

## CODE OF CONDUCT

# Responsibility, Integrity and Respect

Guideline by D'art Design Gruppe GmbH

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### 1 What is it basically about?

Creative passion, team spirit, independence – this is the common ground on which we as D'art Design Gruppe have developed into successful experts for brand presentations since 1991. As an innovative company within a highly competitive design industry, we also understand very well the importance of integrity, respect and responsible collaboration. The parties involved in the design process bear a joint responsibility as mediators between conceptual visions and implemented realities: The design industry often has an influence on the choice of materials technologies or thought patterns which are applied in projects. Through its work it may alter purchasing and consumption habits of people. Above all digital products are increasingly shaping the decisions and behaviors of users. By acknowledging this fact designers bear responsibility towards society, environment and, of course, towards customers, business contacts and, finally, their own company and employees.

In matter of these facts this current code of conduct serves as guideline for all our actions and decisions. It secures that we meet the high ethical standards we have given ourselves as well as all legal requirements.

Our code of conduct is compulsory for all employees regardless of their position or role within the company. It provides clear guidance on expected behaviours and the standards we have in our work and in our relationships with colleagues, clients, business contacts as well as the society we live in. We believe that design can contribute to positive changes in this world. We acknowledge that this is only possible by behaving ethically, respectfully and responsibly. We ask everyone to read, internalize and follow this code of conduct to enable a positive and productive work environment. Our code of conduct is more than a series of rules. It is an expression of our corporate culture and collective commitment to act with integrity and respect.

The ethical guidelines in this code of conduct are based on the principles of the UN Global Compact (see appendix), the ILO conventions, the United Nations Universal Declaration of Human Rights, the UN conventions on children's rights and on the elimination of all forms of discrimination against women, and the OECD guidelines for internal companies. The following paragraphs

describe our minimum standards and are intended to prevent situations that could call into question the integrity of the company and its employees.

## **2 General Principles, Law and Justice**

Obedying law and justice is our highest priority. In all business activities and decisions our employees and the company are committed to respect the prevailing legal situation, the legal system as well as other relevant legal regulations of the country in which operations are taking place. For our industry this includes (yet is not limited to): intellectual property, laws, privacy, labour laws, environmental protection, and anti-corruption laws. By complying with these regulations, we are meeting highest standards without exception. Business contacts are always met with fairness and respect. Contracts are always fulfilled and changes in framework conditions (e.g. due to Corona crisis) are taken into account fairly. The same consistent integrity applies to all internal regulations that D'art Design Gruppe has committed itself to and/or that are agreed on in respective contracts. We expect all employees (as well as business contacts) to understand, internalize and comply with these principles. In case of comprehension doubts or questions about specific situations we urge to approach the corresponding department within our company [see internal „How to dart“-Wiki].

It is our collective responsibility to ensure that we are guided by these principles and comply with the current legal situation and regulations. Employees who learn or suspect that the activities of the company, colleagues or business partners might not comply with law or intend to violate law must immediately contact a member of the D'art Design management board. In the event of a violation of labour contract obligations all employees will have to expect disciplinary consequences (regardless of the legal sanctions).

## **3 Corruption, Bribery, Antitrust Law**

### **3.1 *Corruption and Bribery***

Our success is the result of our own efforts and skills. We do not engage in practices that offer or promise anything of value to people to secure business nor favourable terms of business or anything prompting in unfair business advantages. The interests of the company and private interests of employees are always strictly separated when dealing with business contacts (clients, suppliers etc.) and state institutions. Actions and (purchase) decisions are always free of irrelevant considerations or personal interests. The penal law situation is always to be monitored. Corruption and bribery are serious offenses that undermine trust in our company and can result in legal consequences. In our pursuit to act ethically and in accordance with law we do not tolerate any forms of corruption and bribery.

### **3.2 *Public Official Offenses***

The granting of personal benefits (in particular of a financial nature such as payments and loans, including the granting of small gifts over a longer period of time) by our company and our employees to persons entrusted with an office (such as government employees or employees in the public sector) with the aim to receive benefits for D'art Design Gruppe or yourself or third parties are not permitted.

### 3.3 *Commercial Offenses*

Financial personal advantages in return for preferential treatment in business may neither be offered, promised, granted or approved. Likewise, when dealing with business contacts, personal advantages of value may neither be demanded nor accepted.

Management and employees of our company may not offer, promise, demand, grant or accept any gifts, payments, invitations or services in business transactions that are granted with the intention of improperly influencing a business relationship or where there is a risk of jeopardizing the professional independence of business contacts. In principle, this is not the case for gifts and invitations that are within the scope of customary hospitality, traditions and courtesy.

### 3.4 *Conduct towards competitors (antitrust law)*

We respect fair competition, and thus we always comply with the given legal situation that protects and encourages competition, including but not limited to applicable antitrust and other laws regulating competition. When dealing with competitors, these regulations prohibit agreements and other activities that influence prices or conditions, allocate sales areas or customers, or impede free and open competition in an impermissible manner. Furthermore, these regulations prohibit agreements between customers and supplying companies, with which customers are to be restricted in their freedom to determine their prices and other conditions autonomously when reselling (price and condition determination).

## 4 **Forced Labour, Child Labour**

### 4.1 *Forced Labour*

Forced labour is in clear contradiction to our corporate values and will not be tolerated under any circumstances. We are committed (according to Conventions 29 and 105 of the International Labour Organization ILO) to ensure that neither our company nor our supply chain uses forced labour in any form. This includes any work done under threat of punishment or coercion, including bonded labour and human trafficking. All employees and business stakeholders must share this commitment and work actively to prevent forced labour in all its forms. We promote a culture of vigilance and encourage everyone to report concerns or evidence of forced labour.

### 4.2 *Child Labour*

We respect the regulations of the United Nations on human and children's rights and therefore strictly reject child labour in any form. We are committed to taking all necessary measures to ensure that child labour is not used in our company or in our supply chain. This includes compliance with minimum ages for employment (International Labour Organization Convention 138) and avoidance of work that may be considered hazardous or harmful to the health and welfare of children, as well as the Convention on the Prohibition and Immediate Action on Elimination of the Worst Forms of Child Labour (International Labour Organization [ILO] Convention 182). If a national regulation regarding child labour provides for stricter standards, these are to be given priority.

## **5 Principles of social responsibility**

### **5.1 *Human Rights***

In accordance with internationally recognized human rights legislation, we are fully committed to universal human rights. We are committed to respecting, protecting and promoting human rights within our sphere of influence. This means that we actively ensure that our operations do not contribute to human rights abuses and that we work to positively impact human rights in the communities in which we operate. We expect our employees, suppliers, business contacts and clients to share this obligation and act in accordance with internationally recognized human rights standards based on the United Nations Declaration of Human Rights.

### **5.2 *Discrimination***

As a company, we are committed to creating a workplace free from discrimination and disadvantage, where employees, business contacts, and trainees are treated equally and with respect. We believe that everyone has the right to work in a safe, fair and respectful environment that promotes equal opportunity and prohibits discriminatory behavior. Because only in a positive and inclusive work environment can all team members fully develop their skills, creativity and talents, which ultimately benefits everyone and ensures our long-term success. Disadvantage based on an actual or perceived association with a specific identity or characteristic such as race, color, disability, age, gender identity, sexual orientation, religion or belief will not be tolerated.

We are committed to a non-discriminatory working environment based on the General Equal Treatment Act (German AGG / “Allgemeines Gleichbehandlungsgesetz”) and expect all employees to also act without discrimination and to pay attention to their language and behavior accordingly.

The D’art Design Gruppe has issued a binding internal guideline “Discrimination-free company” on this important topic. All facts regarding possible forms of discrimination and the characteristics protected by the AGG are explained in detail here and a corresponding procedure with the responsible contact persons of the “Vielfalt achten” (respect diversity) team is regulated.

### **5.3 *Health Protection***

The safety and health of our employees at work has long been one of our most important values. We are committed to creating a work environment that offers high standards of health and safety. This includes providing adequate training, equipment and resources to prevent accidents and injuries. We actively ensure that our business premises and their surroundings are good working and living spaces and we are committed to ensuring sustainable and socially responsible development and thus contributing to the support of safe and healthy working conditions. All employees are encouraged to take an active part in creating a safe work environment and to promptly report any safety concerns to a member of the Management Board (or the Working Group to address “people experience”). We expect comparably high standards from our suppliers, business contacts and our customers.

### **5.4 *Fair Working Conditions***

Our company is strongly committed to fair working conditions and values a work environment that promotes justice, respect and equal opportunity. We are committed to treating all employees fairly and without discrimination, regardless of gender, age, origin,

religion or other protected characteristics. This includes fair wages, reasonable working hours, equal opportunities for promotion and training, and the right to a safe and respectful work environment. We promote a culture of openness and dialogue in which employees are encouraged to voice their opinions and concerns and respect our employees' right to freedom of association within the limits of applicable rights and laws. Our policies and procedures are designed to protect and promote the rights and well-being of all employees, and we are committed to continuously improving fair labour standards.

#### 5.5 *Environmental Protection*

Design always means attitude: we see it as our task to protect the environment for future generations within the framework of the current legal situation. As a company in the creative industries, we often have an influence on what materials, technologies, processes and thought patterns are used in projects and can change people's purchasing and consumption behaviour through our work. Environmentally friendly and responsible business practices are therefore the basis of our actions and decisions. We recognize the importance of protecting the environment and are firmly committed to acting responsibly and sustainably. We strive to minimize our environmental footprint by using resources efficiently, reducing waste, and promoting environmentally friendly technologies and practices. This includes compliance with all relevant environmental laws and regulations as well as continuously reviewing and improving our environmental performance.

All employees are encouraged to take an active part in protecting the environment and to make suggestions for improving our practices and policies. The internal working group "Nachhaltiges Unternehmen" (Sustainable Company) can be contacted at any time. Our policies and procedures are designed not only to meet legal requirements, but also to be an increasingly important environmental leader within our industry. Our efforts extend to the entire value chain by also engaging our business contacts in environmentally conscious and sustainable practices.

#### 5.6 *Trade Secrets*

Protecting trade and business secrets is critical to our business and we take our obligation to protect confidential information very seriously. All employees must at all times maintain the integrity and confidentiality of information that is considered trade or business secrets or sensitive company information. This includes compliance with all relevant legislation, contracts and internal guidelines. We are committed to act with the same integrity in the digital sphere as we do in all other areas. We also comply with high standards based on the GDPR when processing personal data. We only use personal data for lawful and transparent purposes and in accordance with applicable data protection laws. Unauthorized access, disclosure or use of trade/trade secrets can result in serious legal and business ramifications. We promote a culture of discretion and trust and expect our employees, suppliers, business contacts and customers to share this commitment.

#### 5.7 *Social Commitment*

We are involved in various areas of social life. We actively support charitable projects with financial contributions and donations in kind, are involved in education and culture and help local initiatives that promote the well-being of the community. In addition, we encourage our employees to get involved on a personal level – whereby private commitment must always be clearly separated from corporate commitment. We support volunteering and participation in charitable or social activities undertaken by our employees on their own time and within the limits of local legislation.

## **6 Radiation Effect of this Guideline**

We reaffirm that we not only communicate the principles of this guideline to our employees, but also to all direct/indirect suppliers, our business contacts and clients, to promote compliance with the contents of the code of conduct by them as best we can and to ask them to follow the guideline as well.

Kind regards

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*(Executive Board)*

Uli Feikes, Dominik Hof, Linda Köper, Olga Mocek, Klaus Müller, Frank Wehner  
*(Management Advisory Board)*

## APPENDIX

### United Nations Global Compact

As an initiative of the United Nations, [UN Global Compact](#) pursues the vision of a more inclusive and sustainable economy for the benefit of all people, communities and markets, based on ten universal principles, today and in the future.

The ten principles of the Global Compact are based on a worldwide consensus derived from:

- \_ the Universal Declaration of Human Rights
- \_ the International Labour Organization's Declaration on Fundamental Principles and Rights at work
- \_ the Rio Declaration on Environment and Development and
- \_ the United Nations Convention against Corruption

The Global Compact requires companies to recognize, support and put into practice a set of core values in the areas of human rights, labour standards, environmental protection and anti-corruption within their sphere of influence:

### Human Rights

- \_ Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights and
- \_ Principle 2: Make sure they are not complicit in human rights abuses.

### Work Standards

- \_ Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining, and for
- \_ Principle 4: the elimination of all forms of forced labour,
- \_ Principle 5: the abolition of child labour and
- \_ Principle 6: Advocate the elimination of discrimination in employment and employment.

### Environmental Protection

- \_ Principle 7: Businesses should support a precautionary approach to dealing with environmental problems,
- \_ Principle 8: Take initiatives to promote greater environmental responsibility, and
- \_ Principle 9: Encourage the development and dissemination of environmentally friendly technologies.

### Anti-Corruption

- \_ Principle 10: Businesses should work against all forms of corruption, including extortion and bribery.

## LINKS

### **United Nations Global Compact**

The [United Nations](#) (UN / United Nations) was founded in 1945 after the devastation caused by World War II. Its central mission: the preservation of international peace and security. With the signing of the [Universal Declaration of Human Rights](#) in 1948, the protection of human rights became part of international law. Since then, the organisation has been working globally to protect human rights using various legal instruments and on-the-ground activities.

### **UN Convention on the Rights of the Child**

The [Convention on the Rights of the Child](#) (CRC) was adopted by the UN General Assembly on November 20, 1989 and came into force on September 2, 1990.

### **UN-CEDAW**

The [Women's Rights Convention](#) CEDAW is the “United Nations Convention on the Elimination of All Forms of Discrimination Against Women”. It is the most important international agreement protecting the rights of girls and women.

### **OECD-Guidelines**

The Organization for Economic Cooperation and Development ([OECD](#)) has existed since 1961. The [OECD Guidelines](#) for Multinational Enterprises are recommendations for action by the 34 OECD member states and 8 other states for international companies. In addition to the ILO core labour standards and the UN Global Compact, the guidelines are the most important instrument for promoting responsible corporate management worldwide.

### **ILO**

The International Labour Organization ([ILO](#)) is a specialized agency of the United Nations tasked with promoting social justice and human and labour rights.

[ILO Convention on Forced Labour \(29\)](#)

[ILO Convention on the Application of the Principles of the Right to Organize and the Right to Collective Bargaining \(98\)](#)

[ILO Convention on Equal Remuneration for Male and Female Workers \(100\)](#)

[ILO Convention on the Abolition of Forced Labour \(105\)](#)

[ILO Convention on Discrimination \(111\)](#)

[ILO Convention on Minimum Age for Employees \(138\)](#)

[ILO Convention on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour \(182\)](#)