

Code of Conduct

DFGE – Institute for Energy, Ecology and Economy

DFGE – Institute for Energy, Ecology and Economy GmbH

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www.dfge.de

DFGE Code of Conduct			
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Preamble

Founded in 1999 as a spin-off of the technical University of Munich, the DFGE – Institute for Energy, Ecology and Economy provides consulting services in the field of sustainability. Our offer Sustainability Intelligence featuring calculation management, reporting solutions and strategy development aims at bundling the effort of taking part in several sustainability/CSR standards and rankings like CDP, UNGC, DJSI, EcoVadis or GRI as well as building overarching strategies, such as a sustainability strategy according to the SDGs. As the unique partner of the CDP for SBTs, DFGE provides its customers with comprehensive advice on climate strategy and helps them to operate climate-neutrally at product level or company-wide. To enable a future AI-based CSR management, DFGE researches in big data approach and machine learning. Our clients comprise international companies (DAX and fortune 500), SMEs, governmental organizations or territorial authorities.

Responsibilities: the CEO of the company is responsible for this policy.

1) Labour Practices

As a service provider company, our workforce is our greatest asset. We intend to provide a nice workplace where employees can thrive.

- DFGE provides its employees with decent working conditions with proper working hours and compensation, which are regulated through our employee handbook.
- DFGE has at heart to focus on the development of its employee through career management.
- DFGE acknowledges the right to social dialogue and collective bargaining. Social dialogue is considered as all types of negotiation, consultation or exchange of information between or among representatives of governments, employers and workers, on matters of common interest relating to economic and social concerns. (ISO 26 000)

2) Health and Safety

As a service provider we do not operate any form of machinery, nor do we perform work that would require any form of protective equipment (for instance handling of chemicals or hazardous substances). However, we guarantee appropriate measures in all areas that apply to us.

- DFGE ensures safety of their employees in case of emergencies. Instructions are always specified and accessible through our employee handbook.
- DFGE ensures appropriate measures regarding fire prevention. Besides fulfilling all official requirements concerning fire protection for all our office locations we conduct yearly fire-safety trainings (including fire drills) to ensure correct behaviour in the event of a fire.

DFGE promotes a healthy and safe workplace. More precisely, DFGE wants to reduce stress and noise to which the employees are exposed, as well as avoiding repetitive strain injuries. In this sense, DFGE commits to implement preventive measures, like providing high quality office equipment (chairs, desks, screens, mouses etc.) or regular common events under the motto “fun at work”.

At DFGE the national regulations, laws and regulations applicable to fire protection are observed. Appropriate fire protection devices, such as fire extinguishers, fire alarms, are installed at our locations in Munich and Greifenberg and are reliably maintained in accordance with the regulations. In addition, there are a corresponding number of emergency exits in all buildings, and escape routes are marked accordingly.

At DFGE we achieve protection through preventive measures. This includes clear work instructions and regulations for accident prevention. The DFGE commits to regularly review the procedures for emergency preparedness and hazard prevention and, if necessary, to adapt them, particularly after accidents or emergencies.

Accidents at work should be reported as soon as possible, but no later than within three working days. Accidents at work are reported to the responsible trade association. Accident reports must include the course of the accident, the consequences of the accident and the measures taken to avoid similar accidents in the future. Implementation will take place as soon as possible.

3) Human Rights

The risks for breaches of human rights were assessed as limited since DFGE is settled in Germany, where laws are enforced to protect human rights, and since DFGE is not a production company relying on a global supply chain subject to such risks. However, DFGE can influence customers. In this sense, DFGE highly promotes recognized standards such as UNGC or EcoVadis and encourage customers to take part in such schemes to minimize their risks. As far as DFGE is concerned, the following principles apply:

- Discrimination. E.g., any distinction, exclusion or preference that has the effect of nullifying equality of treatment or opportunity based on illegitimate grounds (like gender, marital status etc.), is prohibited. DFGE promotes diversity and equal opportunities.
- Violations of fundamentals human rights is prohibited
- Any form of violence and harassment is forbidden. Workplace violence is defined by the ILO as homicide, assault, threats, mobbing and bullying on the job as forms of violence at work
- DFGE condemns any form of child labour and does not employ young people under the legal age of the respective national law.
- DFGE condemns any form of slavery, servitude and forced or compulsory labour and human trafficking. All of our employees are free to choose their workplace and can actively terminate their employment within the frame, stipulated by the individual contracts.

4) Environment

DFGE, as any organization, can have positive impact and manage negative impacts on the environments. DFGE's impacts are mainly linked to office use (energy consumption and waste) and to employees' mobility (commuting and business travel). By the nature of our business, pollution of air or soil, e. g. through improper handling of chemicals, has been assessed being not relevant.

- DFGE wants to curb climate change, by assessing its carbon footprint and implement emission reduction initiatives. DFGE reduces the amount of unnecessary business travel by replacing it by web meetings or by coupling several meetings.
- DFGE commits to sustainability manage resources by sorting out waste properly, buying eco-efficient equipment whenever possible, or labelled products like FSC as well as using water responsibly.
- DFGE promotes sustainability to its customers. More precisely, DFGE encourages them to commit to internationally recognized standards (ex: United Nations Global Compact), as well as set up targets (ex: science-based targets), to implement actions to reduce their environmental and social impacts, to monitor such impacts by using calculations (ex: carbon footprint) and to report them through public reports or dedicated questionnaires and platforms (ex: CDP, EcoVadis). DFGE provides services to support customers in this sense with its Sustainability Intelligence offer and highly promotes Carbon neutrality.

5) Ethics

DFGE is subject to potential corruption risks like any organization making business. In any case, DFGE wishes to be fair and comply with the law. In this sense, the following principles are established:

- DFGE prohibits the use of any corruption practice such money-laundering, embezzlement, fraud, bribery... Corruption is defined “as the abuse of entrusted power for private gain.” (Transparency international). Conflicts of interest, e.g. situations where an individual or the entity for which they work, is confronted with choosing between the duties and demands of their position and their own private interests (Transparency International) are also prohibited
- DFGE commits to respect the competitive framework and not resort to any anticompetitive practices such bid-rigging, price fixing, dumping, coercive monopoly, product tying, dividing territories”.
- DFGE commits to respect the GDPR and all related laws in terms of data security. Employees are trained on a yearly basis and DFGE employee handbook clearly defines roles and responsibilities to ensure data security and confidentiality, as well as fixed rules for the disclosure of information and protection of intellectual property.

Any employee breaching the code of conduct will be exposed to sanctions. Employees can directly report such breaches to the management, anonymously, through our channel available at our contact page on the website <https://dfge.de/en/contact/>. There is a strict non-retaliation policy.

This policy will be reviewed every year, during the CSR report publication.

Greifenberg/Munich, January 2023



Dr.-Ing. Thomas Fleissner
CEO/Managing Director