

Consistent Behaviour and Practices

Code of Conduct
for Business Partners

EWALD DÖRKEN AG

**TOGETHER
WE**

... assume responsibility for society

... respect and protect all staff

... are committed to sustainability

... avoid conflicts of interest

... take data protection and confidentiality seriously

... take our Code of Conduct seriously

Consistent Behaviour and Practices.

Code of Conduct for Business Partners

Dear Business Partners,

with the present Code of Conduct for Business Partners the company of Ewald Dörken Aktiengesellschaft and its subsidiaries (hereinafter referred to as „Dörken AG“) have defined their requirements and principles for a fair cooperation with their business partners.

The Dörken AG expects its business partners to implement and comply with the principles set out in this Code of Conduct for Business Partners worldwide and in all business areas.

**The executive board, management, purchasing department
and all staff of DÖRKEN**

Business partners are all companies not belonging to the Dörken AG but from which the Dörken AG purchases goods and services, as for example suppliers, consultants, sales representatives and other providers of goods and services.

Consistent Behaviour and Practices.

Code of Conduct for Business Partners

DÖRKEN

” We are guided by the UN Sustainable Development

The 2030 Agenda with its 17 Sustainable Development Goals to promote sustainable peace and prosperity, all countries have been working on integrating sustainability and reducing inequalities into national development plans, of particular importance to care for the needs of vulnerable population groups and countries – because only together can they be achieved by 2030.

Goals. ”

Development Goals (SDGs) is a global plan and to protect the planet. Since 2015, this common vision of fighting poverty and development plans. In this regard it is the needs and priorities of the most vulnerable people. If no one is left behind can the 17 goals





DÖRKEN

**We are committed
to common thinking
and acting.**

Consistent Behaviour and Practices.
Code of Conduct for Business Partners

The success of our traditional medium-sized family business is based on cooperation and fairness. Our business activities are always carried out within the framework of legal requirements.

And this is what we also expect from our business partners. Therefore the present Code of Conduct for Business Partners of the Dörken AG is intended to create a common understanding of legally compliant and ethically correct behaviour with our business partners and form the basis for responsible behaviour in all our business relationships. That is why we expect the Dörken AG's business partners to conduct their business activities with integrity, i.e. in particular to comply with the corresponding law applicable to them, such as human rights including the core labour standards of the International Labour Organisation, anti-corruption, data protection, competition, antitrust and environmental law, and to ensure that the principles set out in the present Code of Conduct for Business Partners are also observed by their own business partners to promote them accordingly, to act honestly and in a responsible and fair manner.

DÖRKEN

” Economic success and social responsibility are not contradictory, they are complementary. We believe that responsible behaviour is an important basis for cooperation with our business partners.

Consistent Behaviour and Practices.

Code of Conduct for Business Partners

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DÖRKEN

**They assume
responsibility
for society.**

Consistent Behaviour and Practices.
Code of Conduct for Business Partners

The Dörken AG's business partners

- >> strictly reject **child labour** and comply with the applicable laws prohibiting child labour.
- >> do not employ or tolerate any form of **slave labour, forced or compulsory labour, servitude, human trafficking or involuntary labour**. They ensure that workers are not subject to inhuman or degrading **treatment** and corporal **punishment** of any kind.

DÖRKEN

**They respect and
protect all staff.**

Consistent Behaviour and Practices.
Code of Conduct for Business Partners

The Dörken AG's business partners

- >> therefore provide a **safe and healthy working environment and safety-related qualification measures.**
- >> respect the **freedom of association and the formation of interest groups and implement the protection of the rights** of their staff in their business units.
- >> respect the right of workers to **freely elect their own representatives and to negotiate collectively.**
- >> **remunerate their staff appropriately** according to the applicable laws and industry standards.
- >> promote diversity in the company and **do not tolerate any discrimination in the process of hiring and employing of staff.**

DÖRKEN

” The safety at work and health are of the utmost importance to us and are of our business partners.

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Consistent Behaviour and Practices.

Code of Conduct for Business Partners

**alth of our staff are of
us and are core values**

DÖRKEN

**They are committed
to sustainability.**

Consistent Behaviour and Practices.
Code of Conduct for Business Partners

The Dörken AG's business partners

- >> comply with the applicable **environmental standards** and are committed to the principles of sustainable management and environmental protection as a corporate value. They take effective measures that reflect their **responsibility for the environment**.
- >> commit to a continuous improvement of environmental protection and ensure this by adopting the appropriate **environmental management system**.
- >> ensure the efficient use of resources, use **environmentally friendly technologies** and minimise all kinds of emissions to air, water and soil.
- >> support us by providing us with **correct information** in the form of safety data sheets, technical data sheets, carbon footprint information etc.

DÖRKEN

**They avoid conflicts
of interest.**

Consistent Behaviour and Practices.
Code of Conduct for Business Partners

The Dörken AG's business partners

- >> do not tolerate any form of corruption or **economic crime** by their own staff or those in the supply chain.
- >> Compensation paid to consultants, agents and other intermediaries may not be used to provide **inadmissible benefits** to business partners, customers, or other third parties.
- >> select their advisors, agents, and other intermediaries carefully according to **appropriate suitability criteria**.
- >> avoid **conflicts of interest** that could lead to corruption.
- >> accept or offer invitations in connection with their work for the Dörken AG only when appropriate and not made in expectation of an **inadmissible consideration** or other preferential treatment and do not violate applicable law (in particular anti-corruption laws). The same applies to the acceptance or granting of gifts and other benefits or advantages of any kind.

DÖRKEN

Consistent Behaviour and Practices.
Code of Conduct for Business Partners

The Dörken AG's business partners

- >> do not tolerate **any form of unlawful material or immaterial benefits** (including the offer thereof) to public officials or persons comparable to them (irrespective of whether directly or indirectly through third parties).
- >> The Dörken AG's business partners also do not tolerate **illegal material or immaterial contributions of any kind** (e.g. illegal donations) to political parties, their representatives or elected officials and candidates for political office.
- >> **Donations** by the Dörken AG's Business Partners are only made **voluntarily** and without the expectation of any consideration in return. Sponsorship of individuals, groups, or organisations shall not be used to gain unlawful business advantages.
- >> Our business partners avoid conflicts of interest. Our business activities are based on trust, mutual respect, the standards of conduct and **on German or on the applicable law** and this generally excludes illegal payments and the acceptance of advantages or favours.





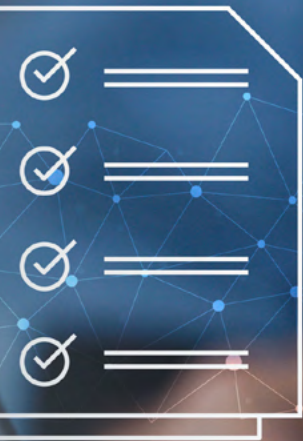
DÖRKEN

**They take data protection
and confidentiality
seriously.**

Consistent Behaviour and Practices.
Code of Conduct for Business Partners

The Dörken AG's business partners

- >> comply with all **relevant competition law requirements**.
In particular, they do not enter into agreements or arrangements that influence prices, conditions, strategies, or customer relations, especially the participation in tenders. The same applies to the exchange of competitively sensitive information and other conduct that may limit or restrict competition in an inadmissible manner.
- >> especially in view of the world-wide business activities ensure **compliance with all applicable laws** regarding the import and export of goods, services and information as well as with applicable embargoes and sanctions.
- >> take appropriate measures in their companies to prevent **money laundering and the financing of terrorist organizations**.
- >> comply with all **applicable laws regarding the protection of personal data**, in particular of staff, business partners and customers.





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DÖRKEN

**They take
the mutual
Code of Conduct
seriously.**

Consistent Behaviour and Practices
in accordance with the Dörken AG's Code of Conduct.

The Dörken AG's Business Partners

- >> **carefully select the suppliers they engage** when working for the Dörken AG, communicate to them the principles listed in this Code of Conduct for Business Partners or equivalent principles, and are committed to ensuring that these principles are also adopted by their business partners.
- >> **undertake to report any evidence of misconduct and violations** committed in the course of their work for the Dörken AG, and which could have an impact on the Dörken AG, to our Compliance Officer R. Vossius rvossius@doerken.de.
- >> **do not tolerate discrimination of any person**, who reports violations of the principles set out in this Code of Conduct for Business Partners.

DÖRKEN

**The Dörken AG
places great emphasis
on establishing a
sound partnership.**

Consistent Behaviour and Practices.
Code of Conduct for Business Partners

What is important to us as a company

- >> The Dörken AG reserves the right to verify this e.g. by auditing the companies of its business partners.
- >> In case of minor violations of this Code of Conduct for Business Partners, business partners are therefore generally given the opportunity to implement suitable remedial measures within a reasonable period of time if they are principally prepared to remedy and improve the situation.
- >> In the event of serious or repeated violations (in particular in case of criminal offenses) the Dörken AG reserves the right to impose appropriate sanctions on business partners. This may also lead to the immediate termination of the business relationship and to claims for damages or the enforcement of other rights.





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WOULD YOU LIKE TO REPORT A CASE ANONYMOUSLY?

<https://doerken.integrityline.com>

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