



Code of Conduct



May 2024



a MISUMI Group Company

1. Definitions	3
2. Validity	3
3. Business Conduct	3
3.1 Full Compliance with Legal Requirements	3
3.2 Collaboration with Trustworthy Business Partners	3
3.3 Conflicts of Interest	4
3.4 Fair Competition	4
3.5 Bribery and Acceptance of Advantages	4
3.6 Prevention of Money Laundering	4
3.7 Compliance - Protection of Whistleblowers	4
4. Quality Strategy	5
4.1 Zero-Defect Strategy	5
4.2 International Standards	5
4.3 Intellectual Property	5
4.4 Disclosure of Information	5
4.5 Time Management	5
4.6 Cost Reduction	5
4.7 Customer Service	6
4.8 Employee training	6
4.9 Audit	6
5. Employee Conduct	6
5.1 Equal Treatment and Non-Discrimination	6
5.2 Human and Labour Rights	6
5.3 Health and Safety	6
5.4 Efficient Use of Resources	7
6. Data Protection Regulations	7
6.1 Confidential Information	7
6.2 Data Protection	7
6.3 Company Property	7

Code of Conduct - DAYTON Progress

1. Definitions

This Code of Conduct is a set of fundamental guidelines and rules that serve as a model for the processes, activities, and behaviour of the directors, executives, senior managers, and employees of Dayton Progress GmbH and all European Dayton Progress branches regarding compliance with relevant laws, regulations, policies, rules, and corporate ethics standards.

The Code aims to communicate our values and work ethics to our employees to ensure the success of our ongoing and long-term business strategies. Additionally, we strive to achieve and enhance our development goals and minimise business risks by ensuring the proper conduct of our business in accordance with the principles outlined in this Code, which align with our commitment to full compliance with all applicable legal requirements and internationally recognized business ethics standards. Therefore, we expect all our employees to agree to our core values by adhering to this Code.

2. Validity

In addition to and independently of this policy, the applicable local laws apply to the business activities of the European Dayton Progress branches and the conduct of all employees.

If conduct rules for individual companies, organisational units, or groups of persons are established in separate policies (e.g., Corporate Standards), these policies apply without restriction alongside this Code of Conduct.

3. Business Conduct

3.1 Full Compliance with Legal Requirements

It is a fundamental principle for us to fully comply with all applicable laws, rules, and regulations to fulfil our goal of responsible business conduct. We continuously observe and follow legal necessities and align our business accordingly, regardless of the advantages or disadvantages that may arise.

3.2 Collaboration with Trustworthy Business Partners

The Companies maintain continuous partnerships with customers and suppliers based on openness and mutual trust. The Companies expect their suppliers to demonstrate sustainability, social responsibility, and compliance with laws and standards. The Code of Conduct defines the principles and requirements of the Dayton Progress branches in Europe, which the Companies set for themselves as well as for their business partners regarding responsibility for people and the environment. We expect all our suppliers to act responsibly and align with the listed guidelines and principles.



3.3 Conflicts of Interest

Conflicts of interest arise when employees act on their own behalf and personally benefit at the company's expense. We make our business decisions solely in the best interest of our company, which sometimes requires a separation of our professional and private lives. Therefore, all personal activities that could jeopardise the interests of the company must be strictly avoided by employees. In the event of conflicts, the company follows transparent and open resolution processes.

3.4 Fair Competition

Sustainable market development requires ensuring fair competition for all market participants. Therefore, we strictly adhere to all competition regulations and compliance programs for antitrust regulations. We place great value on practicing fair conditions with our business partners, suppliers, and competitors. We do not tolerate actions that contradict our commitments to preventing cartels and corruption.

3.5 Bribery and Acceptance of Advantages

Dayton Progress tolerates neither active nor passive bribery. The Companies do not grant other companies undue advantages to influence their decisions, nor do the Companies accept such advantages from third parties. No one working for Dayton Progress may grant, demand, or accept undue benefits such as excessive gifts or advantages that exceed a customary value. Giving gifts or advantages is particularly prohibited if business decisions are unlawfully influenced or if there is an impression that this is the case. All donations from the Companies must be transparent.

3.6 Prevention of Money Laundering

The Companies fully comply with the legal requirements for the prevention of money laundering. In case of doubt, all employees may be required to inform the company about unusual financial transactions for review and control by the relevant department.

3.7 Compliance - Protection of Whistleblowers

All employees are encouraged to report concerns about serious violations of the Code of Conduct and applicable laws or regulations. A reporting procedure is available for this purpose. Whistleblowers must not be disadvantaged or subjected to retaliation for their reports. No one shall be disadvantaged or retaliated against for assisting in the investigation of an actual or suspected violation.

Code of Conduct - DAYTON Progress

4. Quality Strategy

4.1 Zero-Defect Strategy



Satisfaction with our products is a key value to build and secure our company's good reputation. For our entire product portfolio, we continuously ensure and improve our quality standards to achieve a high level of efficiency in perfect quality. Accordingly, we pursue a program of error prevention rather than error detection to fulfil our zero-defect strategy.

4.2 International Standards

We comply with all applicable product safety and sustainability standards to ensure the quality and efficiency of our products. We control and certify our products and European branches according to the requirements of several internationally recognised certification systems, such as DIN EN ISO 9001, ISO 14001, AEO, TISAX, and CE, as well as according to locally binding regulations, such as the RoHS Directive and the REACH Regulation of the European Union. We comply with export control criteria and respect existing economic sanctions. We reject trade outside these regulations.

4.3 Intellectual Property

We respect the protection of third-party intellectual property within the framework of legal provisions. Plagiarism must neither be acquired nor circulated.

4.4 Disclosure of Information

Accounting and records must be kept ongoing and accurate. Financial reporting is done in accordance with legal requirements and generally accepted accounting principles. Information is provided transparently, accurately, continuously, and promptly, and communicated in accordance with applicable laws and other guidelines.

4.5 Time Management

We see the speed of our actions as a competitive advantage for our customers. Therefore, we deliver our products punctually when the customer needs them. Our logistics processes have been optimised to ensure the smooth flow of our deliveries, and we regularly monitor our supply chain around the globe to maintain our competitiveness.

4.6 Cost Reduction

Efficiency is not only the result of successful time management but also depends on offering optimal prices. Therefore, we are constantly working on reducing unit costs and the early implementation of optimised calculation methods for our products.

4.7 Customer Service

We place great value on customer satisfaction. Therefore, we anticipate their needs before they even think about them. Complementary services around the products are provided before and after delivery. Additionally, we support our business partners in developing and marketing their innovative and market-oriented products to reduce the time-to-market span and ensure efficiency within the sales platform.

4.8 Employee training

Employee satisfaction is the most important component required for a company to be successful. Therefore, qualified employees are an important resource of Dayton Progress. To ensure the quality of our products and services, we regularly offer our employees training to further develop relevant competencies, thereby ensuring and enhancing employee performance and effectiveness.

4.9 Audit

We conduct systematic audits to monitor our quality standards in accordance with new technical and legal requirements to ensure compliance with internal and external quality requirements.

5. Employee Conduct

5.1 Equal Treatment and Non-Discrimination

Dayton Progress GmbH and all other European Dayton branches are part of the MISUMI Group, an international corporation with subsidiaries worldwide. The fact that we belong to an internationally active corporation has led to a corporate culture of equal treatment and equal opportunities, regardless of race, nationality, age, gender, gender identity, religion, marital status, skin colour, disability, sexual orientation, political opinion, or other reasons. In this regard, we act in a non-discriminatory manner toward our current and prospective employees.

5.2 Human and Labour Rights

We respect and act in accordance with internationally recognised human rights. Therefore, we reject all forms of forced and child labor and have taken all measures to prevent such working conditions in our company. We comply with national working time regulations and pay appropriate compensation to all employees in accordance with national and legal standards, economic standards of various industries and regions, as well as the personal skills and development of each employee.

5.3 Health and Safety

The safety and health of our employees are very important to us, as our employees significantly contribute to the high quality of our products and our economic success. We comply with applicable legal requirements for workplace safety and health protection and continuously work on the development and improvement of working conditions. We have taken all necessary measures to prevent workplace accidents, and we expect all our employees to comply with our health and safety regulations. Additionally, we expect all our business partners to provide the same level of health and safety standards and consider this standard when selecting our business partners and subcontractors.

Code of Conduct - DAYTON Progress

5.4 Efficient Use of Resources

Sustainable environmental and climate protection, as well as resource efficiency, are important corporate goals for us. We comply with all legal requirements concerning the environment and sustainability and ensure that all impacts on the environment and climate resulting from production are minimised. Each employee is responsible for treating natural resources sparingly and contributing to the protection of the environment and climate through their individual behaviour. The Companies align all activities – from procurement through production to disposal – with resource conservation and emission elimination.

We commit to handling the environment responsibly with our products and solutions. In the use and consumption of resources during production and the generation of waste of any kind, including water and energy.

6. Data Protection Regulations

6.1 Confidential Information

The implementation of our business objectives and the protection of our company's reputation are highly dependent on data security measures. Accordingly, we have taken all necessary steps and established appropriate measures to ensure that the confidential business information of our company and the sensitive information we receive from our business partners are protected from unauthorised access by colleagues and other third parties.

6.2 Data Protection

We are aware of the value of privacy and therefore ensure the confidentiality of personal data of our employees, customers, business partners, and suppliers. We have taken the necessary steps to comply with the GDPR and all other legal requirements of data protection. The collection, processing, use, and transmission of personal data are only carried out if legally permitted or if the individual has consented. Unauthorised access to personal data is strictly prohibited, and we take all measures to comply with the relevant standards.

6.3 Company Property

Company real estate, assets, and resources are only used for the company's business operations and in accordance with our corporate policies. The private use of company property by employees without express permission is strictly prohibited.



We care about your time!

DAYTON PROGRESS Ltd.

Unit F8b
Holly Farm Business Park
Honiley
Kenilworth, Warwickshire
CV8 1NP

Phone: +44 1 926 484 192

Fax: +44 1 926 484 172

Email: info@daytonprogress.co.uk

www.daytonprogress.co.uk

