

# Code of conduct

## GETT.Group

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### ***Basic understanding***

GETT.Group takes responsibility for its business activities in the legal, economic, technological, social and ecological context. Our Code of Conduct forms the basis for ethical and sustainable action and is based on internationally recognized standards and guidelines such as the UN Global Compact, the ILO Core Labor Standards, the OECD Guidelines for Multinational Enterprises and environmental and social standards customary in the industry.

We expect our business partners to incorporate these principles into their business practices and pass them on in their supply chains. The rights of third parties are not established by this Code of Conduct.



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# **1. Compliance with the law**

Compliance with the applicable laws and regulations of the countries in which we operate is a matter of course for us. If local laws and regulations are less restrictive, our actions will be guided by the principles of this Code of Conduct. In cases where there is a direct conflict between mandatory local law and the principles contained in this Code of Conduct, local law shall prevail. However, we strive to comply with the contents of this Code of Conduct.

## **2. Integrity and Compliance**

### **2.1 Corruption**

We do not tolerate any form of corruption, bribery or extortion. Benefits or favors that could influence business decisions or create the appearance of undue influence are prohibited.

### **2.2 Fair competition**

All business practices are conducted in accordance with applicable competition and antitrust laws. Inadmissible agreements on prices, market sharing or other anti-competitive activities are prohibited.

### **2.3 Money Laundering Prevention**

We take measures to prevent money laundering and do not participate in transactions that serve to conceal illegally acquired assets.

### **2.4 Protection of information and intellectual property**

Trade secrets, customer data and intellectual property must be protected from unauthorized access and may not be passed on or used without consent.

### **2.5 Privacy**

We process, store and protect personal data in compliance with the legal regulations. Thus, personal data is collected confidentially, only for lawful, pre-determined purposes and in a transparent manner. We only process personal data if it is protected against loss, alteration and unauthorized use or disclosure with appropriate technical and organizational measures.

### **2.6 Export control**

We are committed to complying with the legal standards relevant to export control – in particular licensing requirements, export and support bans – in the context of the transfer and export of our goods.

### **2.7 Avoidance of conflicts of interest**

Employees and business partners avoid conflicts of interest that could influence business decisions. If conflicts of interest arise, they must be disclosed.

### **3. Health and safety**

A safe and healthy workplace is a basic requirement for our business activities. These include:

- Compliance with applicable laws and alignment with international standards such as ISO 45001 with regard to health and safety at work,
- the provision of a safe working environment through technical, organisational and personal protective measures,
- regular training courses on accident prevention and health promotion,
- Implementation of preventive controls, emergency measures, an accident reporting system and other appropriate measures for continuous improvement,
- access to clean drinking water and adequate sanitation for all workers.

### **4. Remuneration and Working Hours**

The remuneration is based on the applicable laws as well as any existing, binding collective agreements and is supplemented by the relevant national minimum wage laws. Employees are clearly, comprehensively, and regularly informed about the composition of their remuneration..

We comply with applicable laws and (international) laborstandards regarding the maximum permissible working hours and ensure that:

- working hours, including overtime, do not exceed the legally permitted maximum limits,
- the weekly working time, including overtime, does not exceed 60 hours, even in exceptional cases, in the absence of such provisions,
- employees have at least one full day off per calendar week.

### **5. Respect for Human Rights**

We respect and uphold internationally recognized human rights, including the dignity, privacy, and personal rights of every individual. Ensuring freedom of opinion and expression is a fundamental principle we support and protect. Mistreatment of employees, including physical or psychological abuse, sexual harassment, or discrimination, is not tolerated under any circumstances.

#### **5.1 Prohibition of child labor**

Child labor is strictly prohibited. Employees must be at least 15 years old, unless national laws or the ILO exemption for developing countries set a higher minimum age. Young people under the age of 18 must not be exposed to dangerous work.

### **5.2 Prohibition of forced labor**

Any form of forced labour, including modern slavery, debt bondage or involuntary labour, is prohibited. Employment relationships must be voluntary and can be terminated at any time.

### **5.3 Responsibility in the supply chain**

GETT.Group undertakes to take all reasonable measures to ensure that no products manufactured using forced labor enter its supply chain or are offered on the EU market. We expect our business partners to take appropriate measures to identify, prevent and disclose forced labor in their supply chains.

### **5.4 Freedom of association and collective bargaining**

We respect workers' right to freedom of association, freedom of assembly, and collective bargaining, to the extent legally permissible and possible in the country in which we operate. If this is not permissible, we seek appropriate compromises for our employees.

### **5.5 Promoting diversity and equal opportunities,**

We promote equal opportunities and do not tolerate discrimination. We treat all people equally, regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

## **6. Environment, Energy and Climate Protection**

We act in accordance with applicable laws and are guided by internationally recognized environmental management standards such as ISO 14001 in order to minimize negative impacts on the environment and continuously improve our activities for environmental and climate protection.

All employees are sensitized to environmental protection and necessary training measures and training are offered.

The focal points of our environmental protection measures include in particular:

- compliance with the environmental laws and regulations applicable to our production processes and products, as well as industry-specific environmental standards,
- the efficient use of resources and the reduction of waste, emissions and energy consumption,
- Measures for air and water protection as well as for the avoidance of environmentally harmful substances.
- the consideration of sustainability aspects in product development and material selection and in all relevant corporate processes.

We are committed to the continuous reduction of greenhouse gas emissions and align our efforts with the goals of the Paris Climate Agreement. In the development and manufacture of our products, we take into account aspects of resource efficiency and strive for a long-term improvement of material cycles. To ensure transparency and traceability in our supply chain, we conduct risk-based due diligence reviews and promote cooperation with business partners who can demonstrate responsible sourcing practices.

## ***7. Dealing with conflict minerals***

We take the necessary care to avoid the use of conflict minerals in our products in order to prevent human rights violations, corruption and financing of armed groups or the like.

We conduct due diligence in our supply chain to take appropriate and reasonable measures to trace the origin and trade routes of the minerals used. Our goal is to ensure that these minerals come from responsible and conflict-free sources.

We expect our business partners to apply appropriate procedures and disclose relevant information in their supply chains.

## ***8. Supply chain***

We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce the contents of this Code of Conduct in their supply chains as well.

We reserve the right to review the application of this Code of Conduct by our suppliers systematically and on an ad hoc basis. This can be done, for example, in the form of questionnaires, evaluations or audits. If doubts remain as to compliance with this Code of Conduct, the supplier will be asked to take appropriate countermeasures and report the incident to his or her responsible contact in our company. If necessary, the cooperation will be terminated.

## 9. Systems

GETT.Group is implementing a management system that integrates and continuously improves the requirements of this Code of Conduct and ensures the sustainable implementation of the corporate principles.

Our business partners are required to implement an appropriate management system that ensures that:

- comply with relevant legal and regulatory requirements, in particular in the areas of human rights, occupational safety, environmental protection and ethics,
- This Code of Conduct is effectively integrated into business processes and processes are in place to identify and manage risks,
- Develop measures for the continuous improvement of social, environmental and security-related issues,
- responsibilities are clearly defined by appointing one or more persons for the implementation and monitoring of the management system,
- Training for employees is carried out to ensure compliance with the standards set,
- Setting up grievance mechanisms that allow employees to raise concerns anonymously and without reprisals,
- adequate documentation and evidence are provided in order to be able to prove compliance with the requirements.

We expect our business partners to establish comparable management structures that enable them to comply with and implement the requirements of this Code of Conduct.

## 10. Implementation and enforcement

We make reasonable efforts to continuously implement, document and apply the principles and values described in this Code of Conduct. All employees are sensitized to the contents of the Code of Conduct and trained on relevant topics as needed. Violations of the Code of Conduct will not be tolerated and can lead to consequences under labor law.

### 10.1 Communication

We communicate openly and in a dialogue-oriented manner about the requirements of this Code of Conduct and its implementation to employees, customers, suppliers and other interest and stakeholder groups.

## **10.2 Indications of violations**

We offer our employees and business partners access to a protected mechanism to report possible violations of the principles of this Code of Conduct confidentially.

If you have any concerns or suspicions, please contact the following person/body directly or anonymously:

[hinweisgeber@gett.de](mailto:hinweisgeber@gett.de)

## **10.3 Continuous improvement**

We are committed to continuously improving our practices and performance in all areas covered by this Code of Conduct. We set measurable goals, monitor our progress, and report transparently on our progress and results.

Drawn

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# 11. Signing

Confirmation of compliance with this Code of Conduct

The undersigned hereby confirms that he has received, read and understood the Code of Conduct of GETT.Group. The signatory undertakes to implement and ensure compliance with the principles contained therein in its company and supply chain.

Company: \_\_\_\_\_

Address: \_\_\_\_\_

Place, Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Name, Position: \_\_\_\_\_