

#### **Ethics and Code of Conduct**

The Code of Conduct guides Geiger + Co. Schmierstoff GmbH in its endeavor to fulfill its social responsibility towards all stakeholders - such as employees, customers, business partners, state institutions as well as towards the environment and society. They apply to all business activities and, as essential principles, offer orientation for legal and ethical behavior. Compliance is mandatory for employees at all levels of the company.

The conviction in which we stand by these principles requires that this claim also be made upstream in our supply chain as well as with all business partners. We are committed to the following principles and also try to take into account new legal situations or scientific findings in the hope of constantly improving ourselves in relation to our work and its effects and, ideally, setting a good example.

## Social Responsibility and Compliance

We are aware of our social responsibility and the resulting demands. The consideration of ethical principles, regulations and laws are therefore always part of the company decision-making process. For us, this includes not only observing the law, but also dealing with cultural conditions. In order to meet our responsibility towards all stakeholders, we are committed to standards above statutory requirements.

#### **Treatment of Employees**

We refuse to exploit or endanger our employees in any way. In order to create a safe space for everyone, the detection and immediate resolution of any form of harassment or personal disadvantage based on characteristics such as national origin, skin color, gender, age, religion, disability or private way of life is very important to us. Regulations on working hours, occupational health and safety, human rights, the rejection of forced and child labor, socially acceptable wages, the coverage of social benefits and guaranteed freedom of association provide the foundation to our working conditions.

#### Integrity

We believe that independent, trusting work is in the best interest of our employees as well as the company. This is made possible by providing for sufficient resources in a positive and respectful work environment. Commitment to the company goals and to personal development, as well as the respect and representation of the principles is expected. This includes working efficiently, if necessary through innovations in the work process, but only if the benefit can be achieved without negatively impacting others.

## Competition and antitrust law

Any cartel agreements such as division of territory or customers, price agreements or any other exchange of sensitive information about conditions or capacities with competitors are strictly prohibited. In this way, we contribute to legally compliant, fair competition, in line with our responsibility towards all market participants and other stakeholders.

## Corruption, gifts and benefits, bribery and extortion

In order to rule out relationships of dependency and conflicts of interest, our employees are prohibited from receiving any form of benefits in connection with business activities should these exceed a legally determined value. This implies, among other things, the processing of orders, their awarding or mediation and their payment. This is how we ensure sustainable business activity on a purely competitive basis and in the interests of our company. In order to guarantee this and also to maintain good business relationships, we only work with clear and comprehensive agreements.

#### International Trade

The employees responsible for international trade and the related import and export controls, as well as any financial transactions taking place, know and follow international agreements, national laws and other procedures and guidelines.



## **Environmental Protection**

In order to do business sustainably, but also as a personal concern, we try to take environmental protection into account beyond the legal requirements. To do this, we minimize hazardous substances in products and processes and try to reduce our emissions and also to include the life cycle of our products in our planning even after delivery. We want to promote the use of renewable energies and contribute to the conservation of resources by increasing efficiency. We achieve these concerns, as well as the avoidance of waste, e.g. through the reuse of different packaging materials, through the instruction of our employees, but also via the ideas brought forth by our employees.

# **Data Privacy**

The protection of confidential personal or business data, such as that of customers or suppliers, their preservation and that of other company and business secrets is ensured by clear instructions, compliance with legal requirements and supplementary confidentiality agreements.

Geiger + Co

Schmierstoff-Chemie GmbH

Managing Director