



# Code of Conduct for Business Partners

The Dussmann Group works with business partners who have introduced ethical, social and ecological standards in their organization and also maintain these in their supply chain. The Code of Conduct for business partners defines the principles and requirements concerning integrity in dealings and compliance with ethical standards and applicable legislation to be fulfilled by subcontractors and suppliers of the Dussmann Group. The Dussmann Group expects its subcontractors, suppliers and service providers (in the following “business partners”) to observe and implement the standards described in the following in their own companies, not only in the context of business activities with the Dussmann Group but also with other clients, contractual partners, competitors and public authorities. The Dussmann Group’s business partners are also expected to pursue compliance with the principles laid down in this Code of Conduct in their supply chain.

## **Comply with legislation and regulations**

The Dussmann Group requires its business partners to comply with applicable laws, regulations and norms.

## **Prevent corruption and bribery**

The Dussmann Group expects its business partners to combat all forms of corruption and business crime and to initiate preventive measures. Business partners ensure that their employees and subcontractors neither offer, promise nor grant benefits to Dussmann Group employees or to third parties close to them with the intention of influencing an independent business decision in an improper way. If a Dussmann Group employee actively requests a benefit, immediate notification must be made to the Dussmann Group compliance department.

## **Avoid conflicts of interest**

The Dussmann Group expects its business partners to make decisions concerning its business activities with Dussmann Group companies exclusively on the basis of objective criteria. Conflicts of interest which could affect the business relationship with the Dussmann Group must be avoided or disclosed if they occur.

### **Adhere to the rules of fair competition and antitrust law**

Business partners comply with all requirements of competition law. They refrain from agreements and arrangements that influence prices, conditions, strategies and customer relations, particularly during participation in tenders. The same applies to the exchange of competitively sensitive information and to any other action that restricts or potentially restricts competition in an unlawful manner.

### **Comply with export control regulations**

Our business partners comply with all applicable import and export control rules, economic sanctions and embargos.

### **Protect the climate and environment**

The Dussmann Group expects business partners to continuously improve its environmental performance through the active implementation of climate protection and decarbonization measures, the use of renewable energies and the careful use of resources. This includes the continuous minimization of energy, material and resource consumption, the support of sustainable land use and the preservation of biodiversity, as well as transparent reporting on this.

### **Establish health and safety in the workplace**

Business partners ensure safe, healthy working conditions to prevent work-related injury and illness. They provide their employees with the necessary work materials and equipment. Business partners provide regular training and instruction for their employees and document it. They immediately report, document and evaluate risks when they are identified and work-related accidents when they happen.

### **Respect human rights**

Business partners respect the dignity of each individual and ensure that human rights are respected throughout their value chain. They fulfill corresponding due diligence obligations and observe the Dussmann Group's policy statement on the respect of human rights.

### **Oppose discrimination**

Business partners exclude all forms of discrimination on the basis of gender, age, origin, religious affiliation, ideology, sexual identity, disability or trade union activity in any form. Promote equality and fairness. Business partners ensure fairness, trust and respect in their dealings and promote diversity, inclusion and equal opportunities.

### **Ensure fair working conditions**

Business partners comply with relevant regulations to ensure fair working conditions and ensure appropriate remuneration, not falling below the applicable (statutory) minimum wage. They comply with the maximum number of working hours in accordance with applicable laws.

### **Prevent child labor**

The Dussmann Group expects its business partners to prohibit and refrain from all forms of child labor in its operations. The minimum age of employment may not be lower than the age at which compulsory education ends and in no case less than 15 years. No one is directly or indirectly forced to work by threat of punishment. Employment is voluntary.

### **Control security personnel**

Our business partners undertake, if they use private or public security forces, to instruct and monitor them to ensure they do not violate the prohibition of torture and degrading treatment, endanger life and limb or impair freedom of association.

### **Prevent of all forms of harassment and abuse**

Business partners do not tolerate abusive conduct or harassment, including unwelcome advances and physical or verbal assault.

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

Business partners uphold the right to freedom of assembly, freedom of association and collective bargaining in accordance with the law of the place of employment.

### **Protect data and company property**

When processing personal data, our business partners are obliged to take great care and maintain confidentiality in accordance with data protection regulations. Business partners restrict collection and processing of data to that which is necessary or contractually agreed in the context of the provision of services for the Dussmann Group and exclusively during the period in which the service is provided or as contractually agreed. Security of data processing is ensured through appropriate technical and organizational measures and information security risk management. The staff employed is obliged and trained to observe confidentiality and to comply with data protection regulations. Dussmann Group property and that of its clients is used with care and exclusively for the intended purpose. Facilities, work equipment and rights of use or licenses may be used for business purposes only and within the scope of the service contract.

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

Business partners are responsible for ensuring that the contents of this Code of Conduct are respected and implemented in their business and that their employees know, understand and comply with it. The Dussmann Group also requires its business partners to enforce the provisions of this Code of Conduct among their business partners and to take risk-based measures to identify and prevent violations in the supply chain. The Dussmann Group reserves the right to audit observance of the due diligence obligations in the supply chain as well as Code of Conduct or to contract an independent third party to do so and to conduct relevant training courses with the business partner. The business partner is consulted before the audit takes place.

### **Notify breaches and concerns (notification system)**

When a breach of the Code of Conduct is discovered or suspected, the Dussmann Group is informed immediately. Confidential and, if necessary, anonymous reports can be submitted to the Dussmann Group

whistleblower system: <https://en.dussmanngroup.com/responsibility/governance#whistleblower>. Our business partners ensure that their employees are aware of the complaints process. They do not tolerate discrimination against those who report violations of the Code of Conduct.

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

Should a business partner fail to comply with its obligations under the Code of Conduct, the Dussmann Group is entitled to exercise its rights in accordance with contractual regulations. Consequences may include the termination of the contractual relationship.

### **Questions concerning the Code of Conduct may be addressed to:**

Dussmann Group  
compliance department  
Friedrichstraße 90, 10117 Berlin  
[compliance@dussmanngroup.com](mailto:compliance@dussmanngroup.com)

**Confirmation by the business partner**

We have received a copy of the Code of Conduct and undertake to comply with its provisions in addition to existing contractual obligations.

.....

place, date

signature business partner

.....

company stamp

name (in block letters), function