, high-performance business and environmental protection are inextricably linked. As a commercial enterprise, we take responsibility for the environmental friendliness and sustainability of our plants, products, and services and for ensuring that our actions are as environmentally friendly as possible.

The protection of the environment and climate and the conservation of natural resources are corporate goals of the highest priority. When developing, manufacturing, and commissioning our plants and products, we ensure that environmental and climate protection laws are strictly adhered to.

Environmental and climate protection is firmly anchored in our business processes, even where there are no corresponding legal regulations. We are constantly working on new, efficient technologies and the optimization of our processes with the aim of keeping the air around our plants clean (e.g., through smart hall ventilation systems), avoiding or recycling waste (e.g., through innovative packaging solutions), and reducing the consumption of natural materials and resources (e.g., wood, water) throughout the entire life cycle of our plants. Our handling of chemicals and hazardous substances is prudent and responsible and takes into account the associated risks to health and the environment.

We are committed to the Paris Climate Agreement and the 1.5-degree target to combat global warming, and we consistently strive to reduce our carbon footprint as part of our overarching corporate strategy. In particular, we aim to reduce CO<sub>2</sub> and other greenhouse gas emissions at our sites by 2030 in accordance with defined targets, which we regularly monitor. We also promote measures to continuously improve the energy efficiency of our plants, products, and services, as well as our day-to-day activities (e.g., business travel, employee commuting, sustainable electricity procurement). We are committed to our environmental due diligence obligations along the global supply chain and advocate for sustainable environmental and climate protection.

## **5. PROTECTION OF THE COMPANY AND IT SYSTEMS, CONFIDENTIALITY**

We place great importance on the responsible handling of company assets of all kinds, in particular work equipment and intellectual property (e.g., patents, brands, trade secrets, know-how). Company property may only be used for the intended business purposes or authorized private purposes. Misuse for other purposes, in particular inappropriate personal, illegal, or other unauthorized purposes, is prohibited.

We use digitalization to drive our efficiency. The security of the global electronic exchange of information and electronic business transactions is therefore a crucial prerequisite for our business success. All employees are therefore obliged to follow instructions and take measures to protect the security of the company and, in particular, its IT and EDP systems against unauthorized access, internal and external misuse, and criminal acts. In this sensitive field, the company is particularly reliant on the attentiveness and cooperation of all employees to prevent risks that could jeopardize the company's existence, e.g., from fraudulent attacks or cyber crime.

Dieffenbacher's internal confidential information and know-how must be treated with the utmost care. All employees are required to maintain confidentiality so that this information does not become public. The same applies to non-public information entrusted to us by our customers, suppliers, and other business partners. The obligation to maintain confidentiality extends beyond the duration of the collaboration.

## **6. PROTECTION OF PRIVACY AND PERSONAL RIGHTS**

We protect the privacy and personal rights of every individual. Personal data is only collected or processed if this is necessary for specific, clear, and legitimate purposes, or if the data subjects consent to the processing. Personal data must be stored securely and its use must be transparent for the data subjects. The rights of data subjects, e.g., to access, rectification, erasure and objection, must be safeguarded. Strict demands must be placed on the accuracy of the processed data, and the technical protection against unauthorized access. Whenever personal data is handled, care must be taken to ensure that the privacy and personal rights of the data subjects are protected.

## **7. LAWFUL CONDUCT**

Compliance with the law in the respective country in which we do business is a fundamental principle of economically responsible conduct. Violations of the law must be avoided at all costs. All employees are obliged to inform themselves about the legal regulations of the jurisdiction in which they operate and to comply with them. If internal policies exist that exceed the legal regulations, these must also be complied with.

## **8. COMPLIANCE WITH ANTI-CORRUPTION, COMPETITION, ANTITRUST, EXPORT, AND MONEY LAUNDERING LAWS**

Dieffenbacher stands for technological expertise, customer focus, innovation, and responsible conduct. Our excellent reputation in the market and our economic success in global competition are based on this. Corruption, bribery, corruptibility, and violations of competition or antitrust regulations threaten these guarantees of success and are prohibited. In particular, all employees are prohibited from offering, promising, or granting benefits to business partners (or their employees or related parties) with the aim of obtaining an order or other preferential treatment in business dealings. All employees are also prohibited from accepting or being promised such benefits.

The export of goods, technologies, software, and services is an essential part of our business activities. We stand by the freedom of foreign trade and are committed to complying with national and international foreign trade and export control regulations under all circumstances. As part of our export controls, we check our goods, as well as their use and final destination. Where required by applicable export lists, export restrictions, sanctions, or embargoes, we obtain all necessary authorizations to ensure that we act in a lawful and compliant manner.

It is our declared goal to maintain business relationships only with reputable customers and business partners, whose business activities comply with legal regulations and whose financial resources are of legitimate origin. We therefore carefully check the identity of customers and partners with whom we do business. We make sure that the business relationship with Dieffenbacher is not misused for money laundering or other illegal purposes. We use effective methods and processes to identify and minimize the risk of introducing counterfeit parts and materials into our supply chain. We also expect our suppliers to apply equivalent methods.

## **9. INVITATIONS AND GIFTS**

We do not accept gifts, invitations, or other donations that place us in a position of binding dependency. Even the appearance that a business decision could be influenced by a gift must be avoided.

The acceptance of symbolic gifts and invitations within a customary business framework is permitted, provided that a reasonable local value is not exceeded. Invitations and gifts to employees or related parties of business partners are only granted if the occasion and scope are appropriate, i.e., if they are of low value and can be regarded as an expression of generally accepted local business practice.

All employees are prohibited from accepting or giving money or gifts similar to money (e.g., loans, vouchers, securities), regardless of the value of the gift. Exceptions require the prior written consent of the Management Board.

If there is any uncertainty as to whether behavior is prohibited or not, any manager, the Management Board or other responsible functions may be contacted. In case of doubt, the invitation or gift must not be granted or accepted.

## **10. AVOIDANCE OF CONFLICTS OF INTEREST**

We expect all employees to make decisions in the course of their work for Dieffenbacher solely on the basis of objective criteria and in the best interests of Dieffenbacher.

Conflicts of interest may arise if the interests of the company and the personal interests of employees or their relatives (e.g., spouses, life partners, relatives, persons related by marriage, or similarly related persons) are not clearly separated in a business decision.

This is to be assumed if, in the course of their work for Dieffenbacher, employees have an influence on business relationships (e.g., consulting, contract, or employment relationships) that Dieffenbacher enters into with one of their relatives or with a company in which their relative is active as a shareholder, director or in another responsible position. Even the appearance that decisions are not made objectively and impartially in the interests of the company (nepotism) must be avoided.

If there is a conflict of interest, this must be reported immediately to the responsible manager. The same applies if there is uncertainty as to whether or not a conflict of interest exists. Our employees are encouraged to report existing or potential conflicts of interest at an early stage and will not suffer any disadvantages as a result. The business decision affected by a conflict of interest requires the prior written consent of the management.

# 03 COMPLIANCE WITH THE CODE OF CONDUCT



## 03 COMPLIANCE WITH THE CODE OF CONDUCT

All employees are given access to this Code of Conduct, either via the Intranet or by other means. However, it is not a question of just taking note of this Code of Conduct. All employees are called upon to make the above standards part of their daily work behavior, and to review areas of activity in which improvements can be made with regard to the Code of Conduct. It is the responsibility of all managers to actively promote the dissemination and implementation of the Code of Conduct (e.g., in employee appraisals) and to set an example in their dealings with customers, business partners, and all employees.

Even the intention to gain a short-term advantage for the company is no justification for violations of this Code of Conduct or for illegal behavior. In the long term, this will cause much greater damage to our company through loss of trust in our honesty and reliability, which are the foundation of our long-term economic success.

# 04 SUBMITTING A COMPLAINT



## 04 SUBMITTING A COMPLAINT

Anyone who becomes aware of a breach of the law or a breach of this Code of Conduct or has reasonable grounds to suspect such a breach, is protecting the company if they report this via the Dieffenbacher reporting procedure. All employees, external business partners, and third parties are given the opportunity to submit a report or complaint, including in anonymous form, using an electronic reporting system. All reports and complaints are investigated and, if necessary, appropriate measures are taken. Reprisals against persons who report a breach of laws or regulations of any kind shall not be tolerated.

### **ACCESS AND FURTHER INFORMATION ON THE REPORTING SYSTEM:**

<https://dieffenbacher.com/en/contact/compliance>

# 05 CONTENT DISCLAIMER



## 05 CONTENT DISCLAIMER

Breaches of the law and breaches of this Code of Conduct may also constitute breaches of employment contract obligations. Dieffenbacher reserves the right to monitor compliance with the Code of Conduct, to investigate breaches of the Code of Conduct, and to punish such breaches with appropriate consequences within the framework of employment contract, company, and legal regulations.