

# Our principles as a business partner with integrity

As the home of numerous stalwart brands the DAW Group is a fair and reliable partner for employees, customers, suppliers and other business partners. In the paint wholesale business, we pass on this reliability through our CMS Group.

We are aware that we will only sustain and continue our economic success in the long term if we act in an ethical and legal responsible manner. Integrity is therefore of central importance to us - those who act with integrity are righteous and do not act with harmful intent. For us, compliance is therefore more than just observing the law. We also comply to our internal rules of conduct and act in accordance with our corporate values. These values provide us with a framework for our daily work and guide us in our dealings with customers, business partners and colleagues.

## Code of Conduct

As an independent family owned business, we aspire to be a particularly reliable business partner with integrity. Integrity and responsible behaviour are therefore an integral part of our corporate culture and values. These are the basis of our Code of Conduct, which serves as a guideline for our daily work in dealing with colleagues and business partners.

[Code of conduct DAW Group - pdf for download](#)

## DAW IntegrityLine

We always strive for improvements in our behavior, but sometimes depend on impulses from outside and inside to identify potential for improvement or even the need for change. If you have any information for us that clarifies grievances, misconduct or a compliance issue, please feel free to report it to us.

We encourage you to submit tips using names and contact information. This applies in particular to our employees. We assure you that reported

information will be treated confidentially and that whistleblowers will be protected by appropriate measures.

In addition, anonymous reports can also be submitted via our web-based whistleblowing system (DAW IntegrityLine) - in over 20 languages. Incoming anonymous reports cannot be traced by us. The system can be used to ask questions about reported tips and to communicate the measures taken.

For more information on the DAW IntegrityLine, visit the platform directly: [daw.integrityline.com](https://daw.integrityline.com).

## **Complaints about human rights or environmental violations**

Complaints about possible human rights or environmental violations as well as human rights or environmental risks resulting from our company's activities can also be submitted via the DAW IntegrityLine.

We are committed to decent working conditions and environmental protection - within our company and in our supply chain. Your feedback helps us identify problems and initiate corrective or improvement measures where necessary.

For more information, visit [daw.integrityline.com](https://daw.integrityline.com) and see the following rules of procedure:

### **Who can file a complaint?**

The complaints procedure is open to every employee of our company and external third parties, in particular employees of direct and indirect suppliers.

### **What kind of complaints can be filed?**

The complaints procedure can be used to report any violations of applicable laws and our company's internal regulations. This includes, in particular, information on human rights or environment-related risks as well as violations of human rights-related or environment-related obligations caused by our business activities or the business activities of one of our suppliers.

### **How can complaints be filed?**

Complaints can be submitted via our web-based whistleblowing system at [daw.integrityline.com](https://daw.integrityline.com). Complaints can be submitted in over 20 languages and can be made either anonymously or by identifying oneself. If a report is made using the identity, this is known only to the persons who receive the report and take follow-up action. Even if the report is submitted anonymously, it is possible to ask questions and receive information about the measures taken

via a separate, secure inbox. The identity of the whistleblower is comprehensively protected by technical security measures.

In addition, it is possible to receive tips via a special e-mail box. This is [compliance@daw.de](mailto:compliance@daw.de).

## **What is the complaint procedure?**

All investigations are always conducted independently, impartially and fairly. Investigative measures are subject to the principle of proportionality and must focus in an appropriate manner on the purpose of clarifying the facts. All persons entrusted with investigative actions are obliged to treat information they receive in the context of an internal investigation as confidential.

After submitting a tip, each whistleblower receives an acknowledgement of receipt no later than seven days after receipt of the report. The report is then checked for plausibility. If the report is plausible, the facts will be investigated by the Governance & Compliance department, if necessary with the involvement of the department concerned. The facts of the case are discussed with the whistleblower.

Where a compliance violation has been identified, appropriate disciplinary or other remedial action will be taken to prevent or minimize harm to the company, its employees and/or customers, and to prevent recurrence of violations.

Reported issues can vary in scope and complexity. It is therefore difficult to set a generally applicable timetable for investigations. Internal investigations are generally conducted as quickly and efficiently as possible. The whistleblower will be informed of the current status of the investigation and the remedial action taken upon completion of the investigation, but no later than three months after the whistleblower submits the report.

The effectiveness of the procedure described is reviewed annually and on an ad hoc basis. If necessary, DAW will make appropriate adjustments and changes with regard to accessibility and the whistleblowing process. Feedback from whistleblowers is also welcome for this purpose.

## **Contact persons for the complaints procedure**

The Governance & Compliance department is centrally responsible for our complaints procedure. Questions and comments on the complaints procedure can be submitted at [compliance@daw.de](mailto:compliance@daw.de).

## **Protection from disadvantage or punishment**

We do not tolerate reprisals in the sense of retaliation, discrimination and disciplinary measures in our company against a person who has made a whistleblowing in good faith. We consider reprisals against whistleblowers to be a compliance violation that will also be sanctioned. If necessary, we will take interim measures to protect the whistleblower during the investigation.

We expect the same from our suppliers with regard to external whistleblowers. We have formulated corresponding expectations in the Supplier Code of Conduct.

## **Documentation and publication**

DAW regularly publishes information on the number of complaints received regarding human rights or environment-related risks and violations of human rights-related or environment-related obligations, as well as the conclusions drawn from the notices. Publication always takes place in anonymized form.