

CODE OF CONDUCT

FOR COMPANIES BELONGING TO THE GPE GROUP | BASIC PRINCIPLE

1) EMPLOYEES

a) Personnel management

The behaviour of the company with regard to its employees (including potential future employees) is characterised by respect and fairness. The company respects the individual personalities of its employees and opposes all forms of harassment and discrimination.

No person may be placed at a disadvantage or given preferential treatment or subjected to harassment or exclusion on the basis of their nationality, ethnic origin, skin colour, age, appearance, gender, disability, sexual identity, religion or ideology. With regard to business partners (customers, suppliers, banks, competitors, etc.) and representatives from public and state authorities, it is imperative that a clear line is drawn between the scope of a normal business relationship and personal interest.

In order to address complaints, establish the facts and put appropriate measures in place, the company has established a department competent to handle complaints in the sense of the General Act on Equal Treatment (Allgemeines Gleichbehandlungsgesetz – AGG).

b) Data protection and use of electronic media

The company undertakes to treat personal data as confidential and to gather, process and store such data exclusively in accordance with the applicable data protection provisions. The company has appointed a data protection supervisor to whom each and every employee can report if they have questions or observations.

In so far as the company provides access to and allows the use of electronic media for business purposes, such electronic media may not be used for purposes that contravene laws, regulations, instructions, guidelines or other company regulations.

c) Behaviour within the company

Interactions with one another and with third parties must be carried out with tolerance, respect, objectiveness and fairness. The same also applies to interactions taking place with and on social media. Employees must keep their own personal interests separate from those of the company at all times.

2) PRODUCTS: RESEARCH, DEVELOPMENT, MANUFACTURING AND LIABILITY

a) Fair competition

The company competes in an exclusively fair manner and does not enter into any unlawful agreements. It undertakes in particular to comply with competition law.

b) Handling of trade secrets and property rights

- Trade secrets are to be protected from access by third parties.

c) Insider trading

Employees are prohibited from using, for the purposes of trading shares or other securities, or disclosing to third parties any confidential information that, if it became known, is likely to have a significant impact on the value or the market price of the company or other shares or securities belonging to other companies („insider information“).

d) Cooperation with authorities

Regulatory duties concerning the competent authorities are to be upheld. The company relies on a good and cooperative relationship with all competent authorities. For that reason, information provided must always be complete, correct and submitted in a timely manner.

e) Energy management, health and environmental protection

The company is committed to protecting the environment, using energy resources in a sustainable manner and protecting human health. For that reason, the company implements and ensures the continued retention of certifications in accordance with DIN 14001 and DIN 50001

f) Safety and quality of products

- The company aims to ensure that its products and systems, which are becoming increasingly complex, fulfil the stringent quality and safety requirements of its customers, as well as regulatory requirements.

The following standards, which are implemented in the management system and maintained by means of certification, form the basis for this:

DIN EN ISO 9001
DIN EN ISO 13485

The improvements necessary for this are implemented in a rigorous and sustainable manner.

3) TRADING AND DISTRIBUTION

a) Bribery and corruption

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

b) Acceptance and granting of benefits

No employee may demand, accept, offer or grant benefits in connection with their professional activity.

No employee may accept gifts from business partners or other third parties if these are likely to have an undue influence on business decisions or if they could be considered to have such an influence.

c) Lobbying

The company behaves in a neutral manner from a party-political point of view, however it takes part, in a legitimate manner, in political discussions and processes that are relevant to the company, its products and its customers.

d) Money laundering

The inward transfer of property assets, gained as a result of criminal activities, into the legal financial and economic system by concealing their true origin, as well as any other money laundering activities, both within Germany and abroad, are forbidden.

e) Exporting

All national and international customs, export and foreign trade provisions are to be observed.

4) REPORTING AND DOCUMENTATION

a) Financial reporting and obligations with regard to documentation

All business transactions are to be documented accurately and appropriately. The complete and correct recording of accounting and tax-relevant information must be ensured. Legal and regulatory rules for accounting must be observed.

b) Relations with the media and government agencies

Questions received from the press or other similar groups must only be answered by employees who have been granted express special authority to do so.