

ONE VISION. ZERO EMISSIONS



CODE OF CONDUCT

Status 09/2023

Values

Morals

Ethics

www.dilo.eu





PREAMBLE

DILO Armaturen und Anlagen GmbH develops complete solutions for professional, emission-free gas management in accordance with the ONE VISION. ZERO EMISSIONS slogan. Customer orientation is our central drive to develop solutions which offer you safety, economic efficiency and a technological advantage. Thus, DILO is continuously developing its service portfolio to meet the dynamic requirements of the markets.

DILO's range of products and services is divided into the following levels:

- SF₆-Gas
- Alternative Insulating Gases (SF₆-substitutes)
- Equipment of industrial gases
- High pressure products
- DILO Certified Gas

As a major employer in our region, DILO is aware of its social and ethical responsibility. With this Code of Conduct, we set out the fundamental values that guide us. We expect our employees to respect these values and to put the principles laid down here into practice in their daily work. Likewise, we expect our suppliers and customers to comply with the standards set out here, also with regard to all employees. If suppliers use subcontractors, they are responsible for ensuring that all subcontractors also comply with these requirements. The supplier must communicate these standards in an appropriate form to its sub-suppliers and ensure compliance with the standards.

DILO's Code of Conduct is based on the following generally accepted guidelines:

- Universal Declaration of Human Rights of the United Nations
- United Nations Global Compact
- ILO International Labour Standards
- Kyoto Protocol / Paris Climate Agreement and subsequent agreements
- United Nations Convention against Corruption





BASIC GUIDING PRINCIPLES

PRINCIPLE 1: RESPECT FOR HUMAN RIGHTS



DILO is expressly committed to respecting human rights within its area of influence. We commit ourselves not to be involved in any form of human rights violations, neither directly nor indirectly. We also expect our suppliers to treat all human beings respectfully and fairly and to uphold human rights within their area of influence. Since the rights of all genders fall under human rights, in the understanding of DILO, the protection of these is of fundamental importance to us and must be guaranteed. We expect the same from our suppliers. We also expect our suppliers to ensure that no human rights violations are committed when private or public security forces are deployed. DILO commits itself to ensure this too.

PRINCIPLE 2: RESPECT FOR THE FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

DILO respects the right of its employees to freedom of association and to collective bargaining. DILO's employees are free to form or join an employee representation. Being a union member must not result in disadvantages for employees. Employees or their representatives can also negotiate and conclude operational agreements or collective contracts at an appropriate level. Our suppliers must also respect their employees' rights to freedom of association and collective bargaining.

PRINCIPLE 3: ENSURING FAIR LABOUR CONDITIONS

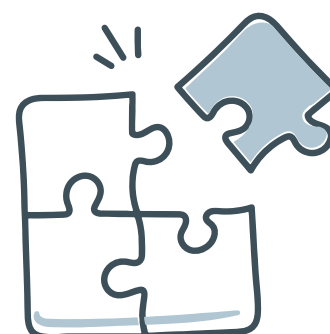
DILO pays attention to fair working conditions for all employees. This includes compliance with the relevant national regulations governing working hours as well as the right to appropriate remuneration, which should at least conform to the respective minimum wage or the applicable collectively agreed wage. Similarly, all salaries and benefits agreed in the employment contract as well as all nationally prescribed social benefits are paid or deducted. Furthermore, DILO supports the further qualification of its employees. We also expect our suppliers to offer their employees fair working conditions and to remunerate them appropriately.





PRINCIPLE 4: ELIMINATION OF ALL FORMS OF FORCED LABOUR, CHILD LABOUR AND HUMAN TRAFFICKING AND RESPECT FOR THE RIGHTS OF MINORITIES

DILO is committed to the prohibition of all forms of forced labour. This includes all types of work or services that are enforced by a person under threat of punishment or that are not voluntarily provided by a person. DILO requires that our suppliers do not permit any kind of forced labour within their companies. DILO is committed to the prohibition of any form of child labour. If minors are employed, DILO observes the minimum age for admission to employment in accordance with national regulations. DILO is committed to the prohibition of any form of human trafficking and to respect the rights of minorities. DILO demands that its suppliers do not tolerate any kind of child labour or human trafficking within their companies. Furthermore, DILO expects that our suppliers and customers respect the rights of minorities. We expect that our suppliers and customers do not let young employees carry out dangerous work, that they observe the national employment regulations of minors and that they do not hinder children's education due to their employment.



PRINCIPLE 5: ELIMINATION OF ALL FORMS OF DISCRIMINATION IN RECRUITMENT AND EMPLOYMENT

DILO rejects all forms of discrimination in the working environment. We respect the privacy of our employees. We are committed to equality of opportunity and diversity and advocate that all employment decisions (such as appointment, promotion and training) are based without bias solely on people's skills and qualifications. Aspects such as ethnic origin, religion or ideology, gender, sexual identity, age, nationality, disabilities, social background, personal relationships or union affiliation may not influence employment decisions. DILO supports a culture which enables employees to work to their full potential and to be able to contribute with equal rights at any given time. We expect the same from our suppliers and customers. DILO rejects any form of sexual harassment of employees and takes all legal measures available against it. We also expect our suppliers and customers to promote equal opportunity and diversity and to prevent discrimination in employment decisions and sexual harassment.





PRINCIPLE 6: COMPLIANCE WITH OCCUPATIONAL HEALTH AND SAFETY

DILO complies with the applicable national legislation on occupational health and safety. Our primary concern is to offer our employees a healthy and safe working environment. We are committed to keeping the risks which employees are exposed to as low as possible by taking appropriate measures to prevent health problems and accidents. The employees' working conditions are designed in accordance with their individual needs and are subject to a continuous improvement process. All applicable legal framework conditions for health protection, workplace ergonomics and work safety are observed. Our suppliers and customers are equally required to meet the applicable national legislation on health and safety at work. They must take active measures to prevent work-related accidents, diseases and deaths and thus guarantee their employees a healthy and safe working environment.

PRINCIPLE 7: OBSERVATION OF ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

Environmental protection is a key concern of DILO, therefore we focus on ensuring that environmental risks and negative impacts on the environment are minimized as far as possible through precautionary measures.

These include in particular:

- reduction and efficient use of energy consumption and
- reductions and reporting of greenhouse gas emissions that are appropriate to the size of the company, in order to contribute to decarbonisation,
- keeping the air clean and thus improving air quality,
- management of natural resources,
- avoiding waste and taking advantage of reuse and recycling opportunities,
- preservation of water quality and the economical use of water as well as
- responsible chemicals management.



We pay close attention to the compliance with applicable national environmental legislation, regulations and standards. Furthermore, we support the use of modern, efficient and environmentally friendly technology. In addition to this DILO intends to use renewable energies as much as possible, maintain soil quality, avoid noise emissions, protect animals and ecosystems and use resources sustainably. DILO advocates a ban on deforestation. Our suppliers and customers are also expected to protect the environment and to adhere to applicable national legislation, regulations and standards. Furthermore, we expect from our suppliers and customers that their activities do not cause avoidable environmental damage and protect animals, ecosystems and soil quality. We expect our suppliers and customers to strive for using renewable energy, to manage resources sustainably, avoid noise emissions and if this is not possible to keep them as low as possible. DILO expects its suppliers and customers to implement the pre-cautionary measures, as well, if this is possible.





PRINCIPLE 8: FINANCIAL RESPONSIBILITY AND COMBATING ALL FORMS OF CORRUPTION AS WELL AS MONEY LAUNDERING

DILO rejects all forms of corruption including bribery and blackmail. Decision-making processes may not under any circumstances be influenced by undue benefits (such as cash, benefits in kind, pleasure trips etc.). Money laundering must be combated. Conflicts of interest must be avoided. If a personal interest or conflict of interest exists, this must be disclosed. There will be no disadvantages to the disclosing person. DILO and their suppliers and customers are aware of their corporate ethical responsibility and actively comply with all legal disclosure requirements for corporate accounting. Furthermore, we disclose financial and non-financial information in accordance with applicable laws.



We also expect our suppliers and customers to take action against all forms of corruption, bribery and blackmail and not to be involved in unfair competition. Our suppliers and customers may neither bribe nor blackmail third parties, nor accept bribes themselves. They must not participate in price rigging with competitors or other agreements of a similar nature. We expect our suppliers and customers to disclose conflicts of interest and combat money laundering. Our suppliers and customers are required to face up to their financial responsibility and maintain documents in accordance with applicable law and generally accepted accounting principles. In addition to this we expect our suppliers and customers to disclose financial and non-financial information in accordance with applicable laws.

PRINCIPLE 9: PROTECTION OF INTELLECTUAL PROPERTY AND PREVENTION OF THE PLACING ON THE MARKET OF COUNTERFEIT PARTS

DILO protects the intellectual property of customers and employees through appropriate technical and organisational measures. Internal regulations prevent counterfeit parts from being put into circulation. These regulations of protection of intellectual property and prevention of the placing of counterfeit parts on the market must also be guaranteed by suppliers and customers.

PRINCIPLE 10: COMPLIANCE WITH THE REQUIREMENTS OF DATA PROTECTION AND INFORMATION SECURITY

DILO ensures that the processing of personal data complies with the currently valid data protection requirements and rules. Furthermore, DILO ensures that the information security requirements for processing information from its customers, suppliers and employees are met. We expect our suppliers and customers to follow these regulations of data protection and information security.





PRINCIPLE 11: CONFLICT MINERALS AND THE SUPPLY CHAIN DUE DILIGENCE ACT



The supplier has to inform DILO if he gets any indications or documents (e.g., CRMT or a smelter list) by his sub-suppliers which contain so-called conflict minerals. He has to provide them in an unsolicited way. The supplier must comply with any conflict minerals laws and regulations (e.g. OECD regulations). In addition to this the supplier must establish a policy to ensure conflict minerals (including tin, tungsten, tantalum and gold) in his manufactured products do not finance or favour directly or indirectly armed groups which severely violate human rights. DILO expects that the prohibitions from the Supply Chain Due Diligence Act Art. 2 (3) will not be violated by the supplier. Of course, DILO also complies with these prohibitions.

GENERAL REQUIRMENTS

This Code of Conduct defines the minimum standards recognised by DILO and to which all suppliers and customers of DILO are expected to adhere to. We regard the definition and implementation of this Code of Conduct to be an integral part of our socially and ecologically responsible corporate governance and to support the sustainable development of our company in the long term. It is therefore our concern to continuously improve the implementation of the standards set out in our daily work. It is understood that in all activities, national legislation, rules and regulations as well as customs and export regulations are respected. In this context, we pay particular attention to international legal requirements and restrictions on export control and export restrictions of security-related services and goods. DILO requires compliance with applicable export controls and economic sanctions (of Germany / of the European Union / of the United States of America) from our suppliers and customers.





COMPLIANCE WITH THE CODE OF CONDUCT

DILO is entitled to carry out on-site visits as well as to carry out audits at the supplier's and customer's premises in order to ascertain, if necessary, supplier's and its sub-suppliers' compliance with the expectations / obligations resulting from this Code of Conduct. DILO will in accordance with the provisions of the Supply Chain Diligence Act (LkSG) conduct periodic and event-related risk analyses with regard to the supplier. If this results in additional expectations to be fulfilled by the supplier, in order to achieve the protection objectives of the Supply Chain Diligence Act (LkSG), DILO shares this in writing with the supplier. The supplier must adhere to these expectations and prove their implementation within a reasonable period of time, starting with the receipt of the communication. We take consequent action in case of legal violations or non-observance of the standards set here. This includes but is not limited to taking measures under labour law and the termination of business relationships.



DEFINITION

DILO means DILO Armaturen und Anlagen GmbH, Frundsbergstraße 36, 87727 Babenhausen, Germany. "National legislation" for DILO is based on German and European laws, rules and regulations. „National legislation“ for suppliers and customers is based on the laws applicable at the company's registered office.