



Dussmann Group

Code of Conduct

The values and standards
of the Dussmann Group

**"Things only
have the value that
we give them."**

Molière, 1622-1673
French actor and playwright

ESTABLISHING AND PRACTICING COMMON VALUES

Dussmann
Group
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Conduct**

Ethical values are a key component of the Dussmann Group's corporate culture; they have a direct relationship to principles such as fairness and responsibility in the business world.

The following code of conduct describes the Dussmann principles as a set of unambiguous and binding rules which guide us in our decisions and our business dealings.

We expect all personnel to identify with our ethical principals and to act accordingly. Our management staff communicate them and set an example through their own actions.



Dr. Wolfgang Häfele
Executive Board Spokesman

The basis of our ethical approach

- compliance with local and international legislation and norms
- support for staff in dealing with ethical issues
- punishment for violation of ethical principles
- prevention of any disadvantage arising from observation of ethical principles
- obligation of subcontractors and suppliers to comply with our code of conduct for subcontractors and suppliers

We undertake to win our contracts in fair competition based on our innovative service approach. We accept national and international antitrust rules and guidelines. We do not tolerate corruption or undue advantage, in whatever form.

Ethical principles of competition

Bribery to gain access to or to secure a business relationship may be neither given nor accepted.

Gifts, invitations and other benefits are subject to the principles of responsibility, appropriateness and legality.

Respect in our dealings with each other

We promote a fair relationship of respect and trust between supervisors, subordinates and colleagues. We respect the personal dignity and private sphere of each individual member of staff. We do not tolerate discriminatory behavior towards personnel, clients, suppliers or other business partners.

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Compliance

with Law and Custom

We expect compliance with applicable legislation and respect for cultural codes in all sections of our company. Every employee is responsible for compliance with legislation in his or her field of work.

Disregard of these principles can have substantial negative consequences on business (criminal proceedings, financial penalties, loss of business etc.). Employees in breach of the law may face disciplinary action in addition to liability for damages and legal proceedings.

Safety in the workplace and the integrity of our services are elementary principles of our company. Each employee is responsible for the observance of health & safety guidelines in his or her work environment. Work processes and equipment must be in accordance with applicable guidelines on health & safety, fire prevention and environmental protection. All employees receive training and instruction accordingly.

Safety and environmental protection start in the workplace

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CONFIDENTIALITY AND DATA PROTECTION IN THE COMPANY

Trade secrets and restricted information may be used only for the purposes of company business and may not be disclosed to third persons (including family members and friends). This obligation persists beyond the end of employment.

Data protection regulations must be observed during the processing of personal data and all other business procedures. The private sphere is to be respected always. Appropriate access and authorization constraints apply to all IT and communication systems. Password regulations apply.

RESPECT FOR COMPANY PROPERTY

Every employee undertakes to handle company property and the property of clients with due care and to use it only for its original purpose. Work equipment and materials (e.g. tools, computers,

office materials, furnishings, vehicles) and licenses may only be used for business purposes. Use for undue private, illegal or other unauthorized purposes is prohibited.

Loyalty towards our company

We expect our employees to demonstrate loyalty towards the company. All employees must avoid situations which may lead to a conflict between personal interest and the interests of the company. Secondary employment is not permitted. The acceptance of a position of responsibility

in another company, taking up paid or unpaid secondary employment or the commencement of entrepreneurial activities must be preceded by the authorization of the supervisor in order to avoid conflict of interest. The above rules apply in particular in connection with a company that is a competitor of or has a business relationship with the Dussmann Group.

Documentation of business transactions

All business transactions must be fully, systematically and reproducibly documented in accordance with statutory and internal regulations.

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MAINTAINING AND PROTECTING OUR CODE OF CONDUCT

This code of conduct is at the heart of our corporate culture and applies to all employees of the Dussmann Group and its subsidiaries. Each employee is called upon to monitor his or her conduct for compliance with this code and to act accordingly.

Our management personnel are called upon to set an example, to act with integrity in all business activities, to inform employees of these rules and to communicate these principles in staff training. Every supervisor must ensure that all of the employees under his or her responsibility understand and comply with these rules.

Every employee has the right to report a breach of this code of conduct or of any other corporate guideline. The Dussmann Group is committed to preventing any resulting discrimination.

Violation of regulations may be reported to supervisors, the executive board or to the compliance officer.

Email: compliance@dussmann.de

Email Compliance Officer:
compliance@dusmann.de

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