



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 to 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.

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





16. COMPLIANCE MONITORING AND AUDITS

Business Partners shall maintain sufficient records to demonstrate compliance with this Policy and all applicable laws and regulations. Dornan reserves the right to undertake reasonable compliance monitoring activities, including:

- Scheduled and unscheduled compliance reviews;
- Spot-check audits;
- Audits and document reviews;
- Site inspections and workplace assessments;
- Reviews of employment records, payroll records, training records, and right-to-work documentation;
- Reviews of environmental, health and safety, and human rights controls;
- Verification of certifications, licences, and permits;
- Supply chain due diligence assessments.

Business Partners shall cooperate fully with such assessments and provide access to reasonably requested documentation, personnel, and facilities where necessary to verify compliance with this Policy.

17. WORKER INTERVIEWS

Where appropriate, Dornan or its nominated auditor may conduct confidential interviews with workers, contractors, or subcontractors to assess compliance with this Policy, particularly in relation to labour standards, working conditions, anti-slavery requirements, health and safety, discrimination, harassment, and whistleblowing arrangements.

Such interviews shall be conducted in accordance with applicable laws and in a manner that protects workers from retaliation.

18. CORRECTIVE ACTION PLANS

Where an audit, review or investigation identifies a non-conformance, Business Partners shall:

- Cooperate fully with Dornan;
- Develop and implement a corrective action plan within an agreed timeframe;
- Provide evidence of remediation actions completed;





- Take reasonable measures to prevent recurrence.

Failure to adequately address identified issues may result in escalation measures, suspension of work, removal from approved supplier status, or termination of the contractual relationship.

19. SUPPLY CHAIN MONITORING

Business Partners shall take reasonable steps to ensure that their subcontractors and suppliers adhere to standards substantially equivalent to those contained within this Policy.

Upon request, Business Partners shall provide information regarding their supply chain due diligence processes and the controls implemented to identify and manage human rights, ethical, environmental and compliance risks.

20. TRAINING AND AWARENESS

Business Partners are encouraged to provide regular training and awareness programmes to relevant personnel on:

- Anti-bribery and corruption;
- Modern slavery and human trafficking;
- Human rights;
- Diversity, equality, and inclusion;
- Health and safety;
- Data protection and confidentiality;
- Speak Up and whistleblowing arrangements.

Evidence of such training may be requested by Dornan as part of its due diligence activities.

21. 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.





22. 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.

Serious breaches of this Policy may include, but are not limited to:

- Forced labour, modern slavery or human trafficking;
- Bribery, corruption, or fraud;
- Deliberate falsification of records;
- Serious health and safety violations;
- Environmental breaches;
- Harassment, discrimination, or victimisation;
- Retaliation against whistleblowers;
- Refusal to participate in due diligence or audit activities;
- Material data protection or cybersecurity incidents.

23. REVIEW AND AMENDMENTS

This Policy will be reviewed and updated at least annually or on ad hoc basis to ensure its effectiveness and compliance with relevant legal and regulatory requirements. Please contact 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.*

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

