



delfort

Version February 2021

Delfort Code of Conduct

Preface from Management Board

delfortgroup AG and its subsidiaries (Delfort) conduct their business on the basis of the key principles of

- Excellence & Sustainability
- Respect & Responsibility
- Integrity & Transparency

We believe that the strength and the future growth and development of Delfort will be driven by our commitment to key Corporate Social Responsibility (CSR) principles and our customers' appreciation of Delfort's business performance.

To develop a uniform understanding of these key CSR principles we have enacted this Code of Conduct.

This Code of Conduct applies to all persons representing Delfort, including board members, general managers, senior officers, employees, agents and business partners.

Principles of Conduct

The Code of Conduct contains binding rules on key CSR principles and sets out a zero tolerance policy towards bribery, fraud and other forms of corruptions. The Code of Conduct will, wherever required, be given greater depth by the issuing of detailed Group directives or other internal general instructions. The Code of Conduct not only operates as a guideline for the business conduct of all Delfort employees, but it will also be brought to the attention of our business partners.

We expect our suppliers to share Delfort's commitment to operating in a responsible and ethical manner, consistent with the principles set forth in this Code of Conduct. To this end we also expect our suppliers to maintain these standards further down the supply chain. We consider compliance with these standards an important factor when choosing new suppliers or continuing our relationships with existing ones.

Any orders from superiors that contravene the Code of Conduct are not binding, and cannot be used to justify misconduct.

I. Excellence & Sustainability

- Delfort stands for the excellence of its products and processes. Goods and



services comply with the highest standards in terms of quality, innovation and customer orientation. Environment, health and safety issues are integral to the way in which we manage product quality, safety and integrity throughout the development, manufacturing and sales processes.

- Delfort expects its employees to accomplish their professional responsibilities to the highest professional standards of diligence, accuracy and completeness.
- Delfort stands for sustainability as defined by long-term value creation and growth. Core elements are innovation, quality and long-term partnerships with suppliers, customers and other business partners.

II. Respect & Responsibility

- Delfort treats others with respect. This includes employees and third parties, such as customers, suppliers and officials.
- Delfort strives to create the best environment for employees to perform, innovate and develop.
- We seek to foster an active and open dialogue about our corporate social responsibility goals and achievements with our employees, customers, public authorities, non-governmental organizations, local communities, business partners and the general public.

Human Resources

- Delfort aims to provide all employees safe and healthy working conditions and a secure and inspiring working environment. All employees are required to perform their tasks without endangering working safety. We do not tolerate any form of child labour or forced labour.
- We respect the rights of our employees to freedom of association. We aim to establish a long-term and constructive working relationship with employee representatives at local, national and international level.
- Delfort encourages its employees to engage in their own professional development and personal growth. Delfort is committed to treating all its employees fairly, impartially and equally. We ensure fair compensation and make decisions with regard to employees strictly based on work related factors such as competencies, job performance and behavior in the work environment.

Diversity

- We are dedicated to provide equal opportunities to all our employees to ensure a safe, healthy and professional workplace with room for diversity. There is no disadvantage and unfair discrimination on the basis of gender, age, religion, race, social background, disability, ethnic or national origin,



nationality, political affiliation, union membership, family status, pregnancy, sexual orientation, gender identity, gender expression or any unlawful criterion under applicable law. We are committed to this principle in recruitment, development, advancement or retirement of any employee. This is the basis for our culture that allows different views and creative collaboration.

Conflicts of Interest

- Conflicts of interest are circumstances in which personal interests and those of Delfort oppose each other.
- Conflicts of interest or any activities which could create the appearance of a conflict of interest or could be interpreted as such must be avoided, or if such activity cannot be avoided it shall be disclosed to the supervisor immediately. For example, conflicts of interest may arise in the following situations:
 - Business transaction with a business partner of Delfort in which direct or indirect (through family members or other related persons) participations are held.
 - Business transaction with a business partner of Delfort which employs a family member or a related person as a managing director, senior officer or regular employee or, respectively, transactions directly entered into with family members or other related persons.

III. Integrity & Transparency

- Delfort complies with all applicable laws and regulations of the countries where it conducts business and respects local social standards. Furthermore, we observe all internal group and company policies, which are updated constantly. Our internal control system is designed so that all key business processes are followed and transactions are fully and correctly captured.
- Any conflict with legal regulations and necessary adjustments must be reported immediately to the direct supervisor, in case of doubts the legal regulation shall prevail.

Anti-Corruption

- Delfort does not tolerate any form of corruption and bribery.
 - In the context of his/her professional activity, employees of Delfort shall not demand or accept direct or indirect benefits for themselves or for the benefit of others, respectively, shall not promise or grant such benefits to third parties that are conducive to influencing business transactions in an impermissible way. We also do not allow the appearance of such impermissible influence to come into being.



- Gifts and hospitalities of negligible value are only permissible within the bounds imposed by normal business customs and in cases in which they do not breach the laws of the respective country. In case of doubt, the direct supervisor shall be consulted.
- The offering or accepting of money or similar benefits (such as gift certificates) is, in any case, impermissible.
- We do not use another person or entity (such as a third party, agent or advisor) to offer or provide a benefit that we cannot offer or give ourselves.
- We conduct business with reputable third parties who engage in legitimate business interests. Delfort will not do business with individuals or entities sanctioned for having past or ongoing associations with criminal or terrorist activities. Delfort uses a due diligence process to ensure that no business is conducted with individuals or entities that are subject to sanctions imposed by the United States, United Kingdom, the European Union or any of its Member States.

Fair Competition

- Delfort commits itself to fair competition vis-à-vis its competitors, business partners and other market participants. We take special care to observe the following principles:
 - Agreements and concerted practices having the object or effect of preventing or restricting competition are strictly prohibited.
 - When communicating with competitors no sensitive business information shall be exchanged or discussed. This includes pricing, sales volumes or production capacities, costs and margins, customer information, marketing and sales strategies, research and development efforts and similar data.
 - The membership of associations related to the business areas of Delfort and the participation in their events shall not result in any activities impairing fair competition or contravening trading or antitrust laws and require prior approval by the respective superior.
 - In the case of receipt of documents, participation in discussions or engagement in other forms of communications that appear to be problematic from a competition law perspective, the communication has to be terminated immediately and the supervisor shall be informed.
- We further the interest of fair competition by refraining from unfair business practices. These include statements relating to our products that could lead to the misleading of customers. We do not disparage competitors or engage in impermissible advertising.

Respecting Property

- Delfort respects the intellectual property of third parties. For that reason we keep



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our know-how strictly confidential as well as the confidential information of our business partners.

- Within their scope of responsibility, employees of Delfort shall protect tangible and intangible assets of Delfort, our suppliers, customers and other business partners.
- Delfort employees are expected to handle and treat equipment, machinery, tools, company cars and other items which are in the ownership of Delfort with due care. It is the duty of each Delfort employee to use resources and assets owned by Delfort in a responsible manner and for business-related purposes only.

Dealing with Confidential Information

- Employees shall keep confidential all matters relating to Delfort that are not specifically intended for the public and shall not disclose this information to competitors or other persons whose knowledge of the confidential information is not in the interest of Delfort. This also applies to information, which has been received in confidence by a third party.
- Delfort strictly adheres to the laws designed to protect and secure the privacy and confidential information about individuals. We are careful not to disclose personal data, within or outside of the company, except when we are legally permitted and have legitimate business need to do so.

Ecological Responsibility

- Environmental protection and ecologically responsible production methods have a high priority for Delfort and we support, among others, the UN Sustainable Development Goals Responsible Consumption and Production and Climate Action.
- To this end we work hard to reduce the environmental impact of our products and operations, use natural resources responsibly, source from PEFCTM and/or FSC[®] certified wood suppliers, improve our resource and energy efficiency, and develop new technologies, optimized processes and innovative products that serve to protect or even benefit the environment, nature and the climate.
- In order to develop and implement best practices throughout the whole supply chain, we closely cooperate with our business partners on environmental issues and support initiatives promoting environmental responsibility.

Implementation of the Code of Conduct

- We communicate with employees through multiple channels to ensure that the principles of business conduct, policies and procedures are widely known. The goal is to equip employees with information, resources and guidance they need to do their jobs in a compliant manner. Every supervisor must organize his or her area of responsibility to ensure adherence to this Code of Conduct and applicable



law.

- Considering the common interest of Delfort and its employees to implement and ensure compliance with the rules as set forth in this Code of Conduct, violations or potential violations shall be reported immediately to the respective direct superior. In case of concerns regarding informing the direct superior, any member of the local top management or the Legal Department shall be informed.
- Every compliance incident brought to the attention of the compliance organization is assessed and, if required, investigated in a timely manner. Any compliance investigation is conducted objectively and protects the confidentiality, dignity and fair treatment of those involved and those who are witnesses to the matter, while assuring the integrity of the investigation.
- Accompanying measures such as process improvements may also be implemented to mitigate identified risks. In addition, we continually evaluate and improve the effectiveness of our compliance program in light of current global and local business and legal environment.

Consequences of Misconduct

- It is expressly forbidden to breach the rules of conduct as set forth in this Code of Conduct. In case of misconduct, Delfort reserves the right to take adequate legal actions. These legal actions will be in accordance with nationally applicable laws, corporate agreements, labour and penal laws and the individual employment contracts.