

**Code**  
**of** **Corporate**  
**Compliance**  
**Conduct**

**EWALD DÖRKEN AG**

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## **How we think and act**

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**We maintain fair business relations**

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**We ask ourselves the right questions**

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**We don't mess around when it comes to our code of conduct**

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**There is  
chemistry here.**

**Dear employees, dear readership.**

**Executive Board, Management, Works Council  
and Compliance Manager of DÖRKEN**

> Our success as a traditional medium-sized company is based on the cooperation and commitment of our employees. However, this commitment must remain within the framework of legal requirements and our internal guidelines, otherwise we may be exposed to the risk of damage to our image and even criminal prosecution.

The Dörken Code of Conduct is intended to create a common understanding for legally compliant and ethically correct conduct in our company and thus form the basis for your responsible acting in your working environment.

Our diverse community grows a little more every day. Be a role model for others: Actively live up to the legal and ethical requirements in your daily work - together with your colleagues, towards customers, suppliers, business partners and in public. Only together can we develop our company nationally and internationally, protect our reputation and write new success stories.

For questions regarding our Code of Conduct and on the correct behaviour in cases of doubt the Board of Management, the management teams, the Works Council and the Compliance Manager are available.

A photograph of industrial machinery, featuring a prominent red metal mesh structure and yellow-painted metal components. The scene is partially obscured by a semi-transparent orange circular overlay. The background shows a blurred industrial setting with various pipes and equipment.

**Company's philosophy.**



**DÖRKEN**

**How we think  
and act.**

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There is  
chemistry here.



For Ewald Dörken Aktiengesellschaft and its subsidiaries (hereinafter referred to as „Dörken AG“), compliance with the respective national laws is the basis of entrepreneurial activity. This is the basis for our Code of Conduct, which is a binding guideline for all employees, shareholders and business partners in their daily cooperation and competition and is intended to serve as a guide for people at Dörken in their day-to-day work.

The Code of Conduct of course cannot cover every aspect of our daily activities. However, it should describe an essential aspect of our corporate philosophy and be consciously lived by our employees in all areas.

Therefore, every employee must be familiar with the Code of Conduct and implement it in his or her area of work and comply with it.

The Dörken Board of Management and the executive managers are aware of their role model function and exemplify the behaviors described in the Code of Conduct for all employees.

Dörken AG takes its Code of Conduct and the values it represents very seriously. We therefore reserve the right to sanction violations of this code with disciplinary measures. If necessary, these may also lead to termination of the employment relationship or the business relationship.





**Commitment.**

# DÖRKEN

**We take  
responsibility  
for society  
and environment.**

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There is  
chemistry here.

Responsibility towards future generations, sustainable management and social commitment are actively practiced in our company. That is why sustainable and resource-efficient action is a top priority for us.

This applies both to the value creation process of existing products and to the development and testing of new products. Our employees share this awareness and act in accordance with this responsibility in the workplace.

We do everything in our power to ensure that comparable standards are also promoted and practiced in companies affiliated with us or in companies with which we cooperate.





**Diversity.**



# DÖRKEN

**We respect  
and protect  
our employees.**

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## **Safety and health in the workplace**

Work safety and health of our employees are of the utmost importance to us. We consistently comply with health and safety regulations. Through appropriate training, continuing education and regular voluntary medical examinations, we always keep ourselves up to date in terms of safety and health at work.



As part of society, we promote its development within the scope of our possibilities. We value the cultural diversity in our workforce. Our employees - regardless of age, gender, sexual orientation, disability, nationality, skin color, culture or religion - are valued as part of our company.

We respect and protect the dignity of our employees as well as their personal rights and privacy. This also applies to customers and business partners. We do not tolerate illegal behavior, discrimination or harassment.

We attach great importance to open, tolerant, respectful and fair dealings with each other - in our daily cooperation, but also in competition. We support and promote support and promote the right of every individual to express his or her views freely and create an open and constructive atmosphere in the company.

We support and maintain cooperative collaboration with the employee representatives and other institutions elected within the framework of the law, who represent our employees.



# Entrepreneurship.



## We avoid conflicts of interest.

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We behave loyally towards the company. Which also means: We do not perform any tasks or activities that collide with the interests and business activities of Dörken AG. This applies both on a business as well as on a private level.

Our business activities are based on trust, respectful dealings, the standards of conduct and laws in Germany and the respective national laws. This excludes illegal payments, benefits or advantages.

Therefore, employees, officers, suppliers, customers or competitors may not grant (active advantage) or accept (passive advantage) financial or material advantages that result in actions or decisions in favor of Dörken.

Gifts of small value as well as invitations to business meals or events may be given or accepted within the framework of the applicable laws and the usual framework in business life, provided the occasion and the amount are appropriate. In case of doubt, however, the manager or the Compliance Officer should always be consulted.

In general, the acceptance of gifts or invitations must never create an obligatory dependency or the appearance of an obligatory dependency, as this could cause lasting damage to the reputation of our company.

Direct or indirect business connections established by Dörken may not be used for the company's own benefit or for the benefit of third parties (e.g. family members). Secondary activities for a competitor, supplier or customer of Dörken AG as well as financial interests therein are only permitted on the basis of agreements under employment law with the explicit approval of the company. Here too, the principle applies: No dependencies or preferential treatment or even the appearance of dependencies or preferential treatment of competitors, suppliers or customers may arise.

# DÖRKEN

**We do take  
data protection  
and confidentiality  
seriously.**

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There is  
chemistry here.

We treat the personal data and information of our employees confidentially and use them only for the legally intended purposes.

In return, our employees treat internal information confidentially and do not communicate it externally. This applies in particular to product data, development and production processes, IT systems, and commercial, strategic or personal information.

In general, internal company information may only be disclosed to third parties with the express permission of the authorized managers. In the case of cooperations with other companies, these must sign a written confidentiality agreement.



**Fairness.**





Lust  
auf

METALLOGRAFIE?





**Convincement.**

# DÖRKEN

**We maintain  
fair business relations.**

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There is  
chemistry here.

We are successful through our products, their performance and quality promise, the commitment of our employees and our good reputation with customers.

Antitrust law and the values of fair and free competition are the basis of our business activities. We always make business decisions independently and condemn price and quantity agreements with competitors. We undertake not to exchange any commercially relevant and sensitive information on prices, strategies or sales markets with competitors.

We protect the intellectual property and copyright of others. This also applies to the unauthorized use and duplication of software. We condemn practices that serve to spy out competitors' competitive secrets and internal, commercially relevant information.

We are convinced that competition always means innovation. An advantage gained by unfair means is therefore not only illegal; it also weakens the company's own innovative strength in the long term and thus threatens its success.







**Think ahead  
together.**

Amplifier  
Control - Amplifier  
Lufthansa 5000 c/o

**DORKEN**

**VLT**  
500C Multi Drive

**WOLF**

# DÖRKEN

**We ask ourselves  
the right questions.**

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There is  
chemistry here.



If it is unclear whether unethical, inappropriate or illegal behavior is occurring, these questions might help:

- // Is what I am doing compatible with the Code of Conduct and our corporate policy?**
- // Was I asked to conceal information or deviate from a normal procedure?**
- // Could I justify my actions in a team meeting?**
- // Is the measure appropriate and compatible with Dörken's values and reputation?**
- // Do business partners contact me privately (for e.g. via presents/little courtesies)?**
- // What would it mean, if my actions made headlines?**
- // Would I be worried, if informations concerning my actions would get to law enforcement agencies or cartel authorities?**
- // What would I recommend to my friends?**

## **We don't take a joke, when it comes to our Code of Conduct.**

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Every employee is obliged to familiarize him/herself with this Code of Conduct and to act in accordance with its values. In case of doubts or ambiguities, the manager or the responsible HR specialist should be contacted at an early stage and, in special cases, the management or the responsible compliance manager.

Managers are obliged to be available as contact persons for their colleagues, to ensure compliance with the Code of Conduct and to report any violations to the company management. Violations of the Code of Conduct can be reported by name or anonymously. Every concern is taken seriously and of course treated in strict confidence. All named inquiries will also be answered personally.

Any indications of a violation of our Code of Conduct will be closely examined. Therefore, sufficient information must be available to allow a proper investigation

We assure our employees that no person who reports suspected violations in good faith will suffer any disadvantages on the part of our company or through our employees. This also applies in the event that an investigation reveals that no violation has occurred. Abusive accusations, on the other hand, are a clear violation of this Code.

Any identified violation of our Code of Conduct may result in employment, civil and/or criminal penalties.

This Code of Conduct applies to all Dörken AG companies worldwide. Where applicable, additional or stricter country-specific guidelines apply. Some of these may also be effective across borders. In the event of any ambiguities, local supervisors can be contacted.

## CONTACT PERSON

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## ANONYMOUS SITE OF CONTACT

**Intranet Service** „Anonymous Feedback“

**Anonymous inhouse mail** to Ralf Vossius

**Whistleblowing-Service** <https://doerken.integrityline.com>

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**There is  
chemistry here.**