

CODE OF CONDUCT

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Introduction

The Code of Conduct is a fundamental document that serves as a guide for our organization. In the following pages, the ethical and behavioral principles to which DWT Holding Spa and the DAB Group adhere in all areas are affirmed, from care for employees to relationships with all stakeholders.

We embrace the ethical principles and behavioral rules of the Grundfos Group, fully integrating them into the company's philosophy. With the aim of preventing crimes in the interest or to the advantage of the Company and the Group, we intend to recommend, encourage, or prohibit certain behaviors.

The adoption of this Code represents a tangible commitment on our part to responsible and respectful corporate conduct. We commit to embracing and promoting the outlined guidelines and values, which reflect our vision of an ethical, inclusive, and sustainable work environment.

We are confident that each of us, in the scope of our activities and relationships with colleagues and third parties, will ensure the adherence to the principles expressed in this document and will strive to uphold them.



A message from Grundfos' CEO

Doing what is right for our people, our customers, our partners, and the communities we serve is key. It matters to me, to my father, and it mattered to my grandfather who founded Grundfos more than 75 years ago.

My grandfather's vision laid the foundation for our purpose and our values. We remain committed to making a positive impact in the world by pioneering solutions to the world's water and climate challenges and improving quality of life for people.

Our deep commitment to the sustainability agenda and our global presence, means we need to act responsibly at all times.

We are a company defined by our values, and we remain united in our wish to operate our company based on a culture of honesty and integrity.

Thank you for playing your part in carrying forward our values and taking an active role in ensuring that we fulfil the obligations laid out in our Code of Conduct. Together we can make a difference in the world.

Sincerely,

Poul Due Jensen

Grundfos President, CEO

Our values



Sustainability

We act driven by awareness and focus on people and on planet's challenges.



Trust

We generate trust by communicating openly and transparently.



People

We preserve an inclusive workplace where people feel good.



Independency

We aim for a solid financial basis, enabling us to invest in our values.



Partnership

We strongly believe in a professional partnership, driven by ethical principles.



Ambition

We keep challenging ourselves in order to lead the market through innovative solutions.

Our Code of Conduct

This Code of Conduct serves as an aid to understand the core elements of our values, policies, ethical principles, and the legislation. It cannot answer every single question but is our common reference point that should shape our behaviour, help with decisions, and describe who we are and who we want to be. It confirms our personal and professional commitment to a wide range of issues which we believe are vital in ensuring we conduct business based on honesty and integrity.

The Code of Conduct applies worldwide to all employees and Board members working in any of our companies as well as third parties working on our behalf. We expect all employees, and others that act on our behalf, to always comply with our Code of Conduct.

Several topics touched upon in the Code of Conduct are elaborated further in policies, procedures, compliance programmes, guidelines, external commitments such as the UN Global Compact, and all employees are responsible for seeking out the information relevant to their work. We abide by local laws and regulations wherever we operate.

In some countries, local laws, regulations, or industry codes may be more stringent than this code. In others, our code may be more stringent. We always abide by the most stringent rule.

Our Code of Conduct is supported by a strong governance framework with the aim to support and facilitate the overall understanding of and compliance with our Code of Conduct.

This framework consists of several initiatives, and it includes:

- The Ethics Committee
- The DAB Whistleblower System
- Mandatory Code of Conduct training for all



1

ALL PEOPLE

- 1.1 Human rights
- 1.2 Working environment
- 1.3 Equal opportunities and discrimination

1. ALL PEOPLE

1.1

Human rights

We respect the integrity and dignity of every human being, and we recognise and acknowledge our responsibility to operate with respect for human rights across our value chain.

Our work with human rights is governed by our Group Human Rights Policy and embedded into existing policies and processes.

We actively work to prevent causing or contributing to adverse human rights impact throughout our activities and we address such impacts should they occur. We also seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products, or services or by our business relationships in our value chain.

All our employees are entitled to a safe and healthy work environment, to join an organisation of their own choice to represent their interests and to be free from harassment and discrimination. We will not benefit from forced or compulsory labour or any other form of coercion. We do not tolerate child labour and we are committed to contributing to its effective abolition.

We expect all our employees to support and respect human rights in our everyday work.

Our approach to human rights is based on internationally recognised human rights principles as described in the International Bill of Human Rights, and the International Labour Organization (ILO) declaration on the Fundamental Principles and Rights at Work.



Q&A

Q: I have heard a colleague talk about a visit to a supplier, where the employees looked very young. He asked about it at the site but got no answer. Should my colleague have done more?

A: Your colleague did the right thing by noticing a potential violation of human rights and addressing the concern to the supplier. The next step would be for your colleague to report it to our purchasing department. We always act responsibly, and we respect human rights along our value chain and ensure that we do not support child or forced labour.

1. ALL PEOPLE

1.2

Working environment

We are committed to ensuring health, safety, and well-being by providing a good work environment, preventing work-related injuries, and ensuring a good physical, psychological and work-life balance.

We actively engage in initiatives and partnerships with the aim of improving the quality of life for people, and we are relentlessly ambitious in creating health, safety, and well-being in DAB. Any employee can experience stress, illness, injury, or low mental well-being and as a company, we take this equally seriously.

If we feel that our working environment is not safe or healthy, we speak up and take action, both with regard to our own health, safety and well-being as well as that of our colleagues. In such cases always inform your people leader or your local Health & Safety coordinator.

We are all responsible for contributing to the health, safety and well-being of ourselves and our colleagues and should:

- Be present
- Take action
- Don't compromise



Q&A

Q: I have noticed a minor safety issue. Should I report it?

A: Yes, all safety issues must be reported. Ensure nobody is in immediate danger, inform your people leader.

Q: I do not feel as motivated as I normally do. Should I talk to someone?

A: Yes, you should talk to your people leader to discuss how DAB can support you.

1.3

Equal opportunities and non-discrimination

As part of our values and our commitment to human rights, we respect individuals from all backgrounds, and we do not accept any form of discrimination.

We support each other in our daily business and strive to be mindful of how our words and actions might affect others. We promote and support an inclusive culture where we value our differences in backgrounds, experiences, and perspectives. We believe diversity fundamentally strengthens our competitive advantage by fuelling innovation in a work environment where people can thrive and grow. We want people to feel they belong.

Did you know?

We have developed a Harassment Prevention Policy. In the policy, you can read more about our commitment to a safe and inclusive workplace.



Q&A

Q: A colleague has made insulting jokes about specific nationalities. I have not commented on it, but it makes me feel uncomfortable. Should I do something about it?

A: Yes, we expect all employees to support diversity, equity, and inclusion to ensure an inclusive culture. You should speak up. If you do not feel comfortable speaking up you can also contact your people leader or HR.

Q: What can I do to support an inclusive culture?

A: By following our values you promote and support an inclusive culture. Additionally, we offer several internal learning and development resources.

2

OUR COMPANY

- 2.1 Confidential information
- 2.2 Data privacy
- 2.3 Environmentally responsible
- 2.4 Social media
- 2.5 Artificial intelligence (AI)

2. OUR COMPANY

2.1

Confidential information

As business integrity and innovation are at the core of our business, we must protect the information we receive in confidence as part of our work.

This applies more broadly to information about our customers, business partners, colleagues and other matters dealt with in DAB. An important part of our confidential information is our trade secrets. We must protect our confidential information from unauthorised disclosure to anyone outside or within DAB. We must never share confidential information unless we have a legitimate business purpose for doing so, and it is permissible in accordance with our policies and relevant laws and regulations.

Typical examples of confidential information:

- Customer lists and product price and cost information
- Technical details of our systems, products and our product manufacturing processes
- Our business strategies and launch plans

What is a trade secret?

A trade secret is a valuable piece of confidential information about a company that gives the company a competitive advantage. It may comprise a wide variety of different information such as information about technologies, finance, sales, operations, intellectual property rights (IPR) and know-how.



Q&A

Q: Can employees or guests on a guided tour of our factories take pictures?

A: No, employees or guests are not allowed to take pictures. Pictures may accidentally reveal information about manufacturing processes or other confidential information.

Q: I am working on a confidential project and need to print some material regarding the project. Is that a problem?

A: No, not if you store the printed material in a safe place such as a locked cabin. You should never leave the printouts where others can access them.

Q: I am on a train and want to work on a project. Is that ok?

A: Yes, you can work on the train or in other public places as long as you are careful. You should not discuss any confidential information on the phone or with a colleague and you should always ensure that no one can see the content of your screen (e.g. by having a privacy screen protector on your laptop).

2.2

Data privacy

We are highly committed to respecting the privacy of individuals and to the principles of self-determination and human dignity.

Personal data is any information that relates to an identified or identifiable person and includes information about DAB employees, customers, suppliers, and other business partners.

We will never treat personal data as an exploitable asset but respect privacy as a basic human right.

Only collect, use, and share personal data if it is relevant and necessary to the job or task you are performing. Always store personal data in a secure manner.

Delete personal data when you no longer need it.
Comply with all internal data privacy guidelines and procedures.



Q&A

Q: I have access to a document on SharePoint that includes personal data, but I should not have access to the document. What should I do?

A: You must ensure that your access is deleted. Please also notify the Legal Department as there may be an obligation to report the breach to the authorities.

Q: I have to send a file containing employee information to a third party. Can I do that?

A: Yes, if you are sure that you can send personal data outside DAB, you can send the email with the right encryption. If you are in doubt, please ask your people leader, or contact the Legal Department to ensure that the necessary agreements are in place.

Q: I just arranged a conference and collected information about the participants such as names, addresses and phone numbers. What should I do with this information after the conference has ended?

A: Unless you have obtained specific consent from the participants, you need to delete the information after the conference has ended.

2. OUR COMPANY

2.3

Environmentally responsible

Running our business in a responsible and ever more sustainable way is an integral part of our purpose and values.

Our efforts are not limited only to our own operations but stretch across the value chain, from our suppliers to business partners and customers around the world, and into local communities where we have a special responsibility to care for people and environment.

As employees we are all environmental stewards. We must be mindful of seeing and driving opportunities to reduce energy consumption and carbon emissions across our value chain, contributing to safe and sustainable use of water in our operations and supply chain, and applying a circular mindset of reduce, reuse, and recycle across the lifecycle of our products.

Through collaboration and innovation with our customers we develop products and solutions that have a positive impact in the world, helping customers achieve their sustainability ambitions of reducing the use of energy, water, and natural resources.

The commitment of Grundfos to sustainability is aligned with leading international frameworks:

- Grundfos is the first water solutions company to set a climate goal of Net Zero by 2050 approved by the Science Based Targets Initiative
- Grundfos is committed to the ten principles of the United Nations Global Compact for responsible, sustainable, and ethical business



2.4

Social media

It is a fundamental value for us that our stakeholders trust us and feel that we communicate in an honest and transparent way.

As employees, we have a shared identity and a responsibility to protect our brand. As individuals, we have our own opinions, ideas, and interests which we want to share with others. Social media platforms make it easy to connect and communicate instantly with a large audience and we should all be aware of how we write about DAB and how we present ourselves on social media.

If you publish content that is relevant to DAB, remember that your actions reflect not only on you but also on DAB, no matter if you are speaking for yourself or as a representative of DAB. You must be respectful and aim to add value to the conversation, always protect DAB reputation and be mindful of how you use the DAB name and logo.

On our internal and external social media platforms, we always communicate in an open, constructive, and respectful way even when we have conflicting viewpoints.

Guidelines for how to act on social media:

- Treat everyone with respect
- When posting personal opinions, clearly state your opinions are personal, and not those of DAB
- Do not share confidential information; respect privacy
- Think before posting; avoid controversial or inappropriate content that could harm DAB's reputation
- Seek permission and give credit when sharing others' content



Q&A

Q: Someone has posted a statement on social media about one of our products that is not correct. What should I do?

A: It is tempting to respond yourself. However, unless you are an authorised spokesperson, you should contact our Communication and Marketing Social Media Team and explain the situation to them so they can take the necessary steps.

Q: Can I post pictures from company events on social media?

A: Yes, authentic content is great. Just ensure nothing is confidential and you have permission from the persons shown in the pictures.

2.5

Artificial intelligence (AI)

We are committed to using, developing, and deploying artificial intelligence that creates value for our company, customers, and society at large.

The use of artificial intelligence represents many opportunities for improving efficiency, reducing cost, or accelerating the development of new products and services. We are very excited about this, but we are also aware of the adverse impact it can have on for example our confidential information, the property rights of others, unintended bias, discrimination, or human judgement.

All employees working with artificial intelligence have an obligation to make sure it is inclusive, safe, trustworthy, and explainable within its context. It must be developed in accordance with both our guidelines concerning artificial intelligence and the intentions in international legislation.

AI is about putting computation at work in innovative ways to make us live our purpose and realise our business goals significantly better tomorrow. We always comply with our guidelines on how to use AI in DAB.



Q&A

Q: I would like to use AI tools for my work, but I am not sure if it is okay?
A: It is generally ok for you to use AI tools for your work. However, for some areas there may be restrictions – it is therefore important that you familiarise yourself with the guidelines that apply for your line of work.

Q: Is there something specific I should pay attention to when using AI tools for my work?
A: First, always ensure you comply with our internal guidelines. Also ensure that when you use AI tools, you do not share sensitive DAB or personal information. In addition, it is important that you as a human being review the output in order not to create or share misinformation.

3

OUR BUSINESS

- 3.1 Corruption
- 3.2 Bribery
- 3.3 Facilitation payments
- 3.4 Hospitality, entertainment and gifts
- 3.5 Conflict of interest
- 3.6 Bookkeeping and accounts
- 3.7 Fair competition
- 3.8 Export control and sanctions

3. OUR BUSINESS

3.1

Corruption

We operate in many countries, and across different cultures, traditions and local laws and regulations. We always conduct business with integrity and in a fair and legal way.

Corruption is the abuse of trusted power for private gain and can take many forms. Corruption is an umbrella term ranging from grand corruption, bribery, and money laundering schemes to everyday dishonest favours in business. Corruption has a negative impact on people and society.

We work against corruption in all its forms and have a zero-tolerance policy towards bribery and facilitation payments, whether committed by employees or by third parties acting on our behalf. We avoid conflicts of interest and make sure that our personal interests never unduly influence our professional judgement. We never make statements or give financial or other contributions to political parties or organisations, as we remain non-political in our political and governmental relationships.



3. OUR BUSINESS

3.2

Bribery

Bribery is a specific form of corruption which is both unethical and illegal in most countries. We believe bribery harms our company and the communities where we do business.

In DAB both giving or receiving bribes is strictly prohibited, including when facilitated through a third party.

Bribes can appear in many forms but in general, they are about something of value – given or promised – to influence the judgement or conduct of a person in a position of trust. A bribe does not necessarily have to involve money changing hands, it can take many forms such as lavish gifts, hospitality, access to assets or favours to friends and families of business relations.

We never offer or accept bribes including kickbacks or anything of value that could improperly influence a business decision, and when in doubt we speak up, seek advice, or use our whistleblower hotline.

Special caution should be given when using third parties, including agents, sales representatives, consultants, intermediaries, and distributors as they pose significant risks under anti-corruption laws.

Always use the DAB Business Partner due diligence standard when working with third parties.



3.3

Facilitation payments

A facilitation payment is a type of bribe. We do not accept facilitation payments as they are considered both against our values as well as having significant negative impact in the societies where they are paid.

Facilitation payments are small payments made to secure or speed up a routine or other necessary process to which the payer is entitled to anyway.

They are typically demanded in everyday transactions, and they can take multiple forms, like cash, alcohol, cigarettes, vouchers, and tickets to events etc. They are considered bribes and are often illegal, and they are separated from other forms of bribery as they are never made to obtain or retain business.

We always refrain from paying facilitation payments unless we feel that our personal safety is at risk. In such a case you must report it immediately to your people leader.



Q&A

Q: My goods are stuck at the border and customs tell me that it will take months to expedite unless I pay a fee. Am I allowed to pay such a fee?

A: No, we do not pay facilitation payment. Instead, we avoid these by planning ahead so that any expected delays in customs can be handled.

Q: I need to get a business license and I've heard it can take months to get but I could hire a consultant to help me get it within days. Can I hire a consultant to get assistance?

A: You can hire a consultant to assist you with the application process as long as a fee is not a hidden facilitation payment.

3.4

Hospitality, entertainment and gifts

We will never grant or receive any benefit such as hospitality, entertainment and gifts which might unduly influence a government representative, a supplier, or a customer in their dealings with DAB which may jeopardise our own integrity.

Hospitality, entertainment and gifts can be an important way to build and strengthen relationships that are important to our business. Giving inexpensive gifts or small tokens of appreciation is considered normal in many countries. The challenge is that there is a fine line between acceptable business practice and illegal bribery, and it can easily be crossed intentionally or unintentionally.

If we offer gifts or pay for hospitality and entertainment, we will always make sure it is not excessive or lavish but reasonable, proportionate, and legitimate.

If you receive a gift from a business partner, you should assess if the gift is acceptable and given in good faith, and not as an attempt to unduly influence you. If you are not sure, report the gift to your people leader so that your people leader can help you decide whether to accept or not. To ensure our own integrity, we will always pay travel and overnight expenses for our employees attending events arranged by others.

General principles on gifts, entertainment and other benefits:

- We do not give or accept gifts, benefits and entertainment that intend to influence any decision-making
- We want to prevent any attempts to improper influence but also any appearance or perception that this is happening
- We always consider the context of the relationship and the situation
- We are open and transparent, and you should always consult your people leader if you are in any doubt
- Local customs and behaviours never justify non-compliance with our Code of Conduct



Q&A

Q: I got a large box of chocolates for Christmas from a supplier. What should I do?

A: You should share the chocolate with your colleagues and place the box in the office to ensure that it can be enjoyed by your colleagues.

Q: I received a regular pen and a pad of paper with an advertising logo from a customer, can I keep it?

A: Yes, you can accept the effects as they will fall below what we define as a natural trivial limit.

3.5

Conflict of interest

We always take decisions in the best interest of DAB, and we must never be improperly influenced by personal, financial, or political interests or any other personal gain.

Conflict of interest occurs when our personal interests unduly influence or can be perceived as influencing our professional judgement. Most conflicts of interest can be avoided or resolved if they are properly disclosed.

If you find yourself in a situation where your own personal interests and those of DAB may collide or where someone could reasonably think that they are colliding, you should immediately disclose it to your people leader and remove yourself from any decision-making process.

Conflicts of interest can take many forms and typical examples are:

- Hiring a family member or a friend as an employee or to provide services to DAB
- Working part-time or as a consultant at a company that sells competing products
- Accepting a seat on the board of a supplier or competitor
- Owning part of a business that supplies DAB with goods or services
- Using suppliers or services providers to DAB for personal use
- Accepting gifts from suppliers and service providers to DAB



Q&A

Q: I have a cousin I would like to employ to do some work for DAB. We do have a legitimate reason to employ a full-time employee to do the work and my cousin is highly qualified within the area. Can I hire my cousin to do the work?

A: Even though there is a legitimate reason to employ a person, the situation creates the impression of a conflict of interest. You must always consult with HR so that an independent review can be conducted. This will also protect you and your cousin if anyone questions whether the relationship unduly influenced your decision.

3. OUR BUSINESS

3.6

Bookkeeping and accounts

For us to take responsible business decisions and maintain the trust of our stakeholders including government, we rely on complete and accurate records.

It is therefore very important that all employees ensure the integrity, accuracy, and effectiveness of our record-keeping. This is done by ensuring that our records and accounts conform to the Group Accounting Manual and are in compliance with our internal controls. All transactions must be duly recorded accurately, using the proper booking account, profit and cost centre, within the relevant accounting period.

Useful definitions

Accounting manual

All significant accounting policies should be adopted in the preparation and presentation of the yearly and monthly reporting. All Group reporting from legal entities in the Group are based on the same accounting principles and thus comparable.

Internal controls

Internal controls ensure compliance with internal and external regulatory requirements.



Q&A

Q: Can I report unconfirmed sales in the quarterly report to meet our targets?

A: No, the revenues and costs must always be recorded in the period when they are generated, earned, or incurred.

Q: Do I need to know how to ensure “financial integrity – accuracy and effectiveness of our bookkeeping” if I am not employed in the finance department?

A: Yes, we all have a responsibility to provide on-time accurate relevant documentation e.g. expense reports, benefits, and invoices to ensure correct reporting.

3.7

Fair competition

We believe in free and fair competition and being open and transparent in the way we do business, and we are committed to conducting business in compliance with competition law globally.

You must never enter into agreements or understandings which would give us an unfair advantage or otherwise infringe competition law. This could be the case if we agree with competitors to set prices or standard terms, allocate markets, split customers, align bids or tenders or limit innovation or production. We can also not exchange commercially sensitive information with competitors.

As a rule of thumb, you should never dictate prices to distributors and dealers. And you should not impose any restrictions on sales e. g. geographical, customer or sector carve-outs on any distributor or dealer.

Meetings with competitors

Meetings with competitors impose a high risk of breaching competition laws. Keep engagement with competitors at an absolute minimum, and only engage if there is a legitimate reason to do so. Never exchange any commercially sensitive information with competitors such as pricing, production capacity, research and development, or cost structures, or intentions to target – or not target– certain customers, markets, or tenders.



Q&A

Q: As part of my job, I participate in meetings of trade associations and our competitors participate as well. Can I go?

A: Yes, you can. But make sure you seek guidance before you go. There could be a risk of accidentally being part of discussions related to topics that could be considered a violation of competition law. If such discussions occur, you should leave the meeting and immediately notify the Legal Department.

Q: We would like to run a campaign on a product and would like our resellers to use a specific resale price for this campaign. Can we do that?

A: No, this could be considered an attempt to control prices at which the products may be resold. It is prohibited to in any way put pressure on wholesalers, installers, or direct customers to get them to charge a minimum or specific resale price.

Q: We have just hired an employee who used to work for a competitor. Can I ask the new employee about new product releases from his former company?

A: No, it is never ok to ask a new employee to disclose confidential business information about a competitor. We always collect information in an ethical manner.

3.8

Export control and sanctions

We have a responsibility to make sure that our products and solutions, including components, services, technology and equipment are only used for legal purposes and in compliance with applicable laws and regulations.

As a global company operating across borders, the ever-changing export control and sanctions landscape means that extra care and diligence must be observed in this area. We will not supply controlled products and solutions without necessary permissions and will not purchase or sell goods or services to any sanctioned parties.

All employees working with export, sales, purchase, and financial transactions must remain very vigilant, conduct proper due diligence checks and follow our global compliance programme for export control and sanctions.

A comprehensive product and sanctions control system is in place globally. This includes daily screening of DAB's suppliers and customers against official sanctioned party lists, and export control screening procedures to ensure that controlled products and solutions will not be purchased or sold without the necessary permissions.



Q&A

Q: Can I purchase or sell products and services in all countries worldwide without restrictions?

A: No, there are a few heavily embargoed countries where DAB generally does not allow business. Furthermore, for some countries, an extended compliance check is required. Be aware that some products are subject to restrictions as they are considered dual-use items meaning that they can be used for both civilian and military applications.

4

SPEAKING UP

As we continually want to develop and nurture our culture of honesty and integrity, it is important that we also dare to speak up when we see something that is wrong. Anyone who speaks up in good faith is protected from retaliation.

If you believe that our Code of Conduct, policies or relevant laws and regulations have been breached, we encourage you to talk to your people leader, HR, or the Legal Department. If you do not feel comfortable speaking to any of them or if you want to remain anonymous you can report your concerns via our whistleblower system.

Whistleblower system

Our third-party whistleblower system allows employees, external consultants, business partners, and others to submit reports.

Our whistleblowing policy describes when and how to use the whistleblower system and the protection against retaliation, confidentiality, and anonymity among other things.

You can read more about our whistleblower system and/or file a report at this webpage:

<https://dab.integrityline.com/frontpage>

Seeking guidance

[Our Code of Conduct](#)

[Our Values](#)

[Whistleblowing Policy](#)

Communication and Marketing Social Media Team

E-mail: social@dabpumps.com

[Social Media Guidelines](#)

Corporate Communication

E-mail: corporatecommunication@dabpumps.com

Group Procurement

E-mail: procurement@dabpumps.com

Human Resources

E-mail: hr@dabpumps.com

[Harassment Prevention Policy](#)

Legal

E-mail: legal@dabpumps.com

E-mail: data.protection@dabpumps.com

Travel Services

[Global Travel Policy](#)



We care for the future by promoting a culture of growth and innovation based on people, technologies and the environment.

Digital transformation, smart solutions and flexible work procedures are part and parcel of DAB adaptive and visionary business model which aims to transform the needs of the market into opportunities within a context of constant evolution.

DWT HOLDING SPA
Via Marco Polo, 14
Mestrino Padova - Italy
Tel. +39 049 5125000
www.dabpumps.com

