

## GfE-MIR Code of Conduct

The GfE-MIR group with its affiliated companies is a worldwide operating group of companies who embeds its business partners directly in its procurement and sales strategy. In all our activities, we carefully take into consideration a set of economic, process-driven and technical criteria as well as essential social and ecological factors such as human rights, labor conditions, anti-corruption concerns and environmental protection.

In terms of this explanation, business partners are all customers, suppliers, agents, representatives and other companies with whom GfE-MIR maintains business relations.

Partner companies in terms of this explanation are all customers, suppliers, agents, representatives and other companies with whom the business partners maintain business relations.

At GfE-MIR, we expect that our business partners comply with applicable national statute, with the principles of the United Nations Global Compact, and with the GfE-MIR Code of Conduct. Moreover, we expect from our business partners to ensure compliance with these principles and requirements by all their affiliates.

For the purposes of this Code of Conduct, an “affiliated company” shall mean an enterprise in which one of the parties holds a direct or indirect participating interest of more than 50% of the voting registered capital.

### Conduct towards employees

At GfE-MIR, we expect that our business partners respect and comply with the fundamental rights granted to all employees under applicable national statute. Furthermore, we expect our business partners to fully recognize the labour standards issued by the International Labour Organization (ILO), taking into due account the applicable laws and regulations in different countries and at different sites.

#### **Child labour**

At GfE-MIR, we expect our business partners to prohibit and refrain from any kind of child labour within their organisation.

#### **Discrimination**

At GfE-MIR, we expect that our business partners promote equal opportunities and equal treatment. Furthermore, we expect our business partners to prohibit any form of discrimination in recruiting, promoting or selecting employees for basic or advanced training programmes. Within the organisation of our business partners, no employee may be discriminated against based on his or her gender, age, colour, race, nationality, sexual orientation, disabilities or religious conviction.

#### **Forced labour**

At GfE-MIR, we expect our business partners to prohibit any kind of forced labour in their organisation.

#### **Freedom of association**

At GfE-MIR, we expect our business partners to respect the right of their employees, to the full extent of applicable national statute, to form a worker council, collective bargaining unit or other employee representations, and to enter into collective bargaining.

### **Remuneration and working time**

At GfE-MIR, we expect our business partners to fully comply with applicable national statute on working time and remuneration.

### Occupational health and safety

At GfE-MIR, we expect our business partners to fully comply with applicable national statute governing health and safety at work. Furthermore, our business partners are expected to establish and maintain an appropriate occupational health and safety management system.

### Environmental protection

At GfE-MIR, we expect our business partners to comply with all applicable national laws, regulations and standards to protect the environment. Our business partners are expected to establish and maintain a suitable environmental management system (e.g., in accordance with ISO 14001) to minimize environmental impact and hazards, and to improve environmental protection in their everyday operations.

### Conduct in business environment

#### **Prohibition of corruption and bribery**

At GfE-MIR, we expect our business partners to have zero-tolerance for corruption and to ensure compliance with all United Nations (UN) and Organisation for Economic Co-operation and Development (OECD) conventions against corruption, and with all governing anti-corruption laws. In particular, our business partners are expected to ensure that their employees, subcontractors and agents do not offer, promise, or grant any advantages to any GfE-MIR employees or related parties with the goal of securing an order award or any other form of preferential treatment in their business transactions.

#### **Preventing conflicts of interest**

In our business partners' business dealings with us, we expect our business partners to take decisions based on objective criteria only. Any factors that might influence our business partners' decisions due to private, business or other conflicts of interest must be prevented from the start. The same applies to relatives and other related parties.

#### **Unrestricted competition**

At GfE-MIR, we expect our business partners to always compete in a fair manner and to comply with applicable antitrust laws and regulations. Our business partners are expected not to enter with competitors into agreements that might constitute a breach of antitrust law, nor to take advantage of any dominant market position they might hold.

#### **Money laundering**

At GfE-MIR, we expect our business partners to comply with all applicable statute governing the prevention of money laundering, and not to participate in any money laundering activities.

### Business partner relations

At GfE-MIR, we expect our business partners to communicate the principles laid out herein to their partner companies and to take these principles into account when selecting partner companies. Our business partners are expected to encourage their partner companies to

comply with the minimum standards of this Code of Conduct regarding the protection of human rights, working conditions, anti-corruption and environmental protection when fulfilling their contractual obligations.

#### Compliance with the GfE-MIR Code of Conduct

We will review our business partners' compliance with the principles and requirements laid out in the GfE-MIR Code of Conduct regularly, asking our business partners to complete a rotational self assessment not less than once a year. Furthermore, we reserve the right to consult with each business partner directly or to appoint a qualified third party to perform a sustainability audit at the business partner's site.

Any violation of the principles and requirements set out in this GfE-MIR Code of Conduct will be regarded as a serious violation of the business partner regarding his contractual obligations towards GfE-MIR. GfE-MIR reserves the right to stop any business with all business partners who are in clear, verifiable violation of the GfE-MIR Code of Conduct and/or who are neither seeking nor implementing measures for improving their sustainability performance. In this event, GfE-MIR reserves the right to terminate any or all contracts with the business partner for cause after an appropriate deadline was set.