



**Dussmann Group**

# Our Responsibility

- THE DUSSMANN GROUP CODE OF CONDUCT -

## Dear colleagues,

Our corporate goals of business success and social responsibility are inseparable. Ethical principles and responsible behavior are the foundation of the Dussmann Group's value system. This is expressed in our Code of Conduct which lays down binding rules for our conduct towards colleagues, business partners and society in general.

The sustained success of the Dussmann Group is reliant on integrity. Our corporate culture therefore reflects economic, social and environmental values. Compliance with the law is a matter of course; violations of the law and other regulations contradict our principles, damage the reputation of the company and may result in legal consequences. Those who do not comply with legislation harm everyone in the company.

The Code of Conduct is binding for all of us as well as for our suppliers and business partners. It serves as a shared guideline for our daily decisions and actions. Our managers act as role models and promote the corporate culture manifested in this Code of Conduct. Infringements are not tolerated and may result in disciplinary measures or penalties.

The continuity and ongoing development of the company depend on our commitment to social responsibility and our reputation as a trustworthy business partner. We thank you for the contribution you make through the integrity of your personal conduct.

The Dussmann Group Executive Board

  
Wolf-Dieter Adlhoch

  
Pietro Auletta

  
Jörg Braesecke

  
Hakan Lanfredi

  
Dieter A. Royal

# Our shared values

## **INTEGRITY**

Everything we do is governed by honesty and consistent compliance with legislation and regulations. We do everything possible in our sphere of influence to exclude all forms of corruption, to uphold fair competition and to prevent child and forced labor.

## **ENVIRONMENTAL AWARENESS**

The Dussmann Group accepts responsibility for the protection of the natural environment, uses resources with care and deploys environmentally friendly products, processes and structures.

## **FAIRNESS**

We are committed to fairness and responsibility in our dealings with clients, employees, business partners, other third parties and society in general.



## **PASSION**

Passion is the driving force of our corporate culture. It defines our approach as a service provider and inspires us in our daily business.

## **SOCIAL RESPONSIBILITY**

We observe human rights, prevent discrimination and promote respect for other cultures and religions. We respect and appreciate diversity. We initiate projects to promote social cohesion and community.

# Principles of conduct

## Observe legislation and regulations

We comply at all times with applicable legislation, regulations, standards and the requirements of our internal and external stakeholders. Where national legislation is less strict than Dussmann Group regulations, the latter apply. Where national legislation is stricter, this takes precedence. Each individual employee is responsible for ensuring that his or her actions are always in observance with these obligations.



## Prevent corruption and bribery

Corruption, bribery and extortion are not tolerated and the mere suspicion must be prevented. Neither money nor any other economic benefit may be granted or accepted to initiate or maintain a business relationship. Gifts, invitations and similar benefits are reviewed for appropriateness and transparency. We expect employees to exercise particular care in their dealings with public officials and to ensure that their actions are always in accordance with applicable laws, regulations and company guidelines. Active or passive participation in money laundering activities is prohibited.



## Avoid conflicts of interest

The Dussmann Group expects its representatives and all personnel to show loyalty towards the company. We avoid situations in which personal or financial interests conflict with those of the Dussmann Group. For a role in another company, approval from the supervisor is sought and documented (particularly if the other company is a competitor). This also applies to paid or unpaid secondary employment or business activity including business activities with close contacts e.g. family members.





### **Observe the rules of fair competition and antitrust law**

We win contracts in fair competition. We rely on our innovative service philosophy and do not participate in activities or agreements which contravene the rules of national and international competition or antitrust law. Any cooperation with competitors, for example cooperation agreements, bidding consortiums, joint ventures or other agreements, is reviewed beforehand by the legal department.



### **Maintain transparency and fairness in our dealings with suppliers and subcontractors**

We maintain fair, reliable relationships with our suppliers and subcontractors. We select suppliers by applying transparent, objective criteria and respect the principles of free, fair competition. All listed Dussmann Group suppliers and subcontractors commit to the Dussmann Group Code of Conduct in writing.

### **Protect the environment**

We protect the environment and reduce our environmental impact through minimization of energy, materials and resource consumption, ongoing reduction of waste and through deployment of environmentally friendly products. We make careful use of raw materials and encourage innovations that promote environmental compatibility and resource and energy efficiency. Our aim is to improve our environmental performance and to make a contribution to the environmental performance of our customers.



### **Respect human rights**

The Dussmann Group respects the dignity of every individual. We are committed to respecting human rights along the entire value chain.



### **Create a safe, healthy work environment**

We create a safe, healthy working environment to reduce hazards and risks and to prevent work-related injuries and illnesses. Employees are actively involved in this process and the necessary work and operating resources are provided. Training and instruction is provided on a regular basis. Everyone is responsible for reporting hazards when these are recognized. All work-related accidents are reported, documented and analyzed.



### **Oppose discrimination**

We oppose all forms of discrimination based on gender, age, skin color, origin, nationality, religion, sexual orientation, disability, political opinion or trade union activity. Decisions made in the context of employment such as recruitment, promotion and disciplinary action must be free of discrimination.

### **Promote equal opportunity and fairness**



We respect and promote diversity. We create a work atmosphere that promotes fairness, trust and respect. Intimidation and offensive behavior are not tolerated. The company is committed to equal opportunity and appointment is based exclusively on ability and suitability. We promote the necessary conditions to achieve equal opportunity. This includes fair remuneration, regardless of the country in which the service is provided.



### **Prevent child and forced labor**

We do not tolerate child labor or the exploitation of children/young adults. The minimum age of employment is never lower than the age at which compulsory schooling ends, and in no case less than 15 years. No one is forced to work by the threat of violence, direct or indirect, or by intimidation. Employment is always voluntary.

### **Exclude harassment and abuse of any kind**

We do not tolerate harassment or abuse including unwelcome advances and both physical and verbal abuse.



### **Uphold the right to freedom of assembly, freedom of association and collective bargaining**

We uphold the right to freedom of assembly, freedom of association, collective bargaining and the associated regulations to ensure fair working conditions.

### **Careful use of company property**

All employees are obliged to use company property and the property of clients with care and only as intended. Equipment, work materials, rights of use and licenses may be used only for business purposes. Improper use for illegal, inappropriate personal or other unauthorized purposes is not permitted.



### **Protect the data and privacy of personnel and clients**

We take great care and maintain strict confidentiality when processing the personal data of our personnel and clients (e.g. name, address, telephone number, date of birth, health information). We observe data protection regulations in our business processes. We respect privacy. Appropriate standards of security with regard to entry and access controls apply for all IT and communication systems.





### **Document business transactions**

All relevant business transactions are fully, systematically and reproducibly documented in accordance with legal and internal regulations.

### **Protect trade secrets**

Trade secrets and other confidential information are protected against disclosure to unauthorized persons. Such information may be used for business purposes only and may not be made accessible to third parties (including family members and friends). This obligation continues to apply after termination of employment.



### **Communicate with the public in a coordinated way**

We communicate precisely and consistently. This is why only those authorized to do so may pass information to external parties on behalf of the Dussmann Group.



### **Report violations and concerns (notification system/ombudsman)**

The Dussmann Group promotes an environment in which every employee may raise concerns and report violations. Everyone is encouraged to report known or suspected violations of the principles and content of the Code of Conduct, company policies and legislation. Notification may be made confidentially and, if necessary, anonymously. Anyone who makes a notification in good faith will not be disadvantaged. Breaches may be reported in confidence to the supervisor, the executive board or the compliance department. Confidential and anonymous notification of potential criminal offences or violation of laws or regulations may also be submitted to the external ombudsman.





### **Non-compliance has consequences**

Breach of the Code of Conduct can compromise the business of the Dussmann Group significantly. In addition to disciplinary measures, non-compliance by any Dussmann Group representative or employee may be penalized by state authorities. We maintain an open dialogue concerning infringement of the Code of Conduct and resulting penalties.

### **Observe and uphold the Code of Conduct**

Everyone is called upon to comply with the principles set down in this document. Managers set an example as role models of business integrity. Every supervisor must ensure that all employees in their sphere of responsibility are aware of, understand and comply with the regulations. We support employees who have questions regarding this Code of Conduct and exclude any disadvantage resulting from adherence.



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