

# Our behavior explained

## Code of Conduct



## Dear Ladies and Gentlemen, Dear Colleagues,

since its foundation over 130 years ago, the Demmel Group has earned a reputation as a reliable and fair partner. These values, coupled with innovation and top quality, have made the Demmel Group to a respected global manufacturer of premium trim parts, brand emblems, human-machine-interface products, high-tech electronic products and high-quality plastic parts. We intend to maintain and further expand this position in the future.

To fulfill this mission, this Code of Conduct is intended to be our ethical and legal compass. It contains the basic rules for our conduct within the Demmel Group as well as towards our business partners and the public. Violations of laws and of other basic rules are not tolerable - without exception.

In line with our corporate guidelines, our Code of Conduct formulates the essential rules and principles for legally correct and responsible behavior by our employees\*. It describes the values that are mandatory for us and is as well used as an orientation framework for our stakeholders specified in further documents.

Public perception and the success of the Demmel Group depend to a large extent on the conduct of our employees\*. By formulating an ethical and legal basis for our actions, we create positions of orientation, prevent conflict situations and promote the public image of our company.

The Code of Conduct supplements and specifies our corporate principles of being responsible, team-oriented and entrepreneurial. These rules apply to us as management and to each individual employee\*, regardless of position, whether employed in corporate functional areas or in our plants and divisions. Each of you is responsible for complying with these rules without exception.

We therefore ask you not only to take note of the rules, but furthermore to consider them in your daily work and to live our core values of fairness, honesty and compliance with the law. Always critically examine your behavior and align your actions with this Code of Conduct.

Board of Directors and Management  
DEMMELE Group

\* For reasons of easier readability, only the masculine formulations are used in this document and in all regulations based on it, insofar as gender-neutral formulations cannot be used. However, this always refers to people of any gender identity, i.e. male, female and diverse and, where provided for in other countries, corresponding differentiations for the collective term "diverse".

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## I. Introduction

### This Code of Conduct is mandatory for everyone.

This Code of Conduct describes the values, basic rules and principles on the basis of which we deal with each other and conduct our business. They are binding for us and a clear commitment: We comply at all times and in all places with applicable laws, fundamental ethical values, respect human rights conventions and act sustainably.

The Code of Conduct helps us implement these rules by identifying potential areas of risk and conflict and providing behavioral guidelines - to live compliance and integrity.

For us, **Compliance** means adherence to rules and regulations. **Integrity** means matching ideals and values with one's own words and actions. Each of our employees\* acts in the interest of the Demmel Group and bears personal responsibility for ensuring that his or her actions comply with this Code of Conduct and with applicable laws.

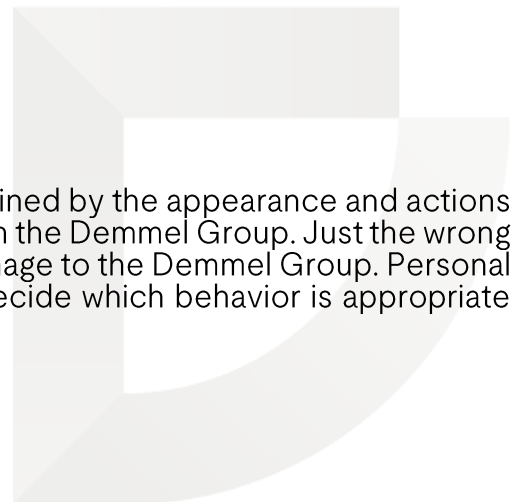
The management and the executives fulfill a special role model function within the scope of their respective personnel and leadership responsibilities. We expect a high level of integrity, ethical and social competence from them. They create a working environment that supports the understanding, implementation and observance of the Code of Conduct.

Each employee\* must inform himself/herself about the legal directives, laws, regulations and internal instructions applicable to his/her area of responsibility. In cases of doubt, advice must be sought from the relevant specialist departments or from the legal advisors active in the respective country. For individual areas of regulation, there are Demmel Group guidelines, process guidelines, work instructions, leaflets, etc., which specify the rules of this guideline and which must be observed by the employees\*.

This Code of Conduct cannot answer all the questions we encounter in our daily work. It is therefore supplemented by internal documents, procedural instructions and contractual agreements. In addition, specific guidelines - such as the Supplier Code of Conduct - are provided for specific stakeholders.

### What is the right way to behave?

The reputation of the Demmel Group is essentially determined by the appearance and actions of each individual employee\*, regardless of their position in the Demmel Group. Just the wrong behavior of a single individual can cause considerable damage to the Demmel Group. Personal integrity and a strong sense of responsibility help us to decide which behavior is appropriate in which situation. We should always ask ourselves:



- Can I ensure that my behavior does not trigger any conflicts of interest?
- Does my behavior comply with the basic principles of the Demmel Group and my own ethical values and attitudes?
- Can I accept responsibility for my conduct in good conscience?
- Is my behavior legal and in accordance with the law?
- Could I stand by it if my behavior became public knowledge?

If you can answer yes to the questions, your behavior is probably consistent with the guidelines. If you still have doubts, you may contact your supervisor and/or your respective management contact.

## II. General Principles

### 1. Integrity and Corporate Responsibility

The Demmel Group complies with all applicable social, societal and cultural rules, laws, standards and regulations of the countries and regions in which we do business. We conduct ourselves morally and ethically in accordance with our fundamental principles described in our Code of Conduct to fulfil compliance and integrity.

We protect our Demmel Group from harm and promote its positive image. Our communication is transparent and open within the limits of non-disclosure and other confidentiality agreements, which we observe and respect.

#### 1.1 Respect for and protection of human rights

The Demmel Group is committed to the Universal Declaration of Human Rights of the United Nations and to its observance. We protect and respect the rights of minorities and indigenous peoples, the avoidance of forced evictions and the deprivation of land, forest and water rights, as well as the prohibition of private and public security forces, if their use threatens human rights violations due to lack of instruction or control. We do not tolerate forced labor or child labor and observe the regulations set forth in the ILO conventions.

Furthermore, the Demmel Group does not tolerate any form of modern slavery and human trafficking or any activities associated with them. This includes, among other things, the use of misleading or fraudulent methods in the recruitment of employees\*, such as charging employees\* recruitment fees or confiscating employees\* identity documents. We expect the same from our business partners without exception.



## 1.2 Diversity & Equal Opportunity, Respect and Courtesy

We firmly reject any form of discrimination, e.g. on the basis of skin color, gender, religion, age, nationality, social background, disability, sexual orientation, ideology or other personal characteristics. We do not accept discriminatory harassment, threats or intimidation and in return promote equality, women's rights and a culture of equal opportunities. We also foster a culture in which people can develop their talents and ideas. We expect each other to be open-minded and to promote diversity. This is an essential prerequisite for the productivity of each individual and a pleasant working atmosphere in general.

In the same way, basic rules of mutual respect and politeness are indispensable and must be lived out as a matter of course. We support and motivate our employees\*, promote their development and skills to the best of our ability and at all levels. We respect the dignity, privacy and personal rights of all people and deal with each other in a trusting, respectful and open manner.

## 1.3 Freedom of association

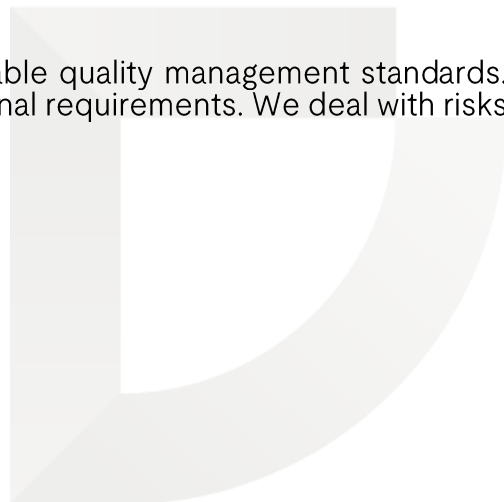
We respect the right of all employees\* to form and join labor unions and employee representatives on a democratic basis. Open and trusting cooperation with employee representatives is a key element of our corporate philosophy. If this right is restricted by local laws, we promote alternative, legally compliant options for employee representation.

## 2 Product Quality and Product Safety

We consistently comply with all applicable product safety regulations and requirements and expect the same from our business partners. This also includes the legal requirements regarding the quality, safety, labeling and packaging of products, as well as the use of hazardous substances and materials and the avoidance of counterfeit parts or plagiarism.

A high level of customer and quality orientation is the basis of our actions, which are always focused on the safety of use of our products. We develop future-oriented and innovative products according to the current state of technology and science and constantly educate ourselves to meet the high demands of our customers.

We are guided by and comply with internationally applicable quality management standards. Our certified quality management complies with international requirements. We deal with risks in a transparent, professional and responsible manner.





## 3. Integrity in Market Behavior

Integrity is a fundamental prerequisite for sustainable and successful participation in global competition, as well as one of our core beliefs. Our business decisions must be consistent not only with our values and ideals, but also with applicable law. Compliance and integrity are therefore directly linked. They are the crucial factors for our success and our good reputation worldwide.

### 3.1 Fair competition

The Demmel Group stands for fair, responsible and free competition. We act in accordance with applicable national and international competition and antitrust laws and stand by our contractual obligations. We do not enter into any anti-competitive agreements with our business partners, e.g. on strategies, conditions, quantity restrictions, territorial or market divisions, prices or on bids in public tenders. We expect and require the same from our business partners.

At events, such as association meetings, trade fairs or symposia, at which Demmel Group employees\* meet representatives of the competition, we limit communication to neutral topics of discussion that are not relevant to competition law. In the general exchange of information with competitors, we take care not to provide or accept any information that might allow conclusions to be drawn about the current or future market behavior of the Demmel Group.

### 3.2 Prevention of Money Laundering

The Demmel Group complies with all national and international laws and regulations for the prevention of money laundering and against the financing of terrorism and other crimes. We maintain business relationships exclusively with business partners of whose integrity we are convinced. Our employees\* do not take any actions, either independently or in cooperation with third parties, that could violate applicable laws against money laundering. Incoming and outgoing payment transactions are primarily subject to monitoring via the house banks.

### 3.3 Business information

We maintain open and truthful reporting and communication with business partners, investors, employees\*, the public and government institutions or authorities. It is important to us that both internal and external reports, records or other documents of our company comply with the applicable legal rules and standards, that they are not only complete and accurate, but also that they are made in a timely manner and in accordance with requirements.





## 4 Integrity in Business Relationships

Willingness to cooperate, honesty and transparency are elementary prerequisites for credibility and trust in business relationships as well as for fair competition. We strive to maintain a correct relationship with all business partners, institutions, government and other authorities, characterized by these values. We do not allow personal dependencies or obligations to arise towards business partners.

### 4.1 Loyalty & Conflicts of Interest

In our Demmel Group, decisions are made exclusively on the basis of objective criteria and in the best interests of the company. We do not allow ourselves to be influenced by personal interests or relationships and we expect the same from our business partners.

Our employees\* may not use their professional position among suppliers, service providers or their employees for their own benefit or the benefit of third parties, nor may they demand or accept personal benefits.

### 4.2 Fight against Corruption

The Demmel Group does not tolerate corruption, bribery or extortion. Therefore, in dealing with business partners, public officials or third parties involved in business transactions, material or immaterial benefits may never be demanded, promised or accepted that could give the impression of influencing business decisions.

Similarly, personal benefits must never be promised, offered or granted to business partners, public officials or third parties involved in business transactions with the intention of obtaining an order, securing a business deal or providing the Demmel Group with any other unjustified advantage. We expect the same from our business partners.

### 4.3 Gifts, invitations, donations

We do not allow ourselves to be influenced by our business partners, especially suppliers and service providers. For this reason, the acceptance of gifts from our business partners is prohibited. We only accept invitations if occasion and scope are appropriate. If a gift or invitation cannot be rejected for reasons of politeness, the further procedure must be coordinated with the supervisor or the respective person in management.

Appropriate invitations or gifts to our business partners are made in consultation with the supervisor. We only make donations on a voluntary basis and without the expectation of any consideration in return. Their allocation is documented transparently. Donations to political parties and religious communities are generally not permitted.

## 4.4 Consulting and mediation activities

The Demmel Group uses consultants or intermediaries only in accordance with applicable laws. We ensure that only consulting and mediation services actually rendered are remunerated and that the remuneration is commensurate with the service rendered.

## 5 Corporate Assets

Our company assets and property secure the economic basis and the success of our business activities. In this context, we are also obligated to our owner to preserve and increase these assets.

Our tangible corporate assets include, for example, buildings, machinery, raw materials, inventories, products and production equipment and are indispensable for our daily business. Intellectual property, such as samples, models, designs, patents, trademarks and copyrights, industrial property rights, trade secrets, confidential information and know-how, are part of the intangible assets of the company and ensure our future viability.

### 5.1 Protection of corporate assets

We handle the resources and assets of our company in an appropriate, protective and lawful manner. We protect them from misuse, damage, destruction, loss and theft.

### 5.2 Protection of Intellectual Property & Innovation

Our intellectual property, i.e. our concepts, innovations and know-how, is extremely valuable. It is our capital and secures our future success. Therefore, we protect it all the more and respect the intellectual property of others. If intellectual property of the Demmel Group is made available to third parties, appropriate agreements must be signed to protect the rights of our company.

As a matter of principle, we do not disclose confidential information, trade and business secrets or know-how of the Demmel Group or of our business partners to third parties, or only to the extent that this is expressly agreed and permitted. We use this information exclusively for business purposes and take appropriate measures to protect it. Confidential information includes, for example, technical data about products or processes, marketing or sales strategies, customer data, non-public financial or transactional information, civil or criminal proceedings, and all personal data. The obligation to keep confidential information classified continues to apply after termination of the employment relationship.

## 5.3 Data protection of personal data

The Demmel Group attaches great importance to the protection of personal data, especially that of employees\*, customers and suppliers.

We only collect and process personal data if this is necessary or required by law, or if we have the consent of the person concerned. We take appropriate measures to protect them in accordance with applicable laws.

## 6. Reporting, Taxes & Export

We maintain transparent and honest business communications with our owner, our business partners and our employees\* in accordance with all applicable laws, rules and regulations.

### 6.1 Proper Documentation, Accounting & Financial Integrity

Financial integrity is based on proper and truthful accounting, regular internal documentation and transparent financial reporting. Records and digital information are processed, stored and retained in accordance with legal requirements and our internal standards and procedures. We attach importance to ensuring that our records are always complete, accurate and legible.

### 6.2 Taxes

The Demmel Group complies with all applicable national and international tax laws. We pay our legally levied taxes correctly, on time and in full in the country in which they are collected.

### 6.3 Export Control

The Demmel Group complies with all applicable international and national agreements and laws governing the control of international trade and financial transactions, as well as laws governing import and export controls.

Our employees\* in foreign business must know, understand and consistently comply with the relevant laws, regulations and procedures. Non-compliance may result in lasting business-damaging consequences for our Demmel Group, including the loss or restriction of import and export licenses.

The Demmel Group complies with all applicable laws governing the import and export of goods, services and information. We ensure strict compliance with all mandatory sanctions and embargoes.



## 7 Climate Protection & Environment, Health & Safety

Energy efficiency and climate protection are of paramount importance to the Demmel Group. Therefore, we pursue a group-wide, global climate strategy and work consistently to continuously improve the sustainability of our company and our products. We pay strict attention to keeping all potential impacts on the environment and climate as low as possible, both in the development and planning of new products and in our process flows and manufacturing.

### 7.1 Compliance with legal requirements

The Demmel Group complies with all applicable legal and regulatory requirements and internationally recognized environmental and occupational safety standards. We assume responsibility with regard to environmental protection and occupational safety. We require our business partners to meet a minimum ecological standard and to continuously improve their environmental performance.

### 7.2 Energy and resource management

We use all resources carefully and focus on initiatives to consistently expand our contribution to environmental and climate protection. Sustainable resource management and activities to reduce waste are part of our daily activities.

For us, resource conservation means not only the economical use of environmentally relevant raw materials, consumables and supplies, but also a material cycle within the plants. We evaluate materials, technical equipment and services according to ecological aspects before they are procured. We minimize environmental impact in our products and production processes and strive to consistently reduce our energy consumption and greenhouse gas emissions as well as to improve air quality. We demand environmental compatibility of our products from their creation to the end of their product life cycle.

### 7.3 Environmental management system

At the Demmel Group, all activities are geared towards sustainable environmental protection and are summarized on a location specific basis. Since 1990 the DEMMELE AG - as parent company and pioneer - is one of the first metal processing companies with an environmental and energy management system, which is certified according to the European EMAS standard.

### 7.4 Occupational Safety & Health Protection

We attach great importance to occupational health and safety. Safety risks are systematically eliminated. We aim to provide a safe and healthy working environment at all times. We comply with laws, regulations, recommendations and ordinances governing working hours and occupational health and safety and offer fair wages and social benefits.

All employees\*, contractors, suppliers and visitors are required to comply with occupational safety regulations at our sites. Everyone is required to identify potential accident risks and eliminate them or report them to their supervisor or the occupational safety officer. In this context, the management and executives have a special role to play as role models. Working under the influence of mind-altering medicines, alcohol, drugs or other mind-altering substances is strictly prohibited in our companies.

## 8 Social Responsibility

As a globally operating company, we see ourselves as a responsible member of society at our locations. The Demmel Group is committed to environmentally sound business practices and assumes social responsibility. For us, awareness and commitment to social responsibility is an important prerequisite for our corporate success. We also encourage our employees\* to get personally involved.

## 9 Open Communication

We communicate consistently, openly and respectfully. We respect the right to freedom of expression as well as the protection of personal rights and privacy.

Our employees\* are aware that they can also be perceived as representatives of the Demmel Group in their private lives. Each of us ensures through his or her behavior and appearance in public, especially towards the media, that the reputation and standing of our company is not damaged.

Any form of corporate communication is always carried out by or in coordination with the respective public relations departments of our company.







### III. Scope, Implementation and Legal Consequences

This Code of Conduct applies to all employees\* of the Demmel Group worldwide and is mandatory for them. The respective locations and their departments actively ensure its implementation. Business and contractual partners, consultants and representatives are equally required to observe these rules of conduct.

Violations of applicable laws or of this Code of Conduct are not tolerable and will be punished within the framework of legal and company regulations.

The Demmel Group actively promotes the communication of the rules underlying this Code of Conduct. We promote a corporate culture in which we communicate and deal with each other openly and fairly. We encourage each individual to act responsibly and to work as a team.

Our managers have a special role model function. They set an example through their own behavior. They are the first point of contact for questions about understanding the regulations and ensure that all employees\* know and understand the Code of Conduct. Each employee\* contributes to the implementation of the Code of Conduct through appropriate behavior.

In case of questions or doubts regarding appropriate ethical behavior or with regard to compliance with rules and principles of conduct, we expressly encourage our employees\* to seek advice from their respective supervisor.





## IV. Contact, Whistleblowing and Reporting

This Code of Conduct describes the most important elements of compliance-relevant business activities and behavior. It sets out the main principles for compliance with applicable laws and ethical behavior. However, this Code of Conduct cannot cover all issues and areas.

If you are not sure whether a behavior or approach complies with the rules of our Code of Conduct, the questions formulated at the beginning can help. In many cases, it is advisable and helpful to speak directly to the person concerned. If a direct approach is not possible or is not an option for you, please contact your line manager or management directly.

**Everyone needs to be alert and willing to point out breaches of the rules if they have specific information!**

If you have the feeling that you cannot approach your manager or management with your concerns - for whatever reason - please contact our ombudsman and whistleblower office via the following channels:

Reporting platform <https://demmel.hinweisgeberexpertemeldeplattform.de>

Other channels:

- Telephone at + 49 (0) 89 21 52 74 33
- Mail: [info@hinweisgeberexperte.de](mailto:info@hinweisgeberexperte.de)
- Postal address Compliance Beratung + Service GmbH  
Maximilianstraße 24 | D-80539 Munich
- Personal contact on request by appointment (telephone | e-mail)



These can be reported to the whistleblower system confidentially, anonymously if required - at any time. This includes, for example, violations of laws such as antitrust law, corruption, violation of human rights, theft or discrimination. Violations of internal regulations (codes of conduct, mission statements, etc.) and all types of discrimination (human rights, #metoo) can also be reported.

### Protection for all parties involved

The whistleblower system guarantees the greatest possible protection for whistleblowers and those affected. An investigation is only initiated after careful examination of the information and if there are concrete indications of a breach of the rules. The information is processed as part of a fair and confidential process. Discrimination, intimidation or hostility resulting from a report to the company's whistleblower system will be investigated and punished in accordance with the same process.

## Making a reports – but do it right!

After receiving the information, our service provider (ombudsman team) processes it in accordance with all the necessary procedural principles (e.g. confidentiality, protection of the whistleblower). In order to process cases and, if necessary, initiate appropriate investigative measures, dialog with the whistleblowers is often necessary. It is therefore important that the report is formulated as specifically as possible. It is helpful if you consider the following five questions when making a report:

- Who – Who is involved? Who is affected?
- What – What has happened? Describe the facts of the case.
- When – When was the incident?
- How – How often did it happen?
- Where – Where did the incident take place?

Whistleblowers should ensure that the descriptions can also be understood by non-specialists. For this purpose, it is helpful if they are available for further questions. If the whistleblower so wishes, the anonymity of the whistleblower will be strictly maintained by our contracted service provider.

In addition to our service provider, other departments within the company may also be involved in the processing of reports. In the case of well-founded reports, the company investigates the facts, if necessary with the assistance of other internal or external experts. The company also cooperates with the HR department in the investigation and initiates measures where necessary. Subsidiaries of the company are also taken into account and contribute to the processing of the information in line with the responsibility and reporting structures.

The Demmel Group ensures that reprisals and any retaliatory measures against the whistleblower are prohibited. The organization also ensures that any operational measures and changes with regard to the whistleblower\* are not related to the exposure of grievances.

## Deliberately incorrect reports and false accusations will be subject to disciplinary action!

In this context, we refer to the Whistleblower Protection Act and emphasize that in the event of an intentional or grossly negligent false report, the whistleblower is obliged to reimburse the resulting damage.

If neither the communication channels via superiors, management or the **preferred internal reporting office** are effective, whistleblowers can turn to external reporting offices. In the country of the parent company, external reporting offices have currently been set up at the Federal Office of Justice, the Federal Financial Supervisory Authority and the Federal Cartel Office. All information on the responsibilities of the external reporting offices and how to contact them can be found on the website of the Federal Office of Justice:

[https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes\\_node.html](https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html)

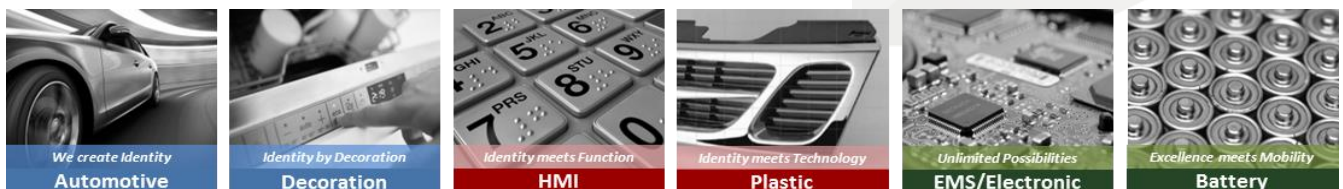


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