

# Dorsch Global GmbH

A Group of Companies

## CODE OF CONDUCT



## Dorsch Global GmbH Subsidiaries (Dorsch Entities)

Dorsch Global GmbH mandates its subsidiaries to universally adopt the Dorsch Compliance Management System, ensuring strict adherence to established compliance policies, ethical standards, and legal requirements. The system meticulously outlines fundamental principles and practices governing corporate behavior globally, requiring each subsidiary to integrate and enforce these standards in their operations. This Code of Conduct aims to reinforce the corporate structure and compliance responsibilities of subsidiaries under Dorsch Global GmbH.

1. DORSCH GLOBAL GMBH
2. DORSCH HOLDING GMBH-DC ABU DHABI
3. DORSCH HOLDING GMBH - GERMANY
4. DORSCH INTERNATIONAL CONSULTANTS GMBH - EUROPE
5. GRE GERMAN RAIL ENGINEERING GMBH
6. BLS ENERGIEPLAN GMBH
7. SPIEKERMANN INGENIEURE GMBH
8. KREBS+KIEFER GMBH
9. KREBS+KIEFER INGENIEURE GMBH (DARMSTADT)
10. KREBS+KIEFER INGENIEURE GMBH (KARLSRUHE)
11. KREBS+KIEFER INGENIEURE GMBH (BERLIN)
12. KREBS+KIEFER PRÜFGESELLSCHAFT MBH
13. KREBS+KIEFER SERVICE GMBH
14. KREBS+KIEFER INTERNATIONAL GMBH
15. IRS STAHLWASSERBAU CONSULTING AG
16. BPS RAIL GMBH
17. DORSCH INTERNATIONAL CONSULTANTS GMBH - INTERNATIONAL COOPERATION
18. AHT GROUP GMBH
19. AMBERO CONSULTING GESELLSCHAFT MBH
20. DORSCH QATAR LLC
21. DORSCH HOLDING GMBH- KSA LLC
22. DORSCH CONSULT EGYPT LLC
23. DORSCH CONSULT INDIA PRIVATE LTD.
24. DORSCH CONSULT ASIA CO. LTD
25. ECG TANZANIA LTD
26. ENGINEERING CONSULTANTS GROUP, SOLE PROPRIETORSHIP
27. ENGINEERING CONSULTANTS GROUP, QATAR
28. ENGINEERING CONSULTANTS GROUP ECG, KUWAIT
29. ECG ENGINEERING CONSULTANTS GROUP S.A.
30. EDG2, INC
31. ALFA TECH CONSULTING ENGINEERS INC.
32. ATPD, INC
33. VERITY COMMERCIAL, LLC
34. ALFATECH VESTASIA PTE LTD
35. RSBG UK LTD
36. GENECON LTD
37. THE YARD CREATIVE LTD
38. LESLIE JONES ARCHITECTS LTD
39. BCS BUSINESS CRITICAL SOLUTIONS GMBH
40. BCS DATA CENTRES LIMITED
41. BCS ITALIA S.R.L. (BCSI)
42. MCBAINS LTD
43. MCBAINS COOPER HELLAS TECHNICAL CONSULTING SA
44. PELL FRISCHMANN CONSULTANTS LTD
45. DESCO (DESIGN & CONSULTANCY) LTD
46. DECAD (ASIA) INC
47. 4WAY CONSULTING LTD

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# A letter from Dorsch Global GmbH

Dear Colleagues,

Social responsibility and economic success are intertwined objectives at our company. Upholding responsible and ethical conduct towards employees, business partners, society, and the environment is inherent to our principles and serves as the cornerstone for successful collaboration.

Our commitment to sustainable growth is unwavering, underscored by a firm refusal to compromise on ethical standards. No business endeavor is of such significance that it justifies the violation of applicable rules and laws. Adherence to legal and regulatory standards in all our business activities is non-negotiable. Violations not only run counter to our core values but are also intolerable, bearing the potential to tarnish our reputation and lead to legal repercussions.

Individuals who flout the law for personal gain do so at the detriment of the company, impacting shareholders, management, and employees alike. Such behavior not only hampers economic success, investment, and growth but also jeopardizes job security. Consequently, strict adherence to rules and laws is imperative, integral to our corporate culture. Our Code of Conduct functions as a moral compass, guiding decisions and actions, fostering awareness of legal risks and pitfalls.

All members of our organization—employees, executives, and management—are equally obligated to uphold the principles outlined in our Code of Conduct. The success of our company hinges on our collective dedication to social responsibility and the establishment of a reputable image as trustworthy business partners. In our pursuit of a sustainably successful future for Dorsch Global GmbH, we urge everyone to thoroughly familiarize themselves with the Code of Conduct and consider it the binding foundation for their actions.

Our fundamental thesis is "Honorability means success - now and into the future!"



**Olaf Hoffman**  
Dorsch Global GmbH  
Chairman



**Ayman Haikal**  
Dorsch Global GmbH  
CEO

# Dorsch Vision and Core Values

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**Our core values define who we are, how we act and what we stand for.**

We aim to create innovative, holistic and sustainable values for all our stakeholders. Shaping future's essential infrastructure, we contribute to achieving cross-generational equality on a global basis.

**Better Together , Together Better**



Integrity



Respect



Transparency



Responsibility



Reliability

# 1. Purpose

## **Our Corporate Vision and Core Values are the foundation of this Code of Conduct.**

### **1.1 Why Do We Have a Code of Conduct?**

At Dorsch Global GmbH (Dorsch) we require that all of our employees conduct themselves according to the highest standards of ethics, integrity, and behavior when dealing with our clients, colleagues and other stakeholders.

This includes, but is not necessarily limited to, full compliance with all legal obligations imposed by statute or any other source of laws.

This Code of Conduct establishes the standards of behavior that must be met by all employees. Where these standards are not met, appropriate disciplinary action will be taken. In instances where there is a serious misconduct breach, it may lead to the possibility of terminating employment summarily.

Our Code applies to all Dorsch employees worldwide.

### **1.2 What is My Responsibility?**

The following guiding questions will assist you to find out whether you act with integrity in accordance with the corporate values of the Dorsch Code of Conduct.

If you can answer the questions in the affirmative, you are acting with integrity.

- Is my behavior in accordance with this Code of Conduct?
- Is my behavior inline with the Dorsch corporate values?
- Do I support the reputation of Dorsch in a positive way through my behavior?
- Does my behavior stand up to external review?
- Can I reconcile my behavior with my conscience?

If you have any questions about this Code of Conduct or any doubts about a particular course of action, please consult with our Dorsch Global Compliance.

## 2. We Act With Integrity

### 2.1 Zero Tolerance for Retaliation

We do not tolerate intimidation or retaliation against anyone who raises a concern, makes a report or cooperates in an investigation.

Retaliation is not just malicious and contrary to our core values – it also undermines the culture of openness and trust we are determined to maintain. Any threat of retaliation can hinder investigations and prevent people from coming forward with concerns.

Each of us has a role to play in making retaliation unacceptable and maintaining an environment in which we can all feel safe and comfortable raising an issue or reporting a violation.

We recognize that speaking up isn't always easy, and we want to make the decision to speak up as simple as possible. Retaliation against anyone, who raises a concern or reports a violation in good faith, will result in disciplinary action.

### 2.2 Anonymity and Confidentiality

Dorsch will always address concerns fairly and discreetly. Employees with concerns are strongly encouraged to identify themselves when seeking assistance. This is the best way to ensure that a thorough and complete investigation can be made, and that an active and lasting resolution can be reached. All reports received will be treated with confidentiality.

However, Dorsch recognizes that in some cases people may prefer to remain anonymous when raising concerns.

Anonymous reports can be made through the Dorsch Integrity Line where an investigation will be conducted using the facts provided, while working to maintain your anonymity as far as permitted by law.

## 2. We Act With Integrity

### How Do I Raise Concerns?

Considering that any kind of misconduct may cause a serious criminal offense, Dorsch employees are obliged to report bribery attempts and violations of our Code of conduct and policies immediately and thoroughly.

#### 2.3 Internal Channels

We can rely on our honesty, caring and integrity to guide us, but when we are not sure how to proceed, we also have a duty to step forward, ask questions and seek help.

If we believe a violation of our policies, our Code of Conduct or the law has happened or may be about to happen, we are obligated to report.

To seek help, report violations and resolve concerns, you may use the following reporting lines:

- Contacting your Manager;
- Contacting Human Resources Department;
- Emailing the Dorsch Global Compliance; [compliance@dorsch.global](mailto:compliance@dorsch.global);
- Tel +49 691302570.

Often it is best to start with your manager when raising a concern, but sometimes this may not be feasible. The most important thing is that you lead the way, speak up and seek help when something doesn't feel right.

Managers who receive an ethics and compliance concern must immediately forward that information to the Dorsch Global Compliance.

Dorsch consistently investigates every indication of misconduct, taking into account the principle of proportionality. Each individual report is reviewed. According to the result, a plausible decision is made as to which consequences are suitable, required and adequate.

#### 2.4 Whistleblower System

Moreover, the option to confidentially submit a report is available through Dorsch's whistleblower system, facilitated by an online platform. This platform is accessible globally, 24/7, in multiple languages via the official website.

Any suspicions of potential violations of relevant laws, this Code of Conduct, or internal Dorsch policies can be reported at any time through the Dorsch Integrity Line. This service can be accessed via the following address:

<https://dorsch.integrityline.org/>

Operated by an external entity, the whistleblowing system is entirely online, ensuring secure and confidential communication with our compliance function.



# 3. We Have Equal Opportunities

## Our Responsibility:

- Demonstrate respect towards all colleagues, clients, and business partners at all times.
- Exercise sensitivity to the potential impact of your behavior on others, refraining from discussing topics that may cause offense.
- Reflect on your actions, considering the perspective of others, and act accordingly.
- Voice your concerns if you encounter offensive or hostile behavior from anyone.
- Promptly report any incidents of discrimination or harassment to your supervisor, other management, Human Resources, or the Dorsch Global Compliance.
- When in doubt about the appropriate course of action, seek guidance from the Dorsch Global Compliance.

## 3.1 Anti-Discrimination

Each of us should have the opportunity to reach our full potential and contribute to Dorsch's success.

We must never discriminate or treat employees or job applicants unfairly including in matters that involve recruiting, hiring, training, promoting, compensation, or any other term or condition of employment.

We are making employment decisions regarding employees and applicants based on job-related factors, without regard to:

- Color;
- Age;
- Sex or gender;
- Sexual orientation;
- Gender identity;
- Gender expression;
- Religion;
- Ethnicity;
- Citizenship;
- Disability;
- Genetic information;
- Pregnancy;
- Marital or familial status;
- Or any other category.

Employment decisions on any of these personal characteristics is against our policies and is illegal under the laws of many countries.

# 3. We Have Equal Opportunities

## 3.2 Human Rights

Dorsch recognizes the importance of maintaining and promoting fundamental human rights in all our business activities and complies with global legal labor standards.

All employees are expected to support our commitment to operate programs and policies that:

- Promote a workplace free of discrimination and harassment;
- Prohibit child labor, forced labor and human trafficking;
- Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws;
- Provide humane and safe working conditions, including safe housing conditions, where applicable;
- Recognize employees' right to freedom of association and collective bargaining.

## 3.3 Diversity & Equity

Dorsch is dedicated to creating an inclusive work environment for everyone. We embrace and celebrate the unique experiences, perspectives and cultural backgrounds that each employee brings to our workplace. Dorsch strives to foster an environment where our employees feel respected, valued and empowered, and our team members are at the forefront in helping us promote and sustain such an inclusive workplace. Dorsch is committed to taking the following actions in support of an inclusive workplace:

- Provide all employees with ongoing education and training on diversity, equity and inclusion topics;
- Provide all employees with a safe avenue to voice concerns regarding diversity, equity and inclusion in our workplace;
- Support flexible work arrangements that accommodate the different needs of all employees.

# 3. We Have Equal Opportunities

## 3.4 Anti-Harassment

Dorsch prohibits all forms of harassment including sexual harassment and other hostile behavior, such as bullying and intimidation. Harassment – whether verbal, visual, psychological or physical – has the potential to harm an individual as well as interfere with their work performance.

Dorsch will not tolerate harassment of or by any employee or individual with whom we do business. Anyone who participates in any form of harassment will be subject to disciplinary action, up to and including termination, whether or not the inappropriate conduct constitutes a violation of law.

Some examples of harassment include:

- Unwelcome sexual advances or requests for sexual favors;
- Displaying sexually explicit pictures, cartoons or other materials;
- Offensive remarks or jokes including vulgar or profane language;
- Any form of physical threat or physical intimidation.

## 3.5 Environment, Health and Safety

At Dorsch, we are dedicated to shaping sustainable living spaces worldwide while fulfilling our obligations to stakeholders and the environment. Recognizing the role businesses play in driving sustainable development and the global climate transition, we are committed to resource-conscious and environmentally responsible practices. We strive to minimize environmental pollution and continuously expand our environmental protection efforts.

Our teams globally work daily to provide innovative, sustainable solutions to global challenges. We also expect our employees to act responsibly and use resources consciously beyond project work. We are committed to measuring, managing, and enhancing our performance across environmental, social, and governance (ESG) metrics throughout our value chain.

Moreover, Dorsch prioritizes the physical, psychological, and social well-being of our employees, ensuring a sustainable approach to our operational environment. Each employee contributes to safety and environmental protection through responsible actions, such as maintaining tidy workspaces and wearing protective clothing on construction sites. We comply with legal requirements for occupational safety and proactive health protection, aiming to be a beacon of safety excellence in our industries and communities.

Our Environmental and Health & Safety policies reflect our commitment to maintaining a safe and injury-free workplace. This dedication from our leadership, management, and employees lays the foundation for a secure work environment, operational excellence, and long-term business success.

# 4. We Act Responsibly

## 4.1 Conflict of Interest

A “conflict of interest” occurs when an individual’s private interest interferes (or appears to interfere) in any way with the interests of Dorsch as a whole.

Our commitment to honesty, caring and integrity compels us to do what is right for the people who are relying on us. We are all accountable for recognizing actual or potential conflicts of interest and avoiding even the appearance of them. By doing so, we protect Dorsch’s reputation, build trust with our business partners and communities, position ourselves to sustain and grow our business over the long term.

A conflict of interest may arise, and disclosure is required, when an employee:

- Hires, manages, or has an influence on the workload, performance assessment, granting of approvals and / or reward of someone with whom they have a close personal relationship;
- Accepts or performs a Public Official role, or has a family member or a close personal contact who is a Public Official with the ability to take decisions that could impact Dorsch businesses;
- Has a close personal interest in the business of competitors or other third parties relevant to Dorsch.

This includes cases where the employee, their family members or a close personal contact:

- Work for or provide any services to competitors or to any other third parties relevant to Dorsch’s business;
- Hold investments other than in publicly traded pension funds, index linked or tracker funds that represent substantial interests in a competitor, State controlled or influenced entity, or any other third party relevant to Dorsch’s businesses.

## Avoid:

Avoiding conflicts of interest means we:

Are **Alert** to situations where personal and company interests are or might be in conflict or where someone could reasonably think there is a conflict;

**Recognize** that conflicts of interest can be avoided or addressed if promptly disclosed and properly managed;

**Consult** with a manager, Human Resources or the Dorsch Global Compliance for advice, especially when we are unsure whether a conflict of interest exists;

**Disclose** actual or potential conflicts honestly and promptly;

**Remove** ourselves from the decision-making process if we have a conflict of interest and support whatever decision is made.

# 4. We Act Responsibly

## 4.2 Protecting Company Property

We have a duty to responsibly and appropriately handle company assets both physical and intangible

Dorsch's physical property includes its buildings, facilities, vehicles, equipment and computer systems. We are responsible for protecting such property from loss, damage, misuse, theft and waste. We can do this by using company resources wisely and only for business purposes.

Intangible assets are fundamental to our business. They include our knowledge, ideas, structures and working methods. These values shall be safeguarded and managed in the best interest of Dorsch.

## 4.3 Personal Data Privacy

We respect the privacy of our employees and our business partners. We handle their personal information with care.

"Personal information" is any information that could be used to identify someone, either directly or indirectly, such as a name, employee ID, email address or phone number.

There are data privacy laws that prescribe how to responsibly collect, store, use, share, transfer and dispose personal information and we comply with those laws everywhere we operate.

## 4.4 Responsible Technology

All information, data and files belong to our company, and – to the extent permitted by applicable law – Dorsch reserves the right to monitor or disclose any messages, documents or any other files on company's data assets.

Dorsch employees are expected to be familiar with their company's information technology policies. These include, but are not limited to, policies concerning the appropriate distribution of emails and compliance with copyright laws.

In all forms of communication, it is essential that we are law abiding, truthful, accurate, and respectful of others.

Dorsch employees must also take care to avoid improper use, such as:

- Sending, receiving or storing inappropriate, or offensive information that are not in line with our Core Values;
- Spreading discriminating or harassing comments or threatening or abusive language;
- Downloading unlicensed or illegal material that is banned by applicable laws where we operate;
- Accessing websites that interferes with our business activities and employee productivity during working hours.

# 5. We Do Transparent Business

## Corruption

We conduct our businesses in an honest and fully transparent way to avoid corruption. Corruption is any illegal or unethical act or failure to act, by a person motivated by personal gain. Corruption can lead to legal penalties and damage to Dorsch's reputation.

Employees may not directly or indirectly offer, promise or grant financial and non-financial unauthorized advantages to public officials, business partners or third parties in connection with business activities with the purpose to influence a business outcome improperly, induce or reward improper conduct or influence any commercial, contractual, regulatory or personal decision. This would be qualified as Corruption.

### 5.1 Gifts, Entertainment & Contributions

Anti-corruption laws generally do not prohibit the giving or accepting of gifts, entertainment, and other business courtesies. However, it is imperative that these actions adhere to both local and international laws, as well as Dorsch's internal policies and procedures, in addition to complying with the policies and procedures of the involved parties.

Such policies often specify monetary limits or mandate pre-approval for gifts, entertainment, and contributions, ensuring compliance with anti-corruption laws and regulations.

Before offering or accepting any gifts, entertainment & contributions to a Public Official or a business partner, you must be able to answer **'yes'** to all of the following:

- Is the recipient permitted under local law and their company policies if any, to accept the gift or benefit?
- Is the gift or benefit offered or received without expecting any benefit or advantage in return?
- Is there a legitimate business purpose to the offer or receipt of the gift or benefit?
- Is the gift or benefit offered or received transparently and openly?

### 5.2 Public Officials

Any employee of a government entity regardless of rank, seniority or position is defined as a government official. Employees of multi-lateral funding organizations such as World Bank, KfW or international organization such as U.N, and members of the royal families are considered as government officials.

Businesses involving governmental entities and government officials represent one of the highest corruption risk to our company and Dorsch policies are more restrictive regarding the interactions with governments and government officials.

# 5. We Do Transparent Business

## 5.3 Facilitation Payments

A Facilitation Payment refers to a payment of nominal value extended to a government official with the aim of expediting a non-discretionary, routine governmental action to which Dorsch is legally entitled.

It is crucial to note that even nominal facilitation payments may incur criminal law implications in certain jurisdictions.

Consequently, Dorsch unequivocally prohibits the making of any Facilitation Payments, irrespective of their size.

Exceptions are recognized in cases where an employee is compelled to make a payment to a public official to prevent loss of life, limb, or liberty, and such cases are not considered Facilitation Payments.

Any payments falling under this exception must be promptly reported to the Dorsch Global Compliance. This reporting requirement ensures transparency and adherence to legal and ethical standards in exceptional circumstances.

## 5.4 Money Laundering

Dorsch is steadfast in its commitment to actively contribute to the global efforts in combating money laundering.

Money laundering is characterized by the illicit transfer of income derived from criminal offenses and illegal transactions into the legitimate financial system.

In order to prevent inadvertent involvement in such misconduct and to mitigate the risk of money laundering transactions, all Dorsch employees are mandated to promptly report any unusual transactions to the Dorsch Global Compliance.

Dorsch prioritizes transparency and integrity in its business operations, conducting thorough due diligence on prospective customers, suppliers, and other business partners involved in transactions with the company.

Employees are expected to remain vigilant and be aware of potential red flags that may indicate money laundering activities, contributing to the overall efforts to safeguard Dorsch from illicit financial practices.

## 5.5 Bid Rigging

Dorsch personnel, along with individuals bound by this policy, are prohibited from engaging in collusion during project bid processes or participating in any improper bidding practices, including but not limited to bid rotation, price fixing, false or misleading representations, or any other activities deemed as improper within the context of bidding processes.

# 5. We Do Transparent Business

## 5.6 Accurate Record Keeping

The record-keeping provisions of laws and regulations require Dorsch to keep its books, records and accounts in reasonable detail, accurately and such that they fairly reflect all transactions and dispositions of assets.

Thus, Anti-Corruption Laws prohibit the mischaracterization or omission of any transaction on a company's books or any failure to maintain proper accounting controls that result in such a mischaracterization or omission. Keeping detailed, accurate descriptions of all payments and expenses is crucial for compliance purposes.

Accordingly, employees must follow applicable standards, principles, laws and Dorsch practices for accounting and financial reporting. Employees are required to demonstrate punctuality and thoroughness in the preparation of all reports and records mandated by management.

Prior to paying or authorizing a payment on behalf of Dorsch to or for the benefit of any person or entity, and in particular a government official, employees and third parties shall be sure that no part of such payment is to be made for any purpose other than that to be fully and accurately described in the Dorsch's books and records.

Employees and third parties may not create an undisclosed or unrecorded account of Dorsch for any purpose.

Finally, personal or third party funds shall not be used to accomplish what is otherwise prohibited by Dorsch policies.

## How to Conduct:

**Act** in the best interest of Dorsch and never let personal interests interfere or appear to interfere with your ability to make sound, objective business decisions.

**Disclose** any outside jobs and a violations with customers, competitors, or suppliers to Dorsch Global Compliance through reporting channels.

**Ask** yourself whether your personal interests could interfere with those of Dorsch. Even if private interests do not affect your business decisions, you should consider whether others may perceive it that way.

**Withdraw** from decision-making that creates or could appear to create a conflict of interest until you are sure that none exists.

**Seek** advice from Dorsch Global Compliance if you are unsure of the appropriate action to take.

**Accurately** record and fully disclose transactions.

**Never** offer or accept anything of value meant to improperly influence business decisions.



# 6. We Care Our Global Practices

## 6.1 Business Partner Engagement and Due Diligence

Corruption indirectly through third parties on behalf of Dorsch may put the company's reputable name under suspicion even if Dorsch had no actual knowledge of a third party's corrupt act.

Dorsch takes measures to reduce risk when choosing and entering into an agreement with any third party who will transact business on Dorsch's behalf.

Before entering into any relationship with a third party, appropriate due diligence must be undertaken on that third party. The necessary due diligence process will vary depending on the nature of the proposed relationship. Dorsch has Code of Conduct for Business Partners to make sure our business partners understand and acknowledge our compliance measures.

### Ask Question If:

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- The compensation the third party requests are reasonable and have a commercial basis;
- The third party is reputable, competent and qualified to perform the work for which they are being hired;
- The proposed arrangement complies with all applicable legal requirements;
- There is any conflict of interest that means engaging the third party would be inappropriate.

### Red Flags:

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Particular attention should be paid to any potential red flags, such as:

- The third party requests unusual payment arrangements such as payment in cash or payment to a personal account without any invoices;
- The third party is a close family member of a government official;
- The third party has objections to Dorsch's policies.

Dorsch employees must ensure that third parties we work with, share our ethical values and operate in a legal and compliant manner.

All engagements of third parties must be done through written agreements.

Any concerns during the engagement of the third party shall be forwarded immediately to the Dorsch Global Compliance for analysis.

# 6. We Care Our Global Practices

## 6.2 Fair Competition

Many countries, have laws that regulate competition. Antitrust laws promote fair competition by prohibiting practices that unreasonably restrain trade, restrict competition or fix prices.

The consequences for violating these laws are severe. Our promise to conduct business fairly and with integrity includes a commitment to comply with all laws regulating anti-competitive activity. This promise also includes a pledge to act with integrity in the marketplace, never obtain information about competitors through inappropriate means and never make false or misleading statements about competitors.

## 6.3 Foreign Trade Law

We observe all regulations of foreign trade law, which arise according to national and international regulations that apply to us.

As a globally operating company, free trade in compliance with applicable regulations is our highest priority. For dealings involving cross-border transactions, we have defined reviews within the framework of export controls.

## Follow These Rules:

- Don't fix prices or divide markets with competitors unless the agreement will be actively supervised and approved by the appropriate regulatory body;
- When attending meetings or social events with competitors or potential competitors, avoid discussing any of the following information if it's not publicly available:
  - Prices, pricing policy, contract terms or conditions;
  - Costs, inventories, marketing and service plans, market surveys and studies;
  - Capacity plans and capabilities, territorial agreements;
  - Any other proprietary or confidential information.
- Avoid using trade secrets or confidential or proprietary information from a former employer or another company;
- Be careful that any negative or critical comments you make about a competitor are accurate;
- These guidelines are applicable to both informal arrangements and formal agreements. To ensure fair competition, it is advised to abstain from discussing these activities with competitors, or engaging in conversations that could be interpreted as an effort to restrict competition. Any behavior contravening these rules should be promptly reported.

# 7. We Are Dorsch Global...

## Better Together... Together Better...

The following guiding questions will assist you find out whether you act with integrity in accordance with the corporate values of the Dorsch Code of Conduct.

When faced with a business decision for which there's no set policy or clear course of action, use the Dorsch Core Values and your own good judgment to determine the best approach.

In addition, **ask yourself** the following questions:

- Will I feel comfortable with my decision?
- Could I explain it to family and colleagues?
- How would it look in a newspaper?
- Have I made a decision that is fair and just?
- Have I verified the significant facts?
- If I'm not sure, have I asked?
- Have I determined if it's legal and within policy?

*\*In adherence to inclusive language principles, this document promotes the use of gender-neutral language. Acknowledging that the traditional binary construction of the abbreviation "he/she" may not encompass all gender identities and choices, the singular pronoun "they" is employed throughout this document to ensure a respectful and inclusive tone.*



# Dorsch Global GmbH

A Group of Companies

Dorsch Global GmbH  
Frankfurt Airport Center 1 Hugo-  
eckener-ring  
Gebäude 234, Hbk 43  
60549 Frankfurt Am Main  
GERMANY

Fon: +49 69 130257-0  
Fax: +49 69 130257-32  
Mail@dorsch.De