



Geia Group Code of Conduct

Introduction Code of Conduct

This Code of Conduct is a legally binding document for all entities within GEIA GROUP, hereinafter referred to as **GEIA**.

Acting ethically and legally compliant creates trust, credibility, reliability, and reputation. Our compliance culture is partially the responsibility of all employees on an individual basis and partially it's the company's responsibility. Trust and credibility are hard to build and easy to destroy. It is therefore of the utmost importance that what has been build is maintained and developed. Acting in a moral and ethical manner is and will continue to be a cornerstone in the continued business success of **GEIA**.

This Code of Conduct is the guiding framework for **GEIA**'s business culture. It combines two important aspects: on the one hand the claim to comply with the law and on the other hand the special requirements for ethics and integrity. For **GEIA**, it is both an internal demand and a promise to the outside world. It also ensures that **GEIA** is and remains transparent and comprehensible for everyone. At **GEIA**, the Code of Conduct applies to **GEIA** employees and our Board of Directors.

The content and values of this Code of Conduct do not, however, stop at any limit. For this reason, **GEIA** expects its suppliers and consultants to comply with the behavioral requirements set out in its Code of Conduct and aims to ensure that they are also contractually obliged to comply with these behavioral requirements. For this reason, **GEIA** has defined the following principles for its Code of Conduct.

1. Preliminary remarks

1.1 What does "compliance" mean?

"Compliance" means to adhere to the laws and internal regulations in all business activities. For **GEIA** "compliance" also means to act in an ethical manner. **GEIA** expects that all its directors, officers, members, consultants, secondees and employees, whether permanent or temporary behave and act compliant to prevent economic and reputational damage for **GEIA**.

1.2 Who is responsible for compliance?

Compliance concerns all of us. Everyone at **GEIA** is responsible for compliance in their daily work.

Only if we know, understand, and adhere to the laws, regulations and our own rules and policies, we can reach our goals. Always behaving and acting in compliance and everywhere, also protects each **GEIA** representative against personal liability.

This requires each of us to pay constant attention to the topics mentioned in this Code of Conduct and all the other **GEIA** policies, rules, and procedures.

1.3 To what extent does the Code of Conduct apply?

This Code of Conduct (as well as all **GEIA**'s policies, rules, and procedures) applies to all internal, external, national and international matters, relations and business situations. This Code of Conduct represents the minimum compliance standard for the activities of all Representatives of **GEIA**. In any case, the applicable laws of the country or countries a matter, relation or business situation is connected or related to, apply additionally and – to the extent they collide or deviate – precede this Code of Conduct.

2. Compliance with law

We as **GEIA** have a high standard on the integrity of our actions. **GEIA** and all our Representatives are obliged to observe all applicable laws and legal regulations. This principle of compliance also applies explicitly if **GEIA** and/or one or more persons in **GEIA** would expect to gain advantages by violating laws or guidelines.

3. Adherence to human rights

GEIA supports and respects the protection of international human rights as set forth in the Universal Declaration of Human Rights of the United Nations and the fundamental conventions of the International Labor Organization. **GEIA** expressly rejects child and forced labor or labor favored by human trafficking and makes this a criterion in the selection of suppliers and business partners.

4. Commitment to Diversity, Equity and Inclusion

4.1 Equal opportunities and non-discrimination

Diversity, equity, and inclusion (“**DEI**”) play an important role at **GEIA**. It is our goal to have a diverse and talented team reflecting the same diversity in our investors, shareholders, colleagues, and business partners. Uniqueness and diversity of our employees represent a core value for us. We support a working environment which is free of prejudice and where everyone is treated equally.

Our commitment is to strive to create a diverse, equal, and inclusive culture at **GEIA**. Initiatives are implemented in all human resources processes for an ongoing development of a working environment build on the premise of diversity, equity, and inclusion.

At **GEIA**, we empower people by respecting and appreciating what makes them different, especially in terms of age, ethnicity, gender, gender identity or expression, language, nationality or national origin, family or marital status, physical, mental and development abilities, race, religion or belief, sexual orientation, skin color, social or economic class, education, work and behavioral styles, political affiliation, military service, caste, and other characteristics that make our employees unique. Workplace diversity also includes differences in personalities, value systems, attitudes and backgrounds like life experiences, skill sets and knowledge bases, academic background, family situation and lifestyle. With our inclusion strategy we want to make everyone feel supported, listened to and comfortable, ready to share their opinions and thoughts without hesitation and able to do their personal best.

We believe that valuing diversity, equity, and inclusion in all aspects of our business is a competitive differentiator enabling us to attract and retain top talent, foster more innovation and creativity whilst being more productive, exceeding financial targets, outperforming our peers, and creating unmatched value for our investors, shareholders, colleagues, and business partners.

5. Health and safety at work

Our employees are our most important asset. Therefore, their safety is a special concern for us. We include occupational safety in all our business considerations. All our employees are called upon to communicate suggestions for improvement to their supervisors, actively pointing out areas for improvement.

5.1 Alcohol and drug abuse

Our company stands for a safe, productive, and drug-free working environment. In the premises of **GEIA** no one may be under the influence of illegal drugs, or other illegal substances. Alcohol intake in company events, whether in or outside **GEIA** premises, should be kept to a level that is responsible.

6. Fair and free competition

All employees of **GEIA** must comply with applicable fair competition and antitrust laws. All measures aiming at an inadmissible restriction of competition and/or violating legal regulations are to be avoided. In principle, agreements between companies, decisions by associations of companies and concerted practices which aim towards or effect the prevention, restriction or distortion of competition are prohibited.

Read more in our Antitrust Policy.

7. Business relationships

7.1 Prohibition of Bribery and Corruption

GEIA does not tolerate any immoral business practices such as corruption, bribery, or dishonest advantage. Therefore, **GEIA** will not improperly influence business decisions by using or accepting improper advantages of any kind. **GEIA** convinces in business by suitability, performance, quality, and price of its offered services. Business partners will be treated fairly by **GEIA** employees, managers, directors or officers.

Any undue influence on public officials is strictly prohibited not only to employees but to anyone who works for or provides services to **GEIA** in any

form. Any appearance of a bribery attempt must be avoided, for example, when obtaining official permits.

For instance, in the case of a public tender, representatives of **GEIA** shall not offer any incentive or gift of such a magnitude that it can be perceived as an attempt to unduly influence individuals involved in the decision-making process.

GEIA representatives should act in line with generally accepted market standards also in this area.

If an employee violates laws designed to prevent bribery or corruption, the employee may face heavy fines, up to and including several years in prison. Employees who attempt to influence business partners or public officials by granting benefits in an unfair manner will be held liable for the criminal consequences as well as for the appropriate legal action, which can range from a warning to termination of employment without notice.

If you have any questions or in special cases, you can contact your supervisor and/or the management of **GEIA** at any time.

7.2 Prevention of money laundering

GEIA fully complies with its obligations to prevent money laundering. Every Representative must avoid unusual financial transactions and have a high awareness thereto. This applies to transactions involving cash or indirect transactions that are conducted via third parties and that could give rise to suspicion of money laundering. Possible cases of suspicion must be reported to the supervisor and/or the management of **GEIA**.

For instance, pay special attention to unusual transactions in connection to incentive providers, unusual amounts on invoices from subcontractors and so on.

Money laundering is often a complicated matter and difficult to detect. If you witness transactions that you are unsure what to make of, you should get in touch with our Finance Team who will be able to help you determine if foul play is at hand.

7.3 Tax compliance

GEIA are prohibited from evading taxes or the like on behalf of **GEIA**, nor may they assist, aid, abet, advise, or assist in tax evasion or engage in any

similar legally prohibited activities for customers, business partners or other third parties.

8. Conflict of interest

GEIA respects the privacy of its employees, directors and officers and is not interested in personal matters outside the workplace. On the other hand, it is important for all employees, directors, and officers to make sure that professional and private interests are clearly separated. Conflicts of interest can cast doubt on the integrity and professionalism of **GEIA**. They must therefore be identified and avoided at an early stage.

Personal relationships with a business partner, e.g., with family members, must not lead to preferential treatment of the business partner and our professional position must not be used for personal gain.

We report possible conflict situations or cases of doubt and solve them together with our supervisors or management. In this way we ensure that business decisions are made neutrally and in the interest of **GEIA**.

9. Business and trade secrets, assets

9.1 Protection of confidential company information

Trade and business secrets as well as confidential information are important assets of **GEIA**. Every Representative is obligated to treat information about **GEIA**, its business and business partners that is not publicly known as strictly confidential and to protect it from unintentional disclosure. This applies to significant intellectual assets such as trade secrets, intellectual property, trademarks, but also to conditions granted to others as well as the content of any agreement or document.

This applies for instance to new or planned concepts and products that we become familiar with in the process of new product development.

9.2 Protection of company assets

Each of us is responsible for the protection and resource-saving use of the company assets. Assets may not be removed from the company. Everyone at **GEIA** is obligated to use the assets of **GEIA** for

legitimate business purposes and to protect them from loss, damage, or unlawful use.

10. Data protection and information security

10.1 Data privacy

GEIA is aware that the personal data of its customers, business partners, shareholders and employees is highly sensitive, and protects that data by handling it in a careful and responsible manner. Therefore, **GEIA** takes a variety of technical and organizational measures to ensure the confidentiality of personal data in these efforts. Every individual is responsible within the scope of their duties for ensuring a high level of data privacy at **GEIA**. The **GEIA**'s employees adhere strictly to the data privacy regulations and respect and observe the comprehensive rights of those whose data they collect, process and use.

Read more in our Privacy policy.

10.2 Data security

Data security is of paramount concern to **GEIA**. It is a decisive factor of its success and public image. That is why **GEIA** uses all the appropriate and reasonable technical and organizational means at its disposal to protect company data and the data of its customers, business partners, shareholders, and employees against unauthorized access, unauthorized or improper use, loss and premature destruction.

All **GEIA** employees are obliged to read, understand, and follow the IT Security instructions for users.

10.3 Social media

Social online networks offer us countless opportunities to communicate with our business partners, families, friends, and the public in general. Social media includes social media messenger services (e.g., WhatsApp Messenger, Facebook Messenger, Instagram), blogs, social network websites, wikis, photo/video sharing sites and other chat applications and chat rooms. Electronic messages are permanent records of our communications that can significantly impact the reputation of **GEIA**. Our employees must not appear to be speaking or acting in the name or on behalf of **GEIA** unless they are specifically authorized to do so.

For instance, users responsible for providing content on the **GEIA** social media account LinkedIn may post on behalf of **GEIA** and Managing directors or other staff may post on social media sites with Managing directors' permission, but other employees should not appear to speak on behalf of **GEIA** on Social media platforms.

Leaders should also be conscious that they are role models when they are expressing their views on social media platforms and may be perceived as speaking as **GEIA** representatives even when they engage in social media as private persons. They should therefore be careful not to post content that could be perceived to go against **GEIA** policy, e.g., political content or content that can be perceived as promoting discrimination.

11. Compliance with rules of behavior

GEIA expects its Representatives to behave in line with the Code of Conduct. Any breaches of these rules, legal obligations, or of other internal policies and regulations may have serious consequences not only for the individuals committing them, but also for **GEIA**. Therefore, deliberate misconduct will not be tolerated. Without any exception, **GEIA** will severely sanction any such misconduct or violation of legal provisions. In doing so **GEIA** will take no account of the employee's rank or position within the company. **GEIA** creates a climate and atmosphere free of any fear of negative consequences to encourage employees to communicate violations and misconduct, if necessary.

This Code of Conduct as well as all internal guidelines, trainings, etc., do not necessarily address all issues and questions. Every employee is therefore given the opportunity and is requested to contact their supervisor or the management at any time regarding questions and remarks.

12. Indications of weaknesses, contact person and monitoring

If employees observe weaknesses in **GEIA**'s compliance management system or possible violations of laws or this Code of Conduct, **GEIA** encourages them to report these confidentially to their supervisor, management, or via the whistleblower

channel.

Our employees can reach these under the following contact details:

- A. Internally: Access via secure software module IPW whistle-blower
- B. Contact whistleblower@geiagroup.com

The report should describe the relevant information as precisely as possible.

The details are described in our Whistleblower policy.

When investigating a report, **GEIA** and the employees/managers involved will take care to protect employees who have made reports in good faith from harm of any kind. To this end, the confidentiality of the identity of the whistleblower is always ensured so that no conclusions can be drawn about the individual and no disadvantage is incurred since an employee has made a report.

Compliance with the requirements of this Code of Conduct and the internal guidelines is regularly monitored, e.g., by superiors, internal audit, or external auditors. Management is also informed about which measures are to be introduced and implemented to further develop and improve the compliance system.