DUMAREY

Annex P 0105456-A02-08 dated 06/11/2026
Code of Conduct _Business Partner ENG

Insert number of rule

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1. PREMISE

Considering that Dumarey Flowmotion Technologies operates on multiple markets and works in an interconnected way, it is important that this document is understood by all commercial partners.

2. CORE VALUES AND GUIDING PRINCIPLES

Sustainability and Integrity are at the centre of the Company's activities and are dear to the hearts of the people who work there.

In its activities, products, services and along the value chain, the Company helps drive the ongoing transformation of the economy towards a healthy ecosystem for sustainable industries.

The Company is committed to respecting the ten principles in the sectors of human rights, labour, the environment, and the fight against corruption envisaged by the Global Compact. The Company is committed to honesty and integrity in all business conduct towards Employees, Customers, Suppliers, Competitors and Stakeholders.

The Company is committed to responsible sourcing. The Company's business partners, including its suppliers, subcontractors and any other (hereinafter referred to as the “Business Partners”), will support the Company in achieving these ambitions with their products, services, and operations, to reduce negative impacts and create economic, social and ecological value for all our stakeholders and the community.

Sustainable business practices and integrity are rooted in corporate values, the Code of Conduct, the rules and policies that inspire us as well as international legislation, including the United Nations Sustainable Development Goals (SDGs), the United Nations Global Compact United, the OECD Guidelines on Multinational Enterprises (MNEs) and the United Nations Guiding Principles on Business and Human Rights with specific reference to the Fundamental Conventions of the International Labor Organization (ILO).

The Company expects all its business partners to act with the same fairness, honesty, responsibility and dedication to sustainability and integrity in all aspects of their businesses.

This Code of Conduct for business partners highlights important standards that are consistent with company values. We expect each business partner, including, but not limited to, suppliers, consultants, vendors, intermediaries, merchants, dealers, contractors, agents, and others, to strictly observe and adhere to these standards and values. In exceptional cases, where there is a conflict between this Code of Conduct and local legislation, business partners will apply the higher standard.

3. COMPLIANCE WITH LAWS, RULES AND LEGAL REGULATIONS

The Business Partner will comply with all applicable laws, rules, and regulations in the countries, in which it operates, and will maintain suitable measures to ensure compliance with such laws, rules, legal regulations and in accordance with the principles of the organizational model 231 and subsequent amendments adopted by the Company and available on company website.

3.1. COMPLIANCE WITH ANTITRUST LAW

The Business Partner will strictly comply with all applicable antitrust laws, trade practice laws and any other competition laws, rules and regulations dealing for example with monopolies, unfair competition, restraints of trade, and relationships with competitors and customers.

The Business Partner will not enter into agreements with competitors or engage in other acts that may unfairly impact competition, including, but not limited to, price fixing or market allocations.

3.2. COMBATTING CORRUPTION

The Company does not tolerate any form of corruption. Therefore, Business Partner will comply with applicable laws and regulations regarding bribery and anti-corruption, including those regarding foreign corrupt practices.

Business Partner will not commit or tolerate any form of corruption, bribery, theft, embezzlement, or extortion. Additionally, Business Partner will refrain from using improper payments, including, without limitation, any payment or other benefit conferred to any individual, company, or government official, for the purpose of influencing decision-making in violation of applicable laws.

Specifically, the Business Partner must not offer illegal benefits or illegal favors such as bribe payments, kickbacks or other illegal beneficial acts including inappropriate gifts and undue hospitality to Company employees in exchange for any business opportunities.

3.3. CONFLICT OF INTEREST

The Company expects its Employees to act in its best interests. Private interests and personal considerations will not prejudice any business decisions.

The Company and all its business partners will avoid any activity or situation that could lead to a conflict of interest of a Company employee.

If a business partner becomes aware of a conflict-of-interest situation, they will immediately notify the company CEO.

3.4. PREVENTION OF MONEY LAUNDERING

The Business Partners of the Company will comply with all applicable statutes governing the prevention of money laundering and not to participate in any money laundering activity.

3.5. FINANCIAL RESPONSIBILITY (RECORDS ACCURACY)

The Company expects its Business Partners to maintain accurate, transparent financial records that comply with international (e.g., IFRS) or local accounting standards. This includes proper transaction documentation, financial audits, and the absence of corrupt practices.

Specifically, Business Partners must be able to demonstrate:

- Record Accuracy: Procedures are in place to accurately record all financial transactions.
- Auditing and Transparency: it is essential to document that financial statements are audited and accurately reflect the company's position.
- Internal Controls: a management system that includes internal controls to prevent fraud and ensure data integrity is essential.
- Legal Compliance: records must comply with applicable tax and accounting laws in the locations of operations.

3.6. IMPORT AND EXPORT REGULATIONS

The Business Partner will comply with all applicable import and export control laws, including without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the international transmission or shipment of goods, technology, and payments.

3.7. COUNTERFEIT SPARE PARTS

To ensure safety, prevent damage, and combat fraud involving substandard materials, the Commercial Partner, in compliance with international regulations, does not use, produce, or sell counterfeit components.

Company personnel involved in purchasing and logistics processes are trained on the risks associated with counterfeit spare parts. In the event of suspected non-compliance, procedures are in place for reporting, escalation, and corrective action against Commercial Partners.

4. SOCIAL RESPONSIBIITY

4.1. HUMAN RIGHTS

The Business Partner will respect, protect, and actively promote internationally recognized human rights. Furthermore, the Business Partner will use its best efforts to ensure that these are not violated along the complete supply chain.

The Business Partner will act based on the UN Guiding Principles on Business and Human Rights in particular.

4.2. BAN ON CHILD LABOR

The Business Partner will respect and protect the dignity and rights of children. The Business Partner will ensure to employ only persons who have reached the minimum age required to perform work in accordance with the applicable national legislation and will not tolerate nor endorse child labour.

4.3. BAN ON FORCED LABOR

The Business Partner will undertake to exclude any kind of forced or compulsory labor as well as any form of slavery. All work must be voluntary and without threat of punishment. The Business Partner thus must avoid any form of labor based on physical, psychological, sexual, or verbal violence and / or abuse or economic exploitation including any forms of modern slavery, human trafficking as well as unethical recruitment practices.

The Business Partner will furthermore ensure an inclusive and cooperative environment with no retaliation and freedom from violence or harassment.

4.4. MISUSE OF PRIVATE OR PUBLIC SECURITY FORCES

The Business Partner shall refrain from hiring or use of security forces if, due to a lack of instruction or control on the part of the Business Partner, there might occur a risk of torture and cruel, inhumane, or degrading treatment, injury to life or limb or impairment of the freedom of association and union.

4.5. OCCUPATIONAL HEALTH AND SAFETY

The Commercial Partner will manage its business in a safe and responsible manner based on a systematic and management approach that protects people. Furthermore, it will ensure responsible safety practices in its facilities.

The Commercial Partner undertakes to produce and supply safe products to the Company, as well as to provide a safe, healthy, and ergonomic working environment that gives priority to the prevention of accidents. minimizing the exposure to health risks of the Commercial Partner's employees and/or contractors.

To achieve this objective, the Commercial Partner implements a safety and health management system for continuous improvement, including but not limited to emergency management, fire prevention and management of chemicals.

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4.6. FREEDOM OF ASSOCIATION

The Business Partner shall respect the fundamental right of employees to form trade unions and to join them in their own free decision. Membership in trade unions or workers' representations shall not constitute a reason for unjustified unequal treatment.

The right to collective bargaining for the regulation of working conditions and the right to strike shall be granted.

4.7. BAN ON DISCRIMINATION

The Business Partner will not tolerate any discrimination, including, but not limited to nationality, ethnicity, gender, disability, age, sexual identity or sexual orientation, religion, beliefs, world view, political opinion, trade union activity, social status, or any racially motivated discrimination.

In the case of comparable requirements and tasks, the principle of equal pay for work of equal value without regard to sex must apply.

4.8. REMUNERATION AND WORKING HOURS

The Business Partner ensures a fair remuneration for regular working hours and overtime as well as benefits, at least equal to the minimum wage established under the applicable law. The Business Partner will undertake to observe legal regulations on working hours and sufficient resting periods including holidays.

4.9. PROTECTION FROM EVICTION AND LAND DEPRIVATION

The Business Partner will acknowledge and respect the existence of land use and customary rights as well as any associated rights within local communities, including those of indigenous people and individuals.

The Business Partner will refrain from unlawful evictions as well as the unlawful deprivation of land, forests or waters, the use of which secures the livelihood of a person.

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4.10. EMPOWERMENT OF WOMEN

The Company supports the UN Women's Empowerment Principles and strongly encourages its Business Partners to formally support these principles in their own operations as well as their supply chains.

4.11. ANIMAL WELFARE

The Business Partner undertakes to comply with all applicable laws and regulations regarding animal welfare. If the supply includes materials or processes involving animals or products of animal origin, the Business Partner must ensure that the animals are treated ethically and responsibly, avoiding any form of mistreatment or practices that do not comply with regulatory and internationally recognized standards.

5. ENVBIRONMENTAL RESPONSIBILITY

5.1. ENVIRONMENTAL PROTECTION

The Business Partner is obliged to comply with applicable national and international regulations as well as standards on environmental protection that affect its operations. Environmental pollution shall be minimized, environmental protection continuously improved and resources used sparingly.

An environmental management system in accordance with ISO 14001 or an environmental management system suitable for the relevant industry shall be established and applied. Every Business Partner shall report comprehensively on environmental performance (emissions, water, waste, etc.) and publish a corresponding risk management (e.g., sustainability report, CDP platform).

5.2. PRESERVATION OF THE NATURAL FOUNDATION OF LIFE

Business Partner shall use resources sustainably by demonstrably reducing the consumption of energy, water, raw materials and supplies.

In areas with water scarcity, water abstraction shall be minimized and access to drinking water and sanitation shall be ensured. Waste and wastewater quality standards shall be defined and monitored within the framework of applicable legal and regulatory requirements.

In addition, Business Partner shall establish and maintain appropriate environmental protection management procedures, including but not limited to climate protection, in particular by paying the utmost attention to the containment of greenhouse gas emissions, air quality, responsible management of chemicals, soil protection, protection of water bodies, biodiversity, as well as measures for animal welfare, waste treatment and handling, noise prevention and deforestation.

5.3. GREENHOUSE GAS EMISSION AND CLIMATE PROTECTION

The Business Partner recognizes the importance of reducing greenhouse gas (GHG) emissions and is committed to adopting measures to limit their environmental impact, improving the energy efficiency of its processes and promoting sustainable practices, particularly with a view to decarbonization.

The Business Partner will actively and sustainably protect the climate, for example by increasing energy efficiency, generating or purchasing energy from renewable sources, and adopting other measures to reduce CO2 emissions.

5.4. BAN OF USAGE SUBSTANCE OF HIGH CONCERN

The Business Partner is obliged to comply with the statutory ingredient prohibitions, restrictions, and declaration regulations as well as applicable standards on the prohibition and declaration of ingredients; the Business Partner will provide evidence regarding such obligations on request. The Business Partner shall exercise particular care regarding the origin of its materials.

5.5. ENVIRONMENTALLY FRIENDLY WASTE MANAGEMENT AND CIRCULAR ECONOMY

The Business Partner shall comply with the prohibition on environmentally unfriendly handling, collection, storage, and preservation, disposing of waste in accordance with the regulations in force in the applicable jurisdiction.

The Business Partner will promote a circular economy approach and allow the use of recycled materials where possible, minimizing waste and promoting reuse and recovery activities.

5.6. LIFE CYCLE ASSESSMENT

The Company aims to conduct a life cycle assessment (LCA) on each new product. Upon request, each Commercial Partner must therefore provide the Company with evidence-

based information relating to products and materials purchased. All information exchanged will be kept confidential and limited to the framework of LCA activities.

The Company can offer a generic introduction to LCA to establish a harmonized and standardized process by regulating the format and flow of information between the Parties.

6. SUPPLY CHAIN DUE DILIGENCE AND MINERALS FROM CONFLICT-AFFECTED AND HIGH-RISK AREAS

6.1. SUPPLY CHAIN DUE DILIGENCE

The Business Partner will use its best efforts to be aware of the business practices of its own suppliers, subcontractors and other business partners and will require all such suppliers, subcontractors as well as business partners to comply with this Business Partner Code of Conduct or the values described herein.

Business Partners will implement due diligence processes to identify, prevent and mitigate risks involving but not limited to human rights abuses and environmental impacts in their supply chains.

The Business Partner and the Company will discuss any questions in relation to this Business Partner Code of Conduct in a trustful and respectful manner.

6.2. DUE DILIGENCE AND TREACEABILITY FOR MINERALS

As part of an overall supply chain due diligence process, the Business Partner is expected to support due diligence and traceability throughout its supply chains for all minerals. The Business Partner is expected to be aware of and comply with all applicable legal requirements in relation to minerals from conflict-impacted and high-risk areas including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict - Affected and High-Risk Areas.

Thereby the Business Partner will perform due diligence on its supply chains to determine whether products sold to the Company contain critical minerals or materials and complete the most recent versions of the relevant reporting templates, such as the Conflict Minerals Reporting Template (CMRT) provided by the Responsible Minerals Initiative (RMI). This must be based on accurate and truthful information from the Business Partner's own suppliers. Upon reasonable notice, the business partner must be ready to provide current and updated information such as CMRTs to the Company and work towards eliminating non-conforming smelters within its respective supply chains.

7. TECHNICAL COMPLIANCE

7.1. TECHNICAL COMPLIANCE BINDING REQUIREMENTS

Technical Compliance is of utmost importance for the Company. This encompasses the whole product lifecycle, including the disposal of the product.

The Business Partner commits to ensure the technical compliance of all products delivered to the Company.

The Business Partner must fulfill the Technical Compliance Binding Requirements (TCBRs) which are applicable for the products delivered to the Company, such as the respective legal

and technical regulations, industrial standards, and other norms as well as standards defined by the Company or public rules and externally communicated self-obligations of the Company.

7.2. STATE-OF-THE-ART PRODUCT INTEGRITY

The Business Partner will only develop, manufacture and supply products that comply with the above-mentioned requirements, including a state-of-the-art Product Integrity. This encompasses but is not limited to Product Safety, Product Compliance and Product Cyber Security. Products must be safe and present either no risk or only a minimum acceptable level of risk, considering the normal and foreseeable use. Products must furthermore be secure against unauthorised manipulation (cyberattacks).

7.3. FOSTERING TECHNICAL COMPLIANCE AND ADEGUATE TRAINING

Further, the Business Partner commits to foster the overall Technical Compliance and will ensure an adequate training of relevant staff, either by completing the Company' Technical Compliance Awareness Training or by conducting similar internal trainings of the Business Partner.

8. BUSINESS INFORMATION AND INTELLECTUAL PROPERTY

It is the Business Partner's responsibility to ensure that any sensitive business information or trade secrets received by virtue of the business activities with the Company (hereinafter referred to as "Business Information") is held in strict confidence and not improperly used or disclosed to third parties.

The Business Partner must ensure that any business Information is appropriately collected, processed, secured, and stored. Furthermore, the Business Partner will protect and secure the Company' registered as well as unregistered intellectual property as confidential information. the Company respects and recognizes the intellectual property rights of third parties. the Company also expects from the Business Partner that it will do the same regarding the intellectual property rights of the Company and any third parties.

9. DATA PROTECTION

The Business Partner will comply with all applicable laws concerning data protection. If the Business Partner processes personal data on behalf of the Company, it agrees to enter into a data processing agreement.

10. BUSINESS CONTINUITY AND RISK ASSESSMENT

With regards to business continuity and supply chain, the Business Partner will regularly conduct comprehensive review of identification and assessment of risks.

For identified risks, the Business Partner will invoke immediate mitigation measures and implement backup and continuity plans. These activities must be carried out and tested on

a regular basis to minimize the impact of interruptions and disruptions for operations that support the Company' business.

11. COMPLIANCE WITH THE BUSINESS PARTNER CODE OF CONDUCT AND CONTROLS

11.1. CONTROLS

The Business Partner will support the Company' implementation of legally required and other due diligence processes by actively participating in related initiatives, e. g. self-assessment questionnaires. The Company reserves the right to audit the Business Partner's compliance with this Business Partner Code of Conduct in an appropriate manner. Any audit will be scheduled at business hours mutually agreed upon with the Business Partner.

The Business Partner will prepare an appropriate level of documentation which substantiates in a clear and transparent manner the Business Partner's compliance with this Business Partner Code of Conduct.

The Business Partner will use its best efforts to be familiar with the business practices of its suppliers, subcontractors, and other business partners and to require all such suppliers, subcontractors, and business partners to comply with this Business Partner Code or the values laid down herein. The Business Partner and the Company will discuss any questions in relation to this Business Partner Code in a trustful and respectful manner.

11.2. CONSEQUENCESIN CASE OF INFRINGMENTS

The Company considers each provision of this Business Partner Code of Conduct, which we may amend from time to time, to be essential for the business relationship between the Company and the Business Partner.

Compliance with the provisions herein is acknowledged and agreed to by the Business Partner. In case of a potential infringement of the obligations, the Business Partner shall immediately notify the potential infringement to the Company and initiate suitable improvement measures within a reasonable period to prevent future violations. The Business Partner will inform the Company of the measures initiated.

In case of any material breach by the Business Partner of this Business Partner Code of Conduct, the Company reserves the right, without prejudice to further rights, to terminate the business relationship.

12. GRIENVIANCE AND COMPLAINTS MECHANISM

The Business Partner and its respective employees as well as all stakeholders are encouraged to report violations of this Business Partner Code of Conduct to the Company Integrity Line: https://dumareyflowmotion.parrotwb.app/.

Contact details are available at the Company.

Business Partners shall support any investigations involving alleged violations. Additionally, in line with their own due diligence efforts, Business Partners should provide a similar and

easily accessible grievance/complaints mechanism or support system for reporting violations.

The Business Partner must ensure that any form of retaliation against whistleblowers, i.e., against individuals who raise concerns or inform the appropriate internal or external offices about potential violations, is prohibited.

We hereby confirm that we share, respect, adhere to and apply the values of the Code of Conduct for Business Partners as set out in the Code above.

Company Name: _____

Address: _____

Date and Signature: _____

Role of the Signatory: _____