

# Preamble

As a responsible group of companies, DKV MOBILITY SERVICES Group (DMG) is committed to ethical, legally compliant and socially responsible corporate governance. We constantly strive to optimise the social and environmental conditions of our business activities.

The following principles are based on the principles of the UN Global Compact (UNGC), the United Nations Guiding Principles on Business and Human Rights and the agreements of the International Labour Organisation (ILO). It is understood that we conduct our business in compliance with laws, rules and regulations. The Code of Conduct sets out the moral and ethical values and requirements that DMG commits itself and its business partners to uphold. The Code of Conduct specifies our expectations regarding the attitude and behaviour of suppliers and business partners.

The principles are considered the basis for a successful business relationship between DMG and its suppliers and business partners. The suppliers / business partners undertake to comply with at least comparable standards and ensure that these are complied with. They shall provide self-disclosure upon request and make available all necessary documents. Business partners / suppliers shall inform DMG of any event that contradict this Code of Conduct.

We welcome the commitment of business partners / suppliers who take and implement initiatives and management systems in accordance with established industry standards in the areas of quality, occupational health and safety, environmental protection and social affairs, as well as strive for substitution with sustainable alternatives in procurement, insofar as this appears possible and economically sensible.

Business partners / suppliers must ensure compliance with the principles of conduct listed here in their own supply chains.

Ratingen, September 2021

Carsten Rübener
Head of Purchasing | Central Services

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We observe the applicable German General Equal Treatment Act (AGG). The texts below are for the most part in the masculine form of address. This is solely for better readability and is free of any form of inequality. We address all persons equally. For reasons of readability, no differentiation is made.



### **COMPLIANCE WITH LAWS AND REGULATIONS**

The laws and regulations of the respective applicable jurisdictions shall be complied with. In the global context, compliance with the respective applicable export, customs and tax laws shall be ensured.

### **NO CORRUPTION OR BRIBERY**

Business partners must not engage in any form of corruption or bribery when dealing with employees of DMG and its business partners.

### PROTECTION OF CONFIDENTIAL INFORMATION

Business partners shall use and protect any information in an appropriate manner. They must ensure that data worthy of protection is properly collected, processed, secured and deleted. The privacy of employees shall be protected. The business partners shall oblige their employees to protect business secrets. Confidential content may not be published, passed on to third parties or made available in any other way without authorisation.

# **FAIR COMPETITION**

All business activities are subject to the rules of fair competition. Business partners shall comply with antitrust laws and acts against unfair competition. Conflicts of interest shall be avoided wherever possible. Where conflicts of interest cannot be avoided, they shall be actively disclosed, and mitigating measures taken.



### NO SUBCONTRACTING

Our business partners / suppliers must ensure that the production of goods or the provision of services is not outsourced to partners or locations where the rules of conduct agreed in this policy are not or only partially respected.

### **NO DISCRIMINATION**

We do not tolerate discrimination in business relationships and interactions or harassment in the work environment based on gender, age, religion, caste, birth, social background, disability, ethnic or national origin, nationality, membership in employee organisations, including trade unions, political membership or opinion, sexual orientation, family responsibilities, marital status or any other situation that could lead to discrimination.

#### NO FORCED LABOUR

Business partners / suppliers shall not use or promote servitude, forced or compulsory labour, slavery, human trafficking or involuntary labour of any kind. They shall not make employment conditional on the surrender of the worker's passport or work permit.

# **NO CHILD LABOUR**

Child labour is prohibited. No employees may be employed who do not have a minimum age of 15 years. In countries covered by the developing country exemption under ILO Convention 138, the minimum age may be reduced to 14 years.



### PROTECTION FOR YOUNG WORKERS

When young workers under the age of 18 are employed, they must not work at night or in conditions that affect their health, safety, morale and development. In addition, it must be ensured that business hours do not conflict with school attendance.

### **EMPLOYMENT**

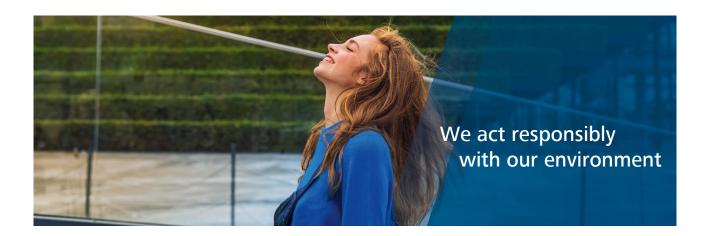
Work must be performed based on a recognised and documented employment relationship that complies with national law, custom or practice and international labour standards. Employment, development and promotion opportunities shall be based solely on occupational qualifications and performance.

# SAFE AND HEALTHY WORKPLACE

All occupational health and safety regulations must be complied with within the framework of national legislation. The employer must ensure the right of workers to healthy working conditions. There must be no risk to life and limb. Vulnerable persons such as young workers, young mothers and pregnant women and persons with disabilities are subject to special protection.

### **REASONABLE WORKING HOURS**

Overtime should remain an exception, be voluntary, be remunerated with a premium and not be associated with significantly higher occupational risks.



#### ADEQUATE REMUNERATION

The right of workers to adequate remuneration must be ensured. Wage levels must reflect workers' qualifications and education levels and be based on normal working hours. Systematic delay of wage payments is not acceptable.

# **ENVIRONMENTAL PROTECTION**

Business partners undertake to comply with the national minimum requirements for environmental protection and to take necessary measures to prevent environmental damage. Impacts on the environment shall be kept as low as possible. When developing products and services, they must ensure that measures are implemented to reduce the use of resources and that resources are used sparingly.

### SAFE PRODUCTS AND SERVICES

Business partner products and services must not endanger people or the environment. They must comply with the prescribed national safety standards.

### **COOPERATION AND TRANSPARENCY**

An open and transparent information policy is an important condition for us. We therefore always expect complete and honest reports. Information must be comprehensible and verifiable.

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