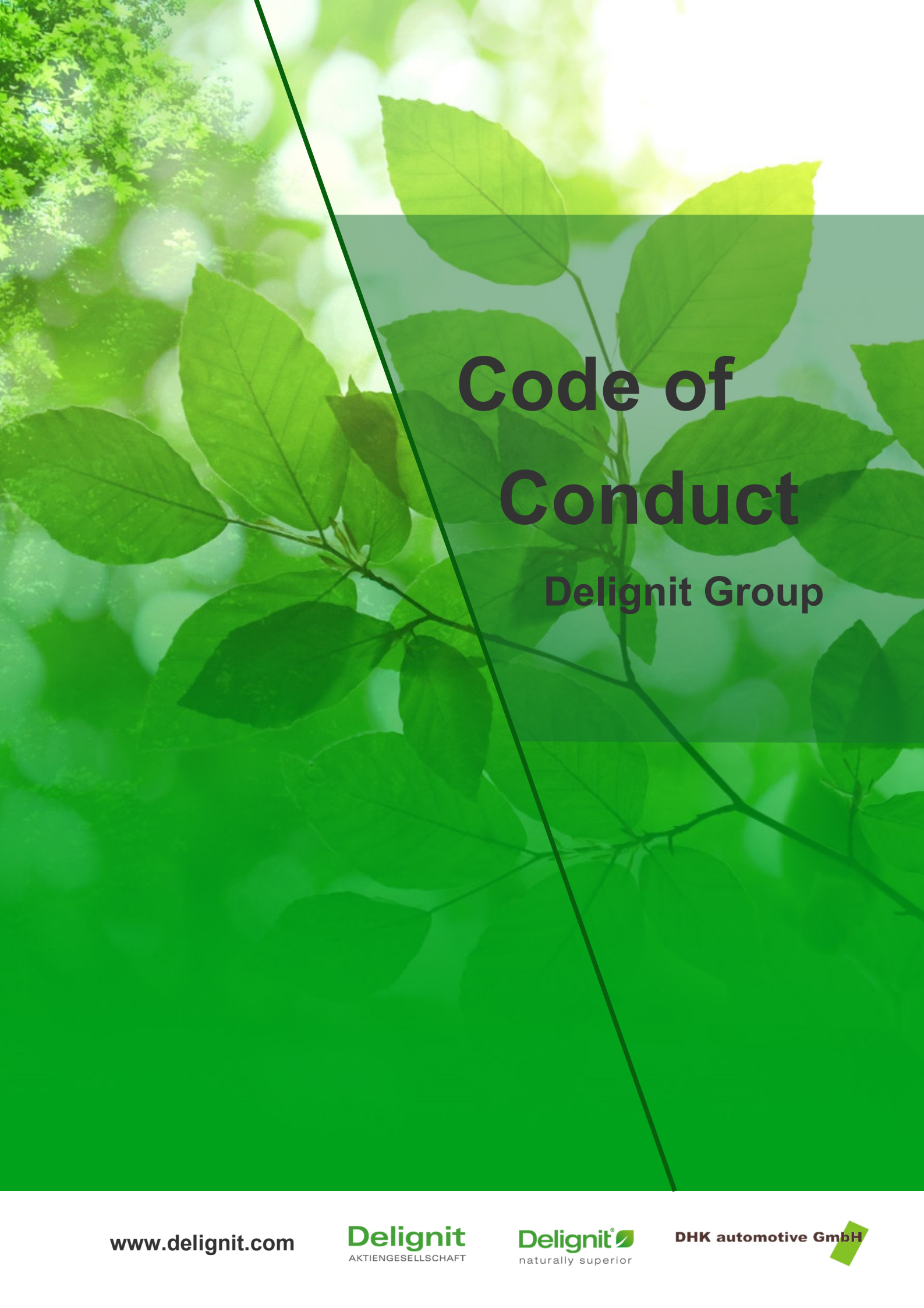




Code of Conduct

Delignit Group

Preface

The companies of Delignit AG develop, manufacture, and distribute ecological system solutions primarily based on the renewable and CO₂-neutral resource of wood. As a competent partner in the field of development, prototyping, and series production, we collaborate closely with various global players in the technology sectors, such as automotive, aviation, and rail transport.

Our core competency lies in the expert design and efficient implementation of customer-specific applications. Our products can be used in various forms and different functional areas as complete system solutions or combinable module solutions. The basis for this flexibility is primarily the Delignit material, which is predominantly based on beechwood. By using this material as a substitute for non-renewable materials, we also significantly improve the environmental footprint of our customers' products and effectively meet their ecological requirements.

As a forward-thinking employer in the (wood) technical field, Delignit AG is aware of its social, ethical, and environmental responsibility. Our Code of Conduct encompasses the essential corporate values of Delignit AG and its subsidiary companies (Blomberger Holzindustrie GmbH and DHK automotive GmbH).

We expect our employees to internalize these corporate values and diligently implement the principles outlined in this Code of Conduct in their daily work. In a cooperative and partnership-based collaboration, we also expect our suppliers to share our values and principles and take measures to consistently implement them in their daily work and report legally relevant violations to the relevant authorities.

We maintain a partnership-based collaboration with all business partners and interested parties. This applies not only to our customers and suppliers but also to our cooperation with service providers and authorities. Furthermore, we commit ourselves to consider and implement the expectations and binding requirements of interested parties in an appropriate manner.

Our principles are aligned with the following internationally recognized guidelines:

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

1. Our responsibility to society

Delignit AG expressly acknowledges the importance of upholding human rights within its business and responsibility domain. We commit to taking all necessary measures to promote the observance of human rights and will not tolerate any human rights violations.

We reject all forms of forced and compulsory labor, including slavery and human trafficking. This encompasses all types of work or services coerced from an individual under the threat of punishment or provided involuntarily. The engagement or utilization of security personnel is prohibited when their use results in inhumane or degrading treatment or injury to individuals or impairs their freedom of association and coalition rights.

Delignit AG strictly prohibits any form of child labor. When employing minors, we observe the minimum age for employment, in compliance with national regulations.

2. Our responsibility towards our employees

Delignit AG values fair working conditions for its female and male employees. This includes adherence to respective national regulations regarding working hours, the right to fair compensation, and compliance with legal requirements for minimum wages and applicable collective agreements. Additionally, all nationally mandated social benefits are provided or remitted. Within the framework of sustainable knowledge management, we support the training and further education of our employees.

Delignit AG places great emphasis on diversity and fosters a work environment that prioritizes and promotes the inclusion and equal rights of all employees, including the respect of women's rights. We reaffirm our commitment to respecting the rights of minorities and indigenous peoples in all aspects. Any form of discrimination is strongly rejected within our work environment. We respect the privacy of our employees. We are dedicated to promoting equality and diversity and ensure that all employment decisions, including hiring, promotion, training, and development measures, are made solely based on an individual's skills and qualifications. Factors such as ethnic origin, religion or belief, gender, sexual identity, age, nationality, disabilities, social background, personal relationships, or union membership have no influence on our decisions. We prohibit all forms of harassment, especially sexual harassment, of our employees and take all necessary legal measures against such behavior.

Delignit AG recognizes the employees' right to freedom of association and collective bargaining. Employees have the opportunity at any time to establish a workers' representation or become a member of one. Membership in a union does not result in disadvantages for an employee. Furthermore, employees or their respective organizations can negotiate and conclude company-level agreements or collective agreements at an appropriate level.

We believe that a safe and healthy work environment significantly contributes to the motivation of our employees and consistently enhances the quality of our products and services. Therefore, our top goals in occupational safety and health protection are to ensure comprehensive safety for our employees at their workplaces. Delignit AG adheres to the respective national legal frameworks for occupational safety and health.

We ensure that the risks to which employees are exposed in their work environment are minimized through appropriate measures to prevent accidents or health impairments. This includes effective measures for accident prevention, emergency preparedness, and hazard prevention, as well as effective fire protection, which is particularly important in our wood processing company. Furthermore, the workstations of our employees are designed to be suitable and ergonomic. To ensure the sustainability of these positive conditions, workplace conditions are regularly assessed and optimized as needed within the framework of risk and hazard analysis.

3. Our responsibility towards quality, ecology, and the environment

Sustainability is not just a central business task for us, but we consider it an essential aspect of a future-oriented, economically and ecologically based corporate management. For us, this means, in particular:

- Adhering to the zero-defect philosophy.
- Solving customer issues and meeting their requirements and expectations.
- Deriving corporate and process goals to promote leaders who take responsibility for achieving our quality goals together.
- Ensuring the growth of our company by entering markets and serving them with meaningful and innovative products, services, and solutions.
- Continuously optimizing products and technologies with a focus on responsible resource management.
- Regularly assessing our environmental impact and preventing environmental disturbances.
- Complying with environmental laws and standards in the development and production of our products.
- Preferentially using renewable resources, where feasible.
- Continuously striving for new environmental protection potentials.

In the development of products and technologies, we strive to reduce resource consumption efficiently and increase efficiency as part of our continuous improvement process. In addition to the quality management system (DIN EN ISO 9001), we have introduced a PEFC certification and a certified energy management system according to DIN EN ISO 50001. For Blomberger Holzindustrie GmbH, we have also implemented a certified environmental management system according to DIN EN ISO 14001.

Our main environmental goals include:

- Reducing energy consumption and greenhouse gas emissions.
- Keeping the air clean and improving air quality.
- Managing natural resources.
- Avoiding waste.
- Using alternative materials, saving, recycling, and reusing materials.
- Preserving water quality and using water efficiently.
- Responsible chemical management.

Our employees are encouraged to reduce environmental impact through environmentally conscious actions in their work areas. They are actively supported by our management.

Furthermore, we want to emphasize that we clearly distance ourselves from any involvement in unlawful evictions and the illegal appropriation of land, forests, and waters in the context of land acquisition, development, or other use of areas essential for individuals' livelihoods. We respect and support animal welfare concerns. Our goal is to preserve and protect biodiversity and its ecosystems, such as species diversity, soil quality, and land use. We strongly condemn illegal logging. We also ensure that noise emissions do not exceed legally established limits.

4. Our responsibility towards data, information, and intellectual property

Delignit AG respects the privacy of its employees and business partners. We protect the right to informational self-determination and data privacy of each individual in our responsibility. Therefore, the collection, processing, and storage of personal data in our company are transparent and always traceable by third parties. Our procedures for processing personal data are in line with relevant national laws and international regulations.

We do not disclose business information that is not already publicly available. Information is treated confidentially and not disclosed to unauthorized individuals unless required by law. This principle also applies to confidential information of our customers, suppliers, or other business partners. Handling insider information and its disclosure is in accordance with international capital market regulations. We ensure that national and normative requirements for information and data security are met for all information and data within our influence.

Delignit AG protects the intellectual property of customers, suppliers, and employees through effective technical and organizational measures. The intellectual property of third parties may only be used with their explicit permission. Therefore, we also reject any distribution of counterfeit goods or plagiarism, especially by our suppliers.

5. Our responsibility to business partners

We are convinced that the quality and sustainability of our products ensure high customer satisfaction and sustainable customer loyalty, allowing us to succeed in the market in the long term. Fair competition and adherence to international and national competition and cartel laws are integral to our identity. Agreements, arrangements, or coordinated behavior aimed at restricting or affecting competition are prohibited. This includes, in particular, that we:

- Do not engage in price fixing with competitors.
- Do not submit sham bids in tenders.
- Do not divide tenders, customers, or territories.
- Do not share competitive-relevant information with competitors.

In this context, Delignit AG complies with all national and international laws that prohibit corrupt business practices in dealing with third parties (public officials, private-sector companies, or individuals). We do not tolerate corruption, extortion, or bribery. Conflicts of interest are to be avoided. If a personal interest or conflict of interest exists, it must be disclosed. Disclosure will not result in any disadvantages to the individual. Transparent and correct business relationships are mandatory for us.

The traceability of all financially relevant transactions and business events is ensured through our accurate and chronological record-keeping. We assume full financial responsibility, thus ensuring strict compliance with legal requirements for proper accounting and disclosure regulations. In all our activities and business relationships, we conscientiously follow national laws, regulations, and standards, as well as all customs and export regulations. Furthermore, we observe international legal requirements and restrictions on export control and the export and economic restrictions of security-related services and goods.

6. Compliance with the Code of Conduct

All employees are encouraged to uphold our Code of Conduct and ensure that any violations are addressed, reported, and rectified within the scope of their personal responsibility. For this purpose, a dedicated whistleblower system has been established. The protection of personal data of both the reporting and reported individuals is ensured. We guarantee the confidentiality of the identity of whistleblowers during all phases of the process.

In the case of violations of the principles laid out in this Code of Conduct, we reserve the right to take further actions, including employment-related measures, termination of business relationships, or the implementation of supplier audits.

CONTACT PERSON

If you have any questions regarding sustainability and the Code of Conduct, you can always contact our CSR Officer (Corporate Social Responsibility, CSR).

Location: Blomberg
Date: January 01, 2025

Markus Büscher
Managing Director

Thorsten Duray
Managing Director