

OUR CODE OF CONDUCT



 DOMETIC





CLEAN HANDS, WARM HEART AND CLEAR CONSCIENCE

As an expanding, multinational company, Dometic is committed to act as a responsible company, employer and business partner no matter where in the world we operate. This is not only important for the company and our employees, but also for our customers, shareholders and other key stakeholders.

Dometic's policies and business principles reflected in this Code of Conduct are a fundamental part of our strategy and serve as guidance for all of us. It is of

outmost importance to us to remain a trusted company and a sustainability leader. All our activities shall at all times be conducted with integrity and respect for business ethics, people and the environment.

When acting in a transparent and correct way, we show that we have clean hands, a warm heart and a clear conscience. This is and will be crucial for Dometic's success and reputation in the market.

Juan Vargues,
President and CEO



Our core values

1 | INTRODUCTION TO THE CODE OF CONDUCT

1.1 | GUIDING PRINCIPLES

The principles in our Code of Conduct are built on our core values, our sustainability focus areas, international and national legislation as well as support and respect for the United Nations Global Compact and other international ethical guidelines.

Dometic is a participant of the United Nations Global Compact, the world's largest corporate responsibility initiative. As a participant, Dometic has committed to making the Global Compact initiative and its principles part of Dometic's strategy, culture and day-to-day operations.

Our core values reflect the heart and soul of Dometic. They define what it takes to work at Dometic and how we do things. They give guidance to how we interact with customers and colleagues around the world. Our shared values are a compass for us in every step when we continue to develop and grow.

In addition to the core values, Dometic has identified four sustainability focus areas as being the most relevant and where the company can make the greatest difference, namely: People, Ethics, Products and Environment.

1.2 | APPLICATION OF THE CODE OF CONDUCT

The requirements of this Code of Conduct apply to all employees, officers and board members of Dometic, in all markets and at all times. Managers at all levels are responsible for the implementation of this Code of Conduct. As an employee, you shall be aware of the Code of Conduct and comply with the provisions set forth herein at all times. In addition, all employees shall follow Dometic's Code of Conduct, its policies, guidelines and instructions as well as applicable laws and regulations. Failure to do so may result in disciplinary actions, which may include written warning or ultimately, termination of employment.

All Dometic business partners shall operate in full compliance with the Dometic Code of Conduct for Business Partners.

1.3 | LEGAL COMPLIANCE

All Dometic companies shall operate in full compliance with relevant laws and regulations applicable to their operations and employment in the countries in which they operate. This is the minimum requirement applicable to all aspects of our business, including the focus areas as set forth below. However, the requirements set forth in this Code of Conduct shall be respected and followed even when they go beyond applicable national requirements.



2 | PEOPLE

2.1 | EQUAL OPPORTUNITIES AND NO DISCRIMINATION

Dometic offers equal opportunities for everyone. Equal opportunities mean that all employees shall be treated according to their abilities and qualifications in every employment decision, including but not limited to hiring, advancement, compensation benefits, training, lay-offs and termination.

Any form of discrimination or harassment against employees due to personal factors, such as gender, ethnicity, skin color, age, sexual orientation, religion, nationality, disability, and pregnancy or employees with family responsibilities is prohibited.

2.2 | WORKING HOURS AND FAIR COMPENSATION

Dometic has a responsible approach with respect to wages, working hours, overtime and benefits. Our employees shall be compensated in line with or above the legal minimum in relevant jurisdictions.

2.3 | FREEDOM OF ASSOCIATION

Dometic respects its employees' rights to form, join or to refrain from joining employee associations. No employee shall be subject to discrimination in his or her peaceful exercise of these rights.

2.4 | SAFE WORKPLACE

All Dometic's workplaces shall be safe and healthy working environments. We work proactively to prevent work related accidents and illness. All unsafe conditions, incidents and work related injuries or illness shall be reported to monitor development and to ensure continuous improvement. All employees and contracted staff shall receive adequate training and required safety equipment.

2.5 | NO CHILD LABOR OR FORCED LABOR

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



*The minimum age for any employee is 15 or the minimum school leaving age, whichever is the oldest. In line with international conventions, we acknowledge that a person is a child until the age of 18. This means that we recognize the rights of every child to be protected from economic exploitation and from performing any work that is hazardous or harmful to the child's physical or mental health or interferes with the child's education.



3 | ETHICS

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 laws or that could be perceived as an improper attempt to influence business decisions or otherwise affect the recipients 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. Employees must never offer or accept gifts, travel, payment or hospitality in return for a favorable decision or business advantage.

Even stricter rules may apply when we interact with the public sector and their employees or representatives.

If you are ever in doubt as to what is permissible, contact your manager for advice.

3.2 | ACCOUNTING AND REPORTING

Accounting records shall show the nature of all transactions in a correct and non-misleading manner. Dometic shall ensure transparency in its financial reporting at all times and make sure that all payments are made by duly authorized employees based upon correct and approved documentation for the right business reasons

3.3 | FAIR COMPETITION

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

3.4 | NO CONFLICTS OF INTEREST

Employees of Dometic may not engage themselves, with or without compensation, in activities outside Dometic that might conflict or appear to conflict with Dometic's interests, without prior approval from the employee's manager and manager's manager. Dometic employees shall immediately disclose situations or transactions that reasonably would be expected to give rise to a conflict of interest.

3.5 | POLITICAL INVOLVEMENT

Dometic observes strict neutrality with regard to political parties and candidates and shall thus not make any contribution or payment, directly or indirectly, to political parties, committees or to individual politicians. Employees may not make any political contribution on behalf of Dometic or through the use of corporate funds or resources.

3.6 | TRADE COMPLIANCE

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

3.7 | CONFLICT MINERALS

Responsible sourcing and responsible extraction of raw materials, without violations of human rights or activities hazardous for environment, are important for Dometic and shall always be taken into account in our due diligence work and our business decisions.

3.8 | PRODUCT COMPLIANCE

Dometic shall make sure that our products are safe and are designed, developed, manufactured, marketed and sold in accordance with applicable laws, regulations and industry standards.

3.9 | MARKETING

Dometic shall present its products and services in an accurate, factual and informative way.





4 | ENVIRONMENT

4.1 | ENVIRONMENTAL IMPACT

Dometic strives, at all times, to improve the environmental performance of its activities and products and to prevent harmful effects on the environment.

Dometic is committed to the responsible use of natural resources and to sustainable development. This means efficient use of materials and energy during the design, production, purchase, logistics, use and disposal of all its products.

Environmental considerations are integral aspects of the product design in order to improve the energy efficiency, repairability and recyclability of each product.

4.2 | RESPONSIBLE TRAVEL

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



5 | PROTECTION OF INFORMATION

5.1 | CONFIDENTIAL INFORMATION

Confidential information of Dometic shall be protected and not shared with unauthorized third parties or publicly. Confidential information consists of any information that is not public, including but not limited to trade secrets, business, financial, product development and marketing information, innovations, manufacturing methods and personal employee data (such as, salary information or medical records).

Confidential information entrusted to Dometic by third parties shall be treated with the same degree of care as Dometic provides its own confidential information.

5.2 | INSIDE INFORMATION

Dometic is listed on Nasdaq Stockholm. Each employee of Dometic may from time to time come in contact with inside information. To ensure proper handling of such information all employees shall adhere to Dometic's information policy and insider policy. Any insider trading and unlawful disclosure of inside information are strictly forbidden.

5.3 | PRIVACY

Dometic respects every individual's fundamental right to privacy and protection of personal data concerning them. Dometic takes appropriate actions to protect the personal data of its employees, customers and business partners.





6 | SPEAK UP

Report all violations of the Code of Conduct or applicable laws and regulations as follows:

- To your direct manager;
- If you are uncomfortable talking to your direct manager, please report your concern to your manager's manager or HR, as relevant;
- If the above is not possible or if you are uncomfortable to report your concern as above, please report the concern via the Dometic SpeakUp line.

A description of the SpeakUp procedure is available on Dometic's intranet.

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Dometic Group AB (publ) on April 27, 2022