



Code of Conduct for Suppliers of the GEMÜ Group

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Foreword

The GEMÜ Group is one of the leading world-wide manufacturers of valves, measurement and control systems for liquids, vapours and gases. As a family-owned enterprise, we count on entrepreneurial foresight as well as the assurance of stability and reliability for our employees, customers and business partners. Integrity and a sense of responsibility, as well as compliance with the law, have always determined our daily actions.

We offer components and system solutions for complex applications and processes in highly sensitive areas of application. We therefore have stringent requirements when it comes to our procurement, and rely on solid long-term partnerships. Costs, quality, reliability and performance capability are essential for us when selecting and assessing our suppliers and other contractors (hereinafter referred to as "Suppliers"). Sustainability criteria such as compliance with human rights, occupational health and safety and environmental protection are also evaluated, and are additionally included in the classification of our suppliers.



Gert Müller
Managing Partner
GEMÜ Group



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Managing Director
GEMÜ Group

Introduction

AREA OF VALIDITY

The GEMÜ Code of Conduct for Suppliers is based on the principles of internationally recognized standards for responsible company management. We expect our Suppliers, including their employees, representatives and subcontractors, to respect and comply with the standards formulated below when doing business with, for or in relation to the GEMÜ Group.

RESPONSIBILITY

It is the responsibility of Suppliers to introduce suitable processes to ensure compliance with these standards and to promote compliance within their own supply chain.

We would like to thank all Suppliers who work together with us to promote responsible and ethical behaviour.

Rules of conduct

1. BUSINESS INTEGRITY

Our Suppliers comply with the applicable legislation at a local, national and international level.

It goes without saying that compliance with all applicable laws and regulations is one of our fundamental principles. We are guided in this by international agreements and guidelines such as the conventions of the UN Global Compact¹ (UNGC), the International Labour Organization² (ILO) and the OECD³ guidelines. As part of our corporate responsibility, we also expect this from our Suppliers. This is the only way to secure a trusting, long-term business relationship.

In individual countries, business areas or markets, there may be more stringent regulations than the standards described in this Code of Conduct for Suppliers. In the event that national and/or international laws, regulations or industry standards provide for further and/or more stringent rules, these must be given priority. In particular, our Suppliers undertake to conduct business activities worldwide only within the scope of their authorization.

Prevention of bribery and corruption

We do not tolerate dishonest business practices or corruption in any form. We expect Suppliers to ensure that their employees, subcontractors, agents or other representatives do not grant or offer bribes, payoffs, inadmissible donations or other inadmissible payments or advantages to customers, officials or other third parties, or accept such payments or advantages from them.

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 conflict of interest arises between them and GEMÜ employees.

Gifts and invitations

We expect our Suppliers not to misuse invitations and gifts in order to influence us. Invitations and/or gifts from the Supplier must be appropriate to the occasion and scope, and can be considered as an expression of generally recognized and legal business practice in the local area. Transparency is of paramount importance here.

Free and fair competition

We aim to act as a fair and responsible market participant at all times, and comply with all relevant competition and anti-trust specifications to ensure fair competition. In particular, we do not enter into any unlawful arrangements or agreements with competitors, suppliers, customers or other third parties, and do not misuse any dominant market position that may exist. We also expect this from our Suppliers.

Money laundering

We expect our Suppliers to comply with the relevant legal obligations to prevent money laundering, and not to participate either directly or indirectly in money laundering activities.

Information security/data protection

We place great value on the security of our data and systems. We also expect our Suppliers to process exchanged data, in particular personal data, in accordance with the respectively applicable legal regulations, and to take appropriate measures to protect confidentiality, integrity and availability.

In particular, this includes regularly checking your systems for security loopholes and immediately reporting any incidents that could also jeopardize GEMÜ's cybersecurity. We work together on protecting our data and systems in the best possible way and ensuring the integrity of our business operation.

Intellectual property

We also expect the applicable regulations for the protection of intellectual property to be respected and complied with.

Foreign trade law specifications

Our Suppliers strictly ensure compliance with all respectively applicable laws and regulations for the import and export of goods, services and information. They also observe the sanctions lists that are relevant in each case.

We strive to continuously improve our procedures, and we want to ensure that we always comply with the requirements of export control law. We expect our Suppliers to provide us with data relevant to export control law in each case, in particular if re-export regulations of third countries (e.g. USA) are affected.

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

² <http://www.ilo.org/>

³ <http://mneguidelines.oecd.org/>

Rules of conduct

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.

Ban on discrimination and protection of human rights

We do not tolerate discrimination of any kind, and we offer a working environment of equal opportunities and equal treatment. No employee must be discriminated against on the basis of their ethnic or social origin, skin colour, gender, sexual orientation, age, physical or mental disability, illness, pregnancy, religion or world view. Mental hardship or sexual and personal harassment of any kind is also unacceptable (ILO Conventions 100 and 111). We also expect this from our Suppliers.

Ban on forced labour and child labour

Our Suppliers do not tolerate forced labour, slave labour or child labour, either directly or through their own subcontractors or suppliers. The regulations of the United Nations on human rights and children's rights as well as ILO Conventions 29, 138 and 182 must be complied with.

Protection of employee rights

We ensure that our employees have access to occupational health and safety services that comply with national and international standards. We stipulate compliance with ILO Convention 155 in terms of employee rights, in particular in the area of occupational safety, working hours and working conditions, remuneration and the exercise of freedom of assembly.

We expect our Suppliers to also comply with these standards in their activities all over the world.

3. ECOLOGICAL STANDARDS

Environmental and climate protection as well as the responsible handling of natural resources form an essential part of our responsibility towards the environment and society.

Environmental protection

We expect our Suppliers to comply with the respectively applicable national environmental laws and international environmental conventions.

The international conventions include the Minamata Convention, which regulates the handling of mercury and the reduction of mercury emissions in industrial processes, the Stockholm Convention, which regulates prohibitive and restrictive measures for certain persistent organic pollutants, and the Basel Convention, which regulates environmentally friendly waste management and the handling of transboundary movements of hazardous wastes.

Suppliers are also requested to ensure that they are working continuously to avoid and reduce environmental pollution, so that future generations also benefit from sustainable handling of resources and the environment. This includes and presupposes the Suppliers being or becoming consistently aware of their own environmental impact on the basis of suitable measuring methods.

To record, monitor and improve our environmental impact, we compile an annual Corporate Carbon Footprint in accordance with the international "Green House Gas Protocol" standard.

Rules of conduct

Conflict minerals

We expect our Suppliers to implement appropriate measures to ensure that their products do not contain raw materials that contribute either directly or indirectly to the financing and support of armed conflicts and serious human rights violations, including child labour, forced labour and slavery. Appropriate measures to minimize this must be taken, and such measures must also be demanded from their own suppliers.

We also expect the use of raw materials that come from smelters and refineries which do not comply with the requirements of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas⁴ to be avoided.

Product reliability

We expect our Suppliers to observe all respectively applicable product safety regulations and specifications, in particular the statutory regulations regarding the safety and identification of products and the use of dangerous substances and materials.

4. IMPLEMENTATION

Compliance with the GEMÜ Code of Conduct

We expect our Suppliers to ensure the implementation of and compliance with the GEMÜ Code of Conduct, and to work towards this along their supply chain. We must therefore be informed immediately of any problems, ambiguities and existing or discovered risks or infringements of this code. Measures for a proper solution and appropriate handling on a case-by-case basis are developed, decided and implemented together. Such measures can be the implementation of (occupational health and safety) training courses, assistance with structural changes, support with supplier training or certifications.

We reserve the right to check both compliance with the aforementioned measures and compliance with the standards defined in this Code of Conduct as part of a specific risk analysis. The Supplier undertakes to cooperate accordingly. In particular, this involves providing truthful information within the scope of regular requests (supplier self-assessments), on-site visits and the disclosure of relevant processes and documents as part of audits.

Striving for improvements

We expect our Suppliers to allow employees to raise legal and ethical issues and concerns if the requirements described here are not complied with. It is also expected that measures will demonstrably be taken to avoid, detect and remedy any retaliation.

Reporting options and handling of misconduct

Any misconduct must be recognized at an early stage, worked through and remedied immediately. This requires everyone's attention, and a willingness to point out possible compliance infringements at specific reference points.

Misconduct at the expense of GEMÜ and other violations of regulations, laws and the GEMÜ Code of Conduct for Suppliers can be reported confidentially and, if necessary, anonymously – either by **e-mail to compliance@gemue.de** or via the GEMÜ whistle-blower link on our website **www.gemue.com**.

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

Confirmation from the supplier

The Supplier herewith confirms that:

1. They have received and noted the GEMÜ Code of Conduct for Suppliers.
2. They undertake to recognize and comply with all basic principles and regulations of the GEMÜ Code of Conduct for Suppliers.
3. They will report any suspected cases and infringements of the code to us.

Name of the company

Signature

Stamp/seal of the company

Name and title

Registration number/identification number/code/number of the company

Date and location

This document must be signed by an authorized representative of the Supplier, and returned to the requesting GEMÜ company, to your personal contact person at GEMÜ or by e-mail to info@gemue.de.

Gendered language: To improve readability, plural pronouns are used here to refer to a single subject of any gender.

