



# Our behavior explained

Supplier  
Code of  
Conduct





## Dear business partners,

since its roots more than 130 years ago, Demmel Group has earned a reputation as a reliable and fair partner. These values, coupled with innovative top quality, have made Demmel Group a re-spected global manufacturer of premium decorative parts, brand emblems, human-machine-interface products, high-tech electronics products, and high-quality plastic trims. We want to maintain and further expand this position in the future.

For us, corporate social responsibility (CSR) and sustainability is not a buzzword, but a central component of corporate management and sustainable corporate strategy. For the Demmel Group, respect for applicable laws and regulations plays an important role. In addition, ecological, social and socially responsible aspects, such as the observance of human rights, fair working conditions and long-term environmental protection, are central pillars of our activities and our actions, and are considered in our sustainable business strategy.



## 1. HUMAN RIGHTS

1.1 The Demmel Group expects its suppliers to respect the rights of minorities and indigenous peoples, to avoid forced evictions and the deprivation of land, forests, and water rights, as well as the prohibition of private and public security forces if their use threatens human rights violations due to a lack of instruction or control. A particular focus is on the observance of internationally recognized human rights such as the United Nations Declaration of Human Rights.

1.2 The Demmel Group expects its suppliers to guarantee equal opportunities in employment and to refrain from any discrimination, unless national law expressly permits selection according to certain criteria. Employees\* may not be treated differently on grounds of gender, race, skin color, any disability, origin, religion, age or gender orientation. (ILO Conventions No. 100, No. 111 and No. 159, source: <http://www.ilo.org>)

1.3 The Demmel Group expects its suppliers to prohibit any kind of forced labor (ILO Conventions No. 29 and 105), servitude or involuntary labor and child labor (ILO Conventions No. 138 and No. 182). The minimum age of employees is based on the respective national law or collective bargaining agreements, insofar as these do not fall below the minimum employment age enshrined in ILO Convention No. 138.

1.4 The Demmel Group expects its suppliers to comply with ethical recruitment, respect for women's rights, as well as human diversity, equality, and inclusion. In addition, we do not expect to engage, participate in or profit from any trafficking-related activities or trafficking during the entire recruitment phase and duration of employment.

## 2. WORKING CONDITIONS

2.1 We expect our suppliers to recognize the right to equitable remuneration for all employees (ILO Convention No. 100). The remuneration and other benefits (social benefits, holidays, etc.) shall consider the principle of fairness and correspond at least to the respective national law or the level of the national economic sectors / industries.

2.2 The Demmel Group expects its suppliers to apply and comply with the respective national regulations and agreements on working hours and regular paid holidays.

2.3 The Demmel Group expects its suppliers to ensure occupational safety and health protection at the workplace (ILO Conventions No. 155 and 187) within the framework of the respective national law and that continuous development takes place to improve the working environment.



### 3. FREEDOM OF ASSOCIATION

3.1 The Demmel Group expects its suppliers to recognize the right of employees to freely form or join trade unions of their choice (ILO Conventions No. 87 and No. 98). The suppliers accept the establishment of company or trade union interest groups of the employees and accept them positively, if these do not conflict with the respective national law.

### 4. ENVIRONMENT

4.1 The Demmel Group expects its suppliers to comply with the applicable national environmental laws, regulations and standards. The supplier strives to introduce an environmental management system that meets the requirements of ISO-14001 of the EMAS Regulation of the European Union or a comparable national standard and whose effectiveness is proven by an audit or certification system.

4.2 The Demmel Group expects its suppliers to manage resources sustainably and to guarantee the best possible effective environmental protection and the continuous reduction of environmental pollution, including noise emissions. This includes the continuous reduction of environmental impacts and measures to improve air and soil quality, animal welfare, the preservation of biodiversity, the prevention of deforestation and responsible chemical management.

4.3 The Demmel Group expects its suppliers to ensure that all products manufactured along the supply chain, including all materials used, meet the relevant environmental protection standards of their market segment. This relates in particular to the reduction of energy and water consumption, the decarbonization and reduction of greenhouse gas emissions, increased use of renewable energies, as well as the promotion of an appropriate circular economy with reuse and recycling and waste management to reduce waste.

### 5. COMPLIANCE

5.1 **Compliance requirements** - Our stakeholders judge us according to how the Demmel Group conducts its business. Therefore, our reputation is crucial for the continuity and profitability of the Demmel Group. No violation of the law can be justified by invoking alleged business requirements. Therefore, the Demmel Group requires impeccable business conduct from its suppliers and their employees\*, subcontractors, intermediaries, and consultants in the form of compliance with all applicable laws, regulations and industry standards.

Within the scope of the business relationship, corruption or corruption attempts of any kind and other illegal practices such as fraud, extortion, embezzlement, theft, tax evasion, money laundering or plagiarism are not tolerated. The Demmel Group expects that, within the scope of its financial responsibility, the supplier has established processes for monitoring and compliance with all applicable laws, regulations and industry standards and has accurate records of this and maintains them permanently.

5.2 **Benefits and gifts** - The Demmel Group expects its suppliers not to accept, demand or give any benefits that could lead to a conflict of interest. These include inadmissible donations, bribes and kickbacks or other unlawful payments (e.g., to accelerate routine administrative matters) to public officials or other persons in the context of the business relationship. Procedures for the enforcement and monitoring of these requirements shall be established and applied.

5.3 **Dealing with authorities and public officials** - The Demmel Group expects its suppliers to comply with legal requirements when dealing with governments, authorities, and public institutions. When participating in public tenders, they observe the respective legal requirements and the rules of fair and free competition.



**5.4 Use of consultants and intermediaries** - The Demmel Group expects its suppliers to use intermediaries and consultants only in accordance with the respective national law. They shall ensure that the remuneration paid is only granted for intermediary and consultancy services provided and that the amount is in a reasonable proportion to the service delivered.

**5.5 Competition law** - The Demmel Group expects its suppliers to comply with the applicable antitrust and competition law provisions. They do not enter into antitrust agreements (e.g., to set prices or share markets) with competitors, suppliers, customers or other third parties, nor do they exploit a possible dominant market position in an undue manner. Any actions that give even the appearance of concerted conduct shall be refrained from.

**5.6 Foreign trade regulations** - The Demmel Group expects its suppliers to comply with all applicable laws for the import and export of goods, services, and information, including export controls and economic sanctions, embargoes, regulations, government orders and guidelines.

**5.7 Prevention of money laundering** - The Demmel Group expects its suppliers to take appropriate and appropriate measures to counteract the introduction of illegally acquired funds into the economic cycle.

**5.8 Tax compliance** - The Demmel Group expects from its suppliers that the taxes / duties incurred in their country of domicile, or third countries are paid in accordance with the rules and documented accordingly.

**5.9 Data protection** - The Demmel Group expects its suppliers to comply with and ensure the respective requirements for the data protection of personal data.

## 6. CONFLICTS OF INTEREST

**6.1** The Demmel Group expects its suppliers to make decisions exclusively based on objective, business-related criteria and not to be influenced by private or financial interests or personal relationships. Any potential or actual conflict of interest with employees of the Demmel Group shall be disclosed by the supplier to the Demmel Group.

## 7. INTELLECTUAL PROPERTY / CONFIDENTIALITY

**7.1** The Demmel Group expects its suppliers to respect trade and business secrets, know-how and patents of the Demmel Group and third parties. The data / information provided may only be used within the scope of the business relationship for the agreed purpose and for the fulfilment of services for the Demmel Group, unless express written consent has been given for other purposes. Confidential information and content must be protected against internal and external misuse and may not be published, passed on to third parties or made available in any other form without authorization.

## 8. RESPONSIBLE SOURCING OF RAW MATERIALS

**8.1** The Demmel Group expects its suppliers to comply with all applicable legal regulations on conflict materials. If a product contains one or more of the so-called conflict materials (tin, tantalum, tungsten, gold, or the corresponding ores), the Demmel Group expects its suppliers to be able to ensure transparency about their supply chain upon request

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## 9. RESPONSIBLE HANDLING OF HAZARDOUS MATERIALS AND WASTE

9.1 The Demmel Group expects its suppliers to act in accordance with applicable legal norms and international standards when handling hazardous materials and waste. In addition, the requirements of the Minamata Convention, the Stockholm Convention and the Basel Convention apply. Risks associated with the handling of hazardous substances and waste must be prevented, minimized, or eliminated. Hazardous substances and waste must be labelled, handled, stored, and transported in accordance with the applicable regulations. In addition, proper reuse, recycling, or disposal must be ensured.





## 10. COMPLIANCE

For the Demmel Group, compliance with environmental, social, and corporate responsibility rules and standards in the value chain is of great importance. Together with our suppliers, the Demmel Group strives for their continuous improvement.

The Supplier Code of Conduct is an integral part of the assignment. All suppliers are required to demonstrate compliance with the Supplier Code of Conduct as part of a self-assessment. The Demmel Group reserves the right to subsequently check compliance with the requirements and, if necessary, to define any necessary measures for improvements with the supplier, e.g., in the context of audits or other measures deemed suitable by the Demmel Group.

The Demmel Group also expects its suppliers to pass on the expectations and contents of the Supplier Code of Conduct to their subcontractors and suppliers, to oblige them accordingly and to ensure compliance.

Any violation of the rules and standards listed in this Supplier Code of Conduct is considered an impairment of the business relationship and the contractual relationship. The Demmel Group expects its suppliers to actively investigate any suspected cases of violations and to cooperate unreservedly with the Demmel Group in this regard. The Demmel Group reserves the right to request information about the relevant facts in the event of suspicion of non-compliance (e.g., negative media reports).

### Whistleblowing system

The Demmel Group would like to encourage its suppliers to report any violation of the rules and standards of this Supplier Code of Conduct, which is committed by a third party or a representative of the Demmel Group itself, primarily to their contact person at the Demmel Group or – if preferably anonymously – centrally to an ombudsman office of the Demmel Group. If you would like to make a report in this regard, please send it to the following contact:

**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. 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 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. 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.



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The Demmel Group ensures that reprisals and any retaliatory measures against the whistleblower are prohibited. 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 your direct contact persons within the Demmel Group, the management of the respective subsidiaries or the preferred internal reporting channels are effective, the whistleblowers can turn to external reporting offices. In the country of the parent company, external reporting offices are currently 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)

The Supplier Code of Conduct is published on the homepage of the Demmel Group and made available for download. The Demmel Group reserves the right to update the content of the Supplier Code of Conduct as required by legal or regulatory changes.







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\* For reasons of easier readability, only the masculine formulations are used in this document and in all regulations based on it. 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".



*We create Identity*  
**Automotive**



*Identity by Decoration*  
**Decoration**



*Identity meets Function*  
**HMI**



*Identity meets Technology*  
**Plastic**



*Unlimited Possibilities*  
**EMS/Electronic**



*Excellence meets Mobility*  
**Battery**





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