

THE DUSSMANN GROUP CODE OF CONDUCT

# Our Responsibility

## Dear colleagues,

Our corporate goals of business success and social responsibility are inseparable. Ethical principles and responsible behavior are the foundation of the Dussmann Group's value system. Our Code of Conduct includes binding guidelines for our conduct towards colleagues, business partners and society in general.

The sustained success of the Dussmann Group is reliant on integrity. Violations of the law and other regulations contradict our principles, damage the reputation of the company and may result in legal consequences. Those who do not comply with legislation harm everyone in the company.

The Code of Conduct is binding for all of us as well as for our suppliers and business partners. Rules and standards described in the Code of Conduct serve as a shared guideline for our daily decisions and actions. Our managers act as role models and embody the values of the Dussmann Group. Infringements are not tolerated and may result in disciplinary measures or penalties.

The continuity and ongoing development of the company depend on our commitment to social responsibility and our reputation as a trustworthy business partner. We thank you for the contribution you make through the integrity of your personal conduct.

September 2023



Wolf-Dieter Adlhoch  
(Chief Executive Officer)



Renato Spotti  
(Member of the Executive Board)



Hakan Lanfredi  
(Member of the Executive Board)



Dieter Royal  
(Member of the Executive Board)

# Our principles of conduct



## Observe legislation and regulations

We comply at all times with applicable legislation, regulations, standards and the requirements of our internal and external stakeholders. Where national legislation is less strict than Dussmann Group regulations, the latter apply. Where national legislation is stricter, this takes precedence. Each individual employee is responsible for ensuring that their actions are always in observance with these obligations.



## Prevent corruption and bribery

Corruption and bribery are not tolerated. In our relations with business partners, we do not grant or accept any benefits that are connected with the intention of influencing business decisions or could even give the impression of influencing a business decision or obtaining any other improper advantage. Gifts and invitations are handled in accordance with the principles of appropriateness and transparency. We reject transactions with financial resources that have been criminally acquired and are to be introduced into the normal economic cycle.



## Avoid conflicts of interest

The Dussmann Group expects its employees to show loyalty towards the company. We avoid situations in which personal or financial interests conflict with those of the Dussmann Group. All (planned) exercise of a mandate in another company (especially with competitors), (planned) paid or unpaid secondary employment, (planned) business activity and (planned) hiring or commissioning of related persons must be approved and documented in advance by the manager in order to disclose conflicts of interest.





### **Observe the rules of fair competition and antitrust law**

We win contracts in fair competition. We do not participate in activities or agreements which contravene the rules of national and international competition or antitrust law. Any cooperation with competitors, for example cooperation agreements, bidding consortiums, joint ventures or other agreements, is reviewed beforehand by the legal department.



### **Maintain transparency and fairness in our dealings with business partners**

We maintain fair, reliable relationships with our suppliers, subcontractors and service providers. We select our business partners by applying transparent, objective criteria and respect the principles of free, fair competition. All listed Dussmann Group business partners commit to the Dussmann Group Code of Conduct in writing.



### **Protect the climate and the environment**

We protect the environment and reduce our environmental impact through minimization of energy, materials and resource consumption, ongoing reduction of waste and through deployment of environmentally friendly products. We make careful use of raw materials throughout the entire life cycle. We achieve continuous improvement through innovative solutions to increase energy efficiency. In this way, we make a positive contribution to the environmental performance of our stakeholders.



### **Create a safe, healthy work environment**

We minimize hazards and reduce risks to create a safe and healthy working environment. Through safety measures, we prevent work-related injuries and illnesses and thus protect our employees. Employees are actively involved in this process and the necessary work and operating resources as well as protective equipment are provided. Required training and instructions are to be carried out regularly and all recognized hazards, accidents and illnesses are to be reported immediately. Everyone is responsible for compliance with occupational health and safety. Employees are supported by their managers and health and safety officers.



### **Respect human rights**

The Dussmann Group respects the dignity of every individual. We are committed to respecting human rights along the entire value chain according to our policy statement on respect for human rights and fulfill corresponding due diligence obligations.



### **Oppose discrimination**

We oppose any form of discrimination based on gender, age, origin, religious affiliation, ideology, sexual identity, disability or trade union activities. Decisions made in the context of employment such as recruitment, promotion and disciplinary action must be free of discrimination.



### Promote equality and fairness

We value and promote diversity. We create a work atmosphere that promotes fairness, trust and respect. Intimidation and offensive behavior are not tolerated. The company is committed to equality—employment-related decisions are based on objective criteria. This includes equal pay for equal work.



### Ensure fair working conditions

We comply with the relevant regulations to ensure fair working conditions. This includes appropriate remuneration, independent from the country in which the service is provided, not falling below the applicable (statutory) minimum wage. We respect collective labour agreements. The maximum number of working hours in accordance with applicable laws must be observed.



### Prevent child and forced labor

We do not tolerate child labor or the exploitation of children/young adults. The minimum age of employment is never lower than the age at which compulsory schooling ends, and in no case less than 15 years. No one is directly or indirectly forced to work by the threat of punishment or by intimidation. Employment is always voluntary.



### Exclude harassment and abuse of any kind

We do not tolerate abusive conduct or harassment including unwelcome advances and physical and verbal abuse.



### **Uphold the right to freedom of assembly, freedom of association and collective bargaining**

We uphold the right to freedom of assembly, freedom of association, collective bargaining in accordance with the law of the place of employment.



### **Careful use of company property**

All employees are obliged to use company property and the property of clients with care and only as intended. Equipment, work materials, rights of use and licenses may only be used in the scope of work for the Dussmann Group. Improper use for illegal, inappropriate personal or other unauthorized purposes is not permitted.



### **Document business transactions**

All relevant business transactions are fully, systematically and traceably documented in accordance with legal and internal regulations.



### **Protect the data and privacy of personnel and clients**

We take great care and maintain strict confidentiality when processing the personal data of our personnel and clients (e.g. name, address, telephone number, date of birth, health information). We observe data protection regulations in our business processes. We respect privacy. Appropriate standards of security with regard to authorization and access controls apply for all information-processing systems.



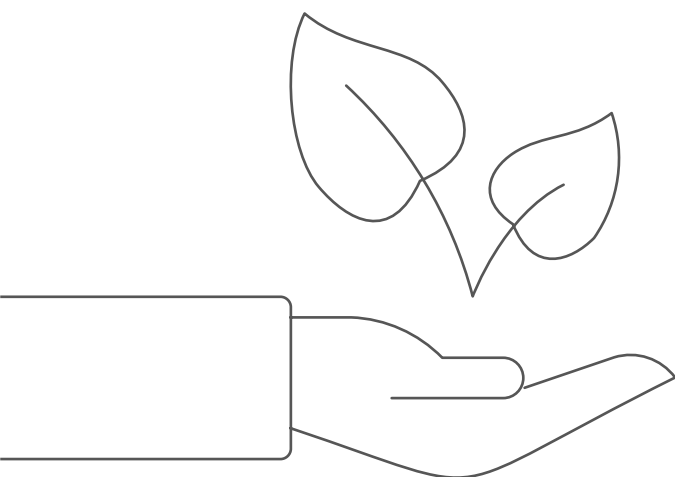
### **Protect trade secrets**

Trade secrets and other confidential information as well as intellectual property of the Dussmann Group are protected against disclosure to unauthorized persons. Such information may be used for business purposes only and may not be made accessible to third parties (including family members and friends). This obligation continues to apply after termination of employment.



### **Shape information security**

Information and data are an essential asset of our company and must therefore be adequately protected. Secure information processing and responsible management of cyber risks are essential for us. We only use systems and applications provided by the company to perform service-related tasks.





### **Communicate with the public in a coordinated way**

We communicate precisely and consistently. This is why only those authorized to do so may communicate with the media or in social media channels on behalf of the Dussmann Group.



### **Report violations and concerns (whistleblower system/ ombudsman)**

The Dussmann Group promotes an environment in which concerns and violation can be raised in an open way. We encourage everyone to report known or suspected violation of the principles and content of the Code of Conduct, company policies and legislation. Notification may be made confidentially and, if required, anonymously to the compliance department. Reports of potential criminal offences or violation of laws or regulations may also be submitted to the external ombudsman. Anyone who submits a report to the best of their knowledge will not suffer any disadvantages.

More information: <https://en.dussmanngroup.com/responsibility/governance#whistleblower>



### **Non-compliance has consequences**

Breach of the Code of Conduct can compromise the business of the Dussmann Group significantly. In addition to disciplinary measures, non-compliance by any Dussmann Group representative or employee may be penalized by state authorities. We maintain an open dialogue concerning infringement of the Code of Conduct and resulting penalties.



### **Observe and uphold the Code of Conduct**

Everyone is called upon to comply with the principles set down in this document. Managers set an example as role models of business integrity. Every supervisor must ensure that all employees in their sphere of responsibility are aware of, understand and comply with the regulations. We support employees who have questions regarding this Code of Conduct and exclude any disadvantage resulting from adherence.

#### **Contact:**

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