

Code of Conduct on Social  
Responsibility of Glen Dimplex Germany  
(Glen Dimplex Deutschland GmbH).

# Code of Conduct.

Version as of November 2023

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## 1. Basic Understanding of Socially Responsible Corporate Governance

This Code of Conduct (CoC) is based on a common understanding of socially responsible corporate governance. For us, this means that we assume responsibility by considering the consequences of our business decisions and actions in economic, technological, social and ecological terms and by achieving an appropriate balance of interests. We voluntarily contribute to the well-being and sustainable development of the global society at the locations where we operate within the framework of our respective possibilities and scope for action. In doing so, we are guided by universally valid ethical values and principles, in particular integrity and probity and respect for human dignity.

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## 2. Scope of Application

This CoC applies to all branches and business units of Glen Dimplex Deutschland GmbH (GDD).

GDD undertakes to promote compliance with the contents of this CoC also among its suppliers and in the further value chain within the scope of its respective possibilities and scope for action.

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## 3. Basic Behavioural Requirements

### 3.1 Compliance with the Law

Compliance with the law is GDD's top priority.

Each employee must comply with the legal requirements of the jurisdiction in which he or she is acting. In countries with weak institutional frameworks, we carefully consider what good corporate practice from our own home country should be applied in support of responsible corporate governance. In particular, we also feel committed to the principles of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz).

Violations of the law must be avoided at all costs, especially violations punishable by imprisonment, fines or penalties. Every employee must expect disciplinary consequences in the event of a violation - irrespective of the sanctions provided for in the law - because of the violation of his/her duties under the employment contract.

### 3.2 Responsibility for the reputation of Glen Dimplex Deutschland (GDD)

The reputation of Glen Dimplex Germany is essentially shaped by the appearance, actions and behaviour of each and every one of us. Inappropriate behaviour by even one employee can already cause considerable damage to the company.

### 3.3 Mutual Respect, Honesty and Integrity

We respect the personal dignity, privacy and personal rights of each individual. We work together with women and men of different nationalities, cultures, religions and skin colours. We do not tolerate discrimination and no sexual or other personal harassment or insult.

### 3.4 Leadership, Responsibility and Supervision

Every manager bears responsibility for the employees entrusted to him or her. He or she must earn their recognition through exemplary personal conduct, performance, openness and social competence. He or she sets clear, ambitious and realistic goals, leads through trust and gives employees as much personal responsibility and freedom as possible. He or she is also approachable for the employees in case of professional and personal concerns.

Every manager has organisational and supervisory duties to fulfil. He or she is responsible for ensuring that no violations of the law occur in his/her respective areas of responsibility that could have been prevented or made more difficult by proper supervision. They remain responsible even if individual tasks are delegated.

In detail, the following applies:

1. The manager must carefully select employees according to personal and professional suitability. The duty of care increases with the importance of the task the employee has to perform (duty of selection).
2. The manager must set the tasks precisely, completely and bindingly, especially with regard to compliance with the legal provisions (duty to instruct).
3. The manager must ensure that compliance with the legal provisions is continuously monitored (duty to monitor).
4. The manager must clearly communicate to the employees that violations of the law are frowned upon and have consequences under labour law.

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#### 4. Dealing with Business Partners and Third Parties

GDD bases its actions on universally valid ethical values and principles, in particular integrity, righteousness, respect for human dignity, openness and non-discrimination of religion, ideology, gender and ethics.

We reject corruption and bribery in the sense of the corresponding UN Convention<sup>1</sup>. We promote transparency, integrity and responsible management and control in the company in an appropriate manner.

We follow clean and recognised business practices and fair competition. In competition, we align ourselves with professional behaviour and quality work.

##### 4.1 Observance of Competition Law and Antitrust Law

Only fair competition enjoys the right to develop freely. The imperative of integrity also applies in the struggle for market shares.

Every employee is obliged to comply with the rules of fair competition. The assessment under cartel law can be difficult in individual cases. Nevertheless, there are behaviours that regularly constitute a cartel violation:

Employees may not, for example, engage in discussions with competitors in which prices or capacities are agreed upon. It is also not permissible to agree with competitors on a waiver of competition, on the submission of sham bids in tenders or on the division of customers, territories or production programmes.

Employees may not influence resale prices vis-à-vis our customers or attempt to enforce export or import bans.

##### 4.2 Offering and Granting Benefits

We compete for orders with the quality and price of our innovative products and services.

No employee may offer or grant unauthorised advantages to others - directly or indirectly - in connection with business activities, either as monetary payments or in the form of other benefits. Promotional gifts to employees of business partners must be selected in such a way as to avoid any appearance of dishonesty or impropriety on the part of the recipient. In case of doubt, the recipient should be asked to obtain prior approval from his/her superior. If the recipient resists this, it shows that he/she considers the reception to be incorrect.

Gifts must not be given to civil servants and other public officials.

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<sup>1</sup> United Nations Convention against Corruption of 2003, in force since 2005

Employees who conclude contracts with consultants, intermediaries, agents or comparable third parties must ensure that these also do not offer or grant any unauthorised benefits.

#### 4.3 Requesting and Accepting Benefits

No employee may use his or her official position to demand, accept, obtain or be promised advantages. This does not include the acceptance of occasional gifts of small value; other gifts must be refused or returned.

#### 4.4 Special Rules for the Award of Contracts

Anyone who applies for a contract expects us to examine their bid fairly and without bias. Employees involved in awarding contracts must observe the following rules in particular:

- The employee shall declare any personal interest that may exist in connection with the performance of his/her official duties to his/her manager.
- Suppliers must not be unfairly favoured or hindered when competing for contracts.
- Invitations from business partners may only be accepted if the occasion and scope of the invitation are appropriate and refusal of the invitation would be contrary to the requirement of politeness. Gifts from business partners must be refused and returned, unless they are insignificant occasional gifts of little value.
- No employee may have private orders carried out by companies with which he/she has business dealings if this could result in advantages for him/her. This applies in particular if the employee has direct or indirect influence or can exert influence directly or indirectly on the commissioning by GDD or one of its affiliated group companies.

#### 4.5 Donations

As a Corporate Citizen, GDD grants donations in cash and in kind for education and science, for art and culture as well as for sports and social causes. We receive requests for donations from a wide variety of organisations, institutions and associations. The following rules apply to the allocation of donations:

- Requests for donations from individuals are to be rejected on principle.
- Payments to private accounts are not permitted.
- Under no circumstances may a grant be made to persons or organisations whose reputation is damaged.
- The donation must be transparent. The recipient of the donation and the specific use by the recipient must be known. It must be possible to account for the reason for the donation and the intended use at any time.
- The donations are to be tax deductible.

Donation-like remuneration violates the transparency requirement and is prohibited. Donation-like remunerations are benefits that appear to be granted as remuneration for a service. However, the remuneration clearly exceeds the value of the service. It is therefore - at least in part - a donation for other purposes.

#### 4.6 Working Conditions

GDD is committed to fair working conditions and complies with the following ILO core labour standards<sup>2</sup> :

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<sup>2</sup> ILO = International Labour Organization = International Labour Organization

#### *4.6.1 Principle of Equal Treatment*

Unless it is owed to the requirements of employment, we treat our employees equally, regardless of national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief. This includes, in particular, payment of equal pay for equal work.

#### *4.6.2 Child Labour*

The prohibition of child labour, i.e. the employment of persons younger than 15 years of age, unless local legislation sets higher age limits and unless exceptions are permitted.<sup>3</sup>

#### *4.6.3 Forced Labour*

The prohibition of forced labour of any kind, including in particular all forms of modern slavery.<sup>4</sup>

#### *4.6.4 Remuneration*

The labour standards regarding remuneration, in particular regarding the level of remuneration in accordance with the applicable laws and regulations.<sup>5</sup>

#### *4.6.5 Workers' rights*

Respecting the right of workers to freedom of association, freedom of assembly and collective bargaining, to the extent permitted by law in the respective country.<sup>6</sup>

#### *4.6.6 Occupational Safety*

Responsibility towards employees and colleagues demands the best possible precautions against accident hazards. This applies to the technical planning of workplaces, facilities and processes as well as to safety management and personal behaviour in everyday work. The working environment must meet the requirements of a health-oriented design. Every employee must devote his/her constant attention to safety.

#### *4.6.7 Working hours*

GDD complies with the labour standards regarding the maximum permissible working hours.

### 4.7 Human Rights

GDD is committed to the promotion of human rights. GDD upholds human rights in accordance with the UN Human Rights Charter<sup>7</sup>, in particular those listed below:

#### *4.7.1 Privacy*

Protection of privacy.

#### *4.7.2 Harassment*

Protection of employees from physical punishment and from physical, sexual, psychological or verbal harassment or abuse.

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<sup>3</sup> ILO Convention No. 138 of 1973 and ILO Convention No. 182 of 1999

<sup>4</sup> ILO Convention No. 29 of 1930 and ILO Convention No. 105 of 1957

<sup>5</sup> ILO Convention No. 100 of 1957

<sup>6</sup> ILO Convention No. 87 of 1948 and ILO Convention No. 98 of 1949

<sup>7</sup> Universal Declaration of Human Rights, UN Resolution 217 A (III) of 1948

#### *4.7.3 Freedom of Expression*

Protecting and granting the right to freedom of opinion and expression.

#### *4.7.4 Protection of Livelihoods*

We undertake to avoid any destruction of the natural livelihoods of people through environmental pollution, e.g. through harmful soil changes or water pollution, in the manufacture of our products. Nor will we unlawfully infringe land rights whose use secures the livelihood of persons.

#### *4.7.5 Protection from the Use of Security Forces*

In order to protect our business interests, we will not hire or use private or public security guards who, due to lack of instruction or control, compromise or disregard the working conditions and human rights set out.

#### *4.7.6 Other Protected Legal Positions*

GDD shall prevent any action or omission in breach of duty which is directly suitable to impair a protected legal position<sup>8</sup> in a particularly serious manner and the unlawfulness of which is obvious upon a reasonable assessment of all circumstances under consideration.

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## 5. Avoidance of Conflicts of Interest

The company attaches importance to ensuring that its employees do not have conflicts of interest or loyalty in the course of their official duties. Such conflicts may arise when an employee works for or has an interest in another company. Therefore, the following rules apply to all of us.

### 5.1 Non-competition Clause

It is not permitted to operate a business that competes in whole or in part with Glen Dimplex Deutschland (Glen Dimplex Deutschland GmbH) or its group companies.

### 5.2 Participation in Unlisted Companies

Direct or indirect participation in an unlisted company that competes in whole or in part with GDD (Glen Dimplex Deutschland GmbH) or its affiliated group companies is not permitted. Any participation by close relatives in a competitor company or another of the companies described above must be reported in writing by the employee to the Human Resources Department if he/she is aware of this and must be documented in the personnel file.

### 5.3 Secondary Activities

The employer must be notified in writing of secondary employment for remuneration in advance of the commencement of work and the secondary employment must be permitted. Secondary employment may be prohibited if it leads to an impairment of the work performance, contradicts the duties in the company or if there is a risk of a conflict of interests. Likewise, the legal limits of the maximum daily and weekly working hours must be observed. Occasional writing activities, lectures and comparable occasional activities are excluded.

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<sup>8</sup> Protected legal positions are those arising from the conventions in numbers 1 to 11 of the Annex to the Supply Chain Sourcing Obligations Act.

## 6. Environmental Protection and Energy Efficiency

The protection of the environment and the responsible use of energy and resources are corporate goals of high priority. In accordance with the principles of the Rio Declaration<sup>9</sup>, we use natural resources responsibly. Environmentally friendly and energy-efficient design, technical safety and health protection are fixed targets in the development of our products as well as in services and operational processes. Every employee is called upon to make a contribution in these areas at his/her workplace.

In the manufacture of our products, we comply with the relevant international conventions, in particular regarding the production, use and/or disposal of mercury<sup>10</sup>, regarding persistent organic pollutants<sup>11</sup> and regarding hazardous waste<sup>12</sup>.

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## 7. Implementation and Enforcement at GDD and its Suppliers

Glen Dimplex Deutschland (Glen Dimplex Deutschland GmbH) undertakes all appropriate and reasonable efforts to continuously implement and apply the principles and values described in this CoC within its own company. Contractual partners shall be informed of the essential measures upon request and within the framework of reciprocity, so that it becomes comprehensible how their compliance is fundamentally ensured. There is no entitlement to the disclosure of trade and business secrets, information relating to competition or other information worthy of protection.

Suppliers of GDD shall be provided with a German or English version of the CoC upon conclusion of the contract and amendments thereto as well as in the event of material changes to the CoC. Suppliers will be measured against the same ethical standards as GDD itself. As far as possible, GDD will include reporting obligations in contracts and agree on termination rights in case of violation of the principles of this CoC.

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## 8. Handling Company Equipment

The equipment and facilities in offices and workshops (e.g. telephone, copier, PC including software and internet/intranet, machines, tools) may only be used for official business. Exceptions and, if applicable, payment shall be regulated locally. Under no circumstances may information be accessed or passed on that incites racial hatred, glorification of violence or other criminal offences or has content that is sexually offensive against the respective cultural background.

GDD respects the diversity of opinion of its employees but is politically neutral as a company. Their name, brand and logo, e.g. on promotional items, may not be used by employees in connection with the expression of political opinion, especially if this contradicts GDD's values. If an employee is given items from GDD for private use, they may

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<sup>9</sup> The 27 principles of the 1992 Rio Declaration on Environment and Development as an outcome of the United Nations Conference on Environment and Development in Rio de Janeiro

<sup>10</sup> Minamata Convention on Mercury of 10 October 2013 (Minamata Convention).

<sup>11</sup> Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants (POPs Convention), as last amended by the decision of 6 May 2005.

<sup>12</sup> Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Basel Convention), as last amended by the Third Ordinance amending Annexes to the Basel Convention of 22 March 1989 of 6 May 2014.



not use these in connection with the expression of political opinion, especially if this contradicts GDD's values, provided that this makes the affiliation to GDD recognisable, e.g., because a logo is attached to the item. No employee is permitted to make any recordings, files, visual or audio documents or reproductions without the consent of the manager, unless this is directly related to the professional activity.

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## 9. Handling Information

### 9.1 Records and Reports

Open and effective cooperation includes correct and truthful reporting. This applies equally to the relationship with investors, employees, customers, business partners as well as the public and all government agencies.

All records and reports made internally or given externally must be accurate and truthful. According to the principles of proper accounting, data collection and other records must always be complete, correct, timely and system-compatible. The requirement for truthful information also applies to expense reports.

### 9.2 Discretion

Confidentiality shall be maintained with regard to internal matters of the company which have not been disclosed to the public. This includes, for example, details concerning the organisation of the company and its facilities, as well as business, manufacturing, research and development processes and internal reporting figures.

The obligation to maintain confidentiality shall also apply after termination of the employment relationship.

### 9.3 Data Protection and Data Security

Access to the intranet and internet, worldwide electronic information exchange and dialogue, electronic business transactions - these are crucial prerequisites for the effectiveness of each and every one of us and for business success as a whole. However, the advantages of electronic communication are associated with risks for personal privacy and data security. Effective precautions against these risks are an important part of IT management, the leadership task and also the behaviour of each individual.

Personal data may only be collected, processed or used insofar as this is necessary for defined, clear and legitimate purposes. A high standard of data quality and technical protection against unauthorised access must be guaranteed. The use of data must be transparent for the data subjects, and their rights to information and correction and, if applicable, to objection, blocking and deletion must be safeguarded.

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## 10. Complaints and Notices

Any employee may make a personal complaint to his/her manager, to the Human Resources Manager or to the Compliance Officer or may point out circumstances that indicate the violation of the Business Ethics Guidelines. The matter will be thoroughly investigated. Appropriate action will be taken where appropriate. All records will be kept confidential. Retaliation of any kind will not be tolerated.

Employees should exhaust the internal possibilities of conciliation.

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## 11 Implementation and Control

The management of Glen Dimplex Deutschland (Glen Dimplex Deutschland GmbH) and the management team actively promote the broad communication of the CoC guidelines and ensure their sustainable implementation.

Kulmbach, November 2023  
Glen Dimplex Germany

Kerstin Wolff  
Managing Director

David Riemenschneider  
Managing Director

Michael Landgraf  
Chief Human Resources Officer / Compliance Officer