



Ch. Dahlinger

## Communication on Progress of Ch. Dahlinger GmbH & Co KG to the Global Compact of the United Nations, Lahr, Germany – December 2021

Ch. Dahlinger GmbH & Co KG (CHD) is one of the leading manufacturers of high-quality packaging and display products for jewellery, watches, writing instruments, spirits, champagnes, and other luxury items. Since 1871 CHD has been renowned for its very high quality and innovative products made of cardboard, plastic, and wood.

CHD has always attached great importance to social and environmental responsibility. We documented this by joining the United Nations Global Compact on 13 June 2005. The ten principles of the Global Compact cover human rights, health and safety standards, environmental protection and anti-corruption are recognised and applied by our management and staff. Consideration is given to observance of these principles – now in their sixteenth year – whenever we make decisions and take actions impacting on the present and future.

The principles are part of the corporate guidelines (attachment 1), the supplier code (attachment 2) and all contracts that CHD negotiates with its main suppliers. These principles are made accessible to business partners and the importance of compliance with them is emphasized. Since 2012, 6 major suppliers receive a questionnaire on compliance with the 10 principles. This year we have added another production partner, who has become more and more a main production partner over the last few years. The complete questionnaire can be found in attachment 3. The answers of our production partner companies are summarised in attachment 4 in a shortened form and the changes for the year 2019 are highlighted.

In 2016 our main partners were audited according to Sedex SMETA 4. Meanwhile, three of our main partners are ISO 9001 certified. Another main partner is still in the planning stage for certification. Many of our new partners are also ISO 9001, ISO 14001, SA8000 and BSCI certified. This is becoming more and more important today. We have therefore decided to have our main production partners audited every 2 years according to SMETA 4 Pillar.

The compliance with principles 1 and 2 in the area of human rights ("**Businesses should support and respect the protection of internationally pro-claimed human rights; and make sure that they are not complicit in human rights abuses.**") is specified in the corporate guidelines and the supplier code and insisted that this must be in accordance with the General Declaration of the United Nations as well as the OECD Guidelines for Multinational Corporations.

Principle 3 ("**Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining**") is contained in point 5 of the Supplier Code. This point stipulates that employees must be protected from any treatment aimed against the freedom of association.



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Principle 4, ("**the elimination of all forms of forced and compulsory labour**"), is part of point 6 of the Supplier Code. In this point, we state that we will not tolerate any form of forced or compulsory labour, bonded labour, serfdom, slave labour or conditions similar to slavery.

CHD continues to monitor and conduct regular checks on principle 5 ("**the effective abolition of child labour**"). Especially in Southeast Asian countries, employees' passports are regularly checked. If only vague suspicion of child labour occurs, the existing business relationships are discontinued, or new business relationships are not even initiated. Detailed instructions for abolition of child labour are to be found in point 3 of the Supplier Code. As well as the required self-monitoring, our partner companies are visited several times a year by the management and employees of CHD Germany and regularly by employees of our subsidiary CHD China in order to check the requirements.

All of our current suppliers have been advised that any violation of the principles 4 and 5 of the Global Compact will result in immediate termination of the business relationship.

Principle 6 ("**the elimination of discrimination in respect of employment and occupation**") is set out in point 4 of the Supplier Code. In particular, this prohibits any differentiation, exclusion or preference based on race, caste, skin colour, sex, age, religion, political opinion, membership of a workers' organisation, physical or mental disability, ethnic, national or social background, nationality, sexual orientation or other personal traits.

Over 20 million product units are manufactured annually at CHD. They, mainly packaging and displays, are made of cardboard, plastics, and wood, and are coated with wide variety of materials. By using the resources responsibly, CHD has a strong influence on environmental protection.

In order to comply with Principle 8 ("**undertake initiatives to promote greater environmental responsibility**"), our Chinese partner companies communicate the principles of the Global Compact to their employees and achieve understanding of them by setting up information boards. In 2019 we have already noticed the increasing demand from customers for materials from sustainable forestry, especially in the area of high-quality lacquered wooden packaging.

In order to meet the demand, but also and above all to meet our own sustainability requirements, CHD was certified according to FSC for the first time in November 2019 and successfully passed the re-audit this year. The relevant main production partners are also FSC certified for various product groups. Thus, we have created the possibility to fulfil customer requirements in this area even better in the following years. Currently, a new production partner is undergoing the initial certification for FSC to become an even more attractive partner for us as Ch. Dahlinger. When sourcing new suppliers, great importance is attached to an existing FSC certification or at least the willingness to be certified according to FSC.

In the past year 2021, it was determined that it should be standard that all products, if possible, are requested and also manufactured with FSC-certified materials, unless the customer explicitly requests this. However, this requirement was not always possible due to the shortage of materials and the enormous increase in the price of raw materials and transport costs. In addition to the use of FSC-certified materials, recycled plastics are also being used increasingly.



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In order to not only positively influence and support the health of CHD employees, but also to increase the sense of responsibility for the environment, the job bike system was introduced at CHD 2020. Here, every employee has the opportunity to lease a bicycle of choice. This is being increasingly accepted by the employees. The job bike is supported on the one hand by CHD and on the other hand by tax advantages.

In correlation with the corona crisis, CHD has made several changes which have a positive impact on the company's carbon footprint:

- Implementation of Home Office. Each employee was provided with their own laptops, monitors as well as keyboard, mouse, and headset. Next steps towards digital work.
- Online meetings internally, as well as with our customers and production partners

CHD is very forward-looking in its response to the Corona crisis also in this year. The central aim is to get through and overcome this crisis together, so that the existing know-how is retained by the company. This does not only refer to the employees, but also to the production partners and customers, who are regularly informed about the current situation based on our Business Continuity Plan. In case of problems, solutions are commonly discussed and sought.

To better recognise the possible additional potential with regard to sustainability and sustainable development at CHD, CHD has elaborated this topic in cooperation with a Master student. The Master's thesis was completed at the beginning of 2021. In order to implement the resulting measures, which represent the essential requirements of all CHD stakeholders, as well as possible, a CSR team was set up internally at CHD.

Here, the catalogue of measures is constantly worked through and supplemented with new ideas. This creates interactive action and encourages everyone to think and act sustainably.

The following topics have already been implemented this year:

- Waste separation: more information and transparency on the topic of waste separation
- Paper consumption: analysis of existing "paper guzzlers" and, if necessary, revision or digitalisation of various internal processes.
- Drinking water dispensers instead of plastic bottles for employees

For the coming year, topics such as more transparent communication with regard to the results of the CSR team and occupational health management, in particular a healthier lunch break, are planned.

The "Innovation Work Group" was launched in 2007 in order to ensure strong compliance with Principle 9 ("**Promote the development and expansion of environmentally friendly technologies**"). At this working group, employees from different departments exchange ideas to find new sustainable, environmentally friendly, and resource-saving materials in combination with new designs. During this year the packaging regulations have been adapted and made more environmentally friendly. Another major topic was the search and development of coating materials made from recycled PET bottles. Furthermore, our suppliers carry out regular lacquering test with water based lacquers in order to reconcile the customer's request for complex, high-quality glossy wooden boxes with a better environmental compatibility. In 2017, we produced a box for a leading watch manufacturer, whose basic body consists of a PP algae composite and



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thus to 30% of renewable raw materials. This year we launched the first sustainable series - Series 137 - in our product retail business. The box is made of FSC-certified materials and the insert is made of natural wool felt laminated onto an FSC-certified cardboard box. In 2018, a lot has happened in the area of increasing efficiency and saving resources in processing, especially in the lacquering of wooden products. Increasing automation ensures higher precision in production, better material flows and lower material consumption. Three suppliers have purchased CNC-controlled robots for gluing. Our main suppliers of wooden boxes have massively reduced emissions from his paint shops' emission by installing activated carbon filters for air cleaning. This installation exceeds national requirements and is orientated towards a high international standard. In addition to the installation of an activated carbon filter, the carpentry department was equipped with a dust extraction system. This collects the wood dust, so that it can be recycled.

In order to take further account of our responsibility with regard to sustainability, we have introduced the Dahlinger Eco Friendly Label for selected products with the presentation of our new 2021 product range catalogue. As part of our responsibility for the environment, we use materials that are renewable or recycled and thus conserve resources as far as possible in the manufacture of our cases and boxes. As an example, wood and wood-based materials are renewable, can be easily recycled and are biodegradable. Depending on the product, the proportion of old fibres, i.e. fibres that have been recycled, is up to 80%. Furthermore, CO2 is reduced through sustainable forest management.

Besides the positive impact these activities have on the environment, they also lead to better and safer jobs.

The importance of environmental protection and environmentally friendly technologies of Principles 8 and 9 is consolidated in the CHD Group's Corporate Guidelines in attachment 1. This is explicitly referred to in point 2, "Our vision", point 5, "Products and services", and point 8, "Environment and sustainability", hereafter.



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*"- Our products and processes should be environmentally sound and make efficient use of resources  
- Wherever possible, we use recycled or environmentally friendly materials  
- We want to make an active contribution to protecting and improving our environment.  
- Through our actions we want to show that economics and ecology don't have to be mutually exclusive."*

REACH, a chemical regulation authority, has officially been in effect since 1 July 2007. REACH stands for Registration, Evaluation (rating), authorisation (approval) and restrictions of chemicals (substances). Since CHD is neither a manufacturer nor importer of chemicals, we merely considered as downstream users and are therefore only affected to a limited extent.

In the last year the quality control of used materials and finished products on-site in China has continued a very advanced level. The staff at our CHD-China service office is still at the high level of ten persons. We carry out tests on SVHC (Substances of Very High Concern) according to the current version of REACH on a regular basis at accredited laboratories in China and Germany.

We also place a strong emphasis on the clean environment of our Asian production partners. We see this as beneficial to the product quality as well as immensely important for the well-being of the workers. As a result, all rooms that are connected to the production are equipped with modern sanitary facilities and hot water.

In order to provide for principle 10, ("**Businesses should work against all forms of corruption, including extortion and bribery**"), point 14, "Bribery and corruption", in the CHD Group supplier code stipulates that no form of bribery or corruption is tolerated by the CHD Group.

Bernd Dahlinger  
Managing Partner

Valerio d'Adamo  
Managing Director



## **Preliminary note**

These guidelines detail our principles and the general rules which govern how we work. They apply to all companies within the Ch. Dahlinger Group.

## **1. The company**

The company was founded on 6 July 1871 as "Cartonnage & Etais Fabrik CH. DAHLINGER" by Christian Dahlinger in Lahr/Baden, Germany.

Today the company is in the hands of the 5th generation of his descendants, Bernd and Christian Dahlinger.

We produce and market innovative packaging products, displays and storage/presentation systems for luxury goods such as watches, jewellery, writing utensils and alcoholic spirits. We have both industrial and retail customers.

As a family-run business with an international focus, we work towards the requirements of an ever changing global market.

The group of companies includes two legally separate businesses in Hong Kong and Guangzhou/China.

## **2. Our vision**

We design and develop high-quality packaging and display solutions for industry and trade within the luxury and lifestyle sector. For our partners in the retail watch & jewellery trade we have an attractive collection of packaging, decorations, storage/presentation systems and organisational aids. The packaging products can be individually embossed as advertising for our customers.

We recognise, inspire and satisfy customer requirements. We create innovative, individual solutions which are cutting-edge in terms of their design, function, quality and service.

We rely on the skills, commitment and creativity of our staff and progressive and environmentally sound technologies to remain one step ahead of the competition and be the most attractive provider anywhere in the world.

## **3. Customers**

Satisfied and impressed customers are the measure of our success and are crucial to our future. We achieve customer satisfaction by:

- developing trusting partnerships
- being obliging and helpful
- developing solutions to real problems
- continually sharing our experiences with customers
- providing reliable and faultless deliveries and competent service



## 4. Employees

The skills, commitment, creativity and integrity of our employees of various nationalities are the most important element of our success. We help our employees to develop their skills through training, provide them with a safe working environment and offer them a fair, performance-related remuneration package.

We motivate our employees by

- trusting them – we believe in monitoring but believe that trust is a better approach
- treating them fairly, never hiding anything from them and listening to them
- being tolerant of mistakes and promoting independent entrepreneurial actions by giving them authority and responsibility
- managing them with a focus on targets and recognising outstanding work
- assisting with career progression
- deploying them in areas where their strengths lie
- creating a working environment conducive to innovation
- engaging in ethical business conduct
- preventing discrimination

In return we expect:

- commitment and enthusiasm
- friendly and fair interactions where employees talk to one another rather than behind one another's backs
- integrity, openness and courage to stand up for convictions
- entrepreneurial thoughts and actions in everything they do
- customer focus

We have a respectful and constructive working relationship with our Works Council.

## 5. Products and services

Our products and services should:

- inspire and satisfy customer requirements
- satisfy high aesthetic standards and trigger positive emotions
- provide our customers with benefits
- satisfy very high quality standards
- be easy to use
- be competitive and always be one step ahead of the competition.

We require our products to be environmentally sound.





## **6. Quality**

Our claim to be a quality leader means that we offer very high levels of dedication and commitment. This applies from the first to the last point of contact with customers and partners. "Made by Ch. Dahlinger" is synonymous with:

- innovative and attractive products
- outstanding product quality
- durability
- functionality

We want satisfied customers who can rely on our quality.

## **7. Competitors**

- We see competitors as a challenge and stimulus to achieve the very best.
- We strive for fair competition.
- We respect their intellectual property.
- We enter into sporting competition with them.

## **8. Environment and sustainability**

- Our products and processes should be environmentally sound and make efficient use of resources.
- Wherever possible, we use recycled or environmentally friendly materials.
- We want to make an active contribution to protecting and improving our environment.
- Through our actions we want to show that economics and ecology don't have to be mutually exclusive.

## **9. Suppliers, creditors and partners**

- Our relations are based on mutual respect and trust.
- We strive for reliable long-term relations.
- We evaluate the performance of our suppliers and creditors using strict, but fair benchmarks.
- We include our suppliers in product development and problem-solving at an early stage.
- The principal requirements of our suppliers are laid down in a separate supplier code.
- We procure items from all over the world.
- We want to work with a small number of financial partners and enjoy a trusting, open partnership with them.





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## **10. The public**

- We promote open and trusting relations with the public.
- We support the peaceful existence, diversity and social integration of people and respect other cultures.
- Wherever possible we voluntarily work towards the good of everyone.

## **11. Shareholders**

We honour the trust of our shareholders by

- running the Ch. Dahlinger group with high ethical standards, working on a professional, committed and responsible basis
- making careful use of the shareholders' capital made available to us
- achieving sustainable profits and increases in value
- recognising opportunities but avoiding risks that endanger our continued existence
- We expect our shareholders to promote the further development of the group of companies.

Dated: December 2014

Ch. Dahlinger GmbH & Co KG



## **Supplier code**

We - the Dahlinger Group - believe that social commitment, environmental considerations and fairness are essential to our business. The Ch. Dahlinger Group aims to reconcile economic, ecological and social responsibility in the long term.

The Ch. Dahlinger Group's basic requirements of its suppliers are set out in this code. The principles this code contains are in line with the "Business Social Compliance Initiative" (BSCI), the conventions of the International Labour Organisation (hereinafter referred to as the ILO), the Universal Declaration of Human Rights of the United Nations, the UN Convention on the Rights of the Child, the UN Convention on the Elimination of All Forms of Discrimination against Women, the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises.

The principles laid down in this code should not be viewed as maximum requirements but wherever possible should be exceeded.

## **1. Scope of validity**

This code forms the basis for all business relations relating to national and international production processes and production plants for final processing (hereinafter referred to as "production sites") for goods purchased by the Ch. Dahlinger Group. It applies worldwide to both the Ch. Dahlinger Group itself and the direct business partners of the Ch. Dahlinger Group. It is also applicable to other parties contracted by direct business partners who are involved in producing goods for the Ch. Dahlinger Group (hereinafter referred to as "business partners"). Business partners guarantee to and are responsible for ensuring that they observe the principles contained in this code.

## **2. Compliance with legislation**

The various production sites shall observe the applicable national and international laws and regulations, industrial minimum standards, conventions of the ILO and UN and all other relevant requirements (hereinafter referred to as "standards"). The standards applicable in each case shall be those with the most stringent requirements.

Compliance with this code and the above standards shall not be evaded through contractual agreements or similar measures (e.g. bogus training programmes).

## **3. Child labour / youth employment**

Child labour and any form of exploitation of children will not be tolerated by the Ch. Dahlinger Group.

The minimum age for employment must not be any lower than that at which compulsory education ceases, and must not be less than 15 years of age in any case. Domestic standards to protect children and youth employees must be observed. The exceptions of the ILO apply.

Compliance with the prohibition of child labour and limitation of youth employment must be ensured. In particular, young people must not be exposed to dangerous or unsafe situations or situations in which their health is put at risk. Should this ban on child labour be violated, the business partner must immediately initiate appropriate remedial measures for the children and young people. These measures must be documented. Measures and actions must also be taken to provide



for the rehabilitation and social integration of the children affected and to enable them to complete their school education in line with domestic standards.

*This is in line with ILO conventions 79, 138, 142 and 182 and ILO recommendation 146.*

#### **4. Discrimination**

Any form of discrimination during recruitment and employment is prohibited.

This applies in particular to any differentiation, exclusion or preference based on race, caste, skin colour, sex, age, profession of faith, political opinion, membership of a workers' organisation, physical or mental disability, ethnic, national or social background, nationality, sexual orientation or other personal traits. It applies regardless of whether the differentiation, exclusion or preference was dictated by the business partner or not.

*This is in line with ILO conventions 100, 111, 143, 158 and 159.*

#### **5. Freedom of association and the right to collective bargaining**

Employees must be protected from any discriminatory treatment in relation to their employment and which prevents the freedom of association. Their right to establish, join, leave and actively work for associations or organisations of their choice to promote and protect employees' interests must be respected. This must not restrict them in their employment activities.

Should domestic standards limit freedom of association and the right to collective bargaining, employees must be enabled and permitted to at least freely and independently come together for the purpose of negotiation.

*This is in line with ILO conventions 87, 98, 135 and 154 and ILO recommendation 143.*

#### **6. Enforced labour**

All forms of enforced and compulsory labour, bonded labour, serfdom, slave labour or conditions similar to slavery are not tolerated by the Ch. Dahlinger Group. Any form of prison labour is rejected. No employee may be directly or indirectly forced to work through violence and/or intimidation. Employees may only be employed if they voluntarily make themselves available for work.

*This is in line with ILO conventions 29 and 105.*

#### **7. Disciplinary measures**

All employees must be treated with dignity and respect. Sanctions, penalties, other fines or disciplinary measures may only be used in harmony with the applicable national and international standards and internationally recognised human rights. No employee may be subjected to verbal, psychological, physical, sexual and/or bodily violence, coercion or harassment.



## 8. Working hours

Working hours must correspond to the applicable law, industrial standards or relevant ILO conventions, depending on which is the most stringent. The maximum permissible weekly working hours laid down in national legislation apply. However, these must not regularly exceed 48 hours, or 60 hours including overtime. Furthermore, the applicable national and international standards, especially the exceptions of the ILO, apply to individual trades and forms of employment, and instances of serious disruption to regular operation.

After six consecutive days of work, the employee is entitled to at least one day off. Overtime must be paid separately according to domestic standards. Overtime must be worked on a voluntary basis.

*This is in line with ILO conventions 1 and 14.*

## 9. Documentation of employment relationship

The business partners guarantee to document in writing the conditions of work (e.g. start and length of employment, working hours, wage and benefits) of their employees in relation to the production phases directly affecting them. The name, date and place of birth, and wherever possible the home address of the employee must be recorded.

Direct business partners also guarantee the appropriate documentation of other agents contracted by them.

Evasion of applicable domestic labour and social security standards is prohibited.

## 10. Remuneration

The business partners guarantee that the wage paid to employees is at least the minimum wage required by law or normally prescribed within the industry, whichever is the higher of the two. The wage paid should suffice to cover employees' basic needs.

Illegal and unjustified deductions from wages, especially in the form of direct or indirect disciplinary measures, are prohibited. The wage must be paid in a manner practical for the employee (e.g. in cash, by cheque or by bank transfer). The employees must be regularly provided with fully comprehensible details of the breakdown of their remuneration.

*This is in line with ILO conventions 26 and 131.*

## 11. Health & safety

The business partners must ensure a healthy and safe working environment.

They must take the necessary measures to prevent accidents and harm to health which may result from employment. To this end, the business partners shall put in place systems to uncover and avoid or respond to potential risks to the health and safety of their employees. They also ensure that employees are regularly informed and trained in applicable health and safety standards and safety measures. The business partner must document this.

Clean toilets and access to sufficient quantities of drinking water must be provided. If sleeping areas are provided, these must be clean and safe and meet basic requirements.

*This is in line with ILO convention 155.*



## **12. Environmental protection**

Environmental protection is an integral element of business practice at the Ch. Dahlinger Group. Business partners must comply with the relevant applicable environmental standards. They are also required to continuously work towards avoiding and reducing damage to the environment wherever possible. Applicable procedures and standards for waste management, handling chemicals and other hazardous substances and their disposal as well as emissions and wastewater treatment must be observed. Particular consideration must be given to protecting and preserving natural resources, and environmentally sound and socially acceptable production should be promoted.

## **13. Information / communication**

This code must be visibly displayed in at least the relevant national language and in a place freely accessible to all the business partner's employees. If employees are illiterate, the code must be explained verbally.

## **14. Bribery and corruption**

Any form of bribery or corruption is not tolerated by the Ch. Dahlinger Group. All business partners and their employees must behave in a manner which does not result in personal dependency, obligation or influence. Everyone is expected to display business conduct based on fairness and observance of the applicable national and international standards. The business partner shall furthermore introduce an anti-bribery and anti-corruption policy for all areas of its business. If gifts are considered a custom and courtesy in some countries, care must be taken to ensure that they do not result in relationships of dependency and obligation and that the applicable national standards are observed.

Information relating to corrupt behaviour should be reported to the Ch. Dahlinger Group (management) (see Item 18).

## **15. Management systems**

Business partners shall introduce a management system to implement, observe and audit the principles drawn up on the basis of this code. The management system must include clear areas of responsibility and procedures as well as appropriate documentation. The documentation, implementation, observance and continuous improvement of the principles based on this code must be checked on a regular basis. Such checks must be documented. The direct business partner shall ensure that any other agents contracted by it observe the principles based on this code.

## **16. Monitoring the code**

It is the responsibility of the Ch. Dahlinger Group to advocate assurance of the principles of this code. To this end, if requested by the Ch. Dahlinger Group, business partners are obliged to allow a social audit to be conducted at their production sites.

The direct business partner guarantees that the Ch. Dahlinger Group itself or a third party authorised by the group may if necessary check compliance with the principles laid down according to this code by the direct agent or any other agent he uses. He shall provide the appropriate details of the production sites.



## **17. Sanctions and remedial measures**

The Ch. Dahlinger Group is entitled to monitor the principles laid down according to this code. Should it find that they are not being observed, the business partner is obliged to immediately initiate corresponding remedial measures. Both sufficient time and the support of the Ch. Dahlinger Group shall be provided for the remedial measures.

The right of the Ch. Dahlinger Group to terminate commercial relations with the business partner is not limited by this provision, regardless of whether the direct business partner itself or the agent appointed by him infringes the principles laid down according to this code.

## **18. Complaints procedure**

Complaints or reports of violations of this code can be sent to the Ch. Dahlinger Group at any time. These may also be made in an anonymous form and should be addressed to the following contact:

Anyone reporting such complaints or information must do so in good faith and must be sure that his or her facts are correct.

All business partners guarantee not to initiate discriminatory measures or disciplinary measures against such persons.

Dated: February 2012

Ch. Dahlinger GmbH & Co KG

### **Contact person:**

Ch. Dahlinger GmbH & Co.KG

- Management -

Mr Bernd Dahlinger

Feuerwehrstraße 9-15

77933 Lahr

Germany

E-Mail: [bernd.dahlinger@dahlinger.com](mailto:bernd.dahlinger@dahlinger.com)

Tel. +49 7821 289-105

Fax +49 7821 289-107

# Attachment 3

## to Communication On Progress 2021

Since 2012 all of our suppliers receive a questionnaire regarding the compliance with the 10 principles. This is the complete questionnaire.

**Company Name**  
**Date**

|  |
|--|
|  |
|  |

Dear Key Partner,  
Ch. Dahlinger has adhered to the Global Compact and is using its principles as guidelines. The UN Global Compact's principles include areas of human rights, labour, the environment and anti-corruption. We kindly ask you to check and fill in this questionnaire.

### Human Rights

#### Principle 1

Business should support and respect the protection of internationally proclaimed human rights;

#### Principle 2

and make sure that they are not complicit in human right abuses.

### Labour

#### Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

#### Principle 4

the elimination of all forms of forced and compulsory labour;

#### Principle 5

the effective abolition of child labour;

#### Principle 6

the elimination of discrimination in respect of employment and occupation.

Does the company ensure that its workers are afforded safe, suitable and sanitary work facilities?

Comments

|  |
|--|
|  |
|--|

|            |                          |
|------------|--------------------------|
| yes        | <input type="checkbox"/> |
| no         | <input type="checkbox"/> |
| in process | <input type="checkbox"/> |

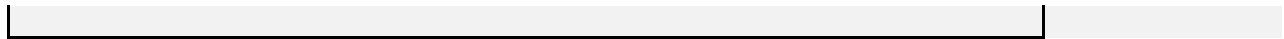
Does the company supply its employees with the protective equipment and training necessary to perform their tasks safely?

Comments

|  |
|--|
|  |
|--|

|            |                          |
|------------|--------------------------|
| yes        | <input type="checkbox"/> |
| no         | <input type="checkbox"/> |
| in process | <input type="checkbox"/> |





Does the company ensure that the workweek is limited to 48 hours; that overtime is infrequent and limited; and that employees are given reasonable breaks and rest periods?

Comments

yes  
no  
in process

Does the company provide a living wage that enables workers to meet the basic needs of themselves and their dependents?

Comments

yes  
no  
in process

Does the company grant employees paid holiday leave, sick leave, and parental leave in accordance with international minimum standards?

Comments

yes  
no  
in process

Does the company protect workers from workplace harassment including physical, verbal, sexual, or psychological harassment, abuse, or threats?

Comments

yes  
no  
in process

Does the company respect the privacy of its employees whenever it gathers private information or monitors the workplace?

Comments

yes  
no  
in process

Does the company have a mechanism for hearing, processing, and settling grievances of employees?

Comments

yes  
no  
in process

Does the company have a procedure to assess and address the environmental and social impact of its operations on the human rights of local communities?

Comments

yes  
no  
in process

☐  
☐  
☐

Before buying, renting, acquiring or otherwise accessing land or property, does the company ensure that all affected owners and users of the land or property, have been adequately consulted and compensated?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company take steps to ensure that company security arrangements are in accordance with international human rights principles for law enforcement and the use of force?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company take steps to prevent risks to human rights arising from product defects or improper use or misuse of company products?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company seek to avoid involvement in human rights abuses owing to government or societal practices in its country or countries of operation?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company promote international human rights standards in its interactions with suppliers and business partners?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company recognise the rights of its workers to freedom of association and to bargain collectively?

Comments

yes  
no  
in process

If independent trade unions are either discouraged or not allowed in the area of operation, does the company enable employees to gather independently to discuss work-related problems?

Comments

yes  
no  
in process

Does the company take all necessary measures to ensure that it does not participate in any form of forced or bonded labour?

Comments

yes  
no  
in process

Does the company comply with minimum age standards?

Comments

yes  
no  
in process

Does the company ensure that employment-related decisions are based on relevant and objective criteria?

Comments

yes  
no  
in process

Does the company promote international labour standards in its interactions with suppliers and business partners?

Comments

yes  
no  
in process

Do you have a policy in place that prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation?

Comments

yes  
no  
in process

Are all workers paid at least the minimum legal wage (or industry benchmark standards, if minimum wage does not exist)?

Comments

yes ☐  
no ☐  
in process ☐

Do all employees receive all the benefits they are entitled to under law?

Comments

yes ☐  
no ☐  
in process ☐

Do you operate a formal health and safety management system? A management system is a standard framework such as the "PLAN, DO, CHECK, ACT" cycle, with defined objectives, performance that is measured and reviewed and actions to respond to performance.

Comments

yes ☐  
no ☐  
in process ☐

Do you provide workers with personal protective equipment appropriate for the work they do?

Comments

yes ☐  
no ☐  
in process ☐

Do you have written procedures for each machine or tool giving details of how to use it safely?

Comments

yes ☐  
no ☐  
in process ☐

Do you have a health and safety policy that complies with the law in your country?

Comments

yes ☐  
no ☐  
in process ☐

Do workers receive health and safety training relevant to their job?

Comments

yes ☐  
no ☐  
in process ☐

Do you maintain a record of the national and international health and safety legislation that your business must comply with?

Comments

yes  
no  
in process

☐  
☐  
☐

Do you have a formal fire evacuation procedure?

Comments

yes  
no  
in process

☐  
☐  
☐

Do you have copies of the relevant local regulations on working hours?

Comments

yes  
no  
in process

☐  
☐  
☐

Do you have a formal grievance procedure that allows employees to raise employment issues with management?

Comments

yes  
no  
in process

☐  
☐  
☐

Can you confirm that you ensure the freedom of association and effective recognition of the right of collective bargaining?

Comments

yes  
no  
in process

☐  
☐  
☐

Can you confirm that workers are permitted to join a trade union if they wish?

Comments

yes  
no  
in process

☐  
☐  
☐

Can you confirm that no workers work in excess of 48 hours per week (or 60 hours including overtime) on a regular basis?

Comments

yes  
no  
in process

☐  
☐  
☐

Do workers receive pay slips clearly showing wages, hours worked, piece rate (if applicable) and deductions?

Comments

yes  
no  
in process

☐

☐

☐

Are all workers free to leave your employment at any time, upon giving reasonable notice?

Comments

yes  
no  
in process

☐

☐

☐

Can you confirm that no workers work in excess of 12 hours per day (including overtime) on a regular basis?

Comments

yes  
no  
in process

☐

☐

☐

Can you confirm that you do not use any forms of forced or compulsory labour?

Comments

yes  
no  
in process

☐

☐

☐

Can you confirm that you do not employ any children under 16 years old?

Comments

yes  
no  
in process

☐

☐

☐

Do you have records that specify the date of birth of all workers with a copy of documentary evidence (e.g. ID card, birth certificate, medical certificate)?

Comments

yes  
no  
in process

☐

☐

☐

Can you confirm that no child workers (under 18) perform hazardous jobs or work at night (between 22.00 and 06.00)?

Comments

yes  
no  
in process

☐

☐

☐



Can you confirm that workers receive equal pay for equal work, regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?

Comments

yes ☐  
no ☐  
in process ☐

Can you confirm there is no discrimination in the recruitment process on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?

Comments

yes ☐  
no ☐  
in process ☐

## Environment

### Principle 7

Businesses should support a precautionary approach to environmental challenges;

### Principle 8

undertake initiatives to promote greater environmental responsibility; and

### Principle 9

encourage the development and diffusion of environmentally friendly technologies.

Do you carry out your activities in accordance with international/national laws and regulations relating to the protection of the environment?

Comments

yes ☐  
no ☐  
in process ☐

Do you have a documented environmental policy signed off by a senior director or executive?

Comments

yes ☐  
no ☐  
in process ☐

Do you operate a formal environmental management system? A management system is a standard framework such as the "PLAN, DO, CHECK, ACT" cycle, with defined objectives, performance that is measured and reviewed and actions to respond to performance.

Comments

yes ☐  
no ☐  
in process ☐

Do you maintain a record of the national and international environmental legislation that your business must comply with?

Comments

yes  
no  
in process

☐  
☐  
☐

Do you monitor your environmental performance? (For example do you collect statistics on areas such as energy consumption, waste disposal, recycling, discharges and emissions of pollutants? Do you measure your performance against any improvement targets you have set?)

Comments

yes  
no  
in process

☐  
☐  
☐

Do you have a programme of environmental initiatives intended to improve your environmental performance?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company comply with all relevant environmental legislation?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company manage environmental issues to ensure appropriate and continuous improvements?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company assess and address environmental impacts of its operations before these operations start?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company have emergency procedures in place to effectively prevent and address industrial accidents affecting the environment and human health?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company promote international environmental standards in its interactions with suppliers and business partners?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company support a precautionary approach to environmental challenges?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company take measures to reduce energy consumption and emissions of greenhouse gases?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company take measures to reduce water consumption?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company prevent, reduce and treat waste water discharges?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company take measures to reduce the production of waste and ensure responsible waste management?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company prevent, reduce and treat air emissions?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company prevent and minimise impacts on the surrounding environment from noise, odour, light and vibrations?

Comments

yes ☐  
no ☐  
in process ☐

Does the company minimise the use of chemicals and other dangerous substances and ensure safe handling and storage?

Comments

yes ☐  
no ☐  
in process ☐

Does the company remedy soil and water contamination at the site and the surroundings?

Comments

yes ☐  
no ☐  
in process ☐

Does the company prevent, minimise and remedy significant impacts on biodiversity?

Comments

yes ☐  
no ☐  
in process ☐

Does the company ensure that natural resources are used in a sustainable manner?

Comments

yes ☐  
no ☐  
in process ☐

Does the company encourage the development and diffusion of environmentally friendly technologies?

Comments

yes ☐  
no ☐  
in process ☐

## Environment

### Principle 10

Business should work against corruption in all its forms, including extortion and bribery.

Do you have a policy or code of conduct in place that prohibits the payment or receipt of unlawful incentives in the course of business?

Comments

yes ☐  
no ☐  
in process ☐

Can you confirm that there are no circumstances where facilitating payments are made in the course of business?

Comments

yes ☐  
no ☐  
in process ☐

Is training provided to employees in relation to your approach to preventing bribery and corruption (e.g. as part of training on your code of conduct)?

Comments

yes ☐  
no ☐  
in process ☐

Do you have a mechanism in place, for employees or other third parties to report incidents of bribery or corruption?

Comments

yes ☐  
no ☐  
in process ☐

Does the company take a clear stand against corruption?

Comments

yes ☐  
no ☐  
in process ☐

Does the company evaluate and assess the risk of corruption when doing business?

Comments

yes ☐  
no ☐  
in process ☐

Does the company ensure that employees know the company's anti-corruption commitment and that relevant persons are properly trained?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company forbid corrupt behaviour and monitor its anti-corruption initiatives?

Comments

yes  
no  
in process

☐  
☐  
☐

Do the company's internal procedures support its anti-corruption commitment?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company's anti-corruption initiative cover agents, intermediaries and consultants?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company promote its anti-corruption commitment in its interactions with suppliers and business partners?

Comments

yes  
no  
in process

☐  
☐  
☐

Does the company take joint actions with others to engage in and promote anti-corruption initiatives and level the playing field?

Comments

yes  
no  
in process

☐  
☐  
☐

1. What are our key supplier do in addition to the China local government requests?
2. What are our key supplier do in addition to do more than REACH?
3. Which kind of training program we and our key partner participate and what are the topics in this training course?
4. How do we sensitizing our own as well as our key partner in regards of
  - a. environment protection
  - b. economical handling of our resources, recycling of raw material
  - c. job safety
  - d. others
5. Use of bio plastic or renewable resources
6. Environment protection with raw material focus
  - a. Will all raw material be recycled?
  - b. Wood dust recycled 100%? How is this done? Which party does support this progress?
  - c. Handling of lacquer and recycling?
  - d. Active carbon filter for spraying room? How often do we exchange the carbon filter? As often as necessary?
  - e. Status of the test with lacquer based on water. Which lacquer could be replaced? How are the tests proceeded? What is the result? What are the next steps?
  - f. Others
7. Any other important point to be reported





## Attachment 4 to Communication On Progress 2021

Questions (from attachment 3) regarding the principles of the UN Global Compact and (abbreviated) responses from our partner companies. Progress compared to 2020 is shown **in green**.

| Questions  | statements suppliers |     |     |     |     |            |     |
|--|----------------------|-----|-----|-----|-----|------------|-----|
|  | AV                   | EA  | OP  | TW  | WS  | TM         | TC  |
| Does the company ensure that its workers are afforded safe, suitable and sanitary work facilities?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company supply its employees with the protective equipment and training necessary to perform their tasks safely?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company ensure that the workweek is limited to 48 hours; that overtime is infrequent and limited; and that employees are given reasonable breaks and rest periods?                                    | yes                  | yes | yes | -   | yes | in process | yes |
| Does the company provide a living wage that enables workers to meet the basic needs of themselves and their dependents?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company grant employees paid holiday leave, sick leave, and parental leave in accordance with international minimum standards?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company protect workers from workplace harassment including physical, verbal, sexual, or psychological harassment, abuse, or threats?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company respect the privacy of its employees whenever it gathers private information or monitors the workplace?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company have a mechanism for hearing, processing, and settling grievances of employees?   | yes                  | yes | -   | yes | yes | yes        | yes |
| Does the company have a procedure to assess and address the environmental and social impact of its operations on the human rights of local communities?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Before buying, renting, acquiring or otherwise accessing land or property, does the company ensure that all affected owners and users of the land or property, have been adequately consulted and compensated? | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company take steps to ensure that company security arrangements are in accordance with international human rights principles for law enforcement and the use of force?                                | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company take steps to prevent risks to human rights arising from product defects or improper use or misuse of company products?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company seek to avoid involvement in human rights abuses owing to government or societal practices in its country or countries of operation?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company promote international human rights standards in its interactions with suppliers and business partners?  | yes                  | yes | yes | yes | yes | in process | yes |
| Does the company recognise the rights of its workers to freedom of association and to bargain collectively?  | yes                  | yes | yes | yes | yes | yes        | yes |
| If independent trade unions are either discouraged or not allowed in the area of operation, does the company enable employees to gather independently to discuss work-related problems?                        | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company take all necessary measures to ensure that it does not participate in any form of forced or bonded labour?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company comply with minimum age standards?  | yes                  | yes | yes | yes | yes | yes        | yes |



| Questions  | statements suppliers |     |     |     |     |            |     |
|--|----------------------|-----|-----|-----|-----|------------|-----|
|  | AV                   | EA  | OP  | TW  | WS  | TM         | TC  |
| Does the company ensure that employment-related decisions are based on relevant and objective criteria?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company promote international labour standards in its interactions with suppliers and business partners?  | yes                  | yes | -   | yes | yes | in process | yes |
| Do you have a policy in place that prohibits physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Are all workers paid at least the minimum legal wage (or industry benchmark standards, if minimum wage does not exist)?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Do all employees receive all the benefits they are entitled to under law?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you operate a formal health and safety management system? A management system is a standard framework such as the "PLAN, DO, CHECK, ACT" cycle, with defined objectives, performance that is measured and reviewed and actions to respond to performance. | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you provide workers with personal protective equipment appropriate for the work they do?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you have written procedures for each machine or tool giving details of how to use it safely?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you have a health and safety policy that complies with the law in your country?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Do workers receive health and safety training relevant to their job?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you maintain a record of the national and international health and safety legislation that your business must comply with?  | yes                  | yes | yes | yes | yes | in process | yes |
| Do you have a formal fire evacuation procedure?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you have copies of the relevant local regulations on working hours?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you have a formal grievance procedure that allows employees to raise employment issues with management?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Can you confirm that you ensure the freedom of association and effective recognition of the right of collective bargaining?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Can you confirm that workers are permitted to join a trade union if they wish?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Can you confirm that - workers work in excess of 48 hours per week (or 60 hours including overtime) on a regular basis?  | yes                  | yes | yes | yes | yes | in process | yes |
| Do workers receive pay slips clearly showing wages, hours worked, piece rate (if applicable) and deductions?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Are all workers free to leave your employment at any time, upon giving reasonable notice?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Can you confirm that - workers work in excess of 12 hours per day (including overtime) on a regular basis?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Can you confirm that you do not use any forms of forced or compulsory labour?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Can you confirm that you do not employ any children under 16 years old?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you have records that specify the date of birth of all workers with a copy of documentary evidence (e.g. ID card, birth certificate, medical certificate)   | yes                  | yes | yes | yes | yes | yes        | yes |



| Questions  | statements suppliers |     |     |     |     |            |     |
|--|----------------------|-----|-----|-----|-----|------------|-----|
|  | AV                   | EA  | OP  | TW  | WS  | TM         | TC  |
| Can you confirm that - child workers (under 18) perform hazardous jobs or work at night (between 22.00 and 06.00)?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Can you confirm that workers receive equal pay for equal work, regardless of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Can you confirm there is - discrimination in the recruitment process on the basis of race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you carry out your activities in accordance with international/national laws and regulations relating to the protection of the environment?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you have a documented environmental policy signed off by a senior director or executive?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you operate a formal environmental management system? A management system is a standard framework such as the "PLAN, DO, CHECK, ACT" cycle, with defined objectives, performance that is measured and reviewed and actions to respond to performance.                     | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you maintain a record of the national and international environmental legislation that your business must comply with?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you monitor your environmental performance? (For example do you collect statistics on areas such as energy consumption, waste disposal, recycling, discharges and emissions of pollutants? Do you measure your performance against any improvement targets you have set?) | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you have a programme of environmental initiatives intended to improve your environmental performance?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company comply with all relevant environmental legislation?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company manage environmental issues to ensure appropriate and continuous improvements?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company assess and address environmental impacts of its operations before these operations start?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company have emergency procedures in place to effectively prevent and address industrial accidents affecting the environment and human health?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company promote international environmental standards in its interactions with suppliers and business partners?   | yes                  | yes | yes | yes | yes | in process | yes |
| Does the company support a precautionary approach to environmental challenges?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company take measures to reduce energy consumption and emissions of greenhouse gases?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company take measures to reduce water consumption?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company prevent, reduce and treat waste water discharges?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company take measures to reduce the production of waste and ensure responsible waste management?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company prevent, reduce and treat air emissions?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company prevent and minimise impacts on the surrounding environment from noise, odour, light and vibrations?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company minimise the use of chemicals and other dangerous substances and ensure safe handling and storage?  | yes                  | yes | yes | yes | yes | yes        | yes |



| Questions   | statements suppliers |     |     |     |     |            |     |
|---|----------------------|-----|-----|-----|-----|------------|-----|
|   | AV                   | EA  | OP  | TW  | WS  | TM         | TC  |
| Does the company remedy soil and water contamination at the site and the surroundings?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company prevent, minimise and remedy significant impacts on biodiversity?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company ensure that natural resources are used in a sustainable manner?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company encourage the development and diffusion of environmentally friendly technologies?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Do you have a policy or code of conduct in place that prohibits the payment or receipt of unlawful incentives in the course of business?                | yes                  | yes | yes | yes | yes | yes        | yes |
| Can you confirm that there are - circumstances where facilitating payments are made in the course of business?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Is training provided to employees in relation to your approach to preventing bribery and corruption (e.g. as part of training on your code of conduct)? | yes                  | yes | -   | yes | yes | yes        | yes |
| Do you have a mechanism in place, for employees or other third parties to report incidents of bribery or corruption?                                    | yes                  | yes | -   | yes | yes | yes        | yes |
| Does the company take a clear stand against corruption?   | yes                  | yes | -   | yes | yes | yes        | yes |
| Does the company evaluate and assess the risk of corruption when doing business?  | yes                  | yes | -   | yes | yes | yes        | yes |
| Does the company ensure that employees know the company's anti-corruption commitment and that relevant persons are properly trained?                    | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company forbid corrupt behaviour and monitor its anti-corruption initiatives?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Do the company's internal procedures support its anti-corruption commitment?  | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company's anti-corruption initiative cover agents, intermediaries and consultants?   | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company promote its anti-corruption commitment in its interactions with suppliers and business partners?                                       | yes                  | yes | yes | yes | yes | yes        | yes |
| Does the company take joint actions with others to engage in and promote anti-corruption initiatives and level the playing field?                       | yes                  | yes | yes | yes | yes | in process | yes |