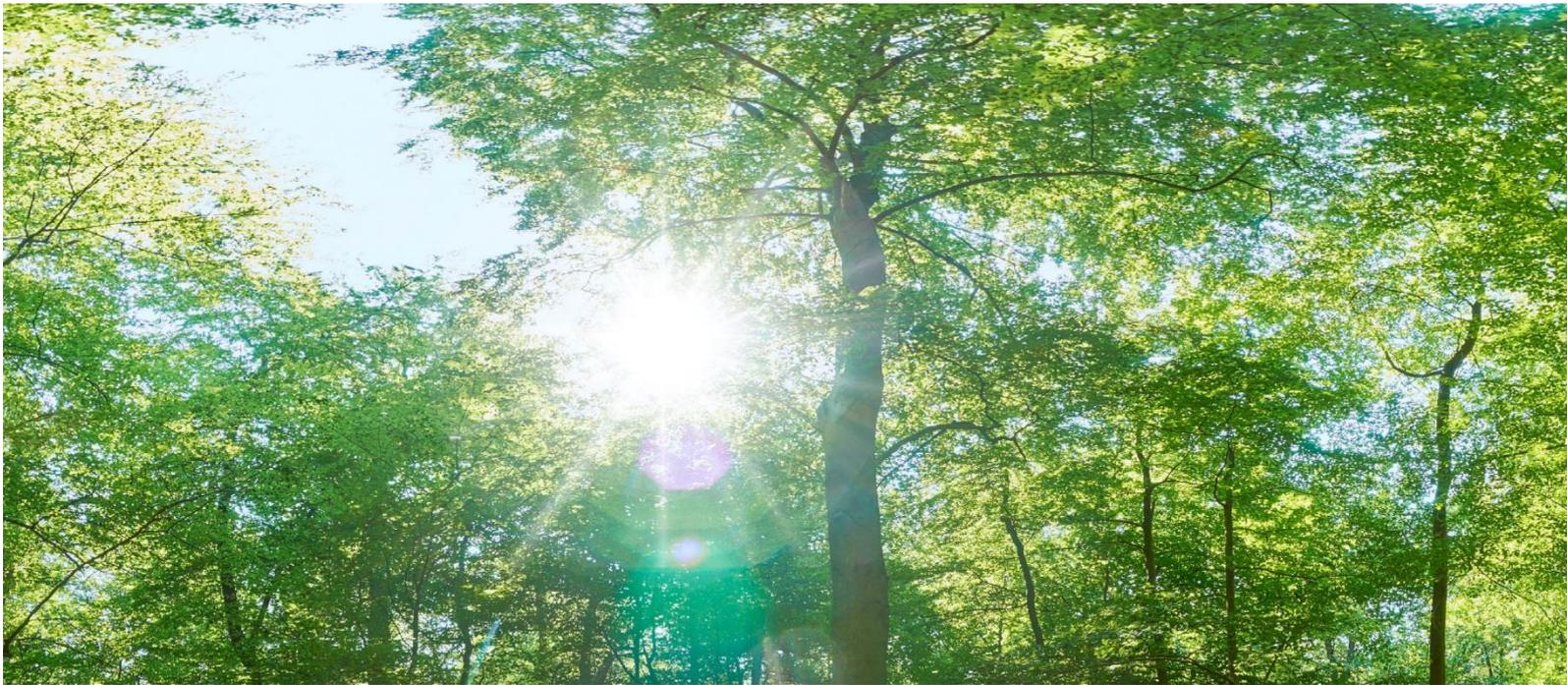


Delignit
AKTIENGESELLSCHAFT

Delignit[®]
naturally superior

DHK automotive GmbH

Code of Conduct



As at 5 May 2020

www.delignit.com

Preface

The companies of Delignit AG develop, manufacture and sell ecological system solutions mainly based on wood, a renewable and carbon-neutral raw material. As an expert partner in the fields of development, prototyping and series production, we work closely with various global players in the automotive, aviation and railway technology sectors.

Our core competence lies in the skilled design and efficient implementation of customised applications. Whether as an end-to-end system or configurable module solutions, our products can be used in a variety of ways and in a range of different functions. Above all, this flexibility is thanks to the material Delignit works with, which is predominantly based on beech wood. The use of this material as a substitute for non-regenerative materials also sustainably improves the environmental footprint of customers' products and effectively implements their ecological requirements.

As a forward-looking employer in the (wood) technology sector, Delignit AG is aware of its social, ethical and ecological responsibility. Our Code of Conduct comprises the key corporate values of Delignit AG and its subsidiaries (Blomberger Holzindustrie GmbH and DHK automotive GmbH).

We expect our employees to embody these corporate values and to implement the principles set out in this Code of Conduct in their day-to-day work conscientiously and appropriately.

In conjunction with our cooperation and partnership, we expect our suppliers to share our values and principles as well, and to take measures to implement them systematically in their day-to-day work and to report any legally relevant violations to the appropriate agencies.

We maintain relationships built on cooperation and partnership with all our business partners and interested parties. This applies not just to our customers and suppliers, but also to service providers and official authorities. We are also committed to respecting and implementing the expectations and binding requirements of interested parties in appropriate form.

Our principles are founded on the following internationally recognised guidelines:

- the United Nations Global Compact
- the Rio Declaration on Environment and Development
- the United Nations Convention against Corruption
- the United Nations Universal Declaration of Human Rights
- the ILO Declaration on Fundamental Principles and Rights at Work

1. Our responsibility to society

Delignit AG is expressly committed to respecting human rights within its sphere of business and responsibility. We promise to take all necessary measures to achieve the observance of human rights. We do not tolerate human rights violations.

We reject any form of forced or compulsory labour, including slavery and human trafficking. This extends to all forms of work or services performed by a person under threat of punishment or against their will.

Delignit AG is committed to the prohibition of any form of child labour. When employing minors, we respect the minimum age for employment in line with national provisions.

2. Our responsibility to our employees

Delignit AG values fair working conditions for its employees. These include compliance with the respective national regulations on working hours, the right to fair pay and the statutory requirements on minimum wage or applicable collective bargaining. In addition, all social security benefits required by national law are paid or deducted. In conjunction with sustainable knowledge management, we support the qualification and ongoing training of our employees.

Delignit AG values diversity and promotes a working environment that emphasises and favours the inclusion of all staff. We reject any form of discrimination in the workplace. We respect the privacy of our employees. We are committed to fostering equal opportunities and diversity, and we guarantee that all employment decisions, including hiring, promotion and training, are made exclusively on the basis of the skills and qualifications of the person involved. Aspects such as ethnic origin, religion or belief, gender, sexual identity, age, nationality, disability, social background, personal relationships or union membership have no influence on our decisions. We prohibit any form of harassment, including in particular sexual harassment, of employees and take all legal steps against it.

Delignit AG recognises the right of employees to freedom of association and collective bargaining. Employees can establish an employee representation association or become a member of such an association at any time. No employee suffers any disadvantage as a result of membership in a trade union. Furthermore, employees or their respective organisations can negotiate and enter into company agreements or collective agreements at a suitable level.

We firmly believe that a safe and healthy working environment contributes significantly to the motivation of our employees, and thus systematically enhances the quality of our products and services as well. Our primary objective for occupational health and safety is therefore to ensure the comprehensive safety of our employees in the workplace. Delignit AG complies with the respective national statutory frameworks for occupational health and safety.

We ensure that the risks to which employees are exposed in the workplace are minimised as far as possible by taking appropriate measures to avoid accidents or health impairment. This includes effective measures for avoiding work accidents, emergency precautions and hazard prevention just as much as effective fire protection, which is especially significant in our wood-processing business. Employee workspaces are also designed ergonomically on a needs-driven basis. In order to guarantee these positive conditions in the long term, workplace conditions are regularly assessed and optimised if necessary in conjunction with a risk and threat analysis.

3. Our responsibility to ecology and the environment

To us, sustainability is not just a central business objective, but also a key aspect of forward-looking, ecologically based corporate governance.

To us, this particularly means:

- the constant optimisation of products and technologies with a focus on the responsible management of resources;
- regularly assessing our environmental impact and preventing environmental impairment;
- adherence to environmental laws and standards in the development and manufacture of our products; and
- continuously striving for new environmental protection potential.

In developing products and technologies, we endeavour to efficiently reduce the consumption of resources while elevating effectiveness in conjunction with our continuous improvement process. To do so, in addition to our PEFC certification, we have also introduced a certified energy management system (DIN EN ISO 50001) and, for Blumberger Holzindustrie GmbH, a certified environmental management system in accordance with DIN EN ISO 14001.

Our most important environmental goals include:

- reducing energy consumption and greenhouse gas emissions;
- keeping air clean and improving air quality;
- the management of natural resources;
- avoiding waste;
- preserving water quality and the economical use of water; and
- responsible chemicals management.

Furthermore, our employees are expected to reduce environmental impact on their own through environmentally conscious action in their work. They are also actively supported in this by our management.

4. Our responsibility to data, information and intellectual property

Delignit AG respects the privacy of its employees and business partners. We protect the right to informal self-determination and data protection of every individual person within our sphere of responsibility. Accordingly, the collection, processing and storage of personal data at our company is transparent and comprehensible to third parties at all times. Our procedures for processing personal data are consistent with the corresponding national laws and international regulations.

We do not disclose business information that has not already been made public. Information is treated confidentially and is not disclosed to unauthorised persons except where there is a legal requirement to do so. This principle also applies to the confidential information of our customers, suppliers and other business partners. Inside information is handled and published in a manner consistent with international capital market laws. For all the information and data within our control, we take suitable measures to ensure that national and normative information and data security requirements are upheld.

Delignit AG uses effective technical and organisational measures to protect the intellectual property of customers, suppliers and employees. The intellectual property of third parties can be used only with their express consent. We therefore reject any circulation of forged goods or counterfeit products, especially by our suppliers.

5. Our responsibility to business partners

We firmly believe that the quality and sustainability of our products lead to high customer satisfaction and sustainable customer loyalty, thereby allowing us to remain on the market lastingly and successfully. Our self-image includes fair competition and compliance with international and national competition and antitrust laws. Arrangements, agreements or concerted action that are intended to or result in the suppression of competition are prohibited.

In particular, this means that:

- we do not arrange prices with competitors;
- we do not make sham offers in invitations to tender;
- we do not divide up invitations to tender, customers or territories; and
- we do not provide competitors with information relevant to competition.

In this context, Delignit AG adheres to all national and international laws prohibiting corrupt business practices in dealings with third parties (officials, private enterprise or private individuals). We do not tolerate corruption, extortion or unfair advantage. Conflicts of interest must be avoided. If a personal interest or conflict exists, this must be declared. The person concerned will not experience any disadvantage as a result of their disclosure. Transparent and correct business relationships are mandatory for us.

The transparency of all asset and business transactions is ensured by our factually correct and chronological record-keeping. We comply with national laws, rules and regulations, and customs and export provisions in all activities and transactions. We also observe international law, restrictions on export control and economic sanctions affecting goods and services relevant to security.

6. Compliance with the Code of Conduct

In conjunction with their own personal responsibility, all employees are required to comply with our Code of Conduct and to ensure that violations are addressed, reported and eliminated. In the event of violations of this Code of Conduct or the principles it sets out, we reserve the right to initiate steps in line with labour law aimed at further measures to terminate business relationships or to conduct supplier audits.

CONTACT

If you have any questions about sustainability or the Code of Conduct, you can contact our Corporate Social Responsibility (CSR) Officer at any time.