CODE OF CONDUCT

Code of Conduct



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Preamble

Dear colleagues,

As a family business, we at GEZE place a premium on long-term collaborations, both with our employees and with our business partners. We have been a successful and economically sound family business since 1863. We have proven our expertise over the years worldwide and continued to grow. Our success and our growth are based on principles that we trust in, but which we also continually question – and further develop.

When we speak of GEZE in this Code of Conduct, we are referring to the entire GEZE Group, including all of our national and international subsidiaries and affiliates.

When it comes to our products, system solutions, and services for doors and windows, we consider the trust and satisfaction of our customers to be essential. We are a major driving force behind the digital networking of building technology – with one goal in mind: the development of liveable buildings.

Our employees are the driving force behind GEZE's business success. To expand on our business success we work together to implement our mission and guidelines and bindingly integrate them into the daily routine of the company. As a family business, we therefore remain independent and flexible enough to identify and meet the changing needs of our customers.

We pursue our objectives and secure the success of our company with committed, responsible employees, with each and every one of you, acting with integrity and in an ethically correct manner. Their and your behaviour towards colleagues and business partners is marked by a solution-oriented approach, openness and fairness. They are "ambassadors" of GEZE and determine the perception and reputation of the company among the public.

Carefully scrutinise your behaviour and ensure compliance with this code in your working environment. We ask that you address violations in an open and transparent manner. You can do so via your supervisor and/or other reporting options. We expect that our employees will observe this code. If you see something you believe violates the guidelines of this Code of Conduct, please be proactive in contacting your manager, the legal department, or a trusted individual at GEZE.

Your Board of Management
GEZE GmbH

Leonberg, November 2023



Market behaviour

Detailed operational regulations can be added to the Code of Conduct as long as they comply with the principles described here or are based on them. In case of deviations, the more stringent regulations must be observed. If locally applicable statutory regulations are stricter or more narrow, then these will apply.

1. FAIR MARKET BEHAVIOUR

GEZE hereby undertakes to act with integrity in its business dealings with competitors, by differentiating its own product and service advantages. This is done on the basis of our values by fair and ethically correct means. Defamatory statements or measures are not permissible, especially with regard to competitors. GEZE does not conclude anticompetitive agreements with business partners or competitors. Applicable laws must be complied with.

2. CORRUPTION, FRAUD, MONEY LAUNDERING

Corruption, fraud, money laundering, extortion, and/or embezzlement in any form are prohibited. Bribes and/or kickbacks, prohibited gifts or other advantages shall not be offered, granted, or requested or accepted from business partners or third parties, such as officials.

To ensure a business relationship cannot be misused for the purpose of money laundering or financing terrorism, it is important to only enter into and maintain business relationships with serious business partners and companies whose business activities are in accordance with the law and whose funds come from legitimate origins.
Coordination, information and/or agreements regarding prices, pricing components and increases, or other business conditions or market-relevant information, etc., are prohibited.

Meetings with business partners must always be official. There must be a concrete reason for the meeting, and the purpose must be communicated in a clear and transparent manner. GEZE advocates a free market and fair competition, and as such it rigorously adheres to the relevant rules under antitrust and competition legislation. For further details, please see our antitrust guidelines. These are available on the Intranet, or from your legal department.

GEZE bases its competition on objective criteria such as quality and intrinsic value of its own products and also selects business partners based on these reliable points. We do not tolerate any punishable, unethical influence on persons, bribery or similar practices, neither actively (as granting party) nor passively (as receiving party).

Specific national contribution guidelines also apply and must be observed by all employees. These are also available on the Intranet or from your legal department.

GEZE does not make any direct or indirect donations (money, tangible assets or services) to political organisations, parties (or organisations or persons close to or associated with them) or individual politicians. Donations may be made only in accordance with applicable laws, and must be communicated in a transparent manner with clear and traceable information on how they are to be used. The applicable specific national donation guidelines of GEZE also apply.





Conflicts of interest

3. CONFLICTS OF INTEREST

Conflicts of interest can arise when employees, family members or friends are working together in business activities. Personal relationships, however, must have no influence on work and must not lead to preferential treatment.

Business decisions of any kind are made with the help of objective and transparent criteria such as quality, service, price and sustainability in the best interest of the company.

Employees may not exploit their position, or information to which they have access, for their own personal advantage or that of their friends or other people who are close to them. This includes, for example, preferential treatment of persons in case of donations or supporting career development. Conflicts of interest or any doubts must be reported immediately.

4. INTERNATIONAL TRADE

GEZE actively participates in the international exchange of goods and services, and complies with all relevant trade control and other regulations on import and export controlling and on applicable embargoes.

National laws and regulations designed to control international trade and financial transactions, and international conventions, such as laws and regulations on import and export controlling and embargoes, are mandatory and must be observed.

5. DATA PROTECTION

Protecting privacy and private and personal data is a central concern for GEZE. Because of this, data protection and information security are a fixed part of our corporate philosophy. Applicable data protection laws must be complied with. If company and personal data are used, the security and safety of the data must be ensured. Any technical requirements must be updated regularly, and must conform to applicable data protection laws.

6. PROPERTY PROTECTION

All the employees are under the obligation to handle the property and assets of the company appropriately, economically and responsibly in every regard. Employees must not use economic goods or services of the company privately in impermissible ways. GEZE ensures the protection of intellectual property of the third parties. Because of this, no copyright protected works, for instance, may be used without authorisation.

Any type of knowledge transfer, and any exchange of data, information, etc., must be carried out so that no intellectual property rights are violated and so that all information, etc. is protected.

7. SUPPLY CHAIN

GEZE is aware of its responsibility within the supply chain, and acts accordingly. All applicable laws, such as the Supply Chain Act, must be complied with.

8. PROTECTION OF CONFIDENTIAL INFORMATION AND THE TRADE SECRECY ACT

Trade secrets and confidentiality agreements must be complied with. This obligation continues to apply even after the end of the working relationship.

9. CYBER SECURITY

We ensure IT and EDI security, and comply with applicable internal regulations to prevent the negative impacts of malware (viruses), data loss due to programme errors, or the misuse of data – for instance by hackers – whenever possible.





Social responsibility

At GEZE, we are committed to be a company where every employee takes on responsibility and acts in accordance with ethical and moral principles. It is impossible to predict today each individual ethical risk that will come about in the future. For this reason, it is all the more important to use our own judgement to comply with the goals and guidelines set forth here at all times.

1. HUMAN RIGHTS

GEZE recognises that the human rights of all employees must be upheld, and that all employees must be treated with respect and dignity. Internationally recognised human rights must be complied with. Each employee should be given the same treatment and the same opportunities. Respect and equal opportunity are fundamental values that are recognised by all employees.

All employees should work together with fairness, politeness, openness, and respect, as well as with a common understanding of trusting teamwork. GEZE managers, in particular, should generally model exemplary personal behaviour, since they are responsible for their work areas and the employees who are subordinate to them.

2. PROHIBITION AGAINST DISCRIMINATION, NO HARASSMENT

Discrimination, harassment and abuse of any kind will not be tolerated. This includes bullying and coercion. All forms of discrimination are prohibited. In particular, no one may be disadvantaged, for instance, due their age, gender, disability, sexual orientation, nationality, ethnic origin, skin colour, religion or worldview, political beliefs, or social background.

Discrimination is defined as disadvantaging a person due to one of the characteristics above, or for other reasons which are not objectively justifiable. Disadvantages due to language barriers, for instance, should be avoided by providing working documents and information in language that is easily understandable by the individual. All of GEZE's employees deserve equal, fair, and respectful treatment, and they must be respected and employed regardless of characteristics such as their nationality, culture, religion, worldview, skin colour, gender, sexual orientation, age, or disability.

All employees must ensure that abrasive or inhumane treatment do not occur in the workplace. This includes, for instance, sexual harassment, physical punishment, abuse, emotional or physical coercion, or verbal abuse of employees. Employees may, likewise, not be threatened with such behaviour.

If disciplinary measures are necessary, these must be carried out in compliance with national law and internationally recognised human rights. All improper disciplinary measures are prohibited, in particular withholding wages, social benefits or documents (like work permits) or prohibiting employees from leaving the workplace.

Concerns or violations of compliance with local legal regulations can be reported to GEZE without the fear of sanctions or retaliatory measures of any kind.

3. PROHIBITION AGAINST CHILD AND FORCED LABOUR

Child labour is prohibited, and relevant internationally recognised standards must be complied with. Likewise, GEZE does not make use of any forced labour or prison labour. Regulations designed to protect minors are observed at GEZE. National regulations and international standards to protect minors must be complied with.





Occupational safety

4. OCCUPATIONAL PROTECTION AND SAFETY
GEZE considers its employees to be its most important capital. Because of this, GEZE promotes the health and satisfaction of its employees over the long-term. Relevant occupational protection and occupational safety laws must be complied with. Work stations and workplaces must conform to applicable laws and regulations. Any violation of human rights at the workplace or at company facilities/work stations is prohibited.

Young employees (minors), in particular, may not be exposed to any dangerous, unsafe or unhealthy circumstances that could endanger their health and development. Employees must be trained regularly on health and safety at the workplace.

If it is not possible to exclude hazards at the work place/work area, then appropriate aids, such as personal protective equipment, must be provided. In general, the potential dangers posed by a workplace must be identified, evaluated and monitored.

Each employee must ensure that they comply with and implement relevant regulations and behaviours in their everyday work. GEZE offers training sessions on occupational health and safety for this purpose.

GEZE supports a good work/life balance, because we believe this contributes to the long-term health and satisfaction of our employees.



Rights and information

5. FAIR WORKING CONDITIONS
GEZE complies with all laws and industry standards on wages and working hours. GEZE never charges hiring fees to employees, and never withholds their work permits.

All employees are entitled to the legally required break periods, and are obligated to take these breaks. The agreed and actually performed weekly work hours may never exceed the maximum under applicable local law. Employees must be entitled to breaks and must be granted vacation time according to applicable local laws.

6. FREEDOM OF ASSOCIATION
GEZE grants all employees the right to freedom of association. All employees have the right to assemble according to relevant local laws and to found or join unions and / or employee representative bodies.

Furthermore, employees have the right to engage in collective actions to resolve workplace-related or wage-related issues. Employees will never be punished or suffer any disadvantage for asserting these rights.



Environmental responsibility

GEZE is committed to upholding the United Nations Sustainable Development Goals, and is doing its part to ensure they are achieved. In addition, for decades, we have been supporting and initiating different charitable activities in the social, medical, ecological, and cultural areas and in the educational sector. We are aware of our responsibilities towards our employees, our customers and suppliers, and our environment, and we work to continuously improve the sustainability of our products and increase our use of sustainable materials.

We focus on the honest reduction of our greenhouse gas emissions for the long-term, and are continuously developing the product lifecycles of our products. We also use resources in an environmentally-friendly manner.

1. ENVIRONMENTAL AND CLIMATE PROTECTION

GEZE hereby undertakes to act sustainably in all of its business activities, and strives to continuously improve the sustainability of its products and manufacturing equipment, as well as the way it handles natural resources carefully. Relevant environmental laws and regulations must be complied with. Environmental impacts must be avoided or at least reduced whenever reasonably possible.

Protecting the environment and the climate and promoting biodiversity are ongoing tasks that can only be carried out by consistently improving our level of protection by permanently reducing the resources we use and reducing waste.

Substances and materials

2. RESOURCES AND SUSTAINABILITY

GEZE has stood for longevity from its very beginnings. This is why all of our internal production processes are committed to the concept of sustainability. Environmental impacts must be avoided, and at least reduced, whenever possible.

Minimizing waste and achieving the highest possible recycling rates according to a strategy of “Avoid-Recycle-Remove” are considered basic principles for recycling and disposal, and must be complied with by all employees.

GEZE is aware of our environmental responsibility, and we align our actions to meet this responsibility. Protecting resources and the environment and maintaining biodiversity are essential tasks we all must participate in. Resources are used in an environmentally-friendly manner – water, the air, and the soil, in particular, must be protected.

3. EVALUATING AND RESTRICTING SUBSTANCES AND MATERIALS

The requirements of waste legislation, emissions and water protection, and all regulations on hazardous materials are complied with. These apply in particular to the handling, storage and disposal of hazardous materials.

GEZE complies with all applicable environmental protection laws in each country, and obtains any necessary official requirements, required environmental permits, and approvals.

Employees are informed how to handle hazardous materials and substances and receive regular training. If such substances are subject to a registration obligation, then GEZE fulfils this.





Consequences of violations

Anyone who violates this Code of Conduct is acting in a disloyal manner. This kind of behaviour can not only damage the GEZE brand and the public perception of GEZE, but also result in economic damages. Violations of applicable law and/or this Code of Conduct can have wide-ranging consequences both for employees and for the company, including consequences under criminal, civil, or public law.

Any employee who learns of a violation of this Code of Conduct should not hesitate to report it. GEZE established an internal email address for this purpose many years ago, where any questions, concerns or violations can be reported:

Please contact **compliance@geze.com**, and the GEZE legal department will handle your concern.

In addition, in accordance with applicable whistleblower protection laws in individual countries, GEZE has established a whistleblower protection process which allows tips to be submitted anonymously.

Further information is available on the website under the “Hinweisgeberschutzsystem” or Whistleblower system tab:

www.geze.com/de/hinweisgebersystem
www.geze.com/en/whistleblower-system

A compliant process will be introduced in compliance with the Supply Chain Act. This process will also offer an option for submitting tips.

GEZE will not sanction whistleblowers for any reports of violations, information on such violations, or similar tips, etc.

VI. DISTRIBUTION OF THE CODE OF CONDUCT

This Code of Conduct will be made accessible to all employees. Amendments will be shared via the customary internal communication pathways. The Code of Conduct will be modified if necessary in consideration of nationally specific requirements.

GEZE GmbH, November 2023

Connecting expertise – building solutions.

GEZE

www.geze.com