

Code of Conduct and Ethics



Preamble

Our traditional company has developed steadily since 1928. As a leading manufacturer of precision springs and stamped-formed parts in Germany, we bear ecological, environmental and social responsibility, which begins with the management of the company. Our success is based on our global network of suppliers with strong partners that help us deliver first-class products to our customers. We strive to optimize our business activities and our products in terms of sustainability and expect the same from our suppliers.

The wave of sustainable development is in full swing. But we don't want to just let ourselves drift, we want to be an active pioneer and an example. That is why sustainability management has been an essential part of our corporate structure since the middle of 2022, in order to position ourselves for the future and offer our employees a safe workplace. We expect our suppliers to adhere to the same ethical standards that we demand of our employees. This Code of Conduct and Ethics applies to our employees and suppliers.

This Code of Conduct and Ethics summarizes our principles in accordance with our corporate culture and is based on the fundamental principles of the International Labor Organization (ILO). We require our suppliers, service providers, consultants, representatives or any other third party acting on behalf of Dietz GmbH ("Suppliers") to comply with the Code. It is an essential part of our contractual relationship. As part of the supply chain due diligence, we expect the guidelines to be passed on to the sub-suppliers. This agreement applies to future deliveries and comes into force upon signing. In addition, it is with immediate effect an integral part of our conditions of purchase. The Dietz company reserves the right to control compliance and to take action in case of violations.

Thank you!

Matthias Dietz
CEO Dietz GmbH

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Ethical business conduct

1. Anti-bribery and anti-corruption laws

The **highest standards of integrity** must be applied to all business activities. Our suppliers must comply with **all current laws applicable** to them and to their business relationship with Dietz. The supplier is required to pursue a zero-tolerance policy on all forms of bribery, corruption, extortion, racketeering and money laundering. The supplier is also required to implement procedures to monitor and enforce the standards to **ensure compliance with anti-bribery and anti-corruption laws**.



2. Gifts and hospitality

In general, employees shall not request, accept or accept a promise for personal benefits, neither for themselves nor for persons close to them. Employees are only allowed to accept **personal benefits** (e. g. invitations to restaurants or gifts) if they are given **freely and without expectation in return**. The benefit must be within the scope of generally accepted business practices and must not violate any law.



On the other hand, Dietz employees are not permitted to demand gifts or hospitality from suppliers. If you are harassed by Dietz employees, you should report it immediately. This is possible (anonymously) via our whistleblower system on our homepage or by e-mail to Compliance@dietz.eu.

3. Protection of information and intellectual property

Our employees and suppliers may have access to Dietz **intellectual property** or gain knowledge of **confidential information** about our company, employees and business partners. They are obliged to protect privacy when collecting, storing, processing, transmitting and disclosing business and personal data and to comply with the laws on **data protection, information security and official regulations**. The supplier also warrants that the products supplied to Dietz are **no plagiarisms or forgeries** which violate the **rights of third parties** through their development, manufacture and later use.



The conclusion of a **non-disclosure agreement** is arranged individually in the case of sensitive information. If you identify violations of intellectual property rights or the disclosure of confidential information, contact the position Compliance in our company immediately (contact details p. 9).

4. Anti-trust and competition laws

We compete intensively and comply at all times with all applicable **anti-trust and competition laws**, to which we also oblige our suppliers. Suppliers are **not allowed to take any action that restricts competition**: Agreements with competitors with regard to prices, discounts or terms of sale, limitation of production, market division, division of customers, coordination of offers or the boycott of customers and suppliers.



5. Conflicts of interest

To ensure that our relationships with our business partners are based on integrity and sound business judgment, we require our employees to **promptly disclose any conflicts of interest**. In particular, the following are not permitted: Orders to related persons or companies in which related persons work, as well as secondary employment for competitors or business partners. As well, we expect our suppliers **to inform us immediately** if there is a related or close personal relationship with a Dietz employee who can make or influence a business decision that is potentially advantageous for the supplier.



6. Information sharing and disclosure

We pursue an **open information policy**, which we also require from our suppliers. They should disclose **financial and non-financial information** in accordance with applicable regulations and prevailing industry practice.

As a result, Dietz keeps its employees informed about its business activities and complies with legal requirements regarding the disclosure of information to the employees.



7. Financial responsibility / Accurate records

Suppliers are required to ensure **transparent and proper accounting**, which can be reflected in financial reports and documents. In addition, an appropriate control system for financial reporting should exist.



8. Sanctions and export control laws

We expect our suppliers to comply with all applicable **export control laws, embargoes and customs regulations**. In addition, compliance with all applicable laws prohibiting business relations with **restricted countries, organizations or persons** is required.



Social responsibility

1. Respect of human rights

Dietz strives to act in accordance with all **internationally recognized human rights**. We expect the same from our suppliers in all business activities within their sphere of influence. They should ensure that they themselves, **their business partners and their suppliers** do not commit or participate in any violations of human rights. This applies in particular to the employment and deployment of **private and public security experts**.



2. Prohibition of child labor

Child labor is strictly prohibited at any production phase. According to ILO conventions, the age of employment should not be less than the age at which compulsory education ends. In any case, it should **not be less than 15 years**. If children are found at work, measures must be taken to enable them to attend school. However, **a training or vocational education program approved by the respective government** for the clear benefit of the participants is an exception.



3. Prohibition of forced labor

All forms of forced labor and human trafficking are prohibited. Psychological and physical abuse as well as sexual and personal harassment are strictly prohibited. Employees must be able to terminate their employment relationship at any time.



4. Diversity and equal opportunities

The **diversity** of our employees is a fundamental strength for our global company. We therefore expect our suppliers to **respect women's rights, maintain equal opportunities, and prohibit discrimination** on the basis of gender, origin, nationality, skin color, religion, disability, sexual orientation or any other legally protected characteristic. The personal dignity, privacy and personal rights of each individual are respected. In principle, **employees are selected, hired or promoted on the basis of their qualifications and skills**.



Dietz actively supports its employees in their **professional training** so that they can develop their greatest possible potential. This includes internal and external training, the transfer of **responsibility** and empowerment, the promotion of **continuous development** at all levels and offers **career opportunities**.

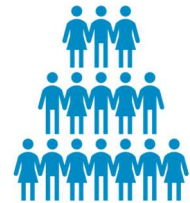
5. Fairness in working hours and wages

Compensation and benefits must comply to the basic principles of minimum wages, applicable overtime regulations and statutory social benefits. **Working hours and non-working hours** must at least comply with applicable laws, industry standards or relevant ILO conventions, whichever is stricter.



6. Freedom of association

Our suppliers shall allow their employees to **form and join trade unions or labor associations and to bargain collectively** in accordance with local laws. Where this right is restricted by local law, alternative possibilities for employee representation that comply with the law shall be encouraged.



7. Right to freedom of expression

Dietz strives to create an **atmosphere of trust** at all company levels and to encourage employees to express their **opinions** freely with regard to **improvements and optimization** of their working environment. Employees must not suffer any disadvantages as a result, and we expect the same from our suppliers.



8. Health and safety

Our suppliers are required to comply with at least all applicable national laws concerning health protection and occupational safety. They have to ensure a **safe and healthy workplace**, provide **personal protective equipment** for the employees and take **preventive measures** to avoid accidents and health hazards in connection with their work. Employees shall be provided with access to sufficient **drinking water** and the use of **clean sanitary facilities**. The Employees should receive regularly **information and training** on the topics of occupational safety and health protection.



9. Rights of minorities and indigenous peoples

Suppliers should respect the **rights of local communities** to adequate living conditions, education, employment and social activities. Furthermore, it is necessary to ensure that no decision affecting indigenous peoples is taken without their **free prior and informed consent (FPIC)**.

10. Land, forest and water rights and eviction

Dietz **respects the legal land rights** of individuals, indigenous peoples and local communities, and **prohibits unlawful forced evictions**. It also prohibits the purchase, development or other use of land, forests and waters which are essential to a human's livelihood.



11. Private or public security forces

Suppliers should not hire or deploy private or public security guards to protect the business project if the deployment of security forces may result in **human rights violations** due to a **lack of training or control** by the company.



12. Grievance mechanism

We expect our suppliers to have a process in place that allows the submission of complaints. **Retaliation** towards the submitter **is not allowed**.

Environmental responsibility

Dietz GmbH is committed to protecting the environment in order to **avoid or minimize the environmental impact** resulting from its activities. We expect our suppliers to comply with the applicable legal requirements and to strive to continuously improve their environmental performance by **acting in an environmentally-conscious manner**. We encourage our suppliers to strive for certification according to established standards such as ISO 14001 or EMAS.

The most important environmental impacts of these standards should be regularly evaluated, monitored, reviewed, and take action if required:

- The use and consumption of resources such as **water, energy and raw materials** should be kept **as low as possible**.
- The switch from fossil energies to **renewable energies** should be pursued in order to **reduce** the company's own **greenhouse gas emissions**. In addition, the **reporting of greenhouse gas emissions** should be promoted whenever possible.
- The generation of **waste of any kind has to be avoided** and has to be disposed properly and, as far as possible, fed back into the **circulation**. When handling **hazardous substances** and flammable materials, the regulations on **storage and disposal have to be complied with**.
- **Air, noise and greenhouse gas emissions** should be **minimized**.
- **Wastewater** from operations, manufacturing processes, and sanitary facilities **has to be checked and minimized** prior to discharge or disposal.
- **Avoidance of soil contamination and minimization of land** use through deforestation and sealing should be adhered to in order to promote **biodiversity** in a sustainable manner.
- The **five freedoms of animals** of the World Organization for Animal Health (WOAH) in relation to animal welfare should be respected. The animals should not be raised or killed for the sole purpose of use in products or for experimentation.



Responsible procurement of raw materials

As a partner to the automotive industry, we are obliged to **trace and disclose the origin of minerals from conflict and risk areas** such as gold, tin, tungsten and tantalum. Upon request, our suppliers have to provide data on the use of conflict minerals in their products using the standardized **Conflict Minerals Reporting Template (CMRT)**. Suppliers may be requested to obtain similar information from their own suppliers to clarify the origin of minerals from conflict and high risk areas. Smelters and refineries without adequate **audited due diligence processes** should be avoided.

Integrity through good communication

1. Implementation of the requirements

If any of the requirements in this document conflicts with Dietz's global supplier requirements, the **requirements in this document take precedence**. We ask you, as a supplier to Dietz, to support us in maintaining the values of **"honesty"** and **"integrity"** as set forth in this Code. In particular, we remind you that violation of certain elements of this Code constitutes a violation of the law in the legal system in which we operate. Dietz does not tolerate any violation of the law by suppliers. Our **employees** are also required to **act with integrity** at all times and to **report any suspected violations** of our ethical standards.

2. Reporting incidents and prohibiting retaliation

We expect our suppliers to identify risks in their **supply chains**, to take appropriate measures and, where necessary, to provide regular information on identified risks.



We require you to **take the necessary measures** to ensure that your employees understand this Code and comply with the requirements set out in it. In the event of a **suspected violation** of applicable law or this Code by suppliers or Dietz employees, we expect **immediate notification**. Retaliation against employees who report violations is prohibited.

A violation can be reported directly to the **Compliance Office** or via our **online complaint procedure** on our website, which also allows anonymous reports to be made.



Self-assessment questionnaires and on-site audits can be used to **verify compliance with the Code of Conduct and Ethics**. By signing the Code of Conduct, the supplier agrees that Dietz may conduct or commission such an audit if necessary and after reasonable advance notice. If a supplier violates the Code, Dietz takes various **measures** depending on the situation, such as the implementation of corrective measures, the suspension of the business relationship or the termination of the business relationship.



3. Support by compliance experts

If you have any questions about the requirements outlined in the Dietz Supplier Code of Conduct and Ethics, please contact the Compliance Office directly:

Compliance @ Dietz GmbH
Am Floßgraben 10
96465 Neustadt bei Coburg
Compliance@dietz.eu

Code of Conduct and Ethics

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Acknowledgement and consent

By signing, the supplier commits to act in a responsible and sustainable manner and, where possible, to take necessary precautions to implement this Code of Conduct and Ethics. In addition, the contents of the Code should be communicated to employees, service providers and suppliers in order to guarantee compliance in the supply chain.

Date

Company stamp, Signature

Effective Date: 1st January 2018
Last Reviewed: 15th November 2024

Approved by: CEO