

# DOVER GERMANY GMBH

## GERMAN SUPPLY CHAIN DUE DILIGENCE ACT (LKSG) – HUMAN RIGHTS STATEMENT

### Introduction

BlitzRotary GmbH, em-tec GmbH, PSG Germany GmbH, Maag Ettlinger GmbH, Maag Germany GmbH, Reduction Engineering GmbH, Maag Witte GmbH, Markem-Imaje GmbH, and RegO GmbH (Dover German Operating Companies) are directly owned by Dover Germany GmbH. Dover Germany GmbH is a corporation organized under the laws of Germany and is an indirect entity of Dover Corporation. Dover Corporation is a diversified global manufacturer that delivers innovative equipment and components, consumable supplies, aftermarket parts, software and digital solutions and support services through five operating segments: Engineered Products, Clean Energy & Fueling, Imaging & Identification, Pumps & Process Solutions and Climate & Sustainability Technologies.

Dover Germany GmbH has prepared this policy statement pursuant to Section 6 (2) of the German Act on Corporate Due Diligence Obligations in Supply Chains of July 16 2021 (Lieferkettensorgfaltspflichtengesetz – LkSG) (“the Act”). The purpose of this policy statement is to provide information about how we fulfill our supply chain due diligence obligations related to the human rights and environmental risks covered by the Act.

This policy statement is reviewed at least once a year and on an ad hoc basis and is updated where required.

### Our Commitment to Human Rights and the Environment Throughout Our Supply Chain

We are firmly committed to responsible sourcing throughout our supply chain. We believe that our customers care not only about the value of our products, but also about how those products are produced. To that end, we view human rights and environmental issues in our supply chain as both a business imperative and a sustainability priority. We have implemented procedures and preventative measures to help identify and manage potential risks and have established standards for our suppliers to follow when conducting business with us. (See [Human Rights in the Supply Chain | Dover Corporation](#) for more information.)

### Policies

Dover has several policies to help safeguard human rights and environmental protections and communicate expectations of employees and our direct suppliers on these topics. These policies include:

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- **Dover Code of Conduct** (“Code”) – Applies to all employees regardless of location or position, and covers human rights, harassment and discrimination, safety, environment, anti-retaliation, and employees’ obligation to report concerns ([Dover Code of Conduct | Dover Corporation](#)).
- **Dover Third Party Guidance** – Establishes procedures for due diligence of direct suppliers and screening for compliance risks, including those related to human rights and the environment.

To drive direct supply chain responsibility, including for issues related to human rights and environmental risks, on a global level, Dover expects all of its direct suppliers to comply with our **Supplier Code of Conduct** ("Supplier Code"). The Supplier Code establishes our expectations regarding human rights, environmental issues, workplace standards, and business practices for our suppliers. [See [dover-supplier-code-of-conduct-en.pdf \(dovercorporation.com\)](#)] Additionally, compliance with the Supplier Code is generally included in contracts with direct suppliers and is referred to in the terms and conditions of purchase orders.

Pursuant to the Supplier Code, we expect our direct suppliers to comply with applicable laws and regulations in the countries where they do business, including those related to human rights topics such as equal employment opportunities, discrimination and harassment, freedom of association, child and forced labor, slavery, human trafficking, the environment, and health and safety.

## Governance and Risk Management Framework

Dover’s Environmental, Social, and Governance (ESG) Strategy: Dover’s cross-functional Sustainability Steering Committee was established in 2020 to manage ESG issues. The Committee, comprised of Dover corporate and operating company leaders, has developed strategic goals to address various sustainability topics, including risks covered by the Act related to, Employee Health & Safety and Diversity and Inclusion. For more information about Dover’s ESG Areas of Focus and progress on each, please visit [Sustainability Overview | Dover Corporation](#).

Management of human rights and environmental risks covered by the Act is embedded within Dover’s management processes and applies to both our own business area and our supply chain. Human rights and environmental risks are incorporated into the Dover risk-assessment process, internal controls framework, external policies and procedures (such as the Supplier Code), third party risk management system, and operation of the complaints procedure which allows for employees as well as third parties to report potential human rights and environmental issues.

While all employees are expected to play an active role in monitoring for and addressing human rights and environmental risks, Dover German Operating Companies have taken the additional step of appointing a Human Rights Officer to oversee the human rights risk management program for German entities that are subject to the Act. The Human Rights Officer assists with the annual risk analysis and mitigation of any identified human rights or environmental risks. They also provide reporting to senior management on at least an annual basis that includes

progress on risk reduction and activities related to the prevention or mitigation of any potential violations.

## Approach to Risk Analysis

The risk analysis process is conducted on an annual basis and on an ad-hoc basis in the event of a substantiated violation or change in the company's operations that would materially alter our risk profile. The goal of the risk analysis process is to identify, weigh, and prioritize human rights and environmental risks in our own business operations and within our direct supply chain.

The risk analysis leverages a global harmonized approach and is divided into two steps, the first being the initial risk analysis which uses external data from sources such as the U.S. Department of Labor List of Goods Produced by Child Labor or Forced Labor, the CSR Risk Check, and the Business and Human Rights Resource Centre. Information related to country and industry specific risks, or risks associated with certain categories of goods or services, is used to identify areas of potentially elevated risk in our own operations and in our direct supply chain. This initial risk analysis is used to prioritize our approach to the more detailed part of the risk analysis discussed below.

The second step involves analysis of internal data and discussions with internal subject matter experts. This is a detailed risk analysis of Dover-specific factors such as the nature and scope of our business activities, the likelihood of adverse human rights or environmental impacts occurring within our own operations or direct supply chain, the potential severity of any such impacts if they were to occur, our causal contribution to those impacts (if any), and our ability to influence third parties that may be most directly responsible for adverse impacts. The results allow us to weigh and prioritize the risks identified in the preliminary assessment, identify potential gaps and consider preventative measures.

Results of the annual risk analysis are shared with senior management of the relevant departments.

The risk analysis process identified the following prioritized areas of potential human rights and environmental risk:

- Risks in our own business area associated with use of labor agents in higher risk geographies for recruitment of temporary or agency workers
- Risks related to employee health and safety
- Supply chain risks related to sourcing of electrical components and/or raw materials from higher risk geographies

The results of the risk analysis are evaluated on an ongoing basis and are integrated into the decision-making process to identify priority areas of risk in our own operations as well as which suppliers should undergo additional due diligence steps. The risk analysis also serves as the basis for selecting appropriate preventative or remedial actions in both our own business area and for direct suppliers.

Several of the potential risk areas identified above are inherent to manufacturing operations. However, given the preventative measures described in the following section and risk-mitigation activities already undertaken by the company, we believe the actual residual risk for our business is relatively low, particularly within our own operations.

For example, Dover fully vets direct suppliers through its Dover Third Party Guidance (DoverTPG) program, including labor agents. The DoverTPG program screens for several compliance related risks, including human rights, environmental, or health and safety violations. In select cases, such as in higher risk geographies where human rights risks are more prevalent, labor agents may receive additional scrutiny and site visits and/or audits may be conducted.

When evaluating our human rights and environmental risks, we also take into consideration the concerns received through our global hotline or raised in our interactions with direct suppliers, including in site visits.

For Health & Safety Risks, “Improving Employee Safety and Wellbeing” was identified as one of Dover’s key ESG topics with a goal to reduce the number of total reportable safety incidents by forty percent by 2025. To help reach this goal, the company leverages the “Zero Harm Program” to promote a safe working environment and educate our workforce on safety hazards. Dover’s EHS Leadership Team and EHS Excellence Awards further promote and reward outstanding safety excellence in the workplace. Dover’s enterprise-wide health and safety management technology platform drives greater visibility into health and safety performance and risk identification across our operating companies.

Additionally, we utilize a supplier evaluation scorecard which considers supplier environmental management system certification (e.g., ISO 14001) environmental, health and safety programs, quality (including continuous improvement and Six Sigma), and other practices.

## Preventative Measures

Dover takes a global, company-wide approach to human rights compliance which includes the legal entities in Germany. Dover does not tolerate any form of modern slavery, human trafficking, forced or involuntary labor, child labor, unlawful labor practices, harassment, discrimination, or any other forms of human rights abuses within its own operations and its supply chain.

The Compliance program is led by Dover’s Chief Compliance Officer and a dedicated team of compliance professionals around the world, both at the corporate and operating company level. This team of compliance professionals is supplemented by the Compliance Champion Program, a network of compliance-trained points of contact at facilities around the world, which extends compliance knowledge and reach throughout the organization.

The policies and procedures discussed in this policy statement, including the Code and the Supplier Code, apply to all direct and indirect wholly owned subsidiaries of Dover, including Dover German Operating Companies. Accordingly, Dover German Operating Companies have adopted and rely on the supply chain processes and policies used by Dover globally.

## Training

Another essential aspect of the global compliance program is the training and empowering of compliance personnel and champions at Dover's operating companies and facilities around the world, including the entities that are owned by Dover Germany GmbH. Training activities – including live training, webinar training, and eTraining – can include updates and best practices related to human rights. Dover conducts an annual compliance conference and quarterly meetings with compliance personnel to promote continuous improvement. A champions program is maintained to train and share best practices as well as regional compliance group meetings for localized training of compliance personnel and champions.

In addition, employees are expected to complete a range of compliance training programs, including, but not limited to, mandatory new hire and regular training on the Code, which addresses the need to abide by wage and hour laws in the jurisdictions in which we do business, not tolerating child or forced labor, and refusing to do business with direct suppliers who engage in such practices.

We also provide annual training for employees who have responsibility for supply chain management or directly engage with our suppliers. The training topics include identifying and responding to potential red flags of human rights, environmental, or health and safety concerns. Our supply chain employees are expected to stay vigilant about these issues and report any suspicious activity to management so that it can be promptly addressed.

## Due Diligence

Globally, Dover maintains a comprehensive compliance third party vetting program (DoverTPG) that screens direct suppliers who provide goods and services to Dover and its operating companies, including the legal entities in Germany.

Prior to engaging a direct supplier, and periodically during a relationship with a direct supplier, diligence is conducted to assess their compliance with applicable laws, regulations, and the Supplier Code. As it relates to human rights risk, the program evaluates potential and existing direct suppliers based on factors such as the country and industry in which they operate, and the type of goods or services they provide, to determine the extent of diligence required and ensure it is commensurate with the level of potential risk. Select direct suppliers that are deemed higher risk for human rights or environmental issues are expected to provide additional information about their program for addressing these risks and may be asked to develop a risk mitigation plan if gaps are identified.

The DoverTPG program also provides for rescreening of direct suppliers on a regular cadence in order to monitor for human rights or compliance related events or material changes to a direct supplier's risk profile. We take a risk-based approach, and high-risk direct suppliers are screened more frequently.

The preventative measures listed above are reviewed on at least an annual basis to consider whether those measures are effective. Furthermore, metrics related to the performance of the due diligence program, compliance training program, and the complaints procedure are regularly monitored.

If we become aware of an imminent human rights risk or potential violation, we will take prompt action to prevent or minimize any adverse impacts and we will work with the direct supplier to bring an end to the violation, to the extent possible.

## Complaints Procedure

On a global basis, Dover maintains a Hotline that can be used by any person to report issues or concerns relating to our standard of business ethics and compliance, and can do so anonymously if they so choose, unless prohibited by local law. This hotline is available 24 hours a day, 7 days a week, and in 17 different languages. The availability of the Hotline is communicated to our employees through the Code, live and online training sessions, quarterly compliance newsletters and through posters that are displayed at every Dover facility.

These training and communication tools encourage employees to promptly report concerns including human rights, environmental, and health and safety risks, in addition to other types of misconduct. Any employee or third-party can submit a report to the Dover Hotline related to human rights or environmental concerns. Reports can be submitted to the Dover Hotline at the following URL: [EthicsPoint - Dover](#)

Dover Law and Compliance evaluates the Hotline reports and responds as appropriate. Reports of actual or suspected misconduct are investigated, as appropriate.

Dover maintains a strict non-retaliation policy. Reports of suspected improper behavior are treated confidentially to the fullest extent possible and there is zero tolerance for retaliation against those who report suspected misconduct in good faith.

## Remedial Action

If potential human rights or environmental violations are detected, or imminent risks of such violations are identified, we will promptly respond to those risks or violations. For risks or violations occurring in our own operations, we will work to immediately prevent the imminent risk or bring the violation to an end. For imminent risks or potential violations involving direct or indirect suppliers, we will work with the supplier to prevent or end the risk or violation, to the extent possible. The effectiveness of any remedial actions will be reviewed at least once per year or at any time when there is a significant change to the risk level of the Dover German Operating Companies' own operations or those of its suppliers.

## Documentation and Reporting

We strive for transparency and accountability in our efforts to safeguard human rights throughout our supply chain. To that end, documentation related to our program is maintained for 7 years. Reporting on our human rights obligations will be submitted on an annual basis to the German Federal Office for Economic Affairs and Export Control (BAFA) and will also be made available on the websites of our Dover German Operating Companies.