



# CODE OF CONDUCT FOR BUSINESS PARTNERS



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# CODE OF CONDUCT FOR BUSINESS PARTNERS

## 1. BUSINESS INTEGRITY

We are pleased to present you with Dornan Code of Conduct for Business Partners (the “Policy”). In this document, we have defined the guidelines for our cooperation.

This Policy, in conjunction with the applicable contractual agreement, reflects our standards and expectations of our subcontractors, suppliers and other vendors (collectively, “Business Partners”). These standards apply to all third parties that provide goods or services to Dornan and their owners, officers, directors, employees, contractors, agents and others working on their behalf.

At Dornan, our values underpin everything we do – the way we approach our work, and the way we interact with colleagues, suppliers, Business Partners and customers.

Combining entrepreneurial activity with ethical principles is key to Dornan’s long-term success and tradition. We believe ethical and economic values are interdependent, and business must be conducted fairly within existing rules.

We expect our Business Partners to uphold responsibilities towards their company, customers, Business Partners, the environment and society. This Policy is based on International standards, including the UN’s Universal Declaration of Human Rights.

Acceptance of this Policy is a prerequisite for all contractual agreements between Dornan and its Business Partners.

Business Partners are expected to communicate the basic principles of this Policy to their immediate contractual counterparties, employees and stakeholders and to require and promote their compliance with this Policy.

Dornan reserves the right to update these requirements, and Business Partners must accept and adhere to these changes. Acknowledgment and acceptance of this Policy are required prior to entering into any agreement with Dornan.

## 2. ANTI-SLAVERY AND HUMAN TRAFFICKING

At Dornan, we are dedicated to upholding labour and human rights standards with our employees and Business Partners. Our Anti-Slavery and Human Trafficking Policy commits us to avoid causing or contributing to adverse human rights impacts and to formalise due diligence processes for identifying, preventing, mitigating and remediating such impacts.



We foster a culture of cooperation and partnership, treating our Business Partners fairly and with respect. If there is a risk or occurrence of a human rights violation, we will participate in remediation and collaborate with stakeholders to prevent future harm.

Business Partners must reject all forms of forced labour. Employees must work voluntarily, without force or intimidation. Dornan does not tolerate slavery, human trafficking, debt bondage or involuntary prison labour. Employees must be free to leave their workplace and terminate their employment within legal requirements.

Business Partners must ensure labour conditions are transparent and agreed upon in contracts before work begins. They must avoid practices that lead to forced labour and debt bondage, such as placement fees, excessive accommodation costs, withholding identity documents and unfair payment. Proper payment of hiring costs, including work visa renewals, must be ensured to prevent employees from becoming undocumented.

### **3. ACCOMMODATION AND LIVING CONDITIONS**

Where housing is provided Dornan ensures safe, clean, and dignified living conditions, including access to water, sanitation, electricity, communication, and personal privacy. We require our Business Partners who are providing accommodation to their workers to ensure they are upholding the same standards.

### **4. FAIR WORKING CONDITIONS AND REMUNERATION**

Business Partners must ensure that their employees and subcontractors receive fair wages and benefits in accordance with national and local laws, as well as contractual agreements. They must also comply with the maximum working hours specified by the respective country.

Business Partners must guarantee that their employees have access to social security, lawful working conditions, rest, leisure, holidays, and an adequate standard of living and professional training.

### **5. ANTI-HARASSMENT AND DISCRIMINATION**

Dornan requires all Business Partners to prohibit unacceptable treatment of employees, including physical punishment, torture, sexual harassment, abuse, mental or physical coercion, verbal abuse, or threats of such treatment. Business Partners must not exploit anyone and must avoid business with entities that disregard human rights standards.

Business Partners must commit to opposing all forms of discrimination, harassment and mobbing within the scope of prevailing laws. They should ensure equal treatment and opportunities for employees, job applicants and Business Partners. Business Partners are encouraged to foster an atmosphere of respectful mutual relations and rigorously oppose



discrimination based on race, ethnicity, religion, language, gender, sexual orientation or gender identity, national or social origin, ideology, political opinion, union membership, age, health status, disability, and personal or social circumstances.

## **6. CONFLICTS OF INTEREST**

Business Partners must avoid situations where personal interests conflict with the interests of Dornan. A conflict of interest arises when an individual's personal, financial or other interests interfere with their professional responsibilities and decision-making.

All Business Partners are required to disclose any potential conflicts of interest to Dornan. This includes, but is not limited to, relationships with suppliers, customers, or competitors that could influence their actions or decisions. Transparency and integrity are essential to maintaining trust and ensuring that business decisions are made objectively and in the best interests of Dornan.

## **7. ANTI-CORRUPTION AND BRIBERY**

Dornan strictly prohibits any form of corruption and/or bribery in all business dealings. Business Partners must not offer, promise, give, or accept any form of bribe or corrupt payment, including gifts, hospitality or other advantages intended to influence business decisions.

Compliance with all applicable anti-corruption laws and regulations is mandatory. We encourage our Business Partners to implement robust anti-bribery systems to ensure adherence to these principles. Any suspected violations must be reported immediately and appropriate measures will be taken to investigate and address such issues.

## **8. ILLEGAL PAYMENTS AND GIFTS**

Business Partners are strictly prohibited from offering, promising, or authorising any gift, meal, ticket, entertainment, or other item of value to any Dornan employee in a position of influence.

Similarly, Business Partners and their employees must not accept any such items in exchange for securing an improper business advantage.

Without prejudice to the above, modest and appropriate gestures, such as meals or entertainment, may be accepted in the ordinary course of business, provided that the associated costs are reimbursed by Dornan and same gesture does not involve employees in a position of influence, and the integrity of the business relationship remains uncompromised.



If there is any uncertainty regarding the appropriateness of accepting a gift, Business Partners are expected to seek guidance from Dornan's Legal, Compliance and Data Protection Department prior to acceptance.

## **9. FAIR COMPETITION**

Business Partners must uphold standards of fair business and competition, avoiding any actions that could be perceived as unfair, anti-competitive or abusive. All activities must comply with current laws that promote competition, including anti-trust and competition regulations.

Business Partners must not engage in collusion, price-fixing, or dividing sales territories or customers, nor use restrictive practices that inhibit free and open competition.

Additionally, Business Partners must not enter into agreements that restrict customers' ability to independently set their pricing and conditions when reselling.

## **10. MONEY LAUNDERING, INTELLECTUAL PROPERTY AND PROTECTION OF ASSETS**

### **10.1. MONEY LAUNDERING**

Business Partners agree to comply with all laws that prohibit money laundering or financing for illegal or illegitimate purposes. Business Partners should endeavour to work exclusively with reputable counterparties involved in legitimate business activities with funds derived from legitimate sources.

### **10.2. INTELLECTUAL PROPERTY AND PROTECTION OF ASSETS**

Business Partners must ensure themselves and their employees protect trade and company information. Confidential information and documents must not be disclosed without authorisation.

Confidential information related to Dornan and its stakeholders must be kept secure and only shared with authorised individuals.

Business Partners must comply with laws protecting intellectual property, trade secrets and personal data. Business Partners must respect Dornan assets, using them only with proper authorisation and preventing misuse, damage or theft.

## **11. RESPONSIBLE RESOURCING**

Dornan is committed to sourcing materials and services in a manner that is ethical, sustainable and socially responsible. All Business Partners must ensure that the resources



used in the delivery of goods and services are obtained in compliance with applicable laws and international standards. This includes avoiding materials sourced through illegal, exploitative or environmentally harmful practices. Business Partners are expected to conduct due diligence on their supply chains to prevent human rights abuses, including forced labour, child labour and unsafe working conditions. Preference should be given to materials that are responsibly sourced, recycled or certified by recognised sustainability standards. Transparency and traceability in sourcing practices are essential and Business Partners must be prepared to provide evidence of responsible resourcing upon request.

## **12. FREEDOM OF ASSOCIATION**

Business Partners must respect and uphold the right of all workers to freely associate and to form or join trade unions or other lawful worker organisations of their own choosing, in accordance with The Charter of Fundamental Rights of the European Union and The European Convention on Human Rights. This includes the right to collective bargaining and peaceful assembly. Business Partners must ensure that workers are not subject to discrimination, retaliation or intimidation for exercising these rights. It must be ensured that all employees are able to openly communicate with management regarding working conditions.

## **13. HEALTH AND SAFETY**

### **13.1. OCCUPATIONAL HEALTH AND SAFETY**

Dornan requires all Business Partners to provide their employees with a safe and healthy environment. They are obliged to have procedures in place to identify and evaluate health and safety risks in the context of their activities and to prevent, detect and mitigate those risks. They are responsible for strictly complying with the Dornan Health and Safety standards and the applicable legislation on this subject. Furthermore, all employees have the right and the obligation to immediately stop unsafe work.

Prior to the start of work, all employees must have received adequate training and are provided with the proper equipment to safely carry out their work.

### **13.2. PREVENTION AND EMERGENCY PREPAREDNESS**

Dornan requires Business Partners to ensure safe working processes, appropriate controls and preventive measures in order to minimise all kinds of health and safety risks at the workplace. In doing so, Business Partners are expected to implement suitable trainings and evaluate production processes and machinery for health and safety hazards. The impact of identified hazards shall be minimised by implementing emergency procedures. Business





Partners must immediately report all health and safety incidents related to Dornan projects, workplaces or construction sites directly to Dornan.

#### **14. ENVIRONMENTAL PROTECTION**

Dornan believes in utilising our technical expertise to create a healthy, prosperous and sustainable future for our people, clients and the environment. Laws and international standards, as well as customer requirements to protect the environment must be observed.

Dornan expects Business Partners to support these goals and to commit to ensuring the utmost respect for the environment in the performance of their activities. Business Partners must comply with applicable environmental laws and regulations and have in place organisational and management models aligned with international best practice and standards, designed to comply with the principles in this Policy.

All required official permits, licenses and registrations need to be present and maintained. Business Partners shall identify environmental risks and impacts associated with their activities and set up appropriate prevention, mitigation and remediation measures.

- **Pollution and Resource Saving**

Dornan expects Business Partners to save natural resources and improve resource efficiency in their operations and products throughout the life cycle. By reusing and recycling materials, adjusting production processes, as well as using material substitutes, negative impacts on the climate and the environment shall be minimised or avoided.

- **Greenhouse Gas Emissions and Energy Efficiency**

Dornan have set a goal to be net zero in our operations by 2030 and for all our activities by 2050. On that behalf, we promote the purchase and use of energy from renewable sources and the efficient use of energy.

Business Partners are expected to keep mechanisms in place to ensure their effective commitment to fighting climate change and avoiding or minimising energy consumption and greenhouse gas emissions generated by their activities. Business Partners are furthermore expected to engage in the development and application of climate-friendly products and working methods to support the reduction of greenhouse gas emissions.

- **Pollution Prevention and Waste Management**

Business Partners shall have systems in place to ensure the safe handling, transport, storage, reuse or recycling of wastewater and solid waste. They are expected to reduce or avoid waste





of all types, including energy, for instance by modifications of production processes, maintenance, the use of material substitutes, recycling or reusing. Business Partners shall monitor and evaluate all kinds of wastewater and solid waste generated from works prior to discharge or disposal and treat the substances as required by local laws and regulations.

Business Partners must furthermore ensure safe handling of hazardous materials. Biological or chemical materials or any other materials that have the potential to cause harm to humans, animals or the environment, either by themselves or by interacting with other materials are to be identified and managed to ensure their safe handling. This applies to storing, moving, using, recycling and disposing of the materials.

#### **15. COLLABORATION WITHIN DUE DILIGENCE PROCESSES**

Business Partners are expected to communicate any identified risks and/or violations with respect to the ESG standards formalised in this Policy and to collaborate and support Dornan in order to fulfil our due diligence obligations. That includes the provision of requested information for prequalification and evaluation processes. In the event of identified risks and/or violations, Dornan will engage to collaborate with our Business Partners to find appropriate solutions and to define according measures where applicable.

Dornan reserves the right to inspect the partner's compliance with the aforementioned requirements

- On site;
- During business hours;
- By a neutral auditor;
- After prior timely notice;
- In the presence of representatives of the partner;
- And in accordance with the applicable law.

The auditor's final report may only deal with the issue of compliance with the aforementioned requirements and may not contain any business secrets or competition-relevant information concerning the partner.

In the event of severe violations, Dornan reserves the right to terminate the contractual relationship.

Should there be differences or a conflict between this Policy and local regulations applicable to our Business Partners, the more restrictive rule will prevail.



#### **16. DUTY TO REPORT**

Dornan provides several ways of reporting violations of incidents or non-compliance with statutory or company regulations. Our whistleblowing system allows for potential and/or actual human rights violations or incidents to be reported anonymously, without discrimination of any kind.

Dornan encourages subcontractors, employees of subcontractors and the supply chain to report to Dornan any suspected or known misconduct, non-compliance, human rights violations or other possible abuses.

#### **17. BREACHES OF POLICY**

Any breach of the Policy, including violations related to data protection, anti-slavery, fair working conditions or any other outlined standards, will be taken seriously and may result in disciplinary action, up to and including termination of employment. All employees have a responsibility to report suspected breaches promptly through the appropriate internal channels outlined throughout this Policy. Dornan is committed to investigating all reports thoroughly and fairly, and to taking corrective action where necessary. Maintaining the integrity of our workplace and upholding our values is a shared responsibility.

#### **18. REVIEW AND AMENDMENTS**

This Policy will be periodically reviewed and updated as necessary to ensure its effectiveness and compliance with relevant legal and regulatory requirements. Please contact [compliance@dornangroup.com](mailto:compliance@dornangroup.com) for any queries in relation to this Policy.



#### **ACKNOWLEDGMENT OF DORNAN'S CODE OF CONDUCT FOR BUSINESS PARTNERS**

All registered Suppliers are required to have acknowledged Dornan's Code of Conduct for Business Partners prior to issuance of any purchase order or contract.

*I, on behalf of \_\_\_\_\_ (Supplier name),  
acknowledge and agree to comply with Dornan's Code of Conduct for Business Partners and  
ensure that the owners, officers, directors, employees, contractors, agents, and others  
working on behalf of \_\_\_\_\_ (Supplier name) are  
aware of and agree to abide by this Code of Conduct in preparing and submitting bids and  
proposals for Dornan work, providing goods and services to Dornan, and performing all  
agreements entered into with Dornan for such purposes.*

<b>Authorised Signatory Name</b>	
<b>Job Title / Role</b>	
<b>Date of Signature</b>	
<b>Signature</b>	
<b>Email Address</b>	