



# Supplier Code of Conduct

December 2022

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. The basic attitude of harmonizing economy, ecology and social responsibility is firmly anchored in our corporate identity – it is an integral part of the corporate philosophy.

Our mission statement on sustainability manifests this:

***“In everything we do, we behave responsibly toward people, nature and society. As an innovative family-owned company, we feel morally obligated to make our contribution to sustainable action and business (sustainable development) that is compatible with the environment and the future.***

***We adhere to the ‘Coating Care’ principle formulated by the international paint industry as an ethical guiding principle and practice the ethical guidelines issued by the German Paint and Printing Ink Industry Association:***

***Plant Safety, Environmental Protection, Employee Training, Product Responsibility, Resource Conservation, Safe Handling, Disposal.“***

At international level, we have committed ourselves to a demanding sustainability standard. By joining the Global Compact more than 10 years ago, we committed ourselves to the ten UN core values in the areas of human rights, labor standards, environmental protection and anti-corruption.

Sustainability is also an essential component of our business processes and, along with cost, quality, reliability, performance and innovation, a key factor in the selection and evaluation of our suppliers.

We expect our suppliers to comply in their activities with the applicable national laws, the principles of the United Nations Global Compact and this Supplier Code, and to implement suitable processes in their and affiliated companies that promote compliance with these regulations.

\* If the generic masculine form is used in the following in this Supplier 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. Scope of the Supplier Code of Conduct

This Code applies to all natural or legal persons who sell or provide products, processes or services either directly or via third parties, e.g. affiliated companies, distribution partners, subcontractors, agents (hereinafter referred to as „suppliers“) to DAW SE and its affiliated enterprises in Germany and abroad within the meaning of Section 15 of the German Stock Corporation Act (hereinafter referred to as „DAW“ or „we“).

The respectively current Supplier Code of Conduct is available on our website.

## 2. Compliance with legal rules

We expect our suppliers to comply in their own companies with the applicable laws and regulations of the countries in which they operate.

## 3. Commandments and prohibitions for dealing with employees – the environment – and products

### 3.1 Prohibition of discrimination

We expect our suppliers to promote equal opportunities and equal treatment and not to tolerate discrimination on the grounds of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religious affiliation or ideology.

### 3.2 Fair working conditions

We expect our suppliers to comply with the applicable minimum wage regulations and the standards of the International Labour Organization regarding workers' rights, in particular concerning working hours and working conditions, remuneration and freedom of assembly.

We expect our suppliers to comply with the applicable national laws on health protection and occupational safety in their own company and to establish an appropriate occupational safety management system and ensure its application. This includes regular and effective training of employees.



We expect our suppliers not to tolerate child labour, either directly or through their own subcontractors or suppliers. At a minimum, ILO Conventions No. 138 on the Minimum Age for Employment and No. 182 on the Prohibition of the Worst Forms of Child Labour shall be complied with.

We do not expect our suppliers to tolerate forced labour, either directly or through their own subcontractors or suppliers. Forced labour includes any work or service which is required of a person under threat of punishment and for which he or she has not voluntarily made himself or herself available. In this respect, we expect our suppliers to comply with ILO Conventions No. 29 on Forced Labour and No. 105 on the Abolition of Forced Labour.

### 3.3 Respect for human rights

We expect our suppliers to speak out against any form of human rights violations and to continuously develop their commitment to respect and uphold human rights. This commitment encompasses own sites as well as suppliers, including the entire value chain.

### 3.4 Responsible treatment of the environment

We expect our suppliers to comply with the respective applicable national environmental and climate protection laws and standards, which should include the establishment of an appropriate, documented environmental management system. Furthermore, the continuous improvement of manufacturing processes is expected in order to ensure that the environmental impact is constantly minimised and environmental protection is constantly improved in daily business operations.

### 3.5 Quality and safety of the products

We expect our suppliers to comply with the relevant legal regulations and standards to ensure the quality and safety of their products. This also applies to the associated work and production processes.

Compliance shall be ensured through appropriate procedures and controls. We expect our suppliers to provide truthful information regarding their products.



## 4. Commandments and prohibitions in business dealings

### 4.1 Observance of the prohibition of bribery and corruption

We expect our suppliers not to tolerate active and passive corruption in their company or even to regard it as a basis for doing business. The relevant anti-corruption laws must be complied with and appropriate measures taken to ensure this. This includes appropriate communication of this pledge, training and documentation.

We expect our suppliers to ensure that their employees, subcontractors, agents or other representatives do not offer, promise or grant any advantages to DAW employees or third parties close to DAW employees for the purpose of influencing or demanding an undue advantage in business dealings.

Invitations and gifts to DAW employees or persons close to them must only be given if the occasion and extent are socially appropriate and can be considered as reflecting local, generally recognised and legal business practice. In doing so, transparency has absolute priority.

DAW employees are required to strictly observe internal DAW guidelines on the acceptance of gifts and invitations and not to request gifts, invitations or other benefits for themselves or persons close to them. We encourage our suppliers to report any infringements of this regulation on the part of DAW employees in a suitable manner.

### 4.2 Dealing with conflicts of interest

We expect our suppliers to make decisions in connection with joint business activities exclusively on the basis of objective criteria and to avoid conflicts of interest with private, economic or other activities from the outset.

### 4.3 Compliance with antitrust laws

We expect our suppliers to behave fairly in competition and to observe the applicable cartel laws and other laws regulating free competition. Suppliers do not participate directly or indirectly in agreements with competitors or other market participants which violate cartel law, nor do they abuse a possible strong or dominant market position.



## 4.4 Anti-money laundering and trade controls

We expect our suppliers to observe the relevant legal obligations regarding the prevention of money laundering and not to participate, either directly or indirectly, in money laundering activities.

We also expect our suppliers to ensure that their business is conducted in accordance with applicable trade regulations. Suppliers comply with import and export control requirements, sanctions or economic embargoes, and requirements to prevent terrorist financing.

# 5. Handling entrusted company property and information

## 5.1 Company property

We expect our suppliers to respect DAW company property exchanged in the course of business and to protect it by taking appropriate measures. This includes both tangible and intangible assets.

## 5.2 Trade and business secrets

We expect our suppliers to take appropriate measures to ensure the protection of information exchanged in the course of business.

## 5.3 Protection of the IT infrastructure

The proper functioning of the computer systems and their security are of utmost importance for the smooth operation of the business, any impairments must be combated as quickly as possible. We expect our suppliers to inform us immediately in the event of a cyber attack which affects DAW data or may have an impact on the business relations so that we can take appropriate protective measures.

## 5.4 Data protection

We expect our suppliers to handle personal data exchanged in the course of business with care and to comply with the relevant data protection laws when processing it.



## 6. Supplier relationships

We expect our suppliers to consider the principles and requirements described above in their selection of subcontractors, service providers and own suppliers and to communicate this to their suppliers. Suppliers shall require their subcontractors, service providers and suppliers to comply with the described standards on human rights, working conditions, prevention of corruption and environmental protection while fulfilling their contractual obligations.

## 7. Compliance with the DAW Supplier Code of Conduct

The DAW Supplier Code of Conduct is an integral part of DAW's contractual relationship with suppliers; any breach of the principles and requirements set out in the DAW Supplier Code of Conduct will be considered a material impairment of the contractual relationship on the part of the supplier.

If there is any suspicion of non-compliance with individual principles and requirements, we reserve the right to demand information regarding the circumstances and, if non-compliance is confirmed, to demand immediate remedy.

Furthermore, in cases of reasonable suspicion of a significant breach of this Supplier Code of Conduct, we reserve the right to verify compliance with the aforementioned principles and requirements, including through audits or other suitable procedures. These audits may be carried out by ourselves or by a third party commissioned by us. Each party shall bear its own costs. The audit shall be announced at least two weeks in advance and must be in accordance with applicable regulations on data protection and the protection of business secrets or confidentiality agreements with third parties. The review must not lead to disproportionate restrictions on the supplier's business activities.

If a violation of the listed human rights-related and environmental principles cannot be eliminated in the foreseeable future, DAW will work with the supplier to develop and implement a concept for ending or minimising the violation. The supplier will support DAW to the best of his ability.



## 8. Reporting possible misconduct

DAW is a company in which every employee or third party may have confidence in being able to report violations of the Supplier Code of Conduct in good faith. This also includes, in particular, reports on human rights and environment-related risks as well as on violations of human rights-related or environment-related obligations as a result of our economic actions or those of one of our suppliers.

At DAW, every report submitted is taken seriously and dealt with according to a standardised process. Via DAW's web-based whistleblower hotline („DAW Integrity Hotline“), reports can be submitted in the respective national language and anonymously if desired. Incoming anonymous reports cannot be traced back 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](https://www.daw.de/en/integrity/code-of-conduct).

In addition, information or reports can be submitted to the G&C department at [Compliance@DAW.de](mailto:Compliance@DAW.de) at any time.

We expect our suppliers not to tolerate any attempts to prevent employees from reporting possible violations. Furthermore, we expect that there will be no reprisals in the sense of retaliation, discrimination or disciplinary action against employees who have made a report in good faith.

## 9. References

DAW Code of Conduct:

<https://www.daw.de/en/integrity/code-of-conduct>

United Nations Global Compact:

[www.unglobalcompact.org](http://www.unglobalcompact.org)

International Labour Standards (ILO):

[www.ilo.org/global/standards/lang--en/index.htm](http://www.ilo.org/global/standards/lang--en/index.htm)



## 10. Confirmation by the supplier

We have received the DAW Supplier Code of Conduct and hereby undertake to comply with it in addition to our other contractual obligations with DAW.

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Place, Date

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Supplier signature

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Company stamp

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Name (in block letters), function