



CODE OF CONDUCT

Code of Conduct



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Preamble

The GEZE Group considers social and environmental sustainability a key element of its business principles. This Code of Conduct sets forth the essential principles and values of GEZE GmbH and its affiliates in accordance with Sections 15 et seqq. of the Joint Stock Corporation Act (hereinafter referred to as “GEZE” or the “GEZE Group”). It contains the minimum standards GEZE has committed to uphold within the framework of its global corporate activities.

These standards apply to our daily interactions with employees, customers, and suppliers, and reflect GEZE's attitude towards our society and our environment. This Code of Conduct is intended to ensure that employees throughout the supply chain are treated in with respect and dignity, and that companies fulfil their ecological and ethical responsibilities.

To ensure fair and equal treatment, it is essential that all business partners act in accordance with applicable laws and standards and base their actions on this Code of Conduct. This Code of Conduct applies to all business partners of the GEZE Group, as well as to customers, suppliers, subcontractors, and sub-suppliers. It regulates the minimum standards GEZE considers essential for our collaborations with business partners.

The contents of this Code of Conduct are based on international guidelines and principles such as:

- United Nations Global Compact (UNGC)
- Core labour standards of the International Labour Organisation (ILO)
- UN Guiding Principles on Business and Human Rights
- UN Convention on the Rights of the Child
- UN Convention on the Elimination of All Forms of Discrimination Against Women
- The German Act on Corporate Due Diligence in Supply Chains

The Code of Conduct is intended to establish mutual understandings between GEZE and its business partners, in particular with regards to sustainability and human rights in the supply chain. Because of this, business partners must ensure that their employees are familiarised with the basic principles set forth here, and that they understand and follow these principles without this having to be explicitly stated for each individual conduct principle. Business partners must inform their subcontractors, customers and suppliers involved in the performance of their services regarding the contents of this Code of Conduct.

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Market behaviour

1. FAIR MARKET BEHAVIOUR

Business partners must comply with all applicable anti-trust and competition laws. Defamatory statements or measures are not permissible, especially with regard to competitors. No anti-competitive agreements may be made with customers, suppliers or competitors, and any market-dominant or strong market position may not be abused.

2. CORRUPTION, FRAUD, MONEY LAUNDERING

Corruption, fraud, money laundering, extortion, and/or embezzlement in any form are prohibited. Business partners must ensure that their employees and/or business partners do not offer, grant, request, or accept any bribes and/or kickbacks, prohibited gifts, or other advantages to or from business partners or third parties such as officials.

3. INTERNATIONAL TRADE

Business partners hereby undertake to observe all applicable direct or indirect sanctions, embargoes, and/or boycott declarations. National laws and regulations designed to control international trade and financial transactions, and international conventions, such as laws and regulations on import and export controlling and embargoes, are mandatory and must be observed.

4. DATA PROTECTION

Business partners hereby undertake to ensure data protection. If company and personal data are used, the security and safety of the data must be ensured. Any technical requirements must be updated regularly, and must conform to applicable data protection laws.

5. PROPERTY PROTECTION

Business partners must ensure the protection of third party intellectual property rights. They must ensure that there are no third party rights on any services, products, etc. and, in particular, that they do not violate intellectual property rights or imitate or counterfeit third party products. Any type of knowledge transfer, and any exchange of data, information, etc. must be carried out so that no intellectual property rights are violated and so that all information, etc. is protected.

6. SUPPLY CHAIN

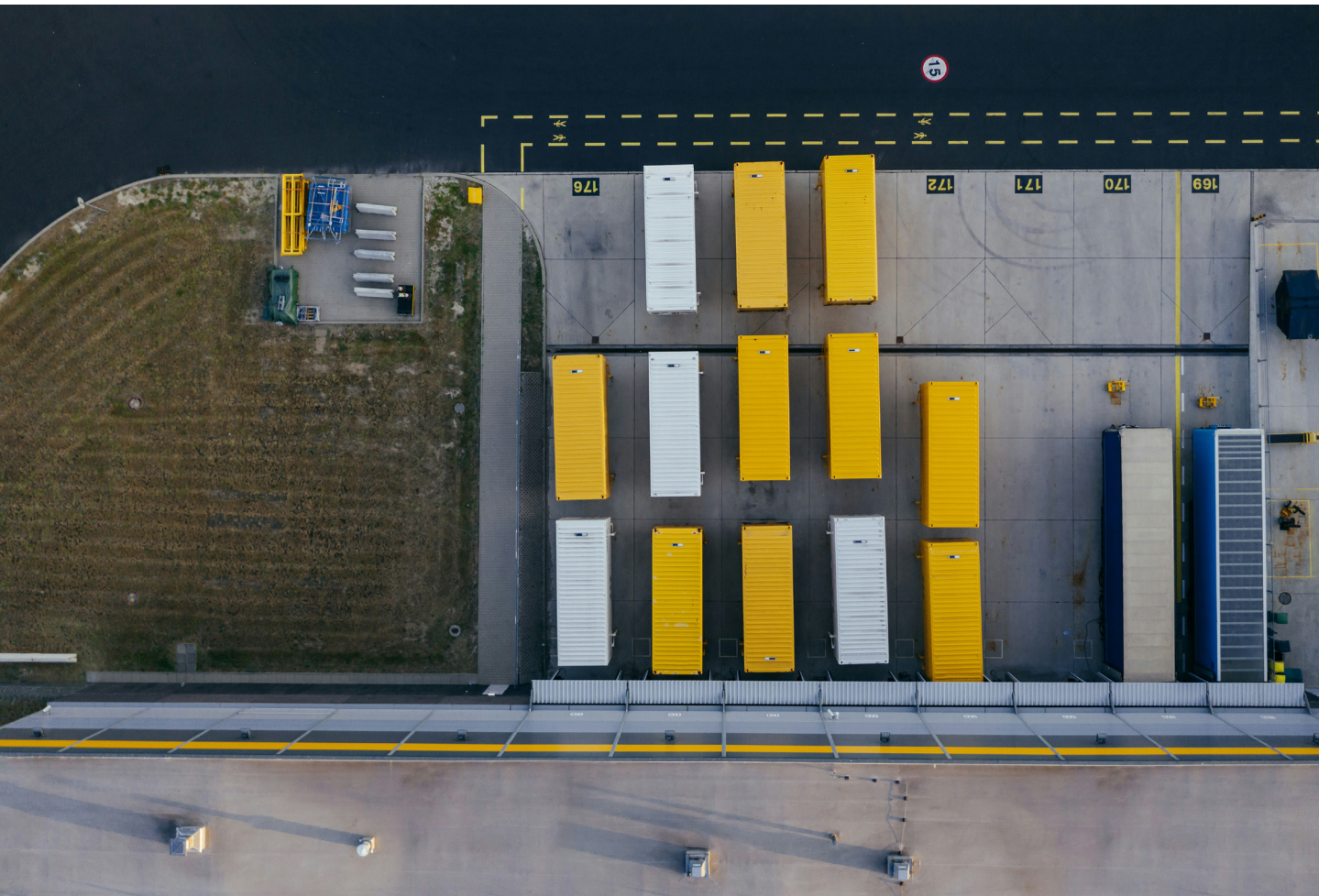
Business partners are aware of their responsibility within the supply chain and act accordingly. All applicable laws, such as the Supply Chain Act, must be complied with.

7. PROTECTION OF CONFIDENTIAL INFORMATION AND THE TRADE SECRECY ACT

Trade secrets and confidentiality agreements must be complied with. Business partners must ensure that their employees do not disclose any confidential information regarding GEZE and/or its business partners to third parties in any form without prior approval from GEZE.

8. DONATIONS AND SPONSORSHIPS / GIFTS

The GEZE Group does not make any direct or indirect donations (money, tangible assets or services) to political organisations, parties (or organisations or persons close to or associated with them) or individual politicians. The GEZE Group only makes donations in accordance with applicable laws, so that they are transparent and their recipients and use can be clearly traced. Furthermore, applicable specific national donation guidelines of the GEZE Group apply.





2. PROHIBITION AGAINST DISCRIMINATION, NO HARASSMENT

Discrimination, harassment and abuse of any kind will not be tolerated. This includes bullying and coercion. Business partners must not engage in any form of discrimination. In particular, no one may be disadvantaged, for instance, due their age, gender, disability, sexual orientation, nationality, ethnic origin, skin colour, religion or worldview, political beliefs, or social background.

Discrimination is defined as disadvantaging a person due to one of the characteristics above, or for other reasons which are not objectively justifiable. Disadvantages due to language barriers, for instance, should be avoided by providing working documents and information in language that is easily understandable by the individual.

Business partners must ensure that abrasive or inhumane treatment do not occur in the workplace. This includes, for instance, sexual harassment, physical punishment, abuse, emotional or physical coercion, or verbal abuse of employees. Employees may, likewise, not be threatened with such behaviour.

If disciplinary measures are necessary, these must be carried out in compliance with national law and internationally recognised human rights. All improper disciplinary measures are prohibited, in particular withholding wages, social benefits or documents (like work permits) or prohibiting employees from leaving the workplace. Business partners must make it possible for their employees to express concerns and report violations of compliance with local legal regulations, without fearing sanctions or retaliatory measures of any kind.

3. PROHIBITION AGAINST CHILD AND FORCED LABOUR

Child labour is prohibited, and business partners must comply with relevant internationally recognised standards. Likewise, business partners may not make use of forced labour or prison labour. Regulations designed to protect minors are observed at GEZE. National regulations and international standards to protect minors must be complied with.

Social responsibility

1. HUMAN RIGHTS

We undertake to act in a sustainable manner in our business activities. In doing so, we strive to continuously improve the sustainability of our products and production equipment as well as to use natural resources carefully.

Our business activity meets all the legal obligations with regard to the environmental aspects. The environmental guidelines and quality management handbook of the GEZE Group and/or local applicable provisions regulate mandatory details.





Occupational safety

4. OCCUPATIONAL PROTECTION AND SAFETY

Business partners must ensure that relevant applicable occupational protection and safety laws are complied with. Work stations and workplaces must conform to applicable laws and regulations. Any violation of human rights at the workplace or at company facilities / work stations is prohibited.

Young employees (minors), in particular, may not be exposed to any dangerous, unsafe or unhealthy circumstances that could endanger their health and development. Employees must be trained regularly on health and safety at the workplace. If it is not possible to exclude hazards at the work place / work area, then business partners must provide employees with appropriate aids, such as personal protective equipment. In general, the potential dangers posed by a workplace must be identified, evaluated and monitored.

5. FAIR WORKING CONDITIONS

Business partners must comply with all laws and industry standards on wages and working hours. Employees may never be charged hiring fees, and employees' work permits may never be withheld.

The agreed and actually performed weekly work hours may never exceed the maximum under applicable local law. Employees must be entitled to breaks and must be granted vacation time according to applicable local laws.

6. FREEDOM OF ASSOCIATION

Business partners must respect and guarantee the rights of all employees to freedom of association. Everyone has the right to assemble according to relevant local laws and to found or join unions and / or employee representative bodies. Furthermore, employees have the right to engage in collective actions to resolve workplace-related or



Rights and information

wage-related issues. Employees may never be punished or suffer any disadvantage for asserting these rights.

Employees may found Works Councils and/or unions and/or join unions of their choice in accordance with local legal regulations. All of the business partner's employees should be able to communicate their concerns, ideas, and comments to corporate management in an open and transparent manner, without the fear of discrimination, negative consequences, retaliation, or intimidation.

7. INFORMATION AND TRAINING

Employees are entitled to information and training on health and safety. Because of this, health and safety information and laws which must be permanently posted must be made available to employees in a clearly visible and easily understandable manner.



Environmental responsibility

1. ENVIRONMENTAL AND CLIMATE PROTECTION

Business partners must comply with relevant, applicable environmental protection laws and regulations. Environmental impacts must be avoided or at least reduced whenever reasonably possible. Protecting the environment and the climate and promoting biodiversity are ongoing tasks that can only be carried out by consistently improving our level of protection by permanently reducing the resources we use and reducing waste. Business partners must make all reasonable efforts to do so within the framework of their business activities.

2. RESOURCES AND SUSTAINABILITY

GEZE is aware of our environmental responsibility, and we align our actions to meet this responsibility. Protecting resources and the environment and maintaining biodiversity are essential tasks we all must participate in. Because of this, business partners commit to comply

with and base their actions on the Paris Climate Agreement. Resources must be used in an environmentally-friendly manner – water, the air, and the soil, in particular, must be protected. Business partners must take measures to protect the environment and ensure sustainability covering the entire lifecycle of their complete product portfolio and all of their processes. Environmental impacts must be avoided, and at least reduced, whenever possible. Business partners must comply with all applicable environmental protection laws in their respective countries, and obtain any necessary official requirements, environmental permits, or approvals.

Substances and

3. EVALUATING AND RESTRICTING SUBSTANCES AND MATERIALS

The business partner's company must comply with waste legislation requirements as well as emissions and water protection laws. Business partners must fulfil all hazardous materials regulations. These apply in particular to the handling, storage and disposal of hazardous materials.

Employees must be informed how to handle hazardous materials and substances and receive regular training. If such substances are subject to a registration obligation, then business partners must fulfil this obligation.





Consequences of violations

If the business partner violates this Code of Conduct or becomes aware of any factors indicating a significant violation of this Code of Conduct, then the partner must inform GEZE of this promptly. The business partner must collaborate with GEZE to clarify the violation. Reports must be handled in consideration of the legitimate interests of the business partner as well as in consideration of the rights of employees, in particular to data protection and to the protection of trade secrets and any non-disclosure regulations. The same applies to violations with respect to the business partner's subcontractors.

However, GEZE will not be liable for any expenses, damages or other costs incurred by the business partner in this context.

If there is a violation of this Code of Conduct, GEZE may provide the business partner with a reasonable deadline to correct the issue. If this is not possible due to the nature of the violation, GEZE can issue a warning.

If the violation is repeated, however, or if the business partner does not meet the deadline, then GEZE is entitled to end its business relationship with the partner through extraordinary means and without notice. If the business partner's violations result in any damage for GEZE, then GEZE can demand reimbursement for such damages from the business partner.

Reporting options are available to the business partner for this purpose in a clearly visible location on GEZE's website (www.geze.com).

If the business partner becomes aware of any violations, they must promptly initiate adequate investigations and corrective measures, and inform GEZE of these.

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Connecting
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www.geze.com