


(Luftbild von Geseke wird noch ausgetauscht.)  
**Druckguss Westfalen GmbH & Co. KG**



**Druckguss Westfalen Behringer GmbH & Co. KG**



<b>Unternehmensleitlinien</b>	<i>Autor:</i> Sandra Kleinejasper	
	<i>Datum</i> Oktober 2022	

## A Message from Corporate Management

Dear employees,

Economic success and social responsibility are closely linked at DW. Our goal is to sustainably increase the value of the company and to make our contribution in the interest of shareholders, customers, employees, and society. This centers on mutual respect, dealings with business partners and authorities, health and the environment, safety, and many other issues. It goes without saying that we comply with laws and regulations in our business activities.

The ever-increasing globalization of our business activities and the large number and complexity of legal rules and regulations worldwide mean that the risk of legal violations is growing. A violation damages the reputation of our company and can have serious legal consequences. This is why our corporate guidelines are so important. They summarize important laws and internal company regulations that govern conduct in the business environment with third parties, in dealings with the public, and also for day-to-day interactions within the company. They serve to master the legal challenges that arise in daily cooperation with colleagues, customers, suppliers, other business partners, and third parties. They are thus a kind of compass for our actions and behavior and help us make the right decisions in complex situations.

The principles described in these corporate guidelines not only indicate that we must comply with the law; they also aim to promote a sense of responsibility on the part of every employee.

We all have the responsibility to live and comply with the basic values outlined in these guidelines every day. They commit all employees equally, regardless of organizational units, departments, and hierarchical levels.

We trust that all of us, from management to each individual employee, as well as those acting on behalf of DW, will conduct ourselves not only lawfully but also ethically. Actions that may constitute a violation of company policy should be reported without exception. Any concerns raised will be treated confidentially and retaliation will not be tolerated.

Please familiarize yourself with our corporate guidelines and personally act accordingly. By being trustworthy and reliable and behaving appropriately, each of us is doing our part to ensure that DW is a company that is valued by our customers, our business partners, and society.

Thank you for your support.


Rolf Cramer

Franz Baier

## 1 Ethical Business Practices

### ***1.1 Responsible procurement of minerals and metals***

The products we manufacture are produced and sold to meet applicable legal requirements and our internal quality and safety standards.

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Due diligence is performed on the origin of raw materials used in our parts, and we do not knowingly use minerals and metals that are extracted and traded in ways that contribute to human rights abuses, unethical business behavior (e.g., corruption), environmental damage, or conflict financing.

## **1.2 Anti-corruption**

We do not tolerate any form of bribery or corruption, extortion, or embezzlement in our business relationships.

We distance ourselves unequivocally from the demand, acceptance, and adoption of unjustified or unlawful advantages that could influence business decisions or transactions. Likewise, in business activities of any kind, we will not offer, provide, or attempt to provide improper benefits to business partners, their employees, or other third parties, or enter into agreements to do so, regardless of whether they are public officials or private individuals.

We are aware that gifts, hospitality, invitations to events, sponsorship, and donations may involve bribery risks, and we follow our relevant internal guidelines. Thus, we accept and grant benefits only within the legally permissible scope.

## **1.3 Data protection**


Responsible data handling and effective privacy protection are very important to us. In addition to the contractually agreed terms, we comply with the relevant laws and regulations on data protection and information security. We collect and process personal data from individuals only if it is necessary for business activities or required by law, or if the individual concerned consents to it.

We protect personal information provided to us and take appropriate measures to maintain privacy and safeguard personal information against loss and unauthorized access or use, including confidential, proprietary, and personal information. When using the personal information of our employees, customers, and other business partners, we respect the privacy and security of business data and trade secrets in accordance with legal and contractual requirements.

## **1.4 Fair competition, business practices, and antitrust law**

Bribery and corruption distort the market, disrupt free competition, and violate laws that result in significant penalties for the companies and individuals involved.

We trust that our products and services will succeed in a competitive marketplace. We will never seek to coordinate with competitors, suppliers, or distributors in a way that could unfairly limit competition in the marketplace. We avoid business practices that are unlawful under competition laws, such as the improper exchange of competitive information, price or bid rigging, and unlawful market sharing. We select our suppliers on the basis of objective criteria. Our business interaction with our suppliers takes place exclusively in a professional context.

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## **1.5 Conflicts of interest**

Companies are expected to make decisions based on sound business judgment that is not clouded by nepotism influenced by personal relationships and opinions.

Thus, we are committed to working in the best interests of the company and to avoiding or disclosing situations in which our personal, financial, or other outside interests conflict with our professional responsibilities. Such a conflict can take many forms, including: hiring or supervising family members or friends; a financial interest in a competitor, customer, or supplier of DW; outside employment or activities that jeopardize the performance and quality of your work at DW. But where such a difficulty cannot be avoided, our employees are required to disclose the conflict and we will handle the situation to the extent permitted by law.

## **1.6 Protection of confidential information and intellectual property**

Our proprietary intellectual property – such as patents, technical inventions, copyrights, know-how, trade secrets, and design – is a very valuable asset. However, this value can be lost or jeopardized if our intellectual property is misused or disclosed in an unlawful manner. We will take reasonable steps to protect this property and are committed to respecting the intellectual property of others as well.

We all have a duty to protect information that DW considers confidential. This includes any non-public information about our processes, products, innovations, and financial or strategic plans or positions.

## **1.7 Export inspections and economic sanctions**

We are a global company and are therefore required to comply with the applicable export inspection and economic sanction laws and regulations of all relevant countries, with which restrictions on the export or re-export of goods, services, and technology to certain countries and prohibitions on transactions with certain countries, regions, entities, and persons are regulated. We recognize that these laws may apply to information (including software, code, and technical information) as well as financial assets.


We strive to implement appropriate policies, procedures and controls, keep them up to date, and train our employees.

It goes without saying that we expect our business partners to also comply with applicable laws and regulations.

## **1.8 Accounting and financial reporting**

Correct, lawful accounting and financial reporting in accordance with the legal framework are our top priority.

We are committed to maintaining accurate and transparent business records in all areas of our company. We will maintain systems and procedures that enable efficient, accurate, and secure recording and storage of business data. Reporting of our financial transactions will be consistent with generally accepted accounting practices. We will truthfully report all non-financial information that we are required to disclose in accordance with applicable regulations and prevailing industry practices.

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## **1.9 Taxes and duties**

We comply with all applicable regulations, including those relating to taxes and customs duties.

### **1.10 Prohibition of money laundering and terrorist financing**

We comply with all national and international laws and regulations on the prevention of money laundering and against the financing of terrorism. We want to maintain business relationships only with reputable business partners whose business activities are legal and whose funds come from legal sources.

### **1.11 Company assets**

Our company's assets, including financial assets, physical property such as equipment, systems, and networks are essential to our ongoing production and business success. We must use these assets responsibly and protect them from theft, fraud, abuse, waste, and other misconduct, whether through guarding access to company buildings, equipment, and tools or exercising good judgment in the use of company funds. To the same extent, we protect our company's reputation and image.

In addition, we develop appropriate measures for our products and services to minimize the risk of introducing counterfeit parts and materials into the products to be delivered.

### **1.12 IT security**

We will only use our IT systems for lawful purposes and will never store or share illegal or offensive content.

## **2 Responsibility for the Environment**


The careful use of finite resources is not only an economic necessity, but also a responsibility for society as a whole.

Our actions include using raw materials and other resources as sparingly as possible and continuously reducing the environmental impact of our entire product range and all production processes.

All suppliers must set reasonable targets that are consistent with DW's climate goals, and they must be able to demonstrate and report progress in reducing greenhouse gas emissions in their own operations and supply chain. All suppliers must have an energy management program with targets for significant efficiency improvements and a program to increase the use of renewable energy.

At our sites, we strive to define strategies, attainable goals, and measures which are geared toward decreasing the environmental impacts of our business operations, such as

- reduction of greenhouse gas emissions in our own production facilities;
- resource-saving and economical use of energy;
- sustainable minimization of the necessary energy consumption of our company / increase in energy efficiency and use of renewable energies;
- conservation and reduction of water consumption and appropriate treatment of wastewater discharge;


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- monitoring and management of air quality and minimization of emissions from volatile organic compounds, corrosives, particulate matter, ozone depleting substances, and combustion byproducts;
- management of water quality & consumption; and.
- support for waste reduction through reuse & recycling and provision of sustainable materials;
- assurance of safe storage, use, recycling, and disposal of chemicals used in manufacturing operations and products;
- minimized use of restricted substances in manufacturing processes and finished products.

In doing so, we consider all relevant legal and regulatory requirements and internationally recognized environmental standards.

We strive to establish appropriate management programs to monitor, evaluate, demonstrate progress and report on impacts.

We recognize that there is always room for improvement, and we will encourage a work ethic among all employees aimed at minimizing the environmental impact of everything we do.

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	<i>Datum</i> Oktober 2022	

### **3 Human rights and working conditions**

Compliance with ethical values is necessary for long-term economic success. This includes dealing fairly with one another and acting within the framework of specified standards in everyday business. We are vigilant and rigorous in ensuring that our business relationships (including our supply chain) do not support any form of human rights abuse.

We strive to develop policies and management systems that support compliance with laws, regulations, industry expectations, and internationally proclaimed human rights. Our actions aim to reduce the risk of potential human rights violations at our sites and through our business relationships by identifying risks and managing them accordingly.

#### ***3.1 Child and forced labor/ modern slavery***

We do not tolerate forms of modern slavery including forced labor, debt bondage, indentured servitude, involuntary prison labor, unlawful withholding of personal documents by employers, or human trafficking. We respect the right of children to personal development and education, and do not tolerate child labor.

#### ***3.2 Wages and benefits, working hours***

We are committed to providing fair wages, hours, benefits, and other working conditions in accordance with applicable laws and labor rights principles.

#### ***3.3 Freedom of association and collective bargaining***

We respect the right of all employees to form and join unions and employee representative bodies to represent their interests as employees, to organize, and to bargain collectively or individually. We also respect each employee's decision not to join a union or employee representative body. We enable a professional dialogue with employee representatives on working conditions and management practices, so that employees can operate without fear of disadvantage or expectation of advantage.


#### ***3.4 Health and safety***

Workplace health and safety is one of our top priorities for our employees, customers, and business partners. We are continuously improving on working conditions and on prevention and health promotion measures. We recognize that safety in the workplace includes mental well-being as well as physical safety.

We ensure that health and safety risks and hazards are identified and adequately mitigated, as evidenced by appropriate systems, controls, training, and performance monitoring.

#### ***3.5 Prohibition of discrimination and mutual respect***

We do not allow personal discrimination on the basis of ethnicity or nationality, skin color, gender, age, religion, ideology, disabilities, private life or sexual orientation, political or trade union activities or attitudes, social origin, or other characteristics protected by law.

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We respect differences among people and their backgrounds and do not tolerate any form of discrimination. Unwelcome behavior that creates an intimidating, offensive, or hostile work environment has no place here. Instead, we promote a working environment characterized by tolerance, respect, and fairness, in which all employees treat each other with courtesy and appreciation. Through open-mindedness, helpfulness, praise, and constructive criticism, we strengthen the team spirit within the company.

Employment decisions such as hiring, compensation, title, promotion, disciplinary action, training opportunities, termination, or working conditions should be based on an individual's skills, qualifications or performance, not on irrelevant personal factors.