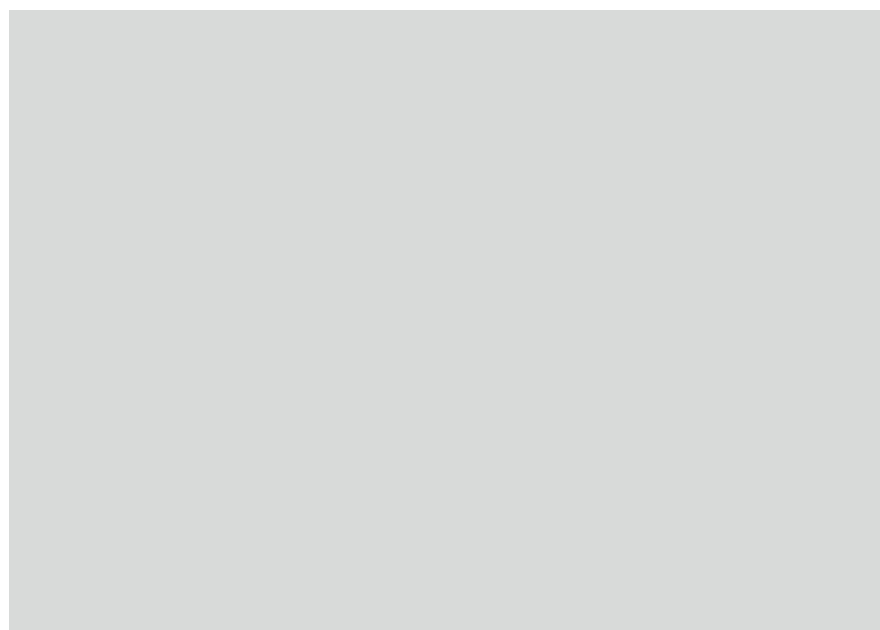




Our Business Partner Code of Conduct

Version 01/2025

Shaped by our history – made for the future



Dear Business Partners,

Gebhardt Group is known throughout Europe and even worldwide as a supplier of high- quality steel profiles for numerous PVCu window systems, substructures for photovoltaic systems as well as for air- conditioning and ventilation technology. With high reliability we have been supplying many companies at home and abroad for decades. We enjoy an excellent reputation as a supplier and over many years have developed into one of the largest and most capable suppliers in these fields. Many years of experience and the permanent striving for quality and precision characterize our organization. They are the foundation on which we build.

But our claim also includes consciously fulfilling our responsibility – towards our customers and business partners, our colleagues, society and our environment – and always acting accordingly, as a group, but also through each and every one of us.

Matters of sustainability are particularly important to us: We actively strive for climate neutrality, are committed to social issues and the well-being of our employees, and stand for responsible corporate governance

Reliability and integrity are crucial factors in this. Acting with reliability and integrity – to us, this means doing the right thing in the right way. Our Business Partner Code of Conduct is intended to provide you with orientation and firm guidelines for this and articulates our expectations towards all our partners.

In the course of everyday work, there can always be situations in which the correct behavior is unclear or ambiguous. It is therefore particularly important to us to maintain a culture of open communication and to assure you: Every employee, every customer and business partner can approach us openly and confidentially with doubts, questions or concerns without having to fear unjustified disadvantages. I stand for this on behalf of the group with my word.

Together we are Gebhardt Group and together we contribute to our ongoing success!



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Introduction

Application and scope

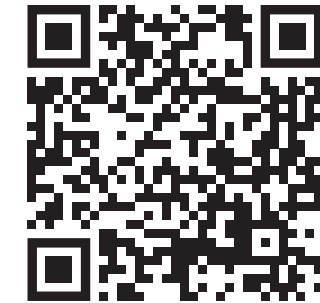
This Code of Conduct is binding for all our business partners in all actions with a professional or business connection to the Gebhardt Group* and must also be observed in their own business activities and their supplier relationships.

It describes our standards and sets out our expectations towards and requirements for our business partners. In cases where individual contractual obligations deviating from these principles have been agreed with the business partners, these take precedence.

Our main principle: We do not accept any illegal, inappropriate and unethical behavior contrary to this code. Violations may result in termination of the business relationship.

Indications of violations of the law or actions in contradiction to this Business Partner Code of Conduct can be reported at any time, also anonymously, to our internal reporting channel available at:

SpeakUp Gebhardt Group



Confidentiality and discretion as well as compliance with the applicable provisions of data and whistleblower protection are guaranteed at any time.

** Includes all controlled companies of Gebhardt Holding GmbH.*

Our values



Principles of conduct

Equal opportunity and diversity

We appreciate the individuality of all employees and take a conscious approach to diversity and active inclusion. We value mutual respect, appreciation and fairness and strive for equal opportunities for all.

Discrimination in any form, especially on the basis of

- Gender or gender identity,
- Descent, origin or nationality,
- Social background,
- Religion or belief,
- Sexual identity,
- Disability,
- Age,
- Political, social or trade union activity,

will not be tolerated by our organization, unless justified by the requirements of the employment. Unequal treatment includes the payment of unequal remuneration for work of equal value.

Open communication

We cultivate open, trusting and respectful communication and a constructive approach to mistakes – our SpeakUp culture. Honesty, transparency, team spirit and trust are the foundations for our interaction.

Our business partners must inform us immediately and comprehensively in the event of actual or potential violations of this code and if they have indications of relevant irregularities in their supply relationships or knowledge thereof.

Dealing with business partners and suppliers

In our dealings with our business partners and suppliers, we attach high importance to fair, transparent conditions and cooperation based on trust.

We take our corporate responsibility to establish and maintain fair supply chains seriously and support our business partners and suppliers through targeted measures.



Lawfulness

Compliance with the law

All business actions must comply with applicable laws and regulations at any time. Unlawful conduct will not be tolerated. Where necessary, local deviations in legal requirements and standards can be taken into account by means of appropriate regulations in the respective applicable internal guidelines and instructions.

Integrity

All business actions are to be aligned with commonly recognized ethical principles and policies and value integrity and reliability.

Respect for human rights

We respect internationally recognized human rights and are committed to the International Bill of Human Rights, the United Nations Guiding Principles on Business and Human Rights and the Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO). In particular, a strict ban on child labor, forced labor and slavery, human trafficking, corporal punishment and unethical recruitment applies along the entire supply chain. Rights of freedom of association and assembly must be respected. Fair and appropriate working conditions, including remuneration and working hours, are to be guaranteed.

Product safety and quality

Our name stands for the reliability and quality of our products.

Through extensive certified quality management, we ensure both the consistent quality and the conformity of our products with all regulatory requirements. The associated structures and processes must be complied with by all our employees and affiliates at all times and, within the scope of their applicability, must also be followed by our business partners.

Customs and export regulations, money laundering prevention

As a globally active group, we ensure compliance with all applicable legal requirements for imports and exports. We observe current national and international sanctions and regulations for the prevention of money laundering and terrorist financing. Our business partners also ensure this in their supplier relationships.

Environmental protection

We pay particular attention to climate and environmental protection in the production and distribution of our products.

Our key goals are to reduce energy and Co2 emissions, optimize our waste management and realize a “green” product portfolio. Considerate use of resources and compliance with all applicable climate and environmental protection regulations must also be ensured by our business partners.



Prohibition of corruption

Prohibition of corruption – Zero Tolerance

We convince business partners and customers through the quality of our products, not through undue influence. There is an unrestricted absolute ban on bribery and corruption for all our employees including representatives and affiliated persons.

We make decisions on the basis of objective, factual and comprehensible reasons.

We ensure transparency and appropriate documentation in all business actions and decisions and avoid even the mere appearance of undue influence or leverage.

We also expect this standard from our business partners. They must respect and comply with our applicable internal policies when dealing with our employees and they reject and prevent all forms of corruption, including facilitation payments for routine official acts.

Our business partners must ensure that their employees, subcontractors or agents do not request, accept, offer or give undue personal benefits, bribes, kickbacks, improper donations or other improper payments or benefits to/from public officials or other third parties.

Gifts and invitations

With reasonable limits, the acceptance and granting of gifts and invitations to/from business partners is customary and permissible.

The respective value as well as frequency, occasion and context must always be in accordance with internal regulations and applicable laws.

Our employees including representatives and affiliated persons are prohibited from suggesting, demanding or soliciting gifts and invitations from business partners. Likewise, they must not respond to such suggestions, demands or requests from business partners. They must report any unacceptable, inappropriate or prohibited gifts or invitations or actions in that regard.

Business partner audits

The selection of our business partners is transparent and based solely on objective factual criteria.

We ensure compliance by our business partners with the statutory provisions on corruption prevention through appropriate risk-based business partner screening measures and by the binding obligations arising from this Business Partner Code of Conduct.

Our business partners support us by actively participating in the necessary measures. They share relevant information with us comprehensively and at an early stage.



Fair Competition

Competition law

Applicable laws and rules of fair and free competition and provisions of antitrust and competition law must be complied with at any time.

All anti-trust or anti-competitive acts, such as unlawful agreements or exchange of information, are prohibited.

Our employees including representatives and affiliated persons must oppose and report unacceptable or inappropriate conduct by business partners or competitors.

Dealing with competitors

When dealing with competitors, for example at trade fairs and trade events, in association activities and in cooperative ventures, each employee takes personal responsibility for ensuring permissible and appropriate conduct.

Through regular training measures for relevant employee groups, we ensure knowledge and awareness of risks and correct and appropriate behavior.

Our business partners respect and observe these standards in their interaction with our employees.

Intellectual property

Protection of intellectual property

Our intellectual property – patents and other intellectual property rights (e.g., trademarks and designs) – is a fundamental corporate asset and secures our long-term success. Through responsible handling, we ensure that it cannot be unauthorizedly disclosed, passed on or misused by third parties.

We treat third-party intellectual property, such as that of our business partners, with equal care. Unauthorized use is not permitted.

We also expect this standard from our business partners.

Trade and business secrets

We protect our know-how, such as products and inventions, concepts, strategies, cooperations and all related information, to a special degree. Internal guidelines and instructions in this regard must also be observed by our business partners within the scope of their applicability.

Data protection and data security

Handling of data

We handle data of our employees, customers and business partners with care and trust and always respect the applicable data protection regulations.

All employees are responsible for protecting personal data from unauthorized access and comply with internal guidelines and measures to ensure data protection.

We take our responsibility for data protection seriously and strive for transparent, restrained and responsible handling of all (not only personal) data.

Our business partners apply the same standards.

Occupational health and safety

Safety and health

We place great importance on the health, safety and well-being of our employees and protect our employees through high technical and operational safety and protection standards.

Our business partners must also respect these standards and ensure compliance with all applicable occupational health and safety regulations for their employees at all times. Work accidents and work-related illnesses must be prevented by taking appropriate measures.

Adherence to the Business Partner Code of Conduct

Consequences of violations

The Gebhardt Group reserves the right to take appropriate steps to protect its rights if a business partner violates or fails to comply with this code, such as:

- requesting the implementation of improvement measures,
- review of reported improvements/measures,
- exclusion from new orders,
- as well as the termination of current business relationships up to and including extraordinary termination.

The exercise of an existing right of termination may be waived if the business partner can credibly assure and prove that it has immediately taken suitable and appropriate measures to prevent future similar breaches.

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Thank you

Contact

Ralf Dahmer

CEO

ralf.dahmer@gebhardt-holding.de