

Code of Conduct

1. Introduction

The success of DMG MORI Finance GmbH (DMF) is dependent on the fact that all people working for the company respect the company's principles in a trustworthy, innovative, dynamic and open way to every time and at every place and that they consequently implement these principles.

DMF is aware of its responsibility towards their business partners, shareholders and employees, as well as to the environment and to society. DMF therefore specifically undertakes to uphold clear principles and values. These provide the framework for our social and corporate actions.

This Code of Conduct defines basic assumptions about values and maxims concerning e.g. human action and social relations.

Our actions are governed by personal responsibility, sustainability and integrity. The following forms the basis of DMF's dealings with all our company's stakeholders and sets out targets and rules that reflect our undertaking to act in a responsible, ethically impeccable and lawful way.

These principles for responsible and legally correct conduct are intended to help our company to recognise and avoid legal and ethical challenges. The main principles are contained in this Code of Conduct.

2. Governance

2.1. Legal Compliance

We observe the principle of legality, and we respect all current international agreements and laws. Therefore, DMF has a compliance officer and an internal audit officer. The Compliance Officer continuously monitors legal updates and consults regarding their implementation in the company.

Compliance and Internal Audit both implement controls to verify if existing law has been correctly implemented.

2.2. Prevention of Corruption and Conflict of Interest

In its dealings with commercial business partners and state institutions, DMF promotes the transparent and lawful handling of all business transactions and forbids any type of corruption. We support national and international efforts to prevent competition being distorted or influenced by bribery and reject any conduct that is corrupt or detrimental to the company.

The interests of the company and the private interests of employees are to be kept strictly separate. Any actions shall be carried out free of irrelevant considerations and personal interests.

2.3. Conduct in Competition

We respect and support fair and undistorted competition. It is DMF's conviction that the interests of the company, its owners and its employees are best served by a corporate policy that takes fair and efficient competition as its benchmark. For this reason, full compliance with the requirements of competition law is as much a part of our corporate policy as the rejection of any unfair, anticompetitive behaviour.

2.4. International Dealing

DMF respects the laws and regulations that are applicable to international trade and that govern commercial and financial transactions.

National and international export control regulations are particularly significant. Our goal is to ensure compliance with export control legislation always through organisational measures and targeted information. We undertake to comply with the respective export regulations of a country and to work in an open and transparent manner with the authorities.

Each employee must respect the control regulations if goods or services are bought, brokered, produced or put into circulation or if technology is transferred or received.

2.5. Data Protection and Information Security

When using confidential data relating to our employees, customers and business partners, we respect the protection of privacy and the safeguarding of commercial information and trade secrets. A commitment to data protection as a confidence-building measure contributes significantly to the handling of sensitive, critical corporate information and personal data. Due to the increasing networking of information and communication systems, data protection is a major concern of the DMF-Compliance with all relevant legislation is expected of all employees.

In addition, we ensure that our IT-security is adequate. All employees are requested to ensure IT-security through their responsible actions.

3. Social Responsibility

DMF is aware of its social responsibility and acts accordingly. Integrity governs our dealings with our employees, business partners and social environment.

We respect and support compliance with internationally recognised human rights. Our actions are in line with the labour and social standards applicable worldwide of the International Labour Organisation (ILO). We reject any form of forced labour and child labour. We promote fair working conditions and support freedom of association. We do not tolerate any form of discrimination. This includes in particular any discrimination on racial grounds or due to ethnic origin, gender, disability, age, sexual identity, religion or ideology.

Moreover, DMF ensures the safety of its employees in the workplace and provides a working environment based on health and safety. We ensure health and safety protection according to the respective national provisions in force and support continuous improvement of working conditions.

Our employees contribute to the success of our company; in doing so, they have equal opportunities to work for DMF according to their individual aptness, and to develop and advance individually.

We place increasing value on diversity management and promote a corporate culture that unites cultural diversity and heterogeneous teams. In addition, we promote a balance between working life and family. We support flexible working hours, the taking of parental leave by employees and individual solutions for a better work-family-life-balance.

4. Environmental

DMF is committed to sustainable creation of value in its business operations. We bear responsibility not only for the environment but also for our employees and strive to make careful use of resources.

DMF addresses the issue of sustainability and sets its own goals for this. These goals are continuously updated.

5. Compliance with the Code of Conduct

Integrity as well as behaviour conforming to the law are essential to our company and are therefore of highest priority. DMF has created clear and transparent processes which guarantee that compliance violations are recognized in-house and clarified and stopped without delay:

The Compliance Officer notices indications to possible compliance violations and ensures that such kind of indications are pursued. Therefore, each employee of DMF who notices a compliance violation has to report it to the Compliance Officer.

Breaches of the Code of Conduct or any individual guidelines or stipulations contained therein, or any misconduct or improper behaviour are not compatible with our principles and values. They damage the DMF and, furthermore, may incur consequences under labour law and may also lead to the civil and criminal prosecution of individual employees or companies.

Moreover, the Compliance Officer shall monitor every 6 months (March and September) that the guideline (incl. the annex) is observed and report on the said state to IPD (International Planning Department of SMFL) by recording in the Action Report column of the Compliance Program.

The Compliance Officer shall inform and instruct the staff of DMF to observe these Guidelines in the workshops held in accordance with the Compliance Program, in the training programs or etc. This is covered and secured by a Compliance training that is conducted every year.

In case being unable to determine how to deal with the matters in compliance with this Guideline or being in a difficult situation to observe this Guidelines in a peculiar business practice, the decision how to deal with the matters shall be made after consulting with SMFL International Planning Department.

6. Information and Contact

DMF's Code of Conduct contains the main principles and areas where compliance is relevant to business activities, however it cannot cover all issues and areas.

We encourage every employee who has any questions or comments on the principles presented in this Code of Conduct to address these to the Compliance Officer of DMF.

7. Cooperation with Business Partners

The DMF has ties to a dense network of business partners. Our business relations are based on mutual trust and integrity. We consider our Code of Conduct to be an essential factor in responsible and long-term collaboration. For this reason, we expect our business partners to respect our Code of Conduct.

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