

## CODE OF CONDUCT

### FOR COMPANIES OF THE GPE GROUP | CODE OF CONDUCT | PRINCIPLES

#### 1) EMPLOYEES

##### a) Personnel management

The conduct of the company towards its (also future potential) employees is and employees is characterised by respect and fairness. The company respects the personalities of its employees and rejects all forms of harassment and discrimination.

No one may be disadvantaged or favoured, harassed or excluded because of their nationality, ethnic origin, skin colour, age or appearance, gender, disability, sexual identity, religion or ideology. In dealings with business partners (customers, suppliers, banks, competitors, etc.) and representatives of public and state authorities, a clear line must be drawn between the normal framework of a business relationship and private interests.

The company shall have a complaints office for complaints and for clarifying the facts and ordering appropriate measures. appropriate measures within the meaning of the General Equal Treatment Act (AGG).

##### b) Data protection and use of electronic media

The company undertakes to treat personal data confidentially and to collect, process and store it exclusively in accordance with applicable data protection regulations. The company has appointed a data protection officer to whom every employee may address questions and comments.

To the extent that the company provides access to and use of electronic media for business purposes, such electronic media may not be used for purposes that are contrary to laws, regulations, directives, guidelines or other provisions of the company.

##### c) Conduct within the company

Tolerance, respect, objectivity and fairness must be observed in all dealings with each other and with third parties.

fairness. This also applies to dealings with and in so-called social media.

Employees must at all times separate their private interests from those of the company of the company at all times.

#### 2) PRODUCTS: RESEARCH, DEVELOPMENT, MANUFACTURE AND LIABILITY

##### a) Fair competition

The company shall compete only in a fair manner and without any unlawful collusion. competition and undertakes in particular to comply with anti-trust law.

## **b) Dealing with trade secrets and industrial property rights**

Business secrets shall be protected from access by third parties.

## **c) Insider trading**

It is prohibited to disclose confidential information which, if it were to become known, would be likely to influence the value or market price of the company or other shares or securities. market price of the company or other shares or securities of other companies ("insider information") for trading in shares or other securities or to pass it on to third parties.

## **d) Cooperation with authorities**

The regulatory obligations towards the competent authorities shall be complied with. It is important to the company to maintain a good and cooperative relationship with all competent authorities.

Information shall therefore always be provided in a complete, correct and timely manner.

## **e) Environmental management, energy management, health protection**

The company is committed to the protection of the environment, the careful use of energy resources and the protection of human health. This results in the implementation and ongoing maintenance of certification in accordance with DIN 14001.

## **f) Product quality and safety**

The company aims to meet the high quality and safety demands of its customers as well as regulatory

and safety requirements of customers as well as the regulatory requirements for increasingly complex

and systems. The basis for this are the standards implemented in the management system and maintained through certification.

Maintained by certifications

DIN EN ISO 9001

DIN EN ISO 13485

Improvements required for this purpose are thoroughly and sustainably enforced.

The company expects its employees to be committed to the quality of its products.

This includes in particular that all employees who become aware of any complaints about products, report them immediately to the quality department (quality management or quality assurance). If, despite all efforts, defects should have occurred, the company shall act to eliminate them in accordance with legal stipulations and contractual obligations.

## **3) TRADE AND DISTRIBUTION**

### **a) Bribery and corruption**

Bribery and corruption are prohibited and will not be tolerated by the Company. The reputation, acceptance and the business activities of the company as a trustworthy market participant shall not be must not be jeopardised by these offences.

### **b) Accepting and granting advantages**

- No employee may demand, accept, offer or grant personal advantages in connection with professional activities. No employee may accept or give gifts from business partners or other third parties if this constitutes or can be perceived as an undue influence on business decisions.

### **c) Lobbying**

The company shall be neutral on party politics but shall legitimately engage in political discussions and processes relevant to the company, its products and its customers. and its customers.

### **d) Money laundering**

The smuggling of criminal assets into the legal financial and economic circuit while concealing their true origin and other money laundering activities at home and abroad are prohibited.

### **e) Export**

All national and international customs, export and foreign trade regulations shall be observed.

## **4) REPORTING AND DOCUMENTATION**

### **a) Financial reporting and documentation requirements**

All business transactions shall be adequately and truthfully documented. The complete The complete and correct recording of information relevant to accounting and tax law must be ensured.

guaranteed. Legal and official storage regulations shall be observed.

### **b) Dealing with the media and government agencies**

Enquiries from the press or the like may only be answered by employees who have received express special authorisation to do so.