



CODE OF CONDUCT

for Geiger GmbH

Objective

In order to consistently guarantee a high degree of integrity in all our activities, we have developed this Code of Conduct as orientation. It contains the fundamental requirements on the conduct of each and every employee. At the same time it represents the binding framework and the bracket for all special guidelines and rules. The internal guidelines serve as binding instructions and support to observe the rules and regulations as well as in-company provisions.

The Code of Conduct is the central guideline for all professional activities and business relationships. Its provisions represent the overarching system of minimum country, social and legal system standards for the ethical conduct of all involved. Nothing can replace personal integrity and sound judgement. An important prerequisite for this is that we all know the rules relevant to our work and are aware of the impact of each and every action or decision.

We are responsible for observing statutory provisions in all regions and countries in which we operate, in order to safeguard us from possible damages and to act with integrity.

Examples include

- Ethically unobjectionable conduct in the company and when dealing with external business partners and authorities
- observing all relevant statutory provisions at home and abroad
- complying with export and import bans as well as embargo provisions
- protecting the health and safety of all employees
- observing human rights

For our management this encompasses the duty of being a role model and exemplifying this requirement credibly to our employees. The managers ensure that the employees know and observe all legal provisions relevant to their position.

In order to recognise our customer's needs early on and meet their expectations as best possible, we must constantly improve. Therefore, we work continuously on optimising our structures and processes, in order to achieve and guarantee the highest quality standards. The satisfaction of our customers has the utmost priority for us and is the focus of what we do.

Our customers, employees, suppliers and business partners place their confidence in us. This obliges us to conduct open discourse and transparent internal and external communication. We are aware of the resulting responsibility. When acquiring new customers we always comply with applicable law. Information is made available to the public in consideration of internationally recognised Corporate Governance Standards.

Working at Geiger GmbH means respecting the rights of others and avoiding, both privately and professionally, everything that could damage the company and its employees. We do not tolerate any form of discrimination or harassment, neither in-company nor in cooperation with business partners.

Conflicts of interest

Conflicts of interest can arise in the relationship between employees or as a conflict of interests between different customers. We must undertake to do everything possible to avoid conflicts of interest, to resolve unavoidable conflicts as quickly as possible and in an ethically unobjectionable manner. We expect our employees to inform their superiors of relationships to persons or companies that could lead to possible conflicts of interest.

To ensure independence, our employees shall in the future not demand to receive, accept or be promised any monetary grants, gifts or other benefits or courtesies unchallenged. Exceptions from this rule are only permitted after prior consultation and authorisation by the company management. The generally permitted acceptance of gifts of insignificant value forms the only exception to this principle.

Independence

All our employees dedicate their working activities to the company that they work for. Without prior consent from the company management, they shall neither for themselves nor for others independently operate a business nor be active for a different company. Correspondingly, they shall not pursue secondary employment nor trade in their own name or for a third party without prior knowledge and the explicit written consent of the company management. Exceptions to this principle may only be considered where the interests of Geiger GmbH are not compromised.

Confidentiality and data protection

We place great importance on the completeness and correctness of the information we generate and treat business affairs, of which we gain knowledge in the course of our operations, with the utmost discretion. We do not use confidential information improperly and do not pass any confidential information on to third parties without authorisation.

We protect corporate data and also personal customer and employee data against unauthorised access, unauthorised and improper use, loss and premature destruction with all suitable and appropriate technical and organisational means available to us. All employees are therefore obliged to take the necessary measures to ensure the security of IT systems regarding internal and external misuse and threats. Additionally, we take the greatest care and observe strict confidentiality and the applicable laws and rules when collecting, storing, processing and transferring personal data of employees, customers and other third parties.

Cooperation shaped by respect

It is our aim to always gain committed and competent employees. Since we treat each person regardless of origin and personal life situation with dignity and respect, the factors age, disability, ethnic background, skin colour, gender, pregnancy, sexual identity, citizenship, religion and marital status play no role, with regards to equal opportunities. We assess our employees on the basis of their performance and provide them with fair feedback in this regard. We treat one another with dignity and respect. Employees that infringe this policy shall face disciplinary measures. We strive to resolve problems at the work place as quickly as possible, confidentially and in consideration of the concerns of all involved. Here we cultivate a culture of open communication. Since it is our conviction that the open articulation of concerns is vital to ensuring that misconduct rarely occurs and, if it does, then it is recognised early on and corrected. This is the reason that we place great value on an open climate in which employees can approach their superiors or the company management without hesitation and trustfully also with critical facts.

Rejection of any form of corruption

We maintain trustful, fair and respectful business relationships with our business partners and expect the same from them. Our purchasing considers the laws and regulation of the countries in which we operate. We convey our principles of ethical trading with integrity to our business partners and encourage them to align their operations with the same standards. Furthermore, where possible, we agree with our suppliers that they observe our Code of Conduct.

We must not let ourselves be influenced when making business decisions by permitting suppliers and customers to offer or promise us illegal advantages or by accepting such advantages. Likewise we do not demand illegal advantages from them. We inform the company management if we are offered, promised or granted illegal advantages.

Our competitors and business partners

We perform as a fair competitor and do not disparage any other company. We observe the legal provisions to ensure fair competition. This applies particularly to agreements with competitors and other third parties, if these agreements could impair competition. We do not participate in price fixing or the prohibited coordination of market behaviour between competitors.

In addition, we are aware of the special significance of intellectual property, therefore we do not protect only our own knowledge and inventions, but rather also respect the intellectual property rights of our business partners and competitors.

Financial reporting/ban on insider trading

The legal provisions regarding the management and monitoring of the company are observed, as well as the internationally recognised standards for good corporate governance. Transparent financial reporting is ensured to provide a realistic impression of the financial, liquidity and performance situation of the company. Against this background, all company employees must contribute to ensuring that our business transactions are completely and correctly recorded in the accounts. We observe the legal ban on insider trading.

Workplace/resources

Our employees ought to work in a healthy and safe environment. That is why we observe the rules and regulations on health and safety at the workplace. At the same time, the managers support their employees in reconciling work and private life and also make use of offers to participate in activities to promote their health.

We treat our work equipment, which is the property of the company, with care and use it only for its intended use. We strive to use our resources efficiently.

This also includes a working method that is environmentally safe and friendly. To us this also means observing the applicable environmental laws and the preferable use of sustainable technologies.

Measure in the event of violations

Insofar as employees in the course of their employment relationship violate agreements and regulations of any kind, appropriate disciplinary measures shall be introduced. It is a priority to attempt to motivate the employees to change their conduct by explaining the meaning of our Code of Conduct. However, labour law or disciplinary measures can result in the event of serious violations.

All employees can approach their superiors or management, their staff, legal or financial department or – where available- also their staff representative with questions regarding the Code of Conduct or to report violations. At the same time, all employees are instructed to inform management should they become aware of such violations.

The role of the ombudsperson is to advise and support the informers as a neutral and independent contact person during the process of clarifying an alleged violation of the Code of Conduct, in particular with regard to illegal business practices. Here the ombudsperson treats the communication with the informer confidentially and passes on facts and the identity of that person to the company only with the person's express consent.

Employees that address an actual or suspected case of misconduct in good faith may not experience any disadvantages, as outlined above, because of this.

The reported cases and the subsequent procedures are documented. After completing the investigation they are concluded in a standardised closure statement and these closed cases are reported in the proximate quarterly report.

Exceptions to the observance of this Code of Conduct without a legitimate reason are not permitted. Appropriate arrangements and exceptions may only be authorised by the company management.

Entry into force

This Code of Conduct applies to the Geiger GmbH and its employees.

Pretzfeld, July 2022

Geiger GmbH



Daniel Kerper
Managing Director