

# GICON Supplier Code of Conduct

## 1 FOREWORD FROM THE MANAGEMENT

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The GICON-Group is committed to acting in an environmentally and socially responsible manner and expects the same behaviour from its suppliers. This Supplier Code of Conduct is based on the company values of innovation and sustainability and aims to continuously improve our own conduct. With this in mind, we also call on our suppliers to contribute to this holistic approach.

The following provisions form the basis of this cooperation, and both contracting parties undertake to comply with the principles and requirements of the Code. A breach of this Code may ultimately constitute grounds for terminating the business relationship, including all associated supply contracts.

The Code of Conduct is based on national laws and regulations such as the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), as well as international conventions such as the Universal Declaration of Human Rights, Children's Rights and Business Principles, the UN Guiding Principles on Business and Human Rights, and the international standards of the International Labour Organisation.

The Managing Directors of the companies within the GICON-Group

## 2 SOCIAL RESPONSIBILITY

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No forced labour, slave labour or any comparable form of labour may be used. All work must be voluntary and carried out without the threat of punishment. Employees must be able to terminate their work or employment at any time. Furthermore, any unacceptable treatment of workers, such as psychological abuse, sexual or personal harassment and humiliation, is prohibited. The commissioning or use of security personnel must be avoided if, during their deployment, individuals are treated in an inhumane or degrading manner or are injured, or the freedom of association is impaired. The recruitment of new employees is based on ethical principles.

## 3 PROHIBITION OF CHILD LABOUR

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The use of child labour is not permitted, and suppliers are required to adhere to the recommended minimum age for the employment of children. Accordingly, the age must not be lower than the age at which compulsory schooling ends under the law of the place of employment, and in any case must not be under 15 years. Should children nevertheless be found working, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. Young workers under the age of 18 must not be

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employed in work that is harmful to the health, safety or morals of children; special protective regulations regarding the employment of workers under the age of 18 must be observed.

### **4 WORKING HOURS AND REMUNERATION**

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The applicable working time regulations are observed as a minimum standard. Both operational and individual needs are taken into account to promote a healthy work-life balance. Every employee receives remuneration that is competitive and performance based.

Remuneration shall comply with the statutory minimum standards and rates. Remuneration is based on an individual employment contract between the employee and the company, which is based on the employee's performance and work results.

If the remuneration is insufficient to cover the costs of a normal standard of living and to build up a minimum level of savings, the supplier is obliged to increase the remuneration accordingly. Employees must be granted all benefits prescribed by law. Deductions from wages as a disciplinary measure are not permitted. The supplier must ensure that employees receive clear, detailed and regular written information regarding the composition of their remuneration.

### **5 FREEDOM OF ASSOCIATION**

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All employees are entitled to exercise their right to collective bargaining and to form employee representative bodies, which leads to improved working conditions. Any form of discrimination or retaliation in this context is strictly prohibited. Employee representatives have the right to operate freely and in accordance with applicable labour laws.

The well-being of the individual must be safeguarded and is characterised by trusting and constructive cooperation. No employee shall be granted advantages or subjected to disadvantages on the basis of membership or non-membership of a trade union or employee representative body.

### **6 PROHIBITION OF DISCRIMINATION**

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GICON commits itself and its suppliers to ensuring equal opportunities in the employment of staff and to preventing or resolutely opposing any form of discrimination. In particular, it is prohibited to treat staff unequally on the basis of their gender, sexual orientation, age, disability, political beliefs, state of health, national or ethnic origin, social status, nationality, religion or philosophy, unless this is justified by the requirements of the respective position. Particular attention is also paid to upholding women's rights and respecting the rights of minorities and indigenous peoples.

Our collaboration is based on the values of diversity, equality and inclusion.

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### **7 HEALTH AND SAFETY AT WORK**

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The safety of our employees in the workplace is one of our top priorities in our day-to-day operations. The supplier undertakes to issue appropriate health and safety instructions and to communicate these effectively.

### **8 PRESERVATION OF NATURAL RESOURCES**

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The supplier must not, in violation of legitimate rights, deprive people of land, forests or water bodies whose use secures their livelihoods. They must refrain from harmful soil alterations, water and air pollution, noise emissions and excessive water consumption if these harm people's health, significantly impair the natural resources required for food production, or prevent people from accessing safe drinking water or sanitation facilities.

Measures must also always be taken to protect biodiversity, land use and deforestation, and to improve soil quality.

### **9 COMPLAINTS MECHANISMS**

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The complaints procedure must be accessible to employees whilst ensuring the confidentiality of their identity and effective protection against discrimination. Unless otherwise specified, the supplier is responsible at operational level for establishing an effective complaints mechanism for individuals and communities that may be affected by adverse impacts.

GICON's complaints management offers an anonymous reporting service at [compliance@gicon.de](mailto:compliance@gicon.de) and via the postal address

**Personal/Confidential**  
**GICON Services GmbH**  
**Compliance Officer**  
**Tiergartenstraße 48**  
**01219 Dresden**

### **10 FINANCIAL INTEGRITY AND DISCLOSURE OF INFORMATION**

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Confidential information and company property, as well as that of customers and business partners, are protected. Furthermore, all business transactions are documented in accordance with financial reporting regulations and generally accepted accounting principles. This documentation contains all necessary information regarding the respective transactions.

## **11 ENVIRONMENTAL RESPONSIBILITY**

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The Supplier Code requires the ecological and efficient use of all resources. To this end, resource consumption and environmental impact must be continuously minimised.

### **11.1 TREATMENT AND DISCHARGE OF INDUSTRIAL WASTEWATER**

Wastewater from operational activities, manufacturing processes and sanitary facilities must be classified, monitored, checked and, where necessary, treated prior to discharge or disposal. Furthermore, measures should be introduced to reduce the generation of wastewater.

### **11.2 MANAGEMENT OF AIR EMISSIONS**

General emissions from operational processes (air and noise emissions) as well as greenhouse gas emissions must be reduced to an absolute minimum and, prior to their release, classified, routinely monitored, checked and, where necessary, treated. The supplier is also responsible for monitoring its exhaust gas purification systems and is required to find cost-effective solutions to continuously minimise all emissions.

### **11.3 CONSUMPTION OF RAW MATERIALS AND NATURAL RESOURCES**

The use and consumption of resources during production and the generation of waste of any kind, including water and energy, must be reduced or, where possible, avoided. This is achieved either directly at the source or through processes and measures – for example, by modifying production and maintenance processes or operational procedures within the company, by using alternative materials, through savings, through recycling or by reusing materials.

### **11.4 HANDLING OF HAZARDOUS SUBSTANCES AND WASTE**

The GICON-Group is aware of the risks associated with the use of hazardous materials, chemicals and substances and expects suppliers to prevent, minimise or eliminate these risks as well. This includes relevant environmental, health and safety aspects for the safe handling, transport and storage of such materials, whereby applicable laws and regulations must be complied with as a minimum.

### **11.5 ANIMAL WELFARE**

Animal welfare must also be taken into account. To ensure compliance with animal welfare standards, suppliers processing animal products are expected to implement standards and best practice methods. Unless animal testing is strictly required by law, alternative methods that do not involve animal testing should be used.

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### **11.6 ENERGY CONSUMPTION AND EFFICIENCY**

Energy consumption must be monitored and documented. Cost-effective solutions must be found to improve energy efficiency and minimise energy consumption. In doing so, the focus should be primarily on renewable energy sources.

### **11.7 DECARBONISATION**

The GICON-Group has set itself the primary goal of achieving carbon neutrality by 2040. The supplier also undertakes to implement measures to reduce its direct and indirect emissions.

## **12 ETHICAL BUSINESS CONDUCT AND COMPLIANCE**

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The GICON-Group and its suppliers shall comply with the legal systems of every country in which they operate. The applicable laws and regulations must be observed; failure to do so may result in disciplinary action.

### **12.1 ACCEPTANCE OF COMPETITION**

All actions must be in accordance with the applicable competition law. No agreements shall be made with competitors regarding prices, price increases, terms or capacities with the aim of preventing, restricting or distorting competition.

Fair competitive conduct, fair contract terms vis-à-vis business partners and compliance with applicable competition law are required.

### **12.2 CONFIDENTIALITY/DATA PROTECTION**

The Supplier undertakes to meet the reasonable expectations of its client, suppliers, customers, consumers and employees regarding the protection of personal information. When collecting, storing, processing, transmitting and disclosing personal information, the Supplier must comply with data protection and information security laws and relevant regulatory requirements.

### **12.3 INTELLECTUAL PROPERTY**

Intellectual property rights must be respected; the transfer of technology and know-how must take place in such a way that intellectual property rights and customer information are protected. The use of external sources without attribution (plagiarism) is not permitted.

### **12.4 INTEGRITY/BRIBERY AND AVOIDANCE OF CONFLICTS OF INTEREST**

All business activities must be based on the highest standards of integrity. The supplier must pursue a zero-tolerance policy regarding the prohibition of all forms of bribery, corruption, money laundering, extortion and embezzlement. Procedures for monitoring and enforcing these standards must be implemented to ensure compliance with anti-corruption laws.

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### **12.5 IMPORT/EXPORT CONTROLS AND ECONOMIC SANCTIONS**

All employees, suppliers and business partners must take into account and comply with applicable national and European import and export controls and, where applicable, economic sanctions.

### **12.6 COMPLAINTS AND REPORTING SYSTEM**

We have set up a system designed to enable our suppliers to submit their complaints or reports regarding compliance-related issues at any time. We strongly urge you to make use of this system!

The email address [compliance@gicon.de](mailto:compliance@gicon.de) is provided for this purpose.

Any form of retaliation in this context will be prevented and the whistleblower protected.

## **13 IMPLEMENTATION OF REQUIREMENTS**

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We expect our suppliers to identify risks within their supply chains and to take appropriate measures. In the event of suspected breaches, and to safeguard supply chains with increased risks, the supplier shall promptly and, where necessary, on a regular basis regarding the identified breaches and risks, as well as the measures taken.

The company may verify compliance with the regulations set out in this document at any time through self-assessment questionnaires and risk-based audits. The supplier agrees that the client may carry out such audits for specific reasons to verify compliance with the Code at the supplier's premises during normal business hours, following reasonable notice, through persons appointed by the client. The Supplier may object to individual audit measures if these would result in a breach of mandatory data protection regulations.

Should a breach of the provisions of this Code of Conduct be identified, the Company will notify the Supplier of this in writing without delay and set a reasonable grace period for the Supplier to bring its conduct into line with these provisions. If a remedy is not possible within the foreseeable future, the supplier must notify the company immediately and, together with the company, draw up a plan with a timetable for ending or minimising the breach. If the grace period expires without result, or if the implementation of the measures contained in the plan fails to remedy the situation after the expiry of the timetable and no less severe means are available, the Company may terminate the business relationship and cancel all contracts. Any statutory right to extraordinary termination without setting a grace period, particularly in the case of breaches deemed to be very serious, remains unaffected, as does the right to compensation.

The supplier is required to draw up a comparable code of conduct, disseminate it within its supply chain and monitor compliance with it.

**14 ACKNOWLEDGEMENT AND CONSENT OF SUPPLIERS**

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The supplier undertakes to act responsibly in all business dealings with the GICON-Group and to adhere to the principles and requirements set out herein. The supplier undertakes to communicate the content of this Code to its employees, agents and subcontractors in a manner they can understand and to take all necessary measures to ensure compliance with the requirements.