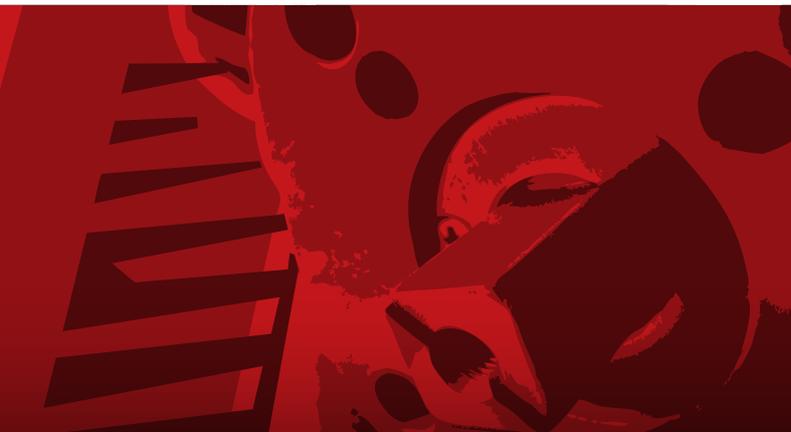
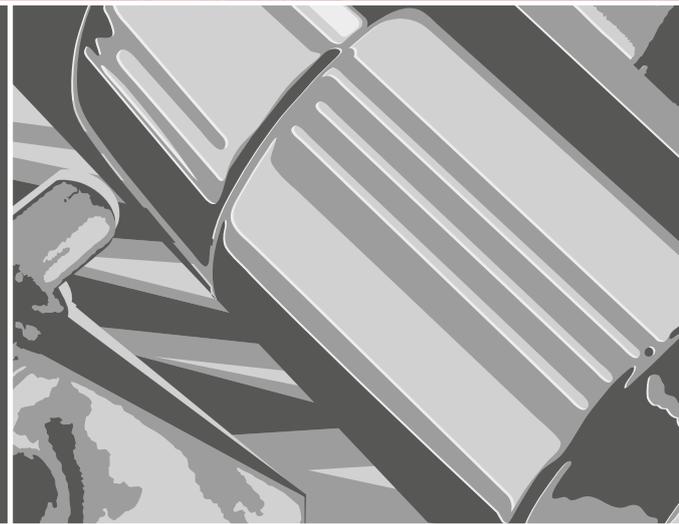




**GEMÜ**



**GEMÜ Code of Conduct**

# Inventive talent and entrepreneurial vision

The GEMÜ Group is one of the world's leading manufacturers of valve, measurement and control systems for liquids, vapors and gases.

We have succeeded in maintaining a pioneering role in the market for more than 50 years. But focusing on innovative products and individual customer solutions is not everything. As a family business, we also focus on entrepreneurial vision as well as stability and reliability for our customers, business

partners and employees. Healthy growth, proximity to our customers and the emotion, inspiration and innovative talent of our employees are behind the long-standing success of our company.

Our daily actions have always been guided by mutual appreciation and a special sense of responsibility with regard to the ecological, economic and social areas where we can have an impact.

Dear employees,

Our long-standing success is based on satisfied customers and committed employees.

GEMÜ develops high-quality products for demanding customers in highly sensitive economic sectors. With our passion for technology, we always strive for new innovative solutions and aim to provide our customers with excellent service. We are convinced that your commitment and skills have made GEMÜ what it is today.

We operate in many countries on all continents. The legal framework, in an increasingly interconnected world, is becoming more and more intricate and complex. Misconduct not only damages the reputation of GEMÜ, but can also cause serious economic damage. You as an employee may also suffer both professional and personal repercussions.

That is why there are no compromises at GEMÜ when it comes to conducting our business in accordance with the law and regulations. Responsible and honest behavior is the overarching standard for each of us – everywhere and at all times.

This Code of Conduct provides us with a framework within which we are able to make decisions and act according to uniform standards worldwide. It applies to everyone at GEMÜ, in all countries and regardless of our respective position in the company.

We expect you to familiarize yourself with the contents of this Code of Conduct, incorporate the principles and rules contained here into your own behavior and take them into account when making decisions.

Many thanks for your valued cooperation and support.



Gert Müller

Managing Partner



Stephan Müller

Managing Director

# Contents

<b>1. Main principles of conduct of the GEMÜ Group</b> .....	<b>4</b>
1.1. Our responsibility .....	4
1.2. Respectful Behavior .....	5
1.3. Management Culture and Working Climate .....	5
1.4. Healthy and Safe Workplaces .....	5
<b>2. Data Protection</b> .....	<b>6</b>
2.1. Protection of personal and confidential Information .....	6
2.2. Information Management .....	6
<b>3. Principles of Cooperation</b> .....	<b>6</b>
3.1. Competing Fairly .....	6
3.2. Prohibition of Bribery and Corruption .....	7
3.3. Recognizing and Avoiding Conflicts of Interest .....	7
3.4. Gifts and Invitations .....	8
<b>4. Our Social Responsibility</b> .....	<b>8</b>
4.1. Product Safety and Quality .....	8
4.2. International Trade Practices .....	9
4.3. Environmental Awareness .....	9
4.4. Social Commitment .....	9
<b>5. Compliance with our Principles of Conduct</b> .....	<b>10</b>
<b>6. Contact Points for Questions and Reports</b> .....	<b>10</b>
6.1. Questions regarding the Code of Conduct .....	10
6.2. Reporting potential risks or violations .....	10

# Maintaining Integrity

This Code of Conduct and our policies cannot cover everything required to help us know what the right course of action is in our daily work. If you are unable to find concrete guidance about such situations in the rules and regulations, you can contact your Line Manager, the responsible department or Legal & Compliance at any time.

Those who violate the Code of Conduct will be met with appropriate consequences, which can range from measures under labor law and claims for damages under civil law to criminal sanctions depending on the severity of the violation.

To ensure such actions are not necessary, we each have the responsibility to familiarize ourselves with the content and principles of this Code of Conduct, to incorporate these into our own behavior and to take them into account when making decisions.

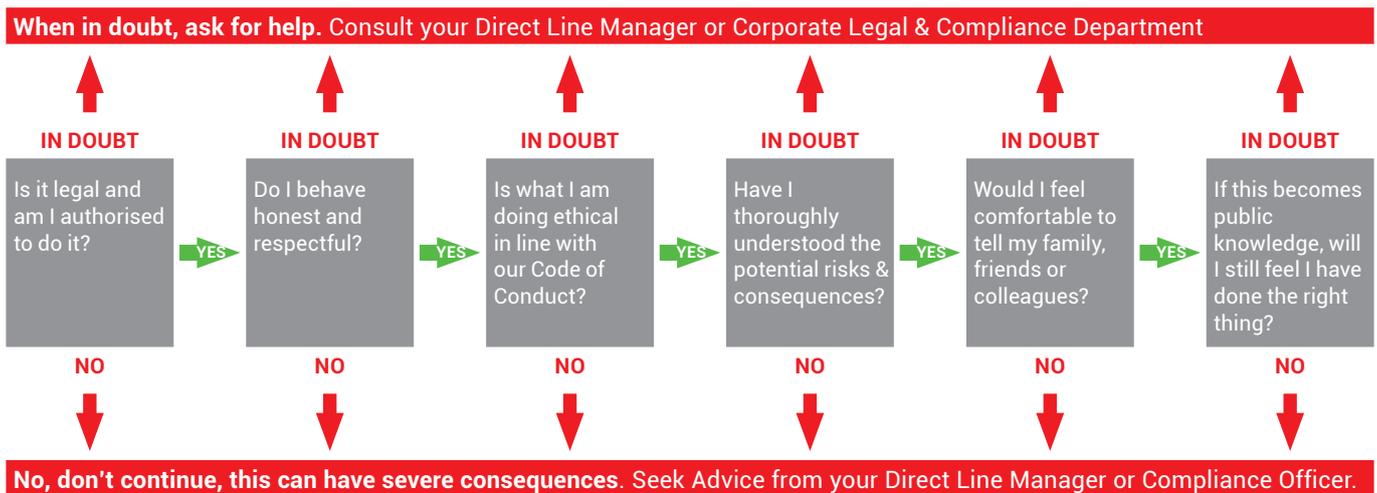
## 1. Main principles of conduct of the GEMÜ Group

Acting with integrity means acting correctly at all times, even when nobody is watching. We not only want to meet the expectations placed on us but exceed them.

### 1.1. Our responsibility

- We comply with local and international laws, regulations and standards.
- We follow the principles of the United Nations Global Compact<sup>1</sup> (UNGC) on respecting human rights and working conditions. Like the UNGC, we base labour-related issues on the conventions of the International Labour Organization<sup>2</sup> (ILO).
- It is important that we make decisions about which we can be proud.
- We cultivate open and honest business relationships, characterized by respect and responsibility. This is true both in our internal work and in dealing with external partners.
- Every interaction with our business partners must meet our high ethical standards. To guarantee this, we require our suppliers and partners to know and accept our principles of conduct.

How do we decide what is appropriate in certain situations?



<sup>1</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>2</sup> <http://www.ilo.org>

# Maintaining Integrity

## 1.2. Respectful Behavior

Diversity as well as an appreciative attitude and respectful way of interacting with people are important for trusting cooperation – in our internal as well as external work.

- We create a working environment with equal opportunities, where everyone is valued for who they are and what they contribute – regardless of their ethnic origin, skin color, gender, religion, nationality, sexual orientation, physical or mental disability, social background or any other legally protected status.
- As an international company, we operate in different cultures and countries, with legal requirements of varying degrees of strictness. We follow internationally recognized principles and conventions on fundamental human rights and core labor standards. All business activities must comply with the applicable minimum standards throughout the company. We do not tolerate forced labor or child labor.
- We owe our success to the knowledge, experience and commitment of every single employee. And we offer our employees opportunities for further training, through which they can develop and direct their ambitions in ways that are of lasting value for them as an individual, the team and GEMÜ.
- We do not tolerate any form of intimidation or disrespectful behavior, bullying, harassment, unwanted sexual advances, racial or other unlawful discrimination.
- We maintain objective, friendly and fair relationships with colleagues, employees and third parties.

## 1.3. Management Culture and Working Climate

Our success is based on highly qualified and motivated employees.

- Our managers do not primarily define themselves through their professional skills alone. Leadership and management skills are equally as important.
- We lead our employees respectfully by treating them with appreciation and acceptance regarding their intentions and opinions.
- We listen to each other. And if mutual help is needed, we arrange for it in a specific and reliable way.
- We encourage and demand independent responsibility, team spirit and commitment at all levels.
- We recognize strong performance and commitment appropriately.

### Find out more:

In order to anchor this approach in our company, GEMÜ has introduced management guidelines which provide employees with an understanding of GEMÜ's approach and management culture.



## 1.4. Healthy and Safe Workplaces

It is important that we take care of ourselves and the others involved in our business, such as business partners and visitors. Our workplaces should always support healthy, safe and productive work.

### What we do

- We are committed to a safe and healthy working environment, use the safety equipment provided to us and treat it with the same care as our own property.
- We know and follow all health and safety instructions in our area of work and are responsible for proactively ensuring the safety of our workplace.
- We address safety concerns openly and immediately inform colleagues, line managers and the safety experts on site of these concerns.
- We immediately report suspected or observed safety issues (e.g. accidents, near accidents and critical incidents).

# Maintaining Integrity

## 2. Data Protection

We understand the value of the data and information entrusted to us and handle it responsibly.

### 2.1. Protection of personal and confidential information

We handle personal and other confidential information about our employees, customers, suppliers and others only in accordance with the legal requirements.

Data may only be used for the purpose for which it was communicated. Confidential information in particular must be processed lawfully with special care and may only be shared on a need-to-know basis.

### 2.2. Information Management

We work with business information of various forms every day: digital, handwritten and oral, and we take the necessary measures to ensure the protection of all such information.

#### What we do

- We collect and use personal information only for lawful purposes; where necessary, we obtain prior written consent for the collection and use of such information.
- We keep personal information accurate and up to date.
- We regularly check all documents and securely destroy those which no longer need to be kept or which must be destroyed in accordance with the law.
- We always treat information provided by our business partners, such as financial data, pricing, contractual terms and conditions, technical data, proprietary processes and software or other details, with absolute confidentiality.
- We observe existing confidentiality agreements.

#### Our responsibility:

We take independent responsibility for informing ourselves about the further regulations of our privacy policy and other documents regarding communication and documentation if we collect, store, use or otherwise process sensitive data.



## 3. Principles of Cooperation

Becoming a role model for responsible behavior, we strive for relationships that are fair and meet our high ethical standards. This means ensuring openness and honesty in our partnerships.

### 3.1. Competing Fairly

We are committed to winning with passion and integrity.

Agreements with competitors regarding prices, sales conditions, quantity restrictions, territorial allocations and bids in public tenders are strictly prohibited. Disregarding the principles of fair competition can have serious consequences, such as damage to our reputation, heavy fines or even prison sentences.

#### What we do

- Business policies and prices are set independently and are never formally or informally discussed with competitors or other parties, either directly or indirectly.
- Customers, territories and product markets are always the result of fair competition and never of collusion.
- In particular, if we operate in the areas of sales, marketing and purchasing, it is essential to comply with the applicable laws and regulations to ensure fair competition. Please take note of and observe our internal antitrust and competition policy.

# Maintaining Integrity

- We protect our intellectual property and respect the intellectual property rights (e.g. patents, trademarks, copyrighted documents such as texts, images etc.) of others.

## **Our responsibility:**

We take independent responsibility for informing ourselves about the further regulations in our antitrust and competition policy in our work with competitors, customers or suppliers.



## **3.2. Prohibition of Bribery and Corruption**

Quality and know-how are the key to our success. We want to convince customers with high-quality products and solutions. However, the better product never requires unfair competitive advantages.

Corrupt behavior can lead to heavy fines and prison sentences as a result of current internationalization, the tightened legal situation and a changed attitude on the part of the public.

### **What we do**

- We do not tolerate bribery or corruption.
- We define the requirements for suppliers and service providers precisely and select those that best meet our business needs. Such decisions must be based on objective criteria such as quality, price, service, reliability, availability, technical performance and fulfillment of the contract.
- We are particularly careful in markets where the risk of corruption is higher.
- We can protect and enhance our reputation by conducting our business in the proper way and by refusing to use or condone corrupt behavior.
- Payments or the guarantee of advantages for the initiation or maintenance of a business relationship may not be offered or accepted.

## **3.3. Recognizing and Avoiding Conflicts of Interest**

In fulfilling our tasks, we never put our own interests above those of the GEMÜ Group.

Conflicts of interest can arise when a person's self-interests, family relations and other personal relationships conflict with the business interests of GEMÜ. Business activities on behalf of the company must not be influenced by personal considerations or relationships.

### **What we do**

- We must ensure that we always act in the best interest of our company. We avoid all situations where our own social, financial, political, or other personal interests conflict, or could conflict, with the business interests of GEMÜ.
- We report any suspected, actual, or potential conflicts of interest promptly to our Line Manager or Group Legal /& Compliance.
- We comply with all internal procurement policies when assessing or selecting suppliers or other business partners, e.g. by always selecting business partners on objective criteria such as quality, price, reliability, and suitability for identified needs.
- We are transparent about our personal relationships or outside activities (e.g. secondary employment) that may lead to an actual or potential conflict of interest and inform our Line Manager or Group Legal & Compliance accordingly.

# Maintaining Integrity

## 3.4. Gifts and Invitations

Benefits in the form of gifts, entertainment and invitations are often considered a courtesy and are a commonplace part of business life in many countries. We decline any inappropriate gifts that could be considered illegal.

### What we do

- We ensure that gifts and entertainment are not inappropriate and have a justifiable business purpose.
- We do not provide unauthorized gifts, favors or entertainment to any government officials or government employees.
- When we accept gifts or invitations, we always do this with full disclosure. That means anyone is permitted to know about the gifts or invitations we have accepted. If we have any doubts, we decline the gift or invitation.

#### Our responsibility:

We take independent responsibility for informing ourselves about the further regulations in our anti-corruption policy before we give or accept gifts, invitations or entertainment. We politely decline offers that violate our internal regulations.



## 3.5. Our Supplier Partnerships

We need raw materials, components and services, among other things, for our business. Our success depends on building and maintaining open, honest and fair partnerships with trustworthy suppliers.

### What we do

- We check carefully when we select suppliers or contractors.
- We demand that our suppliers observe the principles of our Code of Conduct.
- We regularly check our suppliers according to objective criteria regarding the suitability of their products and services, price, quality, performance, trustworthiness and reliability.

## 4. Our Social Responsibility

We think in terms of future generations and are aware of the ecological and social challenges the world faces. Sustainability has been a fundamental part of the GEMÜ strategy from the very beginning.

### 4.1. Product Safety and Quality

As a manufacturer of important components for highly sensitive applications, our products must meet strict requirements. Safety and quality have the highest priority – in everything we do.

### What we do

- We make every effort to ensure the highest quality in order to provide our customers with products that meet or exceed their expectations.
- We want to discover potential opportunities, recognize risks, disclose uncertainties and discuss contradictions. That is how we ultimately succeed in finding the best solution for our customers.

# Maintaining Integrity

## 4.2. International Trade Practices

We want to set an example of responsible behavior and contribute to the development of appropriate trade practices in the international trade community.

### What we do

- GEMÜ supplies technology and components for sensitive economic sectors. In the worst-case scenario, this technology could fall into the wrong hands in the development, production or use of critical goods and be directed against the well-being of other human beings. That is why we conscientiously observe applicable regulations regarding embargoes, trade and financial restrictions.
- We ensure through our control systems that we supply only trustworthy business partners.
- We ensure that the products we manufacture do not contain raw materials that directly or indirectly contribute to the financing or support of armed conflicts or serious human rights violations, including child labor and forced labor and slavery.
- We avoid the use of raw materials from smelters and refineries that do not meet the requirements of the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas<sup>3</sup>.

## 4.3. Environmental Awareness

Our principle is to use as little material and energy as possible for the development, manufacture, processing and transport of our products, to recycle waste materials sensibly or to reuse them.

### What we do

We use resources sparingly by

- reducing waste and, where possible, recycling and reusing.
- saving water and energy.
- giving preference to the use of renewable materials and the development of environmentally friendly packaging, products and working methods, without ignoring customer expectations and consumer preferences.

#### Find out more:

We have summarized our policies in the area of sustainability and under the GREEN ENGINEERING initiative.



## 4.4. Social Commitment

We have always been moved by the desire to be involved in the areas where we do business.

Taking responsibility is part of our self-image. Our economic success gives us the opportunity to support non-profit health, cultural and educational projects through donations.

### What we do

- We donate voluntarily, without the expectation of anything in return and in accordance with local laws and regulations.
- We document our donations and sponsoring services and ensure transparency.

<sup>3</sup> <https://www.oecd.org/corporate/mne/mining.htm>

# Maintaining Integrity

## 5. Compliance with our Principles of Conduct

It is our duty together to stand up for the implementation of our principles of conduct.

- GEMÜ has customers on all continents and has a presence in more than 50 countries. Local conditions and special features may require additional rules, instructions or regulations, the further specification or supplementation of which is the responsibility of our subsidiaries. GEMÜ reserves the right to adapt the Code of Conduct at any time.
- It is important for each and every one of us to understand these principles of conduct, take responsibility for them and act in accordance with them in our daily work so we can guide GEMÜ into a successful future.
- Our Code of Conduct and policies refer to general principles of conduct. Their implementation in everyday situations is supported by training and discussions. The respective manager should be the first contact person for the employees in this regard.

## 6. Contact Points for Questions and Reports

Doing the right thing and addressing concerns. That's the best way to improve our credibility. Versus our customers, our business partners, our stakeholders and versus ourselves.

### 6.1. Questions regarding the Code of Conduct

If you have any questions regarding the Code of Conduct or uncertainty as to its interpretation, you can contact our Corporate Compliance Team ([compliance@gemue.de](mailto:compliance@gemue.de)) at any time.

### 6.2. Reporting potential risks or violations

When something is not going in the right direction, it is right to speak up. This helps to detect and resolve wrongdoing or inappropriate behavior at an early stage before any major damage is done, or to correct and improve ourselves.

- Do not hesitate to raise your concerns or ask for advice. Contact your supervisor, your local Human Resources team or Group Legal & Compliance who will handle this matter confidentially if desired.
- Employees who report irregularities or a (possible) violation of the law or our Code of Conduct in good faith do not have to fear any disadvantages.
- We know that it can be difficult to raise concerns openly. However, our electronic Whistleblower system "RIMIKSX" enables you to report misconduct in a secure and anonymous way.

#### GEMÜ WHISTLEBLOWING-SYSTEM

##### GEMÜ Website

URL: [https://www.gemu-group.com/de\\_DE/gemue-gruppe/compliance/hinweisgeber](https://www.gemu-group.com/de_DE/gemue-gruppe/compliance/hinweisgeber)

##### GEMÜ Intranet - Compliance Page

URL: <https://gemue.rimiksx.com/#/anonymous/login>

#### CORPORATE COMPLIANCE TEAM

##### GEMÜ Gebr. Müller Apparatebau GmbH & Co. KG

Corporate Compliance  
Fritz-Müller-Straße 6-8  
74653 Ingelfingen-Criesbach, Germany  
Phone: +49 7940 123-8185  
E-Mail: [compliance@gemue.de](mailto:compliance@gemue.de)

# Maintaining Integrity

The version currently available on the Internet / Intranet applies.

Detailed information on business ethics and compliance, further guidelines, contact persons and useful links are available for our employees on the GEMÜ Intranet page.

**Note regarding gendered language:**

The gender-neutral pronouns “they,” “them,” and “their” are used to refer to all persons regardless of sex or gender.

**GEMÜ Gebr. Müller Apparatebau GmbH & Co. KG**  
Fritz-Müller-Straße 6-8 · 74653 Ingelfingen-Criesbach, Germany  
Phone +49 (0)7940 123-0 · info@gemue.de

[www.gemu-group.com](http://www.gemu-group.com)