

d&b Code of Conduct

November 2018

General

d&b audiotechnik GmbH (d&b) aims to be an innovative company which develops, manufactures, and sells high quality products, and supplies the corresponding services. d&b is committed to the basic values of society and always does its utmost to ensure its activities are in line with the law and ethical values.

Objective and scope of application

d&b has therefore produced this Code of Conduct. It defines general standards for the activities and conduct of the company and its co-workers from a business, legal, and ethical perspective. It also applies to dealings with colleagues, customers, business partners, and other company stakeholders.

The Code of Conduct addresses all co-workers, including management. Every co-worker is expected to comply consistently with this Code of Conduct and any other internal guidelines relating to the specific area of responsibility.

The d&b code for the company and its co-workers

1. Responsible action and compliance with laws and regulations

d&b attaches great importance to the basic principle of economically responsible action. d&b therefore takes all decisions in accordance with internationally recognized standards relating to responsible corporate governance and based on all applicable binding statutory laws and regulations.

2. Fair competition

d&b is committed to fair competition and respects all regulations and principles of conduct relating to the protection of competition. d&b does not tolerate any anti-competitive practices, e.g. cartel agreements, corruption, bribery, or misuse of its own market position.

3. Prevention of money laundering

d&b is aware of its obligations under the applicable legislation to combat money laundering. d&b helps to enforce this legislation by carefully selecting contractual partners and only using permitted payment methods.

4. Accounting and documentation

d&b aims to ensure all company ledgers, records, accounts and other documents for accounting purposes, and other documentation purposes, meet the highest standards of accuracy and reliability. d&b maintains documents in such a way as to record all

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financially relevant transactions, therefore enabling the company to produce financial statements in accordance with applicable laws and the relevant Generally Accepted Accounting Principles (GAAP).

5. Dealings and cooperation with authorities

d&b cooperates with public authorities according to applicable laws and in a spirit of trust. d&b therefore complies with all legal regulations issued by public authorities. The legal rights of d&b customers, suppliers, partners, and co-workers are also observed in this respect.

d&b itself and others

1. Non-discrimination and non-harassment

Every co-worker, customer, partner, and supplier has the right to fair, respectful, polite, and appropriate treatment. d&b treats everyone equally, irrespective of gender, age, skin color, sexual identity, cultural, or ethnic origin, handicap, religious denomination, or ideology. d&b promotes equal opportunity at work and prevents unfounded unequal treatment.

2. Data privacy

d&b attaches maximum priority to the protection of personal data. It is important for d&b to always guarantee the right of customers, suppliers, partners, and co-workers to decide on the use of their personal data in accordance with legal regulations. d&b only processes and uses personal data if there is good reason to do so, and the data owner consents to its use, or it is mandatory by legal requirement.

3. Protection of intellectual property

Inventions, ideas, and further developments represent an essential part of the corporate culture of d&b. The company therefore espouses the appreciation of intellectual property, irrespective of whether this involves the protection of its own rights or observance of the rights of third parties.

4. Confidential information

d&b attaches great importance to the protection of confidential information, irrespective of whether it involves information belonging to d&b or its customers, suppliers, partners, or co-workers. The company therefore takes all necessary measures to prevent unauthorized persons from accessing and reading confidential information or documents. Access to confidential information will only be granted if this is urgently required or permission has been received from the data owner.

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5. Sustainability and the environment

Sustainability and environmental protection are key concerns at d&b. In all decisions, d&b therefore always considers the consequences for the environment and actively endeavors, wherever possible, to prevent environmental pollution and ensure natural resources are used as sparingly as possible. Participation in environmental protection projects and programs is a matter of course for d&b.

6. Support and donations

As part of the company's corporate social responsibility, d&b supports social projects and events. The recipients of support and donations are always selected based on objective criteria and in accordance with internal regulations.

d&b in society

1. Occupational health and safety

d&b attaches maximum priority to the safety and health of all its co-workers. It is therefore vitally important to d&b that workstations are safe and that there are good working conditions throughout the company. d&b therefore complies with all valid Occupational Health and Safety Regulations. d&b also supports and promotes the health of its co-workers with actions and services relating to health protection.

2. Drugs and alcohol

Drug and alcohol abuse represent a serious risk to the health and safety of all co-workers. d&b therefore does not tolerate the possession or consumption of drugs on company premises or at our events. In addition, in order to ensure operational safety, the consumption of alcohol during working hours is basically not permitted.

3. Handling property and financial resources

d&b uses the company's property and financial resources properly and sparingly. d&b ensures that company property and financial resources are not used inappropriately or for unauthorized purposes. d&b also makes sure that operating equipment is made available to every co-worker to the best possible extent. Efficient handling of financial resources ensures that the company is also well positioned economically for the future.

4. Presents and gifts

d&b strives to ensure transparency in its dealings with customers, suppliers, partners, and authorities. Business decisions may only be taken, and contracts concluded based on transparent, performance oriented and quality related criteria. It is therefore not permitted to accept and offer presents or other gifts which are likely to influence business relationships or decisions.

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5. Conflicts of interests

Conflicts of interest may raise doubts about the quality of business decisions and the integrity of the persons who make these decisions. Conflicts of interest, or even their semblance, must therefore be avoided at all times. If a conflict cannot be avoided, d&b will deal with conflicts of interest in an active, open, and honest way.

6. Public sphere

As a globally present and operating company, d&b realizes that the company and its actions are perceived by a large number of persons. It is therefore very important that the public perception of d&b is not impaired by an inconsistent image, false information, or poor dealings with the general public or media. On the contrary, every co-worker must always ensure that his/her actions do not harm the reputation of d&b.