

Gebrüder Dorfner GmbH & Co. KG

OUR CODE OF CONDUCT



**QUALITY.
FROM THE
VERY
BEGINNING.**

FOREWORD

Dear Sir and Madam,

in our pursuit of economic success, we at Dorfner also attach importance to how we achieve that. In doing so, we are guided by entrepreneurial principles and ethical principles. This code comprises what we stand for at Dorfner and how we want to pursue our values. At the same time, this Code provides us with a framework for decision-making and acting to which we can refer. Last but not least, it is the guidepost for our ethical actions in accordance with global standards and laws.

The Code of Conduct applies to everyone at Dorfner, in all countries where we do business and at all hierarchical levels of our group of companies. We feel it is our duty and inner obligation to live up to this responsibility.

Kind regards,



Mirko Mondan
Chairman of the Executive Board & CEO

PREAMBLE

The Dorfner Group (hereinafter referred to as "Dorfner") with all its affiliated companies accepts its social responsibility worldwide towards its own company and its own employees, towards customers and suppliers in the value chain, and towards the environment.

The following principles are a voluntary code to which the management, executives and all employees are equally committed.



GENERAL PRINCIPLES

Values and Principles

Dorfner is committed to taking responsibility for its activities in all areas of work. Dorfner follows the highest standards in the areas of ethical business conduct, compliance with antitrust and competition laws, and compliance with all relevant and applicable laws and regulations. Working according to these principles strengthens Dorfner's integrity in the eyes of its employees, customers, suppliers, market peers and other interested parties, and helps maintain the company's good name and reputation.

Laws and Order

Dorfner undertakes to comply with the applicable laws and other relevant provisions of the countries in which it operates in all business actions and decisions. Business partners are to be treated fairly. Contracts are complied with, taking into account changes in the general conditions. Dorfner also complies with applicable laws that protect and promote competition, in particular applicable antitrust laws and other laws regulating competition.

All employees of the Company are expected to be familiar with the principles and apply them in their daily business responsibilities. Dorfner is responsible for informing its employees, subcontractors and business partners about these principles.



SOCIAL AND SOCIETAL RESPONSIBILITY

Human Rights

Dorfner respects and supports the observance of internationally recognized human rights. In particular, it observes human rights in accordance with the UN Charter on Human Rights (Universal Declaration of Human Rights, General Assembly Resolution 217 A (III) of 10.12.1948).

Health and Safety at Work

Dorfner ensures occupational safety and health protection at the workplace within the framework of national regulations. In order to prevent accidents and personal injury, Dorfner provides safe and healthy working conditions that meet any applicable legal requirements as minimum criteria. Dorfner supports continuous development to improve its working environment.

Prohibition of Discrimination

Dorfner rejects any kind of discrimination within the framework of the respective applicable rights and laws. Dorfner attaches great importance to respect, dignity and consideration for all people, regardless of their background, age, gender, beliefs or life choices.

Working Time

Dorfner complies with labor standards with regard to the maximum permissible working hours and remuneration, in particular with regard to the level of remuneration, in accordance with applicable laws and regulations.

Remuneration

Compensation, including wages, overtime and fringe benefits, shall be at least equal to or greater than the amount specified in applicable law and statute.

Working Conditions, Prohibition of Forced and Child labor

Employees shall be protected from physical, sexual, psychological and verbal harassment as well as physical punishment. The privacy of employees is to be respected. Dorfner does not accept any form of forced or child labor.

If forced or child labor is discovered in direct or indirect connection, e.g. at a supplier, this is to be reported and the wrongdoing is to be eliminated.

Transparency and Consumer Dialog

Dorfner recognizes the right of consumers to important product and process information needed to make a qualified purchasing decision. Where possible, it will determine the relevant pertinent information and make it publicly available.

Social Commitment

Dorfner promotes civic engagement by making positive contributions to the communities in which it operates. At the same time, it expressly endorses the voluntary commitment of its managers and employees.

Environmental

Dorfner is sustainably committed to the goal of protecting the natural basis of life for present and future generations. Dorfner uses environmentally friendly practices that it continuously improves; it complies with the regulations and standards on environmental protection that affect its operations; and it uses natural resources responsibly.

Communication

Dorfner communicates openly and dialog-oriented about the requirements of this Code of Conduct and about its implementation to employees, customers, suppliers and other interest and stakeholder groups.



PRINCIPLES OF FAIR COMPETITION AND COOPERATION

Ban on Corruption

When dealing with business partners and government institutions, the interests of the company and the private interests of employees on both sides are strictly separated. Decisions are made free of extraneous considerations and personal interests. The applicable criminal law on corruption must be complied with. Among other things, please note as follows:

The company's management and employees may not offer, promise, demand, grant or accept gifts, payments, invitations or services in business dealings that are granted with the intention of unfairly influencing a business relationship or where there is a risk of jeopardizing the professional independence of the business partner.

This is generally not the case with gifts and invitations that are within the scope of customary hospitality, custom and courtesy.

The Company expressly recognizes the importance of honesty, incorruptibility and fairness in its business. Furthermore, the company is aware of its commitment to prevent all forms of active or passive corruption (such as extortion, bribery, promises) towards government officials, political parties, party officials or candidates for public office, etc., in order to obtain or retain business advantages and to fully respect confidential information and intellectual property rights.

Also, no employee may directly or indirectly request, accept, offer or grant incentives or bonuses in the course of his or her business activities that conflict with the Ethical Principles.

Competition Compliance

Maintenance of applicable competition law is a core value for the Company. Dorfner is committed to promoting and complying with national antitrust and competition laws. All employees act in compliance with all competition laws and regulations applicable to the Company's business activities. Dorfner applies the principles of fairness and honesty in its dealings with customers and suppliers. No business will be conducted with business partners or state authorities who practice illegal activities.

Clients

Dorfner strives for a long-term partnership with its customers and is committed to providing them with high-quality products and services, including the necessary information and support.

International Business

Dorfner does business in many countries and is therefore subject to the laws and regulations of several countries, provinces, states and municipalities. Dorfner is committed to complying with national and international law and best practices; it is also committed to respecting the values and customs of the communities and countries in which it does business.



Spelling of genders:

For reasons of better readability, the simultaneous use of the language forms of male, female and diverse (m/f/d) is waived. All personal designations apply equally to all genders and do not imply any valuation.

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The version currently available on the Internet/Intranet applies.

www.dorfner.com/de

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Gebrüder Dorfner GmbH & Co. KG

Scharhof 1

92242 Hirschau Germany

email: info@dorfner.com