



Dehner

Supplier Code of Conduct

Preamble

With over 130 stores in Germany and Austria and more than 5,700 employees, Dehner is today the largest garden centre chain in Europe. As the market leader in the "green industry", founded 1947, Dehner combines a traditional heritage with its own claim to the highest quality standards and continuous innovation.

This continuity is also reflected in its own philosophy:

- Entrepreneurially oriented to the Zeitgeist and with the highest quality standards.
- Socially responsible as a reliable employer that invests in the further training of its employees and offers career prospects.
- Sustainable as a responsible company attaching importance to high ecological standards.

Dehner is named "TOP Employer DONAURIES" for its employee-oriented corporate culture. Furthermore, Dehner commits to the industry's most relevant ecological and social standards and strives for fair and responsible trade and sustainable business.



In future, Dehner would like to continue to grow dynamically and continuously expand its own position as a leading cross-channel provider within the "green industry".

This entrepreneurial spirit and passion paired with a high commitment to compliance and integrity is what characterizes Dehner's employees and drives our business. It builds the basis for our relationship with clients, business partners, stakeholders, communities and with each other. It is crucial for our success and maintaining our reputation.

Dehner is committed to reliability and responsibility, to mutual trust and respect, and to a strong culture of ethics and integrity as well as social and environmental sustainability.

As part of our commitment to the principles set out in the Dehner Code of Conduct we expect from our suppliers to acknowledge and adhere to the principles embodied in this Supplier Code of Conduct, and to ensure that their own suppliers will also comply with these principles. Dehner will monitor the adherence to these principles and assess their implementation in the provision of products and services in the selection and evaluation of its suppliers. We reserve the right to redetermine the continuation of commercial relationships if a supplier is in breach of these principles and cannot agree on an improvement plan or does not implement it.

This Supplier Code of Conduct is made available to our suppliers with the goal of strengthening our mutual understanding of the behaviours that we expect in day-to-day business.

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I. Ethics

All suppliers of Dehner shall conduct their business in an ethical manner and act with integrity. These ethical requirements include in particular the following aspects:

1. Business Integrity

All bribery, corruption, extortion, money laundering and embezzlement are strictly prohibited. Suppliers shall not confer benefits, pay or accept bribes or other unlawful incentives (e.g. facilitation payments) or participate in other illegal inducements in business or government relationships. Suppliers shall conduct their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws. Suppliers shall employ fair business practices including accurate and truthful advertising.

Suppliers doing business with or seeking to do business with Dehner should not provide any gift, gratuities, hospitality, meal or entertainment to a Dehner employee, government/regulatory official or any other business partner in any situation in which it might influence, or appear to influence, the employee's or regulator's decision in relation to the business partner.

Suppliers are expected to keep accurate information regarding their activities, structure and performance, and should disclose these in accordance with applicable regulations and industry benchmark practices.

2. Privacy and Intellectual Property

Suppliers shall safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected. They shall guarantee compliance with the applicable national and international regulations in force in the field of data protection law.

3. Identification of Concerns

Suppliers shall encourage and provide means for their employees to report concerns, complaints or potentially unlawful activities in the workplace without threat of reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action if needed.

4. Conflicts of Interest

Suppliers shall disclose to Dehner any situation that could constitute a conflict of interest, such as Dehner employees having professional, private and/or significant financial advantages or interests in any of the supplier's businesses.

5. Animal Welfare

If applicable to the supplier's business, animals shall be treated humanely with pain and stress minimized. Animal testing should be performed after efforts have been made to reduce the numbers of animals used and to refine procedures to minimize distress. Alternatives to animals should be used wherever these are scientifically valid and acceptable to regulators.

6. Conflict Minerals

Suppliers shall ensure that products supplied to Dehner do not contain metals derived from minerals or their derivatives originated from conflict regions that



directly or indirectly finance or benefit armed groups that commit serious human rights abuses.

II. People and Labour

Suppliers shall be committed to uphold the human rights of workers and to treat them with dignity and respect. The labour elements include:

1. Freely Chosen Employment

We do not tolerate forced, bonded, indentured, trafficked or non-voluntary labour or involuntary prison labour or other kind of forced labour in our supply chain. Practices such as withholding personal property, passports, wages, training certificates, work or any other document for inappropriate reasons are not acceptable. Suppliers will risk allegations of complicity if they benefit from the use of such forms of labour by their business partners. Suppliers shall act with special diligence when engaging and recruiting migrant workers both directly and indirectly.

2. Child Labour

Suppliers must forbid all kinds of child labour. The applicable definition of child labour shall be that in the regulations of the United Nations or the locally applicable laws and regulations, whichever is stricter. Suppliers shall establish robust age-verification mechanisms as part of the recruitment process, which may not be in any way degrading or disrespectful to the worker.

3. Non-Discrimination

Suppliers shall not discriminate, exclude or have a certain preference for persons on the basis of gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in unions or any other legitimated organisations, political affiliation or opinions, sexual orientation, family responsibilities, marital status, diseases or any other condition that could give rise to discrimination. In particular, workers shall not be harassed or disciplined on any of the grounds listed above.

4. Fair Treatment

We expect our suppliers to treat their employees with dignity and respect. Suppliers will provide a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers and with no threat of any such treatment, be all of this imposed by own employees or mandated private or public security forces.

5. Wages, Benefits and Working Hours

Suppliers shall pay workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Compensation and benefits should aim at providing the workers a decent living for themselves and their families. Suppliers shall communicate with the worker the basis on which they are being compensated in a timely manner. Suppliers are also expected to communicate with the worker whether overtime is required and the wages to be paid for such overtime. Wages are to be paid in a timely manner, regularly, and fully in legal tender. The use of overtime is meant to be exceptional, voluntary, paid at a premium rate and shall not represent a significantly higher likelihood of occupational hazards.

6. Freedom of Association

Open communication and direct engagement with workers to resolve workplace and compensation issues are encouraged. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labour unions, seek representation and join workers' councils. When operating in countries where labour union activity is unlawful or where free and democratic labour union activity is not allowed, suppliers shall respect this principle by allowing workers to freely elect their own representatives with whom the company can enter into dialogue about workplace issues. Workers shall be able to communicate openly with the management regarding working conditions without threat of reprisal, intimidation or harassment.

III. Health and Safety

Suppliers shall make adequate provision for a safe and healthy working environment. This comprises the following aspects:

1. Health and Safety at the Workplace

Suppliers are expected to offer their employees a safe work environment and active occupational health protection. Necessary measures must be taken to prevent accidents and health injuries that may occur in connection with or during their work. Our service providers and contractors working on our sites are expected to actively participate in our safety programmes.

Suppliers shall comply with occupational health and safety regulations, or with international standards where domestic legislation is weak or poorly enforced.

Suppliers shall provide appropriate controls, safe work procedures, preventative maintenance, and necessary technical protective measures to mitigate health and safety risks in the workplace and in any company-provided living quarters. When applicable, suppliers shall provide employees with appropriate personal protective equipment. A continuous improvement programme to identify, measure and take actions to prevent accidents/incidents shall be in place. Effective measures shall be in place to prevent workers from having accidents, injuries or illnesses, arising from, associated with, or occurring during work. These measures should aim at minimizing so far as is reasonable the causes of hazards inherent within the workplace.

2. Process Safety

Suppliers shall have programmes in place to prevent or mitigate unintended releases of chemical or biological agents associated with operations and processes. Programmes shall be appropriate to facility and process risks.

3. Emergency Preparedness & Response

Suppliers shall identify and assess emergency situations in the workplace and any company-provided living quarters, and minimize their impact by implementing appropriate fire protection, effective emergency plans, regular drills and response procedures.

4. Product Safety

Suppliers must comply with product safety regulations, label products properly and communicate product-handling requirements. They shall provide Dehner and relevant parties with the applicable documentation containing all necessary safety-relevant information for all hazardous substances in case of a legitimate need. This includes product information, safety data sheets, notification or registration confirmations, uses and exposure scenarios. Suppliers proactively and transparently share information about the health, safety, and environmental aspects of their products with Dehner and all relevant parties.

IV. Environment

We care for our planet and thus, in our facilities, not only focus on significantly reducing waste, but also on employing the most energy and climate efficient appliances.

Suppliers shall operate in an environmentally responsible and efficient manner, and they shall minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible and to engage in activities that reuse and recycle. They shall assess significant environmental impact of operations and establish effective policies and procedures that reflect their environmental responsibility, including the implementation of adequate measures to prevent or minimize adverse effects on the community, natural resources and the overall environment. The environmental elements include:

1. Environmental Authorizations

Suppliers shall comply with all applicable environmental regulations. The requirements of the Minamata, Stockholm and Basel Convention must be observed. All required environmental permits, licences, information registrations and restrictions shall be obtained, and their operational and reporting requirements followed.

2. Waste and Emissions

Suppliers shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.

3. Spills and Releases

Suppliers shall provide systems to prevent and mitigate accidental spills and releases to the environment.

4. Natural Resource Conservation and Climate Protection

Suppliers shall use natural resources (e.g. water, sources of energy, raw materials) in an economical and efficient way and preserve them. To ensure the conservation of renewable natural resources, suppliers shall promote the application of recognized sustainability standards and certifications. Negative impacts on the environment and climate caused by the suppliers or in their supply chain shall be minimized or eliminated.

Practices are encouraged to comply with circular economy principles such as material reduction, substitution, collection, sharing, maintenance, reuse, redistribution, refurbishment, remanufacturing and recycling. Suppliers shall engage in the development and use of environmentally and climate-friendly products, processes, and technologies.

Suppliers shall ensure and demonstrate continuous environmental improvements, including a reduction in raw materials, energy, emissions, discharges, noise, waste, hazardous substances, and reliance on natural resources.

V. Quality

Quality is an overarching principle at Dehner. Irrespective of the stage of the project, whether in the consulting stage, in design, ready for implementation or during production of drug substance, the highest quality is our guiding principle.

We expect our suppliers to follow generally recognized or contractually agreed high-quality standards within their internal processes and their team in order to provide goods and services that consistently meet Dehner's and its customers' needs, perform as warranted and are safe for their intended use. Suppliers shall have in place comprehensive quality management and precise, as well as reliable quality control mechanisms, which should be continuously monitored and regularly adapted as needed.

VI. Management Systems

Suppliers shall use management systems to facilitate continual improvement and compliance with all applicable laws and promote continuous improvement with respect to the expectations set forth in this Supplier Code of Conduct. This includes the following aspects:

1. Commitment and Accountability

Suppliers shall demonstrate commitment to the concepts described in this document by allocating appropriate resources.

2. Legal and Customer Requirements

Suppliers shall identify and comply with applicable laws, regulations, industry standards, ILO and UN conventions and relevant customer requirements. Should the requirements of this Supplier Code of Conduct go beyond the locally applicable laws and regulations, the rules of the Supplier Code of Conduct are binding.

3. Risk Management

Suppliers shall have mechanisms to appropriately determine and manage risks in all areas addressed by this document and with respect to all applicable requirements.

4. Documentation

Suppliers shall maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.

5. Training and Competency

Suppliers are required to build sufficient competence among employers, managers, workers, and workers representatives in order to embed the principles and practices of this Supplier Code of Conduct in business operation successfully. They shall have a continuous training programme that achieves an appropriate level of knowledge, skills and abilities in management and workers to address the applicable principles of this Supplier Code of Conduct as well as the applicable laws, regulations and generally recognized standards.

6. Continuous Improvement

Suppliers shall demonstrate their commitment to continuous improvement by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews.

7. Communication

Suppliers are expected to have effective systems to communicate the principles set forth in this Supplier Code of Conduct to workers, contractors, and suppliers further down the supply chain.

VII. Implementation of the Supplier Code of Conduct Principles

Suppliers' implementation of and adherence to these principles can be demonstrated by reference to their own code of conduct or corporate policy which contains comparable standards. Should a supplier not have such standards in place, the supplier is expected to undertake compliance with this Supplier Code of Conduct.

VIII. Raising Questions or Concerns

Employees of suppliers should contact their own legal/compliance department to resolve internal ethics and compliance concerns. In case this concern might also affect Dehner as the contract partner of the supplier, Dehner must be informed immediately by the supplier.

If you need to raise a question regarding this Code in particular or compliance in general or if you want to report a potential misconduct, we offer the following channels:

Our Whistleblowing Web Intake (anonymous reporting system)

Web Intake: <https://sicher-melden.de/dehner>

Quality Management Categories:

E-Mail address: qualitaetsmanagement@dehner.de