

GEMÜ



**Code of Conduct for Suppliers
of the GEMÜ Group**

Supplier Code of Conduct

Foreword

The GEMÜ Group is one of the world's leading manufacturers of valve, measurement and control systems for liquids, vapors and gases. As a family business, we focus on entrepreneurial vision as well as stability and reliability for our customers, business partners and employees. Our day-to-day actions have always been guided by integrity, a sense of responsibility and compliance with the law.

We offer components and system solutions for complex processes and procedures in highly sensitive application areas. We accordingly have high standards for suppliers and rely on long-term, stable partnerships. In addition to costs, quality, reliability and performance, sustainability criteria such as compliance with human rights, occupational health and safety and environmental protection are essential in the selection and evaluation of our suppliers and other contractors (hereinafter: "suppliers").

Scope

The GEMÜ Supplier Code of Conduct is based on the principles of internationally recognized standards for responsible corporate management. We are guided in our approach by the core principles of the United Nations Global Compact¹, the International Labor Organization² (ILO) conventions and the statements of OECD³. We expect our suppliers, including their employees, representatives and subcontractors, to respect and comply with the following standards when doing business with, for or in relation to the GEMÜ Group. Suppliers are responsible for implementing appropriate processes that ensure compliance with these regulations and for promoting compliance within their own supply chain.

We would like to thank all the suppliers who work with us for their responsible and ethical conduct.

1. Business integrity

Our suppliers comply with applicable law at the local, national and international levels.

Compliance with all applicable laws and regulations is of course one of our foundational principles. In keeping with our sense of corporate responsibility, we also expect this from our suppliers. This is the only way to ensure a trusting, long-term business relationship.

There may be stricter regulations than the standards described in this Supplier Code of Conduct in individual countries, business areas or markets. In the event that national and/or international laws, regulations or industry standards stipulate further and/or stricter rules, these must be given priority.

Prevention of bribery and corruption

We will not tolerate unfair business practices or corruption in any form. We expect suppliers to ensure that their employees, subcontractors, agents and other representatives do not promise, offer or accept bribes, kickbacks, illegal donations or other illegal payments or benefits to/from customers, officials or other third parties.

Avoidance of conflicts of interest

We expect our suppliers to make their decisions solely on the basis of objective criteria and not to allow themselves to be influenced by financial or personal interests or relationships, so that no conflicts of interest arise between them and GEMÜ employees.

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

² <http://www.ilo.org/>

³ <http://mneguidelines.oecd.org/>

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Gifts and invitations

We expect our suppliers not to abuse invitations and gifts in order to gain influence. Invitations and/or gifts from suppliers must be appropriate in terms of occasion and scope and must be regarded as an expression of locally recognized and legal business practices. Transparency is the top priority here.

Free and fair competition

We always aim to be a fair and responsible market participant, and we comply with all relevant competition and antitrust laws to ensure fair competition. In particular, we do not enter into any illegal arrangements or agreements with competitors, suppliers, customers or other third parties and do not abuse any dominant market position that may exist. We also expect the same from our suppliers.

Money laundering

We expect our suppliers to comply with the relevant legal obligations to prevent money laundering and to participate neither directly nor indirectly in money laundering activities.

Confidentiality/ Intellectual property

Confidential information and all types of sensitive data that GEMÜ transmits to suppliers must be properly secured in accordance with the relevant legal requirements. We also expect the applicable regulations for the protection of intellectual property to be respected and observed.

Requirements under foreign trade law

Our suppliers strictly comply with all applicable laws and regulations for the import and export of goods, services and information. They also observe the relevant sanctions lists.

We are constantly striving to improve our processes and to ensure that we continue to comply with the requirements of export control law. We expect our suppliers to provide us with data relevant to export control, in particular if reexport regulations of third countries (e.g. USA) are concerned.

2. Working conditions and social standards

Our suppliers respect and support the protection of universally recognized human rights and ensure that they are not complicit in human rights violations.

Non-discrimination and respect for human rights

We do not tolerate discrimination of any form and provide a working environment with equal opportunities and equal treatment for all. No employee may be discriminated against on the basis of their ethnic or social origin, skin color, gender, sexual orientation, age, physical or mental disability, illness or pregnancy, religion or beliefs. Sexual, personal or psychological harassment of any kind is also unacceptable.

We also expect the same from our suppliers.

Prohibition of forced and child labor

Our suppliers do not tolerate forced or slave labor or child labor, either directly or through their own subcontractors or suppliers. The ILO conventions provide the minimum standard to be observed regarding youth employment.

Respect for workers' rights

We guarantee our employees, health and occupational safety services that comply with national and international standards. We follow the ILO standards with regard to workers' rights, especially in the areas of occupational safety, working hours and working conditions, remuneration and the exercise of freedom of assembly.

We expect our suppliers to follow these standards in their global activities as well.

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3. Environmental standards

Protection of the environment and climate as well as responsible use of natural resources form an essential part of our obligation towards the environment and society.

Environmental protection

We expect our suppliers to comply with the applicable national environmental laws and standards. Suppliers are also required to ensure that they work continuously to avoid and reduce environmental pollution so that future generations can also benefit from the sustainable use of resources and the environment.

Conflict minerals

We expect our suppliers to take appropriate measures to ensure that their products do not contain raw materials that directly or indirectly contribute to the financing and support of armed conflicts and serious human rights violations, including child and forced labor and slavery. Suppliers must take appropriate minimization measures in this regard and must also require their own suppliers to do the same.

We also expect suppliers to avoid the use of raw materials from smelters and refineries that do not meet the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas⁴.

Product safety

We expect our suppliers to comply with all applicable product safety regulations and requirements, in particular the legal regulations concerning the safety and labeling of products and the use of hazardous substances and materials.

4. Implementation

Our business partners ensure the implementation of and compliance with the GEMÜ Supplier Code of Conduct.

Compliance with the GEMÜ Supplier Code of Conduct

We expect our suppliers to ensure the implementation of and compliance with the GEMÜ Supplier Code of Conduct. Suppliers are responsible for training their employees, representatives and subcontractors accordingly.

GEMÜ reserves the right to assess that the expectations defined in this Code are met. Culpable violations will not be tolerated and may lead to termination of the business relationship.

Continuing Improvement

We expect our suppliers to allow employees to raise legal and ethical issues and concerns if the requirements described here are not met. We also expect that demonstrable measures are taken to prevent, identify and correct retaliatory behavior.

Reporting Violations

Any potential misconduct must be identified at an early stage, handled, and remedied without delay. This requires the attention of all employees, but also customers, suppliers and other third parties and their willingness to report possible violations of laws or guidelines.

Whenever the Business Partner becomes aware of facts that give rise to a suspected serious misconduct at the expense of GEMÜ, as well as any violations against laws and regulations or what is outlined in the GEMÜ Supplier Code of Conduct reports can be submitted either by **e-mail to compliance@gemue.de** or via the **GEMÜ whistleblower link on our website www.gemue.com** confidentially and anonymously if so desired.

⁴ OECD guideline <http://mneguidelines.oecd.org/mining.htm>

Note regarding gendered language: The gender-neutral pronouns "they," "them," and "their" are used to refer to all persons regardless of sex or gender.

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Business Partner's/Supplier's Acknowledgement

We, the undersigned hereby confirm that ...

- ... We have received and taken due note of the contents of the GEMÜ Supplier Code of Conduct.
- ... We undertake to comply with and acknowledge all principles and regulations of the GEMÜ Supplier Code of Conduct.
- ... We are aware of all relevant laws and regulations of the countries in which our company operates.
- ... We will report to GEMÜ any case of violations of the GEMÜ Supplier Code of Conduct.

Name of the Company

Signature

Company Stamp/Seal

Name and Title

Company's Business Registration/Statutory ID/Code/Number

Date & Place

This document must be signed by an authorized representative of the Business Partner/Supplier & returned to the requesting GEMÜ Subsidiary or your respective contact person.

