



Compliance Guidelines of GEGGUS GmbH

Status as at 1 February 2022



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1. INTRODUCTION

We operate internationally and sell clean-off zones/entrance matting systems for high-quality properties.

Our business has supplied the market successfully for over 45 years, and we are one of the leading companies in our field. We have a global presence and, apart from our main office in Weingarten, we are represented in over 33 countries with numerous sales offices and partnerships.

With our pleasant and state-of-the-art working environment, we offer attractive employment for committed people. The purpose of our compliance guidelines is to create binding and concrete principles for how the company and its employees should act. Firstly, they focus on systematic compliance with all legal regulations. Secondly, they represent our company's goals, values and code of conduct.

Compliance guidelines are no replacement for the personal responsibility of individual employees. However, they do provide a clear framework to guide all company representatives in their decision-making so that no negative consequences arise in respect of legal breaches, reputational damage or negative developments in relations with business partners.

By publishing these compliance guidelines for customers, suppliers, partners and other groups of interested persons, we wish to emphasise the significance of these criteria for our company and also encourage compliance. All representatives (all employees) of our company can and must measure their actions against these guidelines.

Our use of the term "employee" is gender neutral. This shall also apply accordingly to all gender-specific designations. The condensed language used here is for editorial purposes only and is not a value judgement.

2. OUR GUIDING PRINCIPLES

The customer determines our actions.

It is our aim to deliver outstanding customer benefits. Our success depends on the satisfaction of our customers.

Our innovations provide designs for the future.

New ideas allow us to create new products, provide services and thus deliver greater benefits for our customers.

We measure ourselves against the best.

By keeping a close eye on the market, we identify new opportunities and use this knowledge as a basis for our solutions, our organisation and our actions. We drive forward the necessary changes boldly and with determination.

We are a reliable partner.

Our aim is to build long-term partnerships by demonstrating honesty, reliability and consistency in our dealings with customers, employees and suppliers.

Responsible use of resources.

Preserving our natural environment and resources for the life of future generations is part of our social responsibility. Systematic and detailed environmental management ensures that this is converted into specific targets and codes of conduct.

3. OUR COMPANY VALUES

Customer orientation

- ▷ Long-term collaboration
- ▷ Customer satisfaction through quality and service

Credibility

- ▷ We do what we promise and believe in fair play

Trust

- ▷ Trust and respect for customers, employees and partners
- ▷ Employees take personal responsibility for their actions

Tolerance

- ▷ No to racism Respect and interaction with other cultures enrich our collaboration

People and the environment

- ▷ Health and safety of our employees
- ▷ Respect for our environment

Sustainability

- ▷ Climate-neutral dispatch of our products and climate-neutral printing of our catalogues
- ▷ 100 % recyclable products, conserving resources

4. OBJECTIVES AND SCOPE

We view a responsible attitude to laws, standards and in-house guidelines as being an indispensable part of our desire to act in a compliant way. This is absolutely essential to avoid financial and reputational risks for our company and to be seen as a reliable business partner that operates sustainably.

Our compliance guidelines apply to all employees (employees of associated companies, representatives or sales agents, hereinafter referred to collectively as "employees") of GEGGUS GmbH and its associated companies. As a result, all employees of GEGGUS GmbH have an obligation to comply with the principles set out here and the individual rules referenced in this document when conducting business.

These compliance guidelines apply without restriction to all employees within the different companies, sites, areas and processes of GEGGUS GmbH, taking account in each case of the appropriate national legislation that applies at the sites. The guidelines must not be undermined by individual instructions.

We adhere to these standards. Under no circumstances is it permitted to deviate from these guidelines – not even if the reason is that it will offer financial options or advantages.

These compliance guidelines are to be made available to all managers, employees and business partners of GEGGUS GmbH. Furthermore, the compliance guidelines are to be made publicly available to all interested persons.

5. LAWS AND REGULATIONS

Safety at work

Every employee of GEGGUS GmbH must comply with the current laws, regulations and standards on health and safety at their place of work in order to safeguard the health and safety of all employees.

In relation to health and safety at work, we have generally applicable regulations relating to the necessary compliance with safety instructions and the use of specific work clothes. These are specified in the company guide and everyone must comply with them.

It is the responsibility of all managers to ensure that their staff have a general knowledge of the regulations and to check that these regulations are being followed.

Employees must immediately notify their direct line managers of deviations from these standards, and apparent sources of danger must be reported.

Country-specific laws

The binding legal regulations in individual countries may deviate from our compliance guidelines. In such situations, the stricter rule is always decisive for us.

Anti-trust legislation

The laws, guidelines and regulations of national and international anti-trust law determine how we act in terms of competition. The risk of penalties for behaviour in breach of anti-trust law arises both through interaction with competitors as well as through consultation with suppliers or customers. Practices that are unlawful and/or have implications under criminal law such as unlawful collusion about offers, pricing arrangements or the illegal dividing up of regional markets or customers must therefore be resolutely resisted. Responsible managers and employees must therefore continuously research possible actions in their area of work that may be relevant under anti-trust law and, if they have any doubts, dispense with the corresponding contract structures or oral agreements.

Travel guidelines

GEGGUS GmbH has specified travel guidelines. These travel and expense guidelines are valid for all permanent employees with time-limited and open-ended contracts and, if applicable, temporary workers. These guidelines define the basis for business travel and the booking process. Relevant standards regarding the mode of transport, the accommodation and the means of communication are also defined. In addition, the specifications and payment methods for the travel and business entertainment costs, differentiated according to the possible deployment locations, are broken down in detail. The detailed regulations can be found in the "Travel guidelines" document, which is regularly updated and which we must all use and comply with.

Selection of suppliers

We set high standards for ourselves at GEGGUS GmbH and place equally high demands on our partners. As a prerequisite for this, we expect information from the suppliers themselves, a confidentiality declaration and the appropriate quality certificates.

We create the basis for excellent quality through trust-based collaboration, honesty, and consistently open and fair treatment of each other.

6. BEHAVIOUR

Towards each other

We respect and protect the dignity of our colleagues, customers, suppliers and partners. We penalise discrimination, harassment and other violations of the dignity of others. We comply with the corresponding statutory regulations without exception. Managers set an example in this respect. The guiding principle of our collaboration is mutual respect and esteem. This also means that we expect and allow different opinions, discuss problems in an open manner and look for solutions together. We therefore encourage trust, tolerance and fairness within our organisation.

Good collaboration has its roots in open communication, mutual support and genuine trust. We inform each other fully of the facts and business contexts and thus facilitate decisions and actions that are consistent with our values and objectives.

Management principles

Every manager has an obligation to ensure that activities in their respective area of responsibility are compliant. Managers nurture their employees' personal initiative and further development and value a culture of mutual esteem and mutual respect. This applies in particular to communications with each other and for contact with our customers, suppliers and partners.

When conducting staff appraisals, managers are required to act fairly and responsibly, in particular taking account of the guiding principles on equal treatment set out in these guidelines.

Protection and promotion of health

The management's supervisory role includes safeguarding the health of all employees. We view the promotion of all employees' health as a basis for our corporate and social responsibility as well as the foundation for the smooth running of all business processes and retaining employees' loyalty over the long term. In this context, we are all required to comply with regulations in respect of the ergonomic use of our workplace and to discuss possible optimisation methods with the management.

Company property

No employee is allowed to use the property of GEGGUS GmbH for purposes other than for business, unless special rules are allowed for private use. Furthermore, we treat the company's property in the correct way and with care, and prevent it from being damaged and lost.

7. CORRUPTION

We only win our contracts in a fair and lawful way. For this reason, we do not tolerate any illegal, corrupt or immoral behaviour by our employees and business partners. Violations of laws and standards for the avoidance of corruption can, firstly, inflict enormous financial damage in the form of penalty payments and loss of orders and, secondly, cause long-term damage to the company's reputation with employees, customers and partners. Possible sources of danger regarding corruption are found in areas such as contact with the parties, authorities at home and abroad, and office holders. Here, in particular, no payments, gifts or other benefits in kind may be given to officials, employees in public service or employees of a state-owned company. The same applies to impermissible payments which may influence specific business transactions with private companies.

8. EQUAL TREATMENT

GEGGUS GmbH views the diversity within its workforce as a source of innovations and the basis of our active cooperation in the company. To make this possible, it is our task and duty within the company to ensure that nobody is disadvantaged because of their gender, origin, culture, religion, sexual orientation or physical condition. This applies both to the hiring process and the promotion of employees as to any redundancies that may be required.

9. CONFLICTS OF INTEREST, SECONDARY EMPLOYMENT

Employees of GEGGUS GmbH are not allowed to manage or work for a company that is in competition with GEGGUS GmbH and are not allowed to undertake any activities that compete with GEGGUS GmbH.

This applies in particular to secondary employment that could entail a competitive situation. In any case, the company must be notified if an employee takes up paid secondary employment, and written permission must be given beforehand.

Secondary employment can be prohibited if the employee has connections to the company concerned as part of GEGGUS GmbH's business or if the two companies are in competition.

10. INTERNAL CONTROLS

Data protection, handling confidential information

During and after their work for GEGGUS GmbH, all employees must keep the business secrets of GEGGUS GmbH confidential. This relates to confidential or protected information about our organisation and its equipment, business information such as prices, sales figures, profit, markets and customers as well as information about development processes. All information about customers, employees, suppliers, advisers or other third parties will be treated confidentially by us.

In the company we also always ensure that we implement and comply with an appropriate level of data protection in accordance with the General Data Protection Regulation (GDPR). As part of our integrated data protection management, all employees are required to be aware of their responsibility and handle personal data in a sensitive manner. The obligation to maintain confidentiality extends to after the end of the employment relationship.

Regular in-person and online training courses are held for employees, and external data protection officers regularly carry out monitoring and internal audits.

GEGGUS GmbH's data protection officer is available as a contact person for this in order to clarify any queries and point out possible legal risks.

Risk management

GEGGUS GmbH's risk management creates the necessary preconditions to identify the effects of risks in good time and take these into account when taking tax decisions.

The identification of relevant risks entails the design and implementation of appropriate measures. Risk analysis examines not only internal structures and processes at GEGGUS GmbH, but also developments outside the company. This especially involves developments in competition, technology and relevant laws and standards but also general developments in the economy and society. At GEGGUS GmbH risk management is not the task of the management alone but is also the responsibility of all employees.

All employees are required to take the risk management information into account in their daily activities. This policy is equally as important as our quality and environmental policy.

Controlling

An integrated controlling system that combines planning, monitoring and information processes is an essential prerequisite for dealing proactively with external developments and permanent and effective internal monitoring of success. GEGGUS GmbH operates implemented controlling, i.e. all employees are familiar with the basic principles regarding the implementation of planning and controlling, and they apply these in practice. The management demands active implementation of controlling, and the employees have access to all the usual controlling instruments for gathering information in respect of the company's current situation.

GEGGUS GmbH's planning process is defined. The process covers all aspects of the company's planning, i.e. the strategy, performance and functional areas, activities, drivers and the integration of all planning in the form of P&L, the balance sheet and the cash flow calculation. The company management is responsible for all planning and ensures that planning measures are selected and delegated as required and that their implementation is monitored.

Principal responsibility for the controlling system and maintaining it lies with the company management.

11. SOCIAL RESPONSIBILITY

As a company with international operations, we acknowledge our responsibility to treat all people affected by the actions of GEGGUS GmbH in a way that is legally compliant and, above all, respects human dignity. Here we consider that full recognition of human rights is the basic prerequisite for how we act and how we treat our partners and suppliers.

This is why we manage our business in a way that prevents any infringement of national and international standards regarding principles and rights at work. This also covers renunciation of any forms of forced labour and exploitative child labour.

We are also judged as a company on how we conduct ourselves outside our immediate working environment. For this reason, we are all required to respect the culture of the respective country and demonstrate understanding for the societies and communities in which we operate.

We comply with the labour legislation of the respective sites and also expect our suppliers and partners to do the same. In addition to the statutory regulations, we have our own standards and specifications for in-house and external collaboration, and these are combined within these compliance guidelines.

12. ENVIRONMENTAL PROTECTION

Viability of our company Avoiding our natural resources being treated in a harmful way as part of a sustainable concept as well as the ecosystem that surrounds them not only satisfies our ethical and ecological principles but also forms a basis for GEGGUS GmbH's strategic direction and is part of our responsibility to society.

Our main focus here is on the use of natural resources and how we deal with the waste and hazardous substances produced. GEGGUS GmbH's environmental policy forms the cornerstone for this. Systematic and detailed environmental and energy management ensures that this is converted into specific targets and codes of conduct.

Every employee is involved and has the right and duty to make a contribution to rectifying situations which cause energy to be used unnecessarily. We encourage our employees to be conscious of how they use energy both within and outside the company through the provision of information and training courses. By acting responsibly, every employee contributes to ensuring that natural resources such as air, water and energy are not wasted unnecessarily, but instead are used to optimum effect.

13. MONITORING

Compliance Officer

GEGGUS GmbH's management is responsible for establishing and updating the compliance guidelines and coordinating appropriate monitoring and improvement measures. The task of monitoring to ensure that activities comply with the rules is primarily the responsibility of the management.

Dealing with information supplied, notification obligation

All employees are expressly encouraged to contact the Compliance Officer or their line managers if they notice that someone is acting dishonestly or not in compliance with the rules. This can stop minor problems from becoming large ones. No employee needs to fear that they will suffer disadvantages when they have raised an issue with honest intentions, even if the information they provided proves to be groundless. Information can also be provided anonymously.

The Compliance Officer is the first point of contact for raising the suspicion or documenting actions that conflict with the compliance regulations provided here. All GEGGUS GmbH employees are required to inform the Compliance Officer about the relevant occurrence if they have a justified suspicion.

Consequences resulting from compliance breaches

We cannot tolerate any detected breaches against these compliance rules. We comply with the relevant laws, regulations and in-house rules that relate to our respective field of work and align our actions with the values and guidelines of our corporate group.

Any employee who does not comply with the rules must expect appropriate consequences as set out in company and statutory regulations. These may even involve termination of the employment relationship and claims for compensation.



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