Dorsch Global

Global Compliance

Code of Conduct

Version 4.0

Dorsch Global GmbH Entities

Dorsch Global GmbH mandates its subsidiaries collectively referred to as "Dorsch Global, to universally adopt the Dorsch Global 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
4. Dorsch Europe GmbH
5. Dorsch Engineers GmbH
6. GRE German Rail Engineering GmbH
7. BLS Energieplan GmbH
8. spiekermann ingenieure gmbh
9. Dorsch Service GmbH
10. KREBS+KIEFER Ingenieure GmbH (Darmstadt)
11. KREBS+KIEFER Ingenieure GmbH (Karlsruhe)
12. KREBS+KIEFER Ingenieure GmbH (Berlin)
13. KREBS+KIEFER Prüfgesellschaft mbH
14. IRS Stahlwasserbau Consulting AG
15. BPS rail GmbH
16. Dorsch Impact GmbH
17. Dorsch Qatar LLC
18. Dorsch Holding GmbH - KSA LLC
19. Dorsch Consult Egypt LLC
20. Dorsch Consult India Private Ltd.
21. Dorsch Consult Asia Co. Ltd.
22. ECG Tanzania Ltd.
23. Engineering Consultants Group, Sole Proprietorship
24. Engineering Consultants Group, Qatar
25. Engineering Consultants Group ECG, Kuwait
26. ECG Engineering Consultants Group S.A.
27. Vela Tech, Inc.
28. EDG2, Inc.
29. Alfa Tech Consulting Engineers Inc.
30. ATPD, Inc.
31. Verity Commercial, LLC
32. AlfaTech VestAsia PTE Ltd.
33. RSBG UK Ltd.
34. Genecon Ltd.
35. The Yard Creative Ltd.
36. Leslie Jones Architects Ltd.
37. BCS Business Critical Solutions GmbH
38. BCS Data Centres Limited
39. BCS Italia S.r.l. (BCSI)
40. McBains Ltd.
41. McBains Cooper Hellas Technical Consulting SA
42. Pell Frischmann Consultants Ltd.
43. Desco (Design & Consultancy) Ltd.
44. Decad (Asia) Inc.
45. 4Way Consulting Ltd.

**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.*

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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 Hoffmann
Chairman
Dorsch Global GmbH

Ayman Haikal
CEO
Dorsch Global GmbH

DORSCH GLOBAL VISION AND CORE VALUES

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

We aim to create innovative, holistic and sustainable value for all our stakeholders. Worldwide we are driven by a shared vision: To actively shape sustainable living spaces for present and future generations.

Together we shape a sustainable tomorrow.

DORSCH GLOBAL'S COMMITMENT TO UPHOLDING HUMAN RIGHTS AND SUSTAINABILITY

Dorsch Global is unwavering in its commitment to upholding the highest standards of human rights, ethical practices, and corporate responsibility.

We are dedicated to respect and uphold the values of the International Bill of Human Rights and the eight International Labour Organization's (ILO) Conventions on Fundamental Principles and Rights at Work. Additionally, we are committed to following the principles outlined by the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Our anti-corruption and anti-bribery policies and procedures further are aligned with the principles of the UN Convention against Corruption, which guide our efforts to prevent, detect, and combat corruption in all its forms.

We actively contribute to the achievement of the United Nations Sustainable Development Goals (UN SDGs), through ethical business conduct and the daily work in our projects worldwide.

Our Compliance Management System (CMS) underpins these principles by ensuring adherence to local laws and international standards, fostering integrity, transparency, and accountability across all subsidiaries globally.

Our Corporate Vision and Core Values are the foundations of this Code of Conduct.

1 PURPOSE

1.1 Why Do We Have a Code of Conduct?

At Dorsch Global 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.

Our Code of Conduct applies to all employees worldwide. It establishes the standards of behavior that shall be met by all employees. Where these standards are not met, appropriate disciplinary action will be taken. In instances where there is serious misconduct, it may lead to summarily termination of employment.

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 our 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 in line with the Entity's corporate values?
- Do I support the reputation of the Entity 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 (compliance@dorsch.global).

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 whistleblowing system 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 is not 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 Global will always address concerns fairly and with strict confidentiality. Employees with concerns are strongly encouraged to identify themselves while submitting a report. 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 Global recognizes that in some cases people may prefer to remain anonymous when raising concerns.

Anonymous reports can be made through the Dorsch Global Integrity Line (*see 2.4 Whistleblower System)* where an investigation will be conducted using the facts provided, while working to maintain your anonymity as far as permitted by law.

2.3 Internal Reporting 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 Dorsch Global Compliance (compliance@dorsch.global);
- Call +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 does not feel right.

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

Dorsch Global 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 Global's whistleblower system, facilitated by an online platform. This platform is accessible globally, 24/7, in multiple languages via the Dorsch Global website.

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

https://dorsch.integrityline.org/

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

3 WE HAVE EQUAL OPPORTUNITIES

3.1 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 Dorsch Global Compliance
- When in doubt about the appropriate course of action, seek guidance from the Dorsch Global Compliance

3.2 Anti-Discrimination

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

We shall 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-related 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 based on any of these personal characteristics are against our policies and illegal under the laws of many countries.

3.3 Human Rights

Our commitment to human rights is enshrined in our Human Rights Policy. Dorsch Global 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.

3.4 Diversity & Equity

Dorsch Global 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 Global 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 Global 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.

3.5 Anti-Harassment

Dorsch Global 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 Global 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.

3.6 Environment, Health & Safety

At Dorsch Global, 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 Global 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 Global 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 Global's reputation, maintain the trust of our business partners and communities, and 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 Global businesses;
- Has a close personal interest in the business of competitors or other third parties relevant to Dorsch Global.

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 Global'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 Global's businesses.

Avoiding conflicts of interest means that 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 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.

4.2 Protecting Company Property

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

Dorsch Global'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 Global.

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 Global reserves the right to monitor or disclose any messages, documents or any other files on company's data assets.

Our employees are expected to be familiar with their Entity'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.

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

- Sending, receiving or storing inappropriate, or offensive information that is 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 interfere with our business activities and employee productivity during working hours.

5 WE DO TRANSPARENT BUSINESS

5.1 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 Global's reputation.

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

5.2 Gifts, Entertainment & Contributions

Anti-corruption laws generally do not prohibit 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 Global'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 or contributions to/from 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?

5.3 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 the World Bank, KfW or international organizations such as the United Nations, and members of the royal families are considered government officials.

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

5.4 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 Global is legally entitled. It is crucial to note that even nominal facilitation payments may incur criminal law implications in certain jurisdictions. Consequently, Dorsch Global 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.

5.5 Money Laundering

Dorsch Global 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 employees are mandated to promptly report any unusual transactions to the Dorsch Global Compliance.

Dorsch Global 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 Global from illicit financial practices.

5.6 Bid Rigging

Our employees, 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.

5.7 Accurate Record Keeping

The record-keeping provisions of laws and regulations require Dorsch Global 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 and accounts 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 Global 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 Global 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 Dorsch Global's books and records.

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

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

How to Conduct Correctly:

- **Act** in the best interests of Dorsch Global and never let personal interests interfere or appear to interfere with your ability to make sound, objective business decisions;
- **Disclose** any outside jobs and violations with customers, competitors, or suppliers to the Dorsch Global Compliance through reporting channels;
- **Ask** yourself whether your personal interests could interfere with those of Dorsch Global. 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 the 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 FOR OUR GLOBAL PRACTICES

6.1 Business Partner Engagement and Due Diligence

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

Dorsch Global takes measures to reduce risk when choosing and entering into an agreement with any third party who will transact business on Dorsch Global'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 Global has a Business Partner Code of Conduct to make sure our business partners understand and acknowledge our compliance measures.

Ensure that:

- The compensation for the third-party requests is reasonable and has a commercial basis;
- The third party is reputable, competent and qualified to perform the services for which they are being hired;
- The proposed arrangement complies with all applicable legal requirements;
- There is no conflict of interest that means engaging the third party would be inappropriate.

Red Flags:

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 Global's policies.

Our employees must ensure that the 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.

6.2 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.

Please follow the below rules:

- Do not 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 is 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

Together we shape a sustainable tomorrow.

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

When faced with a business decision for which there is no set policy or clear course of action, use the Dorsch Global policies and procedures 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 am not sure, have I asked?
- Have I determined if it is legal and within policy?