

01. INTRODUCTION

d-fine pursues a long-term sustainability strategy that is reflected in all our activities and in our dealings with our clients, workforce, business contacts, environment, and society. Our aim is to minimise the negative social and environmental impacts of our business activities.

Furthermore, we are committed to the highest ethical and professional standards.

This Code of Conduct summarises our minimum standards and requirements in sustainability that we adhere to, which also form the basis of business cooperation for us. We expect adherence from all suppliers whose products and services have an influence on d-fine's business activities. Our clients are not covered in the sense of this document. In addition to compliance within their own business, we expect our suppliers to ensure compliance through their suppliers, thereby considering their entire supply chain.

To ensure compliance with the standards and values that are fundamental to us, d-fine will conduct risk-based due diligence on suppliers and, if necessary, work with the supplier concerned to develop an appropriate plan of action. If the supplier company fails to submit and successfully implement a plan to end any identified breaches of the obligations arising from this Code of Conduct within a reasonable period of time, d-fine shall be entitled to terminate the business relationship for cause. Extraordinary termination shall only take place if milder means have not previously led to an end to the breach.

Please contact csr@d-fine.com immediately if you have any questions regarding this Code of Conduct or if there has been a breach of any of the requirements set out.

02. BUSINESS ETHICS AND INTEGRITY

Acting in accordance with applicable law is a matter of course for us and forms the basis of any cooperation with suppliers. This includes responsible handling of business records and disclosure of information in accordance with applicable regulations and industry practices.

02.01 ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING

d-fine does not tolerate practices related to corruption or money laundering under any circumstances and expects suppliers to comply with legal requirements to avoid corruption and prevent money laundering.

02.02 DATA PROTECTION AND DATA SECURITY

Protecting the data of employees, customers, and suppliers is a top priority for d-fine. The right to informational self-determination of each individual and the confidentiality obligations towards our customers and suppliers are paramount. Accordingly, d-fine expects its suppliers to protect confidential information and to comply with applicable data protection regulations.

02.03 FAIR COMPETITION AND ANTITRUST LAW

d-fine is committed to fair competition and does not tolerate anti-competitive behaviour.

Suppliers must not engage in unfair competitive practices that violate the antitrust and competition laws and regulations applicable to them. Under no circumstances may suppliers

engage in formal or informal agreements on prices, fees or benefits that improperly restrict competition.

02.04 CONFLICTS OF INTEREST

To ensure the greatest possible objectivity in the provision of our services, d-fine acts according to the principle of avoiding conflicts of interest in all internal and external business processes. We also expect our suppliers to deal responsibly with potential conflicts of interest. Actions and situations that could lead to a conflict of interest or give the appearance of a conflict of interest are to be avoided. If such actions and situations become known, appropriate measures must be taken immediately to eliminate the conflict.

02.05 INTELLECTUAL PROPERTY

As a company whose services are based on innovation and quality, d-fine attaches great importance to respecting intellectual property, e.g., in the form of software solutions, and protecting it accordingly. We believe that every originator has the right to be adequately compensated for intellectual achievement. We therefore condemn plagiarism and other forms of unauthorised use of intellectual property. We expect our suppliers to prevent the unauthorised and improper use and distribution of intellectual property by their employees, customers, and suppliers.

02.06 EXPORT CONTROLS AND ECONOMIC SANCTIONS

Consistent with our respect for applicable laws and regulations, we do not engage in or assist others in engaging in activities that violate applicable economic sanctions and export controls. We also expect our suppliers to comply with the economic sanctions and export controls in place in their respective locations and not to participate, directly or indirectly, in circumventing them.

02.07 WHISTLEBLOWING

Our corporate culture is characterised by openness, transparency, and respectful interaction with each other. The fact that both employees and suppliers can openly address problems and grievances in the company is, in our view, an important prerequisite for sustainable corporate success. We therefore refrain from any form of retaliation against whistleblowers. Accordingly, we also expect our suppliers to refrain from any form of retaliation against their employees and suppliers.

Reports of breaches, legal issues and complaints can be submitted via [d-fine anonymous](#) on our website by all employees of the d-fine group, employees of direct or indirect suppliers, business partners, customers or other affected parties and their representatives.

In addition, suppliers are expected to have their own whistleblower reporting mechanisms in place that protect the identity of whistleblowers.

03. DIVERSITY AND INCLUSION

d-fine rejects any form of discrimination and is committed to an inclusive and equal working environment. Our fair, non-discriminatory recruitment process and our transparent remuneration system to ensure equal pay for work of equal value contribute to this. We also expect our suppliers to be committed to diversity and inclusion. Equal treatment regardless of national or ethnic origin, social background, health status, disability, sexual orientation, age, gender, religion, or belief shall be ensured through appropriate processes. Where their business activities involve relevant risks, suppliers should take appropriate measures to ensure respect for the rights of indigenous peoples and local communities in accordance with the "United Nations Declaration on the Rights of Indigenous Peoples".

04. HUMAN RIGHTS AND LABOUR STANDARDS

For d-fine, the central condition for cooperation with suppliers is the observance of human rights in accordance with

- the United Nations Universal Declaration of Human Rights
- the European Convention on Human Rights
- the fundamental principles of the International Labour Organisation (ILO)

We expect suppliers to ensure compliance with the above standards and legal requirements in all their business activities.

04.01 CHILD LABOUR AND YOUNG WORKERS

d-fine rejects any form of child labour. Suppliers must ensure that no persons under the age of 15 are employed and that the national legal provisions on the minimum age of employment are complied with. Employees under the age of 18 require special protection and may not perform dangerous work, work night shifts, or work overtime.

04.02 PROHIBITION OF MODERN SLAVERY AND HUMAN TRAFFICKING

Any form of slavery, forced labour, or human trafficking will not be tolerated by d-fine. Suppliers must ensure that all employment is voluntary and that no form of modern slavery takes place.

04.03 WAGES AND SOCIAL BENEFITS

d-fine remunerates all employees according to a fair and transparent remuneration system. Suppliers are likewise expected to receive appropriate remuneration that at least meets the applicable statutory minimum wage requirements and includes the legally prescribed social benefits.

04.04 WORKING HOURS

We are convinced that appropriate rest periods increase the well-being and productivity of our workforce. We expect our suppliers to arrange working hours in accordance with the respective applicable legal provisions. Exceptions are only permitted in emergencies or exceptional situations.

04.05 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

d-fine respects the applicable regulations on freedom of association and collective bargaining. Suppliers must ensure that all employees have the right to form employee representation and to bargain collectively to regulate working conditions. Discrimination or retaliation for forming, joining or being a member of a trade union or works council is not permitted.

04.06 LAND, FOREST AND WATER RIGHTS AND EVICTION

We distance ourselves from forced evictions from lands, forests, or waters through the acquisition, development or other use of these areas and expect suppliers to stop these practices. In the event of land use, the free and informed consent of the existing land-using person must be obtained, and fair compensation ensured.

04.07 DEPLOYMENT OF SECURITY FORCES

Where private or public security personnel are used, suppliers must ensure that they are professional personnel with sound training. Attention must be paid to the training of security personnel regarding respect for human rights.

05. OCCUPATIONAL HEALTH AND SAFETY

The health and protection of all employees are core values for d-fine and the basis for long-term and sustainable professional relationships. We expect suppliers to comply with all legal requirements for occupational health and safety. Potential safety risks must be identified and minimised with the help of effective processes and preventive maintenance as well as occupational health and safety measures.

06. CLIMATE AND ENVIRONMENTAL PROTECTION

d-fine aims to act sustainably regarding the environment and climate and is therefore committed to climate neutrality: We avoid emissions that are harmful to the environment and climate, e.g., during business trips or the furnishing of our offices. Unavoidable emissions are fully compensated. We also expect sustainable business practices in the sense of this chapter from our suppliers.

06.01 DECARBONISATION

Our suppliers must address the environmental and climate-damaging emissions they cause and take measures to reduce them. Although not legally mandatory, we encourage suppliers to report on greenhouse gas emissions and to use renewable energy to reduce emissions.

06.02 BIODIVERSITY AND ENVIRONMENTAL AND ANIMAL PROTECTION

All locally applicable laws on environmental protection, animal welfare, and animal testing are to be followed by suppliers. In addition, d-fine supports sustainable use of land, forests, and water, avoiding deforestation and conversion of natural ecosystems, and avoiding degradation of soil, water, and air quality. Suppliers are encouraged to identify and reduce the environmental impacts they cause.

06.03 SUSTAINABLE USE OF RESOURCES

d-fine expects suppliers to use water, energy, and raw materials in a sustainable and responsible manner. We consider an orientation towards the circular economy, using mechanisms such as reuse and recycling, to be sensible to avoid waste.

06.04 RESPONSIBLE HANDLING OF CHEMICALS

Where chemicals are used in business activities, a responsible chemicals management system must be established to ensure that risks are identified and minimised and that safe handling, transport, storage, and proper disposal are ensured. All applicable laws and regulations shall be complied with.