



DAW

DEUTSCHE  
AMPHIBOLIN-WERKE  
VON ROBERT MURJAHN

DAW SE

# CODE OF CONDUCT

[www.daw.de](http://www.daw.de)

June 2022

Better Building Performance. Better Life. Since 1895.



# Table of contents

<b>Foreword by the Executive Board</b>	<b>5</b>		
<hr/>			
<b>1. ONE DAW – ONE COMPLIANCE</b>	<b>6</b>		
1.1 Why do we have a code of conduct?	<b>7</b>		
1.2 To whom does the Code of Conduct apply?	<b>7</b>		
1.3 What is the role of each individual in implementing the Code of Conduct?	<b>9</b>		
1.4 What happens if the Code of Conduct is violated?	<b>9</b>		
<hr/>			
<b>2. Compliance with legal requirements and internal rules</b>	<b>11</b>		
<hr/>			
<b>3. Commandments and prohibitions for dealing with colleagues – the environment – our products</b>	<b>12</b>		
3.1 Prohibition of discrimination	<b>13</b>		
3.2 Fair working conditions	<b>14</b>		
3.3 Respect for human rights	<b>16</b>		
3.4 Responsible treatment of the environment	<b>16</b>		
3.5 Quality and safety of our products	<b>17</b>		
		<b>4. Commandments and prohibitions in business dealings</b>	<b>18</b>
		4.1 Observance of the prohibition of bribery and corruption	<b>19</b>
		4.2 Dealing with conflicts of interest	<b>20</b>
		4.3 Compliance with antitrust laws	<b>21</b>
		4.4 Anti-money laundering and trade controls	<b>22</b>
		<hr/>	
		<b>5. Handling entrusted company property and information</b>	<b>23</b>
		5.1 Company property	<b>24</b>
		5.2 Trade and business secrets	<b>25</b>
		5.3 No misuse of the IT infrastructure	<b>26</b>
		5.4 Data protection	<b>27</b>
		<hr/>	
		<b>6. Reporting possible misconduct</b>	<b>28</b>
		<hr/>	
		<b>Contact</b>	<b>30</b>

*In everything that we do we behave responsibly towards people, nature and society. As an innovative family enterprise we feel obliged to make a contribution to sustainable, environmentally compatible, economic management (Sustainable Development) that is fit for the future.*



**Dr. Ralf Murjahn**  
Owner and Managing  
Director (CEO)



**Steffen Heiko Fischer**  
Managing Director  
(COO)



**Dr. Jörg Leuninger**  
Managing Director  
Innovation and Business  
Fields (CIPO)



**Dr. Thomas Späth**  
Managing Director  
Finance, Controlling IT  
(CFO)



**Daniel Weber**  
Managing Director  
Supply Chain (CSCO)

# Foreword by the Executive Board

**Dear colleagues, dear employees,<sup>1</sup>**

As an independent family owned business, we aspire to be a particularly reliable business partner with integrity that always justifies the trust placed in it. In view of rapidly changing legal regulations, and an equally increased public expectation towards our company to act in a socially responsible and sustainable manner, we would like to support our employees even better in complying with the requirements. In this way, we strengthen our company as a trustworthy supplier and employer in the social environment.

This is based on internal policies that we have defined for our activities and business processes, compliance with which is mandatory for all employees. They are based on internal standards as well as the applicable law in the respective countries. With additional strengthening of our compliance activities and the present Code of Conduct, we want to achieve these goals. The Code of Conduct is intended to help strengthen trust, avoid conflicts of interest and protect assets and the reputation of DAW and its subsidiaries, as

well as to respect the traditions and social values of the respective countries in which we operate.

**Behaviour that contradicts these principles can never be in the interest of DAW!**

We all have a decisive share in DAW's good image and business success. Only together can we secure and further expand this success.

If you have any questions, uncertainties or suggestions, please contact your manager or the Governance & Compliance Department („G&C Department“). It is important to us that clear answers are found to your questions so that you always feel securely positioned.

Ober-Ramstadt, March 2022



<sup>1</sup> If the generic masculine form is used in the following in this Code of Conduct it is solely for reader friendliness.  
At DAW it is the individual who counts. The employees who work for us are as colourful as our colours and as diverse as our brands.  
Everyone can be part of the DAW family, regardless of their background - as long as the chemistry fits!



# 1. ONE DAW – ONE COMPLIANCE

Compliance describes the responsibility of the company and every employee to observe and adhere to both legal provisions and internal company rules in everyday business.

## 1.1 Why do we have a code of conduct?

The claim derived from this is expressed in a code of conduct which is valid throughout DAW and which provides the employees with guidelines for their daily work and their dealings with colleagues and business partners.

In addition to the statutory provisions and internal company rules, the Code of Conduct also reflects DAW's guiding principles which form the basis of our corporate culture:

***Open and communicative,  
respectful and supportive,  
fact-based and disciplined,  
entrepreneurial and enthusiastic,  
pride in mutual success.***

This Code of Conduct shall be adapted if changed legal or economic conditions make it appear necessary. Adjustments will be communicated throughout the Group.

## 1.2 To whom does the Code of Conduct apply?

The Code of Conduct applies without exception to all employees (hereinafter „employees“ or „we“). The Code of Conduct is binding for DAW SE and all subsidiaries.





## COMPLIANCE - WHAT DOES IT MEAN?

- > Compliance comes from the English „to comply“ and can be translated as „to follow“, „to observe“ or „to conform“.
- > Compliance therefore describes the duty of every employee to observe both the legal provisions and the company's internal rules, such as this Code of Conduct, in everyday business.

### 1.3 What is the role of each individual in implementing?

DAW expects its employees to consistently implement the Code of Conduct and to set a good example of the values associated with it.

Managers have a prominent role to play here. They must actively fulfil their leadership role in order to avoid omissions or uncover violations.

Personal integrity and a sense of responsibility help to decide what behaviour is appropriate in certain situations.

**The following essential control questions can help you to assess your own behaviour correctly:**

- ✔ Do I act and make decisions in accordance with the legal provisions and DAW's internal company rules?
- ✔ Do I act and decide appropriately and on the basis of the facts that are objectively available to me?
- ✔ Will my decision stand up to critical scrutiny by the public?

### 1.4 What happens if the Code of Conduct is violated?

Non-compliance can lead to immediate damage and high fines for DAW and can jeopardise its business basis in the long term. Employees who violate the Code of Conduct must fear measures under labour law up to and including dismissal or even civil or criminal consequences, depending on the nature of the violation.



## INTEGRITY - WHAT DOES IT MEAN?

- > Integrity comes from the Latin „integritas“, which can be translated as „undamaged, uncorrupted state“.
- > Integrity is the integrity of character, incorruptibility, integrity or inviolability of a natural person (employee) or legal entity (company or institution).
- > Synonyms of integrity are decency, honesty, righteousness.
- > Those who have integrity are righteous and act with non-harmful intent.

## 2. Compliance with legal requirements and internal rules

At DAW we comply with the applicable legal provisions of the countries in which we operate. In addition to the rules of conduct explained in the Code of Conduct, the respective group guidelines contain concrete instructions on conduct which must be observed by the employees. In order to take country-specific circumstances into account, local guidelines may provide for additional regulations which, however, must not contradict the Code of Conduct and the Group Guidelines.

**The following control questions can help to correctly assess your own behaviour:**

- ✔ Do I know and follow the rules of this Code of Conduct and the relevant internal (Group) policies?
- ✔ In case of contradictions between the Code of Conduct and local legal provisions, do I respect the primacy of the local legal provisions?

3. Commandments and prohibitions for dealing with colleagues – the environment – our products



## 3.1 Prohibition of discrimination

At DAW we promote equal opportunities and equal treatment. We do not tolerate discrimination of any kind. No employee may be disadvantaged because of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religious affiliation or ideology.

**The following control questions can help to correctly assess your own behaviour:**

- ✔ Do I always treat colleagues fairly and respectfully, regardless of hierarchies?
- ✔ Am I careful not to make jokes or comments that others may find offensive?
- ✔ Am I making a positive contribution to open cultural interaction with my colleagues?
- ✔ Do I ensure that I always make objectively justifiable personnel decisions regardless of gender, gender identity, sexual orientation, religious affiliation, ethnicity or similar factors?

## 3.2 Fair working conditions

At DAW we only achieve our goals with motivated employees in all positions. It is therefore a matter of course for us to comply in our own company with the respective applicable provisions on the minimum wage as well as the standards of the International Labour Organisation with regard to workers' rights, in particular in the area of working hours and working conditions, remuneration and the exercise of freedom of association.

At DAW we comply with the applicable national laws on health protection and occupational safety, establish an appropriate occupational safety management system and ensure its application.

### The following control questions can help to correctly assess your own behaviour:

- ✓ Am I aware of the internal health protection measures and do I comply with the regulations on safety at work?
- ✓ Do I participate in the regular trainings to ensure safety at work?
- ✓ Do I report any health or safety hazards to the safety officer in charge or to my supervisor (e.g. lack of necessary safety clothing during guided tours for guests in production)?



We do not tolerate any kind of forced labour or child labour, neither directly with our suppliers nor with commissioned subcontractors.

**The following control questions can help to correctly assess your own behaviour:**

- ✔ When selecting our suppliers, sub-suppliers and other business partners, do I pay attention to respecting humane working conditions to the same extent as we expect from ourselves at DAW?
- ✔ Do I remember to inform a manager, the Governance & Compliance department (G&C department) if there are indications of forced or child labour? Do I use the possibility to report indications anonymously via the DAW Integrity Hotline? This is the only way to investigate the matter and evaluate the business relationship with the business partner.



### 3.3 Respect for human rights

DAW SE has been involved in the United Nations Global Compact since 2012 and is committed to the internationally recognised principles and standards. We speak out against any form of human rights violations and continuously develop our commitment to respect and uphold human rights. Our commitment encompasses our own sites as well as our suppliers, including the entire value chain. With our Supplier Code of Conduct, we also demand appropriate behaviour from our suppliers.

**The following control questions can help to correctly assess your own behaviour:**

- ✔ Do I know and support our commitment to human rights?
- ✔ Since contracting suppliers is part of my job, do I enforce and comply with the process for supplier recognition of our Supplier Code of Conduct? If I have any questions, I contact the purchasing department, the sustainability department or the G&C department.

### 3.4 Responsible treatment of the environment

At DAW we have been practising holistic sustainability management for more than 10 years with the aim of being a pioneer for sustainability in the industry. We comply with the respective applicable national environmental and climate protection laws and standards with our business activities. We maintain an appropriate, documented environmental management system. Our claim to sustainable innovation leadership includes striving for continuous improvement of manufacturing processes and our products to ensure that environmental impact and risk is constantly minimised, and environmental and climate protection is constantly improved in daily business operations.

**The following control questions can help to correctly assess your own behaviour:**

- ✔ Do I know and support our sustainability strategy? It is presented at [daw.de/en/responsibility](http://daw.de/en/responsibility).
- ✔ Do I use natural resources responsibly within my work area and avoid unnecessary waste, among other things?

## 3.5 Quality and safety of our products

As one of the largest European manufacturers and suppliers of paint and thermal insulation for buildings, we are aware of our responsibility to comply with the relevant legal regulations and standards to ensure the quality and safety of our products. This also applies to the associated work and production processes.

At DAW we ensure compliance through appropriate procedures and controls. We have our quality management regularly certified and agree corresponding claims with our suppliers within our supply chain. We make truthful statements in relation to our products. False or misleading information about products can not only damage our customers but also violate legal standards and endanger the reputation of DAW.

### **The following control questions can help to correctly assess your own behaviour:**

- ✔ As part of my job, do I ensure that legal regulations, standards and internal (Group) guidelines on product development, safety and quality are observed?
- ✔ As part of my job, do I ensure that anomalies or deviations from standards are reported to my manager or to the responsible departments for product management and approvals as well as to quality management (for example: incorrect packaging labelling; no or outdated approvals or certifications)?



## 4. Commandments and prohibitions in business dealings



## 4.1 Observance of the prohibition of bribery and corruption

We do not tolerate active or passive bribery and corruption or even recognise them as a basis for doing business.

At DAW we take appropriate measures to ensure that employees do not offer, promise or grant any unjustified advantages to our business partners or persons close to them, for example in the form of illegal payments, bribes, generous gifts or invitations, with the aim of obtaining a contract or other preferential treatment in business dealings.

Employees of DAW are also not permitted to demand, accept, offer or grant unjustified advantages, either directly or indirectly, in the course of their business activities, whether in the form of monetary payments, gifts or other benefits and services. This applies to persons, companies as well as authorities or other institutions. In particular, no domestic or foreign public official may be offered or granted any advantage. The only exceptions are generally customary occasional or promotional gifts, hospitality and other benefits of demonstrably low value. Furthermore DAW does not make any donations or other benefits to political parties, politicians or corresponding institutions.

### The following control questions can help to correctly assess your own behaviour:

- ✔ Do I always know and observe the current internal guidelines on value limits and approval requirements when accepting and granting gifts, invitations or other benefits (especially for customer loyalty measures)?
- ✔ Do I always comply with the requirement to request written approval from the recipient's superior for valuable donations or privately initiated invitations? If a recipient refuses, the donation may not be made.

## 4.2 Dealing with conflicts of interest

At DAW we make business and personnel decisions exclusively on the basis of objective criteria and avoid conflicts of interest with private, economic or other activities from the outset.



**The following control questions can help to correctly assess your own behaviour:**

- ✔ Do I act exclusively in the interest of DAW and do I separate private, own economic interests from those of DAW? Do I report circumstances which could jeopardise this principle to my manager? This also includes situations which are of an “internal” nature (for example: a personal relationship between an employee who initiates orders and an employee who checks or releases the related invoices) as well as situations which affect external parties such as business partners, customers, suppliers or competitors.
- ✔ Have I reported secondary employment to my manager and obtained written approval from the HR department?
- ✔ Is my manager aware of any economic interests held by me or persons close to me in business partners, customers, suppliers or competitors of DAW? Have I had them approved in writing by the responsible department via the G&C department?

## 4.3 Compliance with antitrust laws

At DAW we behave fairly in competition and observe the applicable cartel laws and other laws regulating free competition. We do not participate directly or indirectly in agreements with competitors or other market participants which violate cartel law, nor do we abuse a possible strong or dominant market position. At DAW we take appropriate measures to ensure this.

### **The following control questions can help to correctly assess your own behaviour:**

- ✔ Do I know the rules on conduct in compliance with antitrust law that are relevant to my activity?
- ✔ Do I ensure that I do not pass on any competition-relevant information to DAW's competitors or that I do not enter into any oral or written agreements with competitors that violate antitrust law, for example on pricing?
- ✔ Do I ensure that the prohibition of agreements under cartel law, for example in the form of a price fixing of the second hand by prescribing fixed or minimum prices, is observed?
- ✔ Do I know how to behave during association activities? Have I made sure that minutes of such events are always taken and available?
- ✔ Am I aware that I have to involve the M&A | Legal | Integrity department in case of open antitrust questions and doubtful cases?



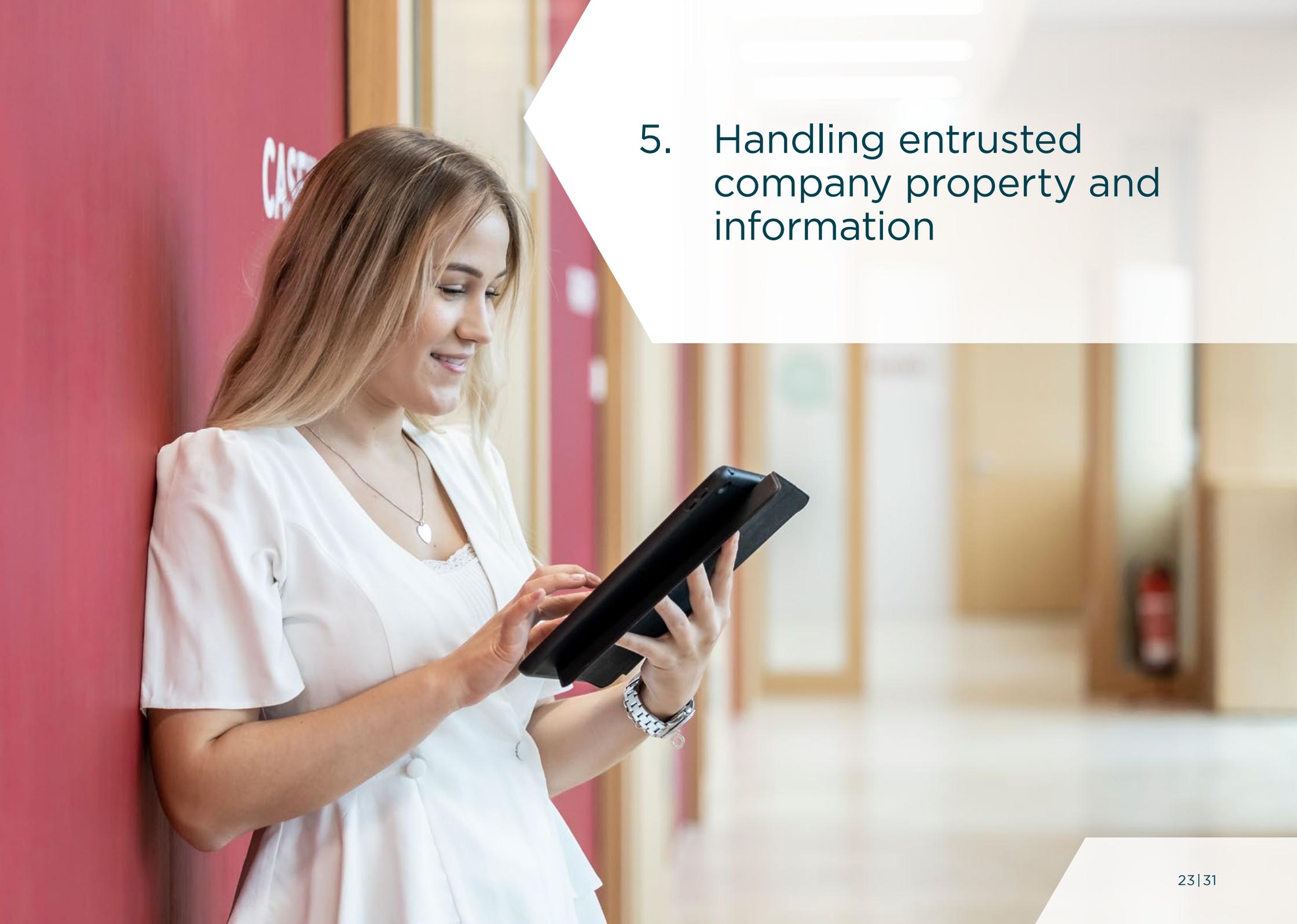
## 4.4 Anti-money laundering and trade controls

Money laundering is the smuggling (acceptance, transfer) of illegally acquired cash or other assets into economic circulation. We comply with the relevant legal obligations to prevent money laundering and do not participate directly or indirectly in money laundering activities. At DAW we take preventive measures throughout the Group to prevent/detect money laundering and report suspicious facts or other conspicuous circumstances to the competent authorities.

We also ensure that our business is conducted in accordance with applicable trade regulations. We are committed to complying with import and export control requirements, sanctions or economic embargoes, and requirements to prevent terrorist financing.

### **The following control questions can help to correctly assess your own behaviour:**

- ✔ As part of my role, do I ensure that we have verified the identity of our business partner?
- ✔ Do I look out for warning signs, such as payments by third parties on behalf of the customer, requests for payments to accounts of parties not involved in the transaction or other transactions that could indicate possible money laundering activities?
- ✔ If I am unsure, I contact the G&C department immediately.

A woman with long brown hair, wearing a white lab coat, is standing in a hallway and looking at a tablet computer. She is smiling slightly. The hallway has a red wall on the left and a wooden door on the right. The text '5. Handling entrusted company property and information' is overlaid on the right side of the image in a white box.

## 5. Handling entrusted company property and information

## 5.1 Company property

All employees are jointly responsible for the protection of DAW's company property within their area of activity. This includes tangible as well as intangible assets. Tangible assets are objects such as buildings, land, products, vehicles, furniture, computers, inventories and any form of records or documents. Intangible assets also include intellectual property such as know-how, industrial property rights in the sense of patents, trademarks or utility models as well as copyrights, technologies or trade secrets. We also respect the intellectual property of third parties.

### **The following control questions can help to correctly assess your own behaviour:**

- ✔ Do I pay attention to the careful handling of the objects entrusted to me by DAW for my business activities, such as tools, office furniture, mobile phone, computer or other things?
- ✔ Do I use company property for private purposes only with the express permission of the office responsible for it and in accordance with the relevant internal regulations?
- ✔ Do I respect patents, trademarks and other intellectual property rights of third parties in the course of my activities and do not use them without prior permission/licence granted by the owner (for example: internal/external use of images)?

## 5.2 Trade and business secrets

Employees must maintain confidentiality about all internal DAW matters unless they have been expressly released to third parties or the public by the bodies responsible for this.

### **The following control questions can help to correctly assess your own behaviour:**

- ✔ Do I always take appropriate measures to ensure that no confidential internal information such as business strategies, research results, market surveys or the contents of contracts as well as internal reporting is passed on or made accessible to unauthorised persons inside or outside DAW? Do I also observe this with regard to information which we have received confidentially from third parties?
- ✔ Have I obtained prior authorisation from the relevant manager before disclosing confidential information to third parties?
- ✔ Do I always ensure that confidential DAW information we receive in the course of our business is not used for my personal benefit or the benefit of others?

## 5.3 No misuse of the IT infrastructure

Our IT infrastructure serves the business. The proper functioning of the computer systems and their security are of utmost importance for the smooth operation of the business.



### The following control questions can help to correctly assess your own behaviour:

- ✔ Am I vigilant and check with IT Security or G&C for reassurance when doubts arise about the trustworthiness of email or other electronic requests?
- ✔ Do I use the security precautions and procedures available for the use of the electronic information systems (in particular encryptions, passwords) according to the specifications of the responsible IT security?
- ✔ Do I ensure to the best of my knowledge and belief that I refrain from actions which could adversely affect the operational or failure safety of the DAW IT infrastructure?
- ✔ Am I careful never to use the communication systems (this includes emails) in an offensive, disruptive or otherwise harmful way (for example: creating, displaying, storing or sending morally offensive content)?
- ✔ Do I always access sites on the Internet with the necessary care and only download data from secure sites?
- ✔ Do I only use software approved by DAW IT?

## 5.4 Data protection

When data of natural persons is stored, sent and evaluated (personal data), a high level of data protection must be ensured for this data in addition to data security. This applies to personal data of customers, interested parties and business partners as well as to data of employees.

At DAW we handle personal data with care and comply with the relevant data protection laws when processing it.

### The following control questions can help to correctly assess your own behaviour:

- ✓ As part of my role, do I ensure that personal data is only collected, stored and processed as intended for the approved purposes?
- ✓ Do I remember to contact the responsible data protection coordinators or data protection officers if I have any doubts or questions? I can find the contact details on the intranet under the keyword data protection.





## 6. Reporting possible misconduct

At DAW, we expressly promote and support a culture that is concerned to detect and remedy any misconduct in the spirit of this Code of Conduct (Speak-Up Culture).

DAW is a company in which every employee may have confidence in being able to report violations of local laws, regulations or the Code of Conduct in good faith. Every employee can expect DAW and its managers to investigate these reports and to clarify the facts internally accordingly. We at DAW are dependent on your support for this.

#### What DAW is committed to:

- ➔ Every report submitted is taken seriously and dealt with according to a standardised process in which feedback is provided within seven days that the report has been received. Information on actions taken is provided within three months of the report.
- ➔ No attempt will be tolerated to prevent employees from reporting possible violations. Furthermore, DAW will not tolerate reprisals in the sense of retaliation, discrimination or disciplinary action against a person who has made a report in good faith.

#### The following control questions can help to correctly assess your own behaviour:

- ✔ Do I have any indications that suggest misconduct or violations of this Code of Conduct or legal provisions? In these cases, I can contact my superiors, the Human Resources Department, the Internal Audit Department or also the G&C Department directly at **Compliance@DAW.de** or by telephone at **+49-(0)6154-71-76477** at any time.
- ✔ Am I aware of DAW's web-based whistleblower hotline ("DAW Integrity Hotline")? This can be used to submit reports in the respective national language and, if desired, anonymously. Incoming anonymous reports cannot be traced by DAW. The system can be used to ask questions about submitted reports and to communicate the measures taken. The DAW Integrity Hotline can be reached at **daw.integrityline.com**.



## The G&C department – your reliable contact partner

Situations that may raise questions are natural and well known to all of us. In this respect, the Code of Conduct can only provide guidance and cannot cover every single situation. If you have any doubts, questions or uncertainties about the interpretation and application of the Code of Conduct, you can always contact the G&C department. It is your reliable point of contact who will be at your side and happy to help you at any time.

### **Governance & Compliance**

**Email:** [Compliance@daw.de](mailto:Compliance@daw.de)

**Phone:** +49 - (0)6154-71-76477

**Intranet:** <https://dawgroup.sharepoint.com/sites/intranet-legal-de/SitePages/Compliance.aspx>



DEUTSCHE  
AMPHIBOLIN-WERKE  
VON ROBERT MURJAHN