

# **DOMETIC BUSINESS PARTNER CODE OF CONDUCT**



**↗ DOMETIC**

# BUSINESS PARTNER CODE OF CONDUCT

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# 1 INTRODUCTION

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## 1.1 GUIDING PRINCIPLES

Dometic Group companies (“Dometic”) are committed to upholding high standards for human rights, business ethics and sustainability in all business relationships. Dometic expects all its business partners to uphold the same high standards and to conduct their respective businesses in compliance with all applicable laws and regulations and Dometic’s Code of Conduct for Business Partners (“Code”).

The principles set forth in the Code are based on Dometic’s core values, its sustainability platform as well as international conventions, including the United Nations Global Compact, the Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention Against Corruption.

Dometic’s core values are the following:

- Together we build our future;
- We play to win;
- We embrace change; and
- We walk the talk.

Dometic’s core values reflect the heart and soul of Dometic. They give guidance on how we interact with our employees and business partners around the world. At Dometic, sustainability is a strategic priority, guiding how we operate and grow as a company. Our sustainability strategy is continuously evolving. Dometic’s commitment to sustainability is supported by several governing documents. You can read more about Dometic’s core values and sustainability platform in the Dometic Annual and Sustainability Report available on Dometic’s website.

Dometic evaluates and selects its business partners impartially based on objective criteria relating to our business partners’ commercial performance and reliability as well as their commitment to protection of human rights, business ethics and sustainability.

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## 1.2 APPLICATION OF THE CODE

The Code shall apply to all Dometic’s business partners. In order to do business with Dometic, our business partners shall implement the requirements set forth herein in their respective business activities, operations, supply and value chains and continuously ensure compliance thereof with the provisions of this Code, including through relevant training.

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## 1.3 LEGAL COMPLIANCE

All Dometic’s business partners shall operate in full compliance with laws and regulations applicable to their operations in the countries in which they operate. The requirements set forth in this Code shall be respected even when they go beyond applicable laws and regulations.

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## **2 PEOPLE**

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### **2.1 EQUAL OPPORTUNITIES AND NO DISCRIMINATION**

Dometic is committed to treating everyone with respect and dignity while ensuring equal and fair opportunities for all. Equal and fair opportunities mean that all employees shall be treated according to their abilities and qualifications in every employment decision, including but not limited to recruitment, advancement, compensation benefits, training, lay-offs and termination. Any form of discrimination or harassment due to personal factors, such as gender, ethnicity, skin color, age, sexual orientation, religion, nationality, disability and pregnancy or family responsibilities is prohibited.

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### **2.2 FAIR EMPLOYMENT PRACTICES AND COMPENSATION**

Dometic's business partners shall have a responsible approach with respect to wages, working hours, overtime and benefits and all employees of our business partners shall be compensated in line with or above the legal minimum in relevant jurisdictions.

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### **2.3 HARASSMENT**

Dometic does not tolerate any form of violence, harassment, intimidation or inhumane or degrading behavior. Dometic's business partners shall take preventive and corrective measures to protect all employees, including vulnerable individuals and members of vulnerable groups and communities as well as their respective business partners, sub-contractors and contracted staff.

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### **2.4 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Dometic's business partners shall respect their respective employees' rights to form, join or to refrain from joining employee associations and to bargain collectively. No employee shall be subject to discrimination in his or her exercise of these rights. Dometic promotes meaningful representation of all workers, with equal consideration given to everyone, regardless of gender. In countries where the right of freedom of association is regulated, restricted or prohibited by law, Dometic business partners shall facilitate, and not hinder, alternative forms of independent and free worker representation. Dometic disapproves any use of force and limitations of freedom of movement.

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### **2.5 OCCUPATIONAL HEALTH AND SAFETY**

Dometic's business partners shall ensure safe and healthy working environments and respect the right to healthy living conditions of workers and local communities. Dometic's business partners shall work proactively to prevent work related accidents and illness. Business partner employees and contracted staff shall receive adequate training and required safety equipment. Business partners shall adhere to applicable occupational health and safety laws. In instances where local regulations are inadequate or not effectively enforced, adherence to international standards is expected. Business partners shall work proactively to assess, monitor and mitigate potential and actual risks to the health and safety of employees, contractors and other relevant stakeholders. When residential facilities are provided or mandated, business partners shall strive to ensure that they are clean, safe and meet the basic needs of workers.

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### **2.6 NO CHILD LABOR OR FORCED LABOR**

Dometic supports and respects the protection of internationally proclaimed human rights. Dometic does not tolerate child labor or any forms of modern slavery, forced, bonded or compulsory labor, physical or psychological punishment or human trafficking, including any form forced labor.

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## **3 ETHICS**

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### **3.1 ANTI-CORRUPTION**

Dometic has zero tolerance for any form of corruption and financial irregularity, including bribery, kickbacks, facilitation payments, fraud and money laundering.

Dometic shall exercise fairness in all dealings with its business partners. No one representing Dometic may offer to, or accept from, business partners or any other third parties, gifts, benefits, reimbursements or entertainment that would constitute a violation of applicable laws or that could be perceived as an improper attempt to influence business decisions or otherwise affect the recipient's performance or work duties. Gifts, meals and entertainment may only be offered or accepted if they are moderate, occasional, constitute a reasonable compliment to a legitimate business relationship and are offered openly in the normal course of business. Dometic employees must never offer or accept gifts, travel, payment or hospitality in return for a favorable decision or business advantage.

Equally, Dometic's business partners shall refrain from offering or accepting gifts, benefits, reimbursements or entertainment that would constitute a violation of applicable laws or that could be perceived as an improper attempt to influence business decisions or otherwise affect the recipient's performance of work duties.

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### **3.2 ACCOUNTING AND REPORTING**

Business partners shall ensure transparency in their financial and sustainability reporting and make sure that all payments are made by duly authorized personnel based upon correct and approved documentation for the right business reasons.

Dometic strictly prohibits falsifying or participating in the falsification of any information or engaging in any act of misrepresentation throughout the supply chain.

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### **3.3 FAIR COMPETITION**

Business partners shall support the principles of free enterprise and fair competition as the basis for business development and innovation. Business partners shall compete on the market in a manner that is both ethical and fair, without engaging in any inappropriate activities or unfair trade practices.

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### **3.4 CONFLICT OF INTEREST, NEUTRALITY AND TRADE**

Business partners shall inform Dometic if any Dometic employee has an interest in the business partners' business which might cause a conflict of interest. A conflict of interest may occur when an individual's personal interests or family, friendships and financial factors could compromise their judgment and actions in the workplace. Business partners shall disclose situations or transactions that reasonably would be expected to give rise to such conflict of interest.

Dometic's business partners shall not make any political contribution or use corporate funds or resources to support any political parties or individual politician on behalf of Dometic.

Business partners shall ensure that all trade and export conducted for /with Dometic is carried out in compliance with applicable export and import regulations, anti-boycott provisions, trade embargoes and sanctions, including dual-use rules.

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### **3.5 PRODUCT COMPLIANCE**

Dometic business partners shall ensure that all products, components and materials supplied to Dometic are safe and designed, developed, manufactured, marketed and sold in compliance with applicable laws, regulations and industry standards. Distributors and other intermediaries shall ensure that Dometic product and services are marketed and sold in accordance with applicable laws, regulations and presented in a correct and informative way.

Business partners shall report to Dometic the presence or use of any hazardous substances or materials used in connection with sourcing or manufacturing of products, components or materials for Dometic. The business partners shall, upon request, supply documentation confirming compliance.

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### **3.6 MATERIAL AND MINERALS DUE DILIGENCE**

Business partners shall conduct risk assessment and due diligence activities to ensure that sourcing and extracting of raw materials, including but not limited to tin, tantalum, tungsten and gold, used in products are conducted with no violation of human rights. Business partners shall document and disclose the use of conflict minerals and metals in accordance with applicable laws and regulations. Business partners shall, upon request, provide Dometic with relevant information in relation thereto.

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## **4 ENVIRONMENT**

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### **4.1 ENVIRONMENTAL IMPACT**

Dometic is committed to responsibly utilize natural resources and to promote sustainable development. This commitment entails identifying and addressing the environmental impact of our operations and value chains. We are committed to take proactive measures to prevent, mitigate and rectify any adverse effects on surrounding communities, natural resources, climate and the environment as a whole.

Dometic requires its business partners to support these efforts. Business partners shall operate in compliance with applicable, national or international laws and regulations and strive for using environmentally responsible production methods to minimize the use of resources, prevent pollution and mitigate climate change.

Business partners shall, upon request, supply Dometic with information for the purpose of assessing and addressing an environmental impact in Dometic's value chain.

At Dometic, we recognize that our business relies on healthy natural ecosystems, particularly through outdoor recreation and leisure. We are committed to protecting these ecosystems by reducing risks related to ecosystem services. We expect our business partners to share these commitments.

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### **4.2 FREIGHT AND TRAVEL**

Dometic strives to reduce environmental and climate impact throughout its value chain. Dometic expects business partners to avoid unnecessary transportation of goods and services and to reduce dependency on fossil fuels for transportation. Transportation modes with lower environmental impact and shorter distances should be carefully considered. Whenever feasible, the use of expedited airfreight shall be avoided. Dometic's business partners are expected to collaborate with Dometic to reduce emissions throughout the value chain.

To reduce the impact on the environment, business travel shall be conducted with consideration of alternative virtual meeting options, whenever possible. In connection with business travel, the most suitable means of transport with regard to aspects, such as time, cost, safety, security and environmental impact shall be used.

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## **5 PROTECTION OF INFORMATION**

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### **5.1 CONFIDENTIAL INFORMATION**

Confidential information of Dometic shall be protected and not disclosed to anyone without Dometic's prior approval. Confidential information consists of any information that is not public, including but not limited to business, financial, product development, marketing information as well as any information regarding trade secrets, other intellectual property innovations, manufacturing methods or any personal data. Confidential information entrusted to a business partner by Dometic or any third parties shall be treated with the same degree of care as the business partner provides to its own confidential information, but in no event less than reasonable and prudent care.

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### **5.2 DATA PROTECTION AND DIGITAL INTEGRITY**

Dometic's business partners shall respect every individual's fundamental right to privacy and protection of personal data concerning them. Dometic's business partners shall take appropriate actions to protect the personal data of its and Dometic's employees, customers and business partners and implement all reasonable organizational and technical measures in order to ensure that all personal data is protected and processed accurately in compliance with applicable laws and regulations.

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## **6 AUDIT AND CONSEQUENCES OF BREACH**

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Dometic shall have the right to monitor and audit business partners' compliance with the provisions of this Code. Business partners shall accordingly provide relevant information and conduct self-assessments of their compliance with the provisions of the Code at Dometic's request. Dometic's representatives shall be allowed access to business partners' premises at agreed times in order to audit the business partners' compliance hereunder. Any breach of the provisions of this Code may lead to Dometic immediately terminating contract(s) with the business partner. Dometic's exercise of such termination right shall be without prejudice to any other rights and remedies available under applicable laws and regulations, including claiming any damages incurred by Dometic as a result of such breach.

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## **7 REPORTING CONCERNS**

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Business Partners are encouraged to report, in good faith, any suspected violation of applicable laws, regulations, or this Code of Conduct to a Dometic employee, who shall follow internal procedure for handling concerns.

Dometic is committed to addressing these issues seriously and working toward a satisfactory resolution in accordance with applicable laws and/or this Code of Conduct. Individuals reporting in good faith will not face retaliation or any negative consequences.

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### I HAVE READ AND UNDERSTOOD:

Date: \_\_\_\_\_ Place: \_\_\_\_\_

Company: \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

## 8 REVISION HISTORY

Version	Prepared by	Approved by	Approval date
<b>1</b>	Group General Counsel	Board of Directors of Dometic Group AB (publ)	2023
<b>1.1</b>	Group General Counsel	Board of Directors of Dometic Group AB (publ)	2024
<b>1.2</b>	Group General Counsel	Board of Directors of Dometic Group AB (publ)	2025 <sup>1</sup>

<sup>1</sup> Aligned with yearly updates of Dometic Code of Conduct approved by the Board of Directors of Dometic Group AB on April 23, 2025.