



**Dennemeyer Group  
business partner code of  
conduct**



# 1. Introduction

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The Business Partner Code of Conduct ("Code") applies to all business partners of the Dennemeyer Group, comprising all entities of the IP Solutions branch, Dennemeyer S.A. and its affiliates, all entities of the Law Firm branch, Dennemeyer & Associates S.A. and its affiliates, Dennemeyer IP Consulting and all entities of the Dennemeyer Technologies branch, Dennemeyer Octimine, Dennemeyer Software Solutions and its affiliates, (referred to as "Dennemeyer"). Business partners include, but are not limited to, agents, consultants, vendors, subcontractors and/or dealers ("Suppliers") that work with Dennemeyer throughout the whole supply chain.

Suppliers must abide by all applicable local laws and regulations, putting in place substantive environmental and social policies, as well as follow principles regarding ethical conduct, business integrity, information security and workplace environment. This Code establishes basic principles and ethical guidelines that Dennemeyer expects its Suppliers to comply with. Suppliers are additionally expected to encourage their subcontractors and sub-suppliers to adhere to this Code.

Dennemeyer commits to high environmental, social and governance (ESG) standards and incorporates these principles into this Code. Corporate sustainability means operating in ways that, at a minimum, meet fundamental obligations in the areas of human rights, labor, environment and anti-corruption. Responsible businesses enact these same values and principles wherever they have a presence and know that good practices in one area do not offset harm in another. Dennemeyer also expects Suppliers to incorporate the Ten Principles of the UN Global Compact into their own strategies, policies and procedures.

In case of any violation of this Code, Dennemeyer reserves the right to reconsider its business relationship with a Supplier. Moreover, Dennemeyer expects Suppliers to monitor their day-to-day management process with respect to this Code and may conduct annual compliance surveys and audits.





## 2. Ethical conduct & business integrity

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Dennemeyer is committed to maintaining a working environment and conducting business with integrity. Our obligation to act ethically starts with open and honest communication with our colleagues, customers and any other business partner or authority with whom we interact. Therefore, Suppliers are asked to conduct business with honesty and authenticity.

### 2.1 Anti-bribery, anti-corruption and anti-money laundering

Dennemeyer takes a strong stance against bribery and corruption in its global business operation. Suppliers are expected to have a strict zero tolerance policy for bribery and corruption and adhere to anti-bribery, anti-corruption, and anti-money laundering laws and regulations wherever applicable. Dennemeyer does not give or receive, whether directly or indirectly, bribes, unlawful kickbacks, illegal payments or other improper advantages for business or financial gain. Supplier shall not offer or provide, neither directly or indirectly, any gifts, gratuities or other benefits, which may influence decisions with respect to Dennemeyer's relationship with the Supplier or which may be conceived as a bribe.

### 2.2 Conflicts of interest

Suppliers are expected to take decisions based on objective criteria only and prevent any type of conflict of interest. Suppliers shall report any potential conflict of interest to:  
[compliance@dennemeyer.com](mailto:compliance@dennemeyer.com)

### 2.3 Antitrust and competition

Supplier shall commit to complying with all applicable antitrust, competition and fair trade laws and regulations of each country and region where it conducts business. Antitrust and competition laws promote fair competition and

Supplier must give immediate notice if (i) Supplier is subject to any restrictions to operate imposed by any authority, (ii) Supplier or any of its shareholders or managers is subject to any imposed sanction based on a crime or (iii) Supplier or any of its shareholders or managers is designated on any financial sanction list.

protect consumers from unfair business practices. These laws frequently address areas such as illegal agreements between competitors aimed at preventing or restricting free competition, price fixing, and unfair trade practices. Suppliers must 1) avoid any formal or informal agreements with competitors that limit competition, 2) respect competitive bidding processes and not rig or fix the outcomes, and 3) use appropriate sources that are truthful when gathering competitive intelligence.

### 2.4 International trade

Suppliers must comply with all applicable international trade laws and regulations. These laws and regulations apply to the import and export of goods, services, and technical data between countries, transactions or dealings with sanctioned countries and restricted parties, and anti-boycott/boycott requests.

In light of the ever-evolving trade compliance scenario, Suppliers are expected to closely monitor all applicable changes and implement adequate measures to comply with applicable laws and regulations.

### 2.5 Precise accounts and records

Suppliers are required to maintain accurate books, records, and relevant information about all transactions. Moreover, Dennemeyer expects its Suppliers to be in compliance with all tax regulations, to be reliable when performing services, and to act diligently in the market.



### 3. Protection of information, data and other assets

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Suppliers shall respect Intellectual Property rights and the confidentiality of the information provided by Dennemeyer.

### 4. Workplace environment

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Dennemeyer commits to providing a supportive work environment, where employees have the opportunity to reach their fullest potential. Suppliers are expected to do their utmost to create a workplace culture for their employees that is free of harassment, intimidation, bias, and unlawful discrimination. Suppliers shall also follow the labor standards issued by the International Labor Organization and the UN Global Compact and shall support and respect all forms of human rights in accordance with the Universal Declaration of Human Rights for any kind of employee.

#### 4.1 Occupational safety

Supplier shall commit to an injury-free and illness-free workplace that is operated in an environmentally sound manner in compliance with all relevant laws and regulations that protect worker safety.

#### 4.2 Anti-discrimination / equality

Suppliers shall provide equal opportunities for employment. Employment decisions should be determined on merit, considering qualifications, skills and achievements. Suppliers shall not tolerate discrimination based on characteristics such as age, gender, race, ethnic background, sexual orientation, gender identity or expression, disability, genetics, national origin or religious beliefs. Suppliers shall not tolerate actions, comments or conduct that creates, encourages or permits an offensive or intimidating work environment.

#### 4.3 Harassment

Suppliers shall not tolerate any form of harassment, sexual or otherwise. Harassment is unwelcome and offensive conduct that may interfere with a person's ability to perform his/her/their work. Harassment does not require intent to offend. Inappropriate conduct meant as a joke, a prank or even a compliment can lead or contribute to harassment.

Suppliers are encouraged to put in place adequate mechanisms allowing for employees to anonymously report workplace issues.

#### 4.4 Labor

Suppliers shall prohibit any kind of forced or compulsory labor. Suppliers shall respect the employees' working time, minimum wages, and overtime hours with regards to applicable national laws. Suppliers shall comply with the applicable local law related to the minimum age for employment, and in any case, shall not employ children under the age of 16.

Suppliers shall prohibit their employees, subcontractors, and/or agents from engaging in human trafficking related activities. Suppliers shall also respect the freedom of association and collective bargaining.



# 5. Environment and climate

As part of its commitment to the protection of the environment and the fight against climate change, Dennemeyer has formally adhered to the United Nations Global Compact on human rights, labor, environment and anti-corruption and has been admitted to the Science Based Targets initiative.

Dennemeyer expects its suppliers to implement, through adequate policies, all applicable national and international laws and regulations on environment and climate change. Suppliers are expected to have in place an effective environmental policy to mitigate environmental risks throughout all levels of Supplier's company. Suppliers are encouraged to manage and reduce waste and water usage in their operations.

Suppliers should monitor environmental performance, and the data should be reviewed and addressed regularly. Suppliers are expected to manage and reduce energy usage and greenhouse gas (GHG) emissions. Suppliers should consider applying for environmental credentials. Additionally, suppliers should require a minimum set of standards concerning environmental sustainability within their own supply chain.

## Compliance with the code

In case of material breach of this Code of Conduct by any Supplier, Dennemeyer is entitled to terminate the business relationship with that Supplier without notice and with immediate effect. Dennemeyer has the right to recover all damages that arise as a consequence of exercising this termination right and every breach of this Code.

## Acknowledgement

The Supplier hereby acknowledges that it has read, accepted, and adheres to this Code.

Supplier: \_\_\_\_\_  
Name: \_\_\_\_\_  
Title: \_\_\_\_\_  
Date: \_\_\_\_\_  
Signature: \_\_\_\_\_





