

Gebrüder Dorfner GmbH & Co. KG

Version June 2025

**Our**  
**Code of Conduct**  
for suppliers



# 1 INTRODUCTION

## 1.1 PREFACE

The Code of Conduct represents a voluntary commitment by all employees of the Dorfner Group to act correctly and responsibly in their professional daily activities. The principles described in this document reflect the Dorfner culture and the way we interact within our company, which has continuously evolved over more than 130 years of corporate history. In business relationships, we act reliably, transparently, responsibly, and ethically. These principles provide a framework for our actions.

## 1.2 EXPECTATIONS AND SCOPE OF THE DORFNER SUPPLIER CODE OF CONDUCT

The Dorfner Group expects its suppliers to comply with applicable national laws and this Dorfner Supplier Code of Conduct in all their activities. Furthermore, suppliers are expected to implement appropriate processes that support compliance with applicable laws within their companies and promote continuous improvement with regard to the principles and requirements of the Dorfner Supplier Code of Conduct. We also expect our suppliers to ensure that their affiliated companies also comply with and acknowledge all principles and requirements described herein. "Affiliated companies" within the meaning of this declaration are entities in which the parent company holds, directly or indirectly, at least fifty percent (50%) of the voting share capital.

Business partners within the meaning of this Supplier Code of Conduct, from whom we expect compliance with the standards set forth herein, include all third parties acting for, on behalf of, or in cooperation with the Dorfner Group. These include, among others, suppliers, service providers, sales partners, consultants, brokers, subcontractors, commercial agents, and freelancers.

Suppliers must comply with all applicable laws, regulations, and international standards, including but not limited to:

- Labor laws (social responsibility)
- Environmental protection laws (ecological responsibility)
- Anti-corruption and competition laws (ethical business conduct)

# 2 INTEGRITY

## 2.1 COMPLIANCE WITH APPLICABLE LAWS

Compliance with all applicable laws and regulations is a matter of course for us. We expect the same from our business partners. Only in this way can a trustworthy and long-term business relationship be ensured. In certain countries, business sectors, or markets, stricter regulations may apply than those described in this Supplier Code of Conduct. In such cases, the stricter regulations must be followed.

## 2.2 FOREIGN TRADE LAW

National and international laws regulate the import, export, or domestic trade of goods, technologies, or services, the handling of certain products, as well as capital and payment transactions. Appropriate measures must be taken to ensure that transactions with third parties do not violate applicable economic embargoes or regulations on trade, import and export controls, or the prevention of terrorism financing.

### 2.3 PROTECTION AGAINST CORRUPTION AND BRIBERY

Dorfner expects its suppliers to have zero tolerance for corruption and to ensure compliance within their companies with the United Nations (UN) and the Organisation for Economic Co-operation and Development (OECD) conventions on combating corruption, as well as with relevant anti-corruption laws. In particular, they must ensure that their employees, subcontractors, or representatives do not offer, promise, or grant any benefits to Dorfner employees or third parties close to them with the aim of obtaining a contract or other preferential treatment in business dealings. Any form of bribery, corruption, or unethical behavior is strictly prohibited.

### 2.4 INVITATIONS AND GIFTS

Dorfner expects its suppliers not to misuse invitations and gifts to exert influence. Invitations and gifts to Dorfner employees or people close to them are only permitted if the occasion and scope are appropriate and they are considered and tolerated as an acceptable expression of locally recognized business practices. Likewise, suppliers must not demand any inappropriate advantages from Dorfner employees.

### 2.5 CONFLICTS OF INTEREST

Dorfner expects its suppliers to make decisions related to their business activities with Dorfner solely based on objective criteria. Conflicts of interest with private matters or other economic or personal activities - including those of relatives or other closely associated persons or organizations - must be avoided from the outset. Business partners who are affected by a potential or actual conflict of interest in their dealings with Dorfner are obliged to disclose and resolve it immediately.

### 2.6 FAIR COMPETITION

Dorfner expects its suppliers to behave fairly in competition and to comply with applicable competition and antitrust laws. Suppliers must not engage in anti-competitive agreements with competitors or abuse their market position. They must refrain from anti-competitive agreements with competitors, suppliers, distributors, dealers, and customers, as well as from other practices that restrict competition. This includes, for example, price-fixing with competitors, dividing customers or sales territories among competitors, unlawful boycotts, and the illegal exchange of competitively sensitive information with competitors.

### 2.7 PROTECTION OF ASSETS AND PROPERTY

Any form of fraud or asset-damaging offenses (e.g., fraud, breach of trust, theft, embezzlement, tax evasion, or money laundering) is prohibited, regardless of whether it harms Dorfner's assets or those of third parties. Dorfner expects its suppliers to comply with the relevant legal obligations for the prevention of money laundering and not to engage in money laundering activities.

### 2.8 PROTECTION OF INTELLECTUAL PROPERTY

Intellectual property refers to rights to intangible creations (products of intellectual work), regardless of their commercial value. This includes, among others, software and graphic works. Intellectual property is protected by law (e.g., copyright, trademark, design, or patent rights), as trade secrets, or as know-how. Violations of protected intellectual property include the use, disclosure, and unauthorized reproduction or distribution of intellectual property (patents, drawings, designs, etc.), whether in physical or digital form. The protection of intellectual property is of essential strategic importance to Dorfner and is therefore also expected from our business partners.

## 2.9 DATA PROTECTION

When collecting, storing, processing, or transmitting personal data (e.g., name, address, telephone number, date of birth, health information) of employees, customers, or other third parties, our business partners must exercise the utmost care and strict confidentiality, and comply with applicable laws and regulations. The protection of confidential information must be ensured.

## 2.10 FINANCIAL INTEGRITY

Business transactions, assets, and liabilities must be recorded and documented in accordance with legal requirements. Documents relevant to financial accounting must not be knowingly falsified or contain misleading entries. Any form of accounting manipulation is prohibited. Business transactions must be documented or recorded under all circumstances.

## 2.11 CONFIDENTIALITY AND BUSINESS INFORMATION

Our business partners must ensure that confidential information and data are stored securely, not disclosed or made accessible to unauthorized persons, and used exclusively for the agreed business purposes. Discussing confidential information in public or on social media, or unauthorized disclosure of information about the company or its customers to third parties - such as media or competitors - constitutes a breach of confidentiality and may result in violations of competition law and significant claims for damages. Suppliers must promote fair competition and avoid collusion. Suppliers must disclose and actively avoid potential conflicts of interest.

## 2.12 INFORMATION SECURITY

In day-to-day business, sensitive information is regularly used and processed through IT systems. Appropriate security measures (processes, approved technologies, and licensed software) are required to ensure the protection of intellectual property and personal data. Failure to observe necessary security measures can lead to serious consequences, such as data loss, theft of personal data, or infringement of copyright. Our business partners commit to using the information provided by Dorfner solely for fulfilling agreements with Dorfner and not for unauthorized personal purposes or for unethical or illegal activities. It is the responsibility of our business partners to ensure that all necessary measures are taken to protect sensitive information from internal and external misuse and threats.

# 3 HUMAN AND LABOUR RIGHTS

## COMPLIANCE WITH APPLICABLE STANDARDS AND LAWS

Dorfner expects its suppliers to comply with the fundamental labor rights set out in applicable national and international laws, as well as to recognize the core labor standards of the International Labour Organization (ILO) and the Universal Declaration of Human Rights of the United Nations, taking into account the laws and legal systems applicable in different countries and locations. Dorfner expects its suppliers to respect the rights of third parties and to minimize any potential adverse impacts in accordance with international standards. We expect our suppliers to respect and uphold the fundamental rights of their employees:

Prohibition of Child Labor:

No children under the legally permitted minimum age may be employed.

Prohibition of Forced Labor:

Any form of forced, compulsory, or involuntary labor is prohibited.

Fair Working Conditions:

Employees must work in a safe and healthy environment. Discrimination or harassment of any kind will not be tolerated.

Working Hours and Compensation:

Dorfner expects its suppliers to comply with applicable national legislation on working hours. Furthermore, employees must receive compensation in accordance with applicable national laws.

Promotion of Diversity and Inclusion:

Suppliers should take measures to promote diversity and equal opportunities within their operations.

Preservation of Livelihoods:

Suppliers have a responsibility toward the environment and natural resources to help secure the living conditions of current and future generations.

Non-Discrimination:

No employee may be disadvantaged based on gender, age, marital status, skin color, nationality, ethnic, political, or social origin, sexual orientation, disability, religion or belief, or political opinion.

Freedom of Association:

Dorfner expects its suppliers to respect employees' rights to form employee representations and engage in collective bargaining, in accordance with national legislation.

Conflict Minerals:

Dorfner expects its suppliers to comply with all applicable legal regulations regarding conflict minerals.

## 4 HEALTH AND SAFETY AT WORK

### HEALTH AND SAFETY

We expect our suppliers to comply with the applicable national legislation on health protection and occupational safety. Furthermore, suppliers are expected to establish and implement an appropriate occupational safety management system (e.g., in accordance with SCC\*\* or ISO 45001). This includes both the mitigation of actual and potential occupational safety risks and the training of employees to best prevent accidents and occupational illnesses.

## 5 ENVIRONMENTAL PROTECTION RESPONSIBLE USE OF NATURAL RESOURCES

Dorfner expects its suppliers to comply with all applicable national environmental laws, regulations, and standards. Furthermore, suppliers are expected to establish and implement an appropriate environmental management system (e.g., in accordance with ISO 14001) to minimize environmental impacts and risks, and to ensure and improve environmental protection in daily business operations.

Our suppliers must proactively contribute to reducing their ecological footprint and take measures to minimize environmental impact (based on Science Based Targets Initiative SBTi):

### Energy Efficiency:

Implementation of measures to reduce energy consumption and transition to renewable energy sources where possible.

### Carbon Footprint:

Commitment to tracking and reducing greenhouse gas emissions throughout the entire value chain.

### Waste Management:

Systems for waste separation, recycling, and minimization of waste.

### Circular Economy:

Promotion of recycling and reuse of materials in the production process.

### Sustainable Procurement:

Preference for materials and raw materials from sustainable sources.

### Use of Environmentally Friendly Technologies:

Promotion of innovations and technologies that enable more sustainable production.

### Use of Certifications:

Suppliers should comply with environmental standards such as ISO 14001 or equivalent certifications.

### Reduction of Water Consumption:

Measures for responsible use and reduction of water consumption.

## 6 SUPPLIER RELATIONSHIPS SUBCONTRACTORS AND SUB-SUPPLIERS

Dorfner expects its suppliers to communicate all principles and requirements described herein to their subcontractors and sub-suppliers and to take them into account when selecting such partners. Suppliers are encouraged to ensure that their subcontractors and sub-suppliers comply with the described standards on integrity, human and labor rights, health and safety, and environmental protection in the course of fulfilling their contractual obligations.

Furthermore, Dorfner expects its suppliers to use only materials from legal sources and to be able to provide proof of this upon request.

## 7 COMPLIANCE WITH THE DORFNER SUPPLIER CODE OF CONDUCT

### 7.1 COMPLIANCE

Compliance with the principles and requirements of this Dorfner Supplier Code of Conduct by suppliers is verified through supplier self-assessments. In addition, on-site audits may be conducted by Dorfner or a third party commissioned by Dorfner, in coordination with the supplier.

We invite our suppliers to actively participate in innovative projects that promote sustainability. Together, we can create a positive impact on our environment and society.

#### Joint Initiatives:

Suppliers are encouraged to participate in cross-industry programs and partnerships to accelerate progress in sustainability and social issues.

#### Promotion of Sustainable Logistics:

Measures to reduce transport emissions and the use of low-emission technologies.

### 7.2 VIOLATIONS

Any violation of the principles and requirements set out in the Dorfner Supplier Code of Conduct is considered a material breach of the contractual relationship by the supplier. In the event of suspected non-compliance, Dorfner reserves the right to request information regarding the matter. Furthermore, Dorfner reserves the right to terminate individual or all contractual relationships with suppliers who demonstrably fail to comply with the Supplier Code of Conduct or who do not pursue and implement improvement measures after being granted a reasonable period to do so.

To ensure compliance with these standards, our company reserves the right to:

- Conduct audits and inspections at the supplier's premises.
- Request documentation and reports demonstrating compliance with these standards.
- Enforce consequences in the event of violations, including termination of the business relationship.
- Evaluate sustainability performance: Suppliers are regularly assessed, and development plans may be introduced to address weaknesses.
- Ensure supply chain transparency: Suppliers are expected to disclose the origin of raw materials and the entire supply chain.

## 8 DORFNER SUPPLIER CODE OF CONDUCT SUPPLIER DECLARATION

1. The supplier has received the "Dorfner Supplier Code of Conduct."
2. The supplier hereby commits to complying with and acknowledging all principles and regulations of the Dorfner Supplier Code of Conduct, in addition to the obligations arising from framework and supply agreements with the Dorfner Group.
3. This declaration is governed by the substantive law of the Federal Republic of Germany.

Name and Address of the Supplier (alternatively, company stamp)

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Name, First name of the Responsible Person

Position/Job Title

Email Address

Date, Signature of the Responsible Person

*This declaration must be signed by a person duly authorized in the field of sustainability, or alternatively by an appropriately authorized sales colleague or another member of the executive management.*