

Code of Conduct

With this Code of Conduct, the GBA Group sets itself a binding standard of conduct for all managers and employees. Together with GBA Group's Compliance Management Policy, the Code of Conduct forms the basis of GBA Group's compliance management system.

The GBA Group wants to be perceived as a company of integrity and be known for this. The GBA Group and all of its members should always strive to be regarded as competent, reliable and fair by acting in accordance with the rules and by respecting general social regulations, appropriate business practices, and through adherence to local regulations and the protection of the environment. The Code of Conduct is intended to serve as a guideline for legally and ethically sound decisions. It enables all managers and employees to always act in accordance with the fundamental values and expectations.

Each individual manager and each individual employee is required to familiarize themselves with this code and to strictly observe it. The GBA Group expects its business partners to respect this code in their business dealings and to refrain from doing business that is only possible in violation of the law and this code.

All members are responsible for the long-term success of the GBA Group. Accordingly, the implementation of this Code of Conduct is a key factor for our long-term success. We, the members of the GBA Group Executive Board, conduct our day-to-day business in accordance with this Code of Conduct and trust that every manager and every employee observes and respects these rules and guidelines on a daily basis.

In October 2020

Stefen Walter
CEO GBA HOLDING GmbH

1. Bribery and Corruption

The long-term success of the GBA Group is based on the customer orientation of its managers and employees and the quality of our products and services. We do not take part in any form of bribery, corruption or any other behaviour that might indicate unfair influence.

Therefore, you shall never directly or indirectly grant illegal or improper advantages to other parties in your business dealings.

This includes cash payments and other benefits (e.g. vouchers / air travel / hotel accommodation / private trips and the transfer of company property). This also applies when the advantage has no influence on a business decision.

Any benefit shall be provided in a transparent manner and in accordance with applicable laws and our internal policies. This applies in particular to officers or employees of government companies who are subject to even stricter standards.

The GBA Group is obliged to ensure that none of its partners commit illegal acts in connection with any activity for the GBA Group. It is of the utmost importance that such partners are carefully and critically selected, reviewed and monitored. Any contractual relationship must be entered into in such a way that there is an appropriate balance between performance and reward and that there is no apparent acceptance or granting of an advantage. In case of uncertainty in the application of this regulation, supervisors should be asked for advice.

Violations of anti-corruption laws may result in penalties and loss of profits that could endanger the GBA Group's existence. Employees who commit these acts or are responsible for such acts must expect consequences, including imprisonment.

2. Gifts and Invitations

We do not give or accept gifts or invitations that suggest unfair influence.

The GBA Group recognizes that exchanging gifts and mutual invitations or hospitality is useful and legitimate for maintaining contacts. However, in order to avoid any appearance of unfair influence on third parties, the following principles should be observed:

- Gifts or hospitality should always be within the bounds of courtesy and custom and should not be ethically questionable.
- Gifts or hospitality must not be related to or suggest any obligation on the part of the recipient.
- Never ask for gifts or other amenities from (potential) business partners. Gifts are any material or immaterial advantage. GBA Group managers and employees may only receive small gifts in terms of value. If the rejection of a gift is not in keeping with cultural customs, the gift will be accepted

on behalf of the GBA Group and it will be made clear that the gift will be made available to all GBA Group employees.

- During business negotiations, a bidding process or similar events, you should be careful with dinner invitations - these are only allowed if the value is low and the frequency low. In addition, gifts or similar benefits are to be declined.
- Invitations from government officials must be declined. Gifts may not be distributed to government representatives.
- In the event of any doubt as to the appropriateness of a gift or invitation, please obtain clearance from your supervisor.

3. Fair Competition

The GBA Group stands for fair and free competition and complies with all national and international antitrust and competition regulations. In all regions and countries in which we operate, we will actively and fairly compete to gain customers and orders. This ensures that our interests and those of our customers are protected by our respect for fair competition.

It must therefore be ensured that you do not under any circumstances enter into agreements or coordinated arrangements with (potential) competitors. In particular, you should not participate in the coordination and fixing of prices, discounts or price components, any restrictions with regard to the type and quantity of services, the geographical division of markets or the division of business partners or customer segments. Furthermore, no confidential or other internal information may be shared with former supervisors, colleagues or friends, particularly those working for a competitor.

You must ensure that your marketing and promotional activities regarding our services are in compliance with applicable laws, rules and regulations.

4. Conflicts of Interest

The independence of our decision-making processes and the integrity of our managers and employees are fundamental to our credibility and success.

All employees are required to act in the best interest of the GBA Group at all times and not in their own interest or in the interest of third parties. A conflict of interest may arise if relatives work for competitors, suppliers or customers and the GBA Group manager or employee has an influence on the GBA Group's business relationship with the company concerned. You must also obtain the consent of your supervisor before commencing any secondary employment if it conflicts in any way with your employment with GBA Group or the interests of GBA Group.

Secondary activities or jobs can lead to conflicts of interest. These generally arise when relationships or activities of employees outside an activity for the GBA Group impair the independence and objectivity of their decisions. You must ensure that any appearance of such influence is avoided. In addition, the consent of your supervisor must always be obtained before starting any such secondary employment.

Decline activities and business relationships that could bring you into conflict with your obligations to the GBA Group.

If you are politically active, make sure that your political activities are not related to or appear to be related to your employment with the GBA Group. Do not use any GBA Group property, equipment or other resources for this purpose.

Do not abuse your position at the GBA Group to gain an advantage for yourself or others.

5. Proper Documentation, Accounting and Reporting

The GBA Group maintains open and honest communication with shareholders, customers, managers and employees, business partners, the public and all authorities. This is based on adherence to proper and true accounting, internal documentation and reporting.

Correct, complete and orderly accounting is fundamental to our business operations. This is the only way we can comply with legal requirements and operate safely in our society. All business transactions, documents, numerical data and other information must be processed, stored and recorded in accordance with legal requirements and our internal guidelines. We submit accurate, truthful and complete payment requests or permit applications that meet the relevant legal and contractual requirements.

All business transactions and services must therefore always be properly presented, particularly the compliance with legal and internal quality regulations and full compliance with the GBA Group's approved methods and processes. All findings and results must be meticulously documented and must not be changed in an unfair manner. Reports and certificates must reflect the results and findings as well as opinions obtained from experts.

6. Equal Treatment, Prohibition of Discrimination

At the GBA Group, all employees are treated with respect and are not harassed or discriminated against under any circumstances. We pride ourselves on the diversity of our employees as it represents a significant contribution to the success of our society.

We respect the dignity, freedom and personal rights of all employees. The working environment is characterized by mutual trust and respect. In accordance with our values and laws in most countries, we do not tolerate discrimination based on skin colour, gender, religion, age, nationality, social or ethnic origin, disability, creed, sexual orientation or political or trade union activity.

Every manager and every employee is obliged to ensure that neither prejudice nor discriminatory behaviour in any form exists or can exist.

Managers and employees are hired, paid and promoted exclusively on the basis of qualification and suitability for the intended position and never on the basis of special treatment or bias. Each manager is required to promote and develop the individual knowledge and skills of each employee in the team.

We all have the right to a working environment free from harassment. Harassment is behaviour that has the purpose or effect of making the working environment appear intimidating, hostile or threatening. There are many forms of harassment. These include physical acts, verbal or written remarks. Ensure that there is no harassment in the workplace.

7. Health, Occupational Safety and Environment

A safe working environment for all employees and environmental awareness are top priorities for the GBA Group.

Health, safety and environmental protection are integral parts of our business activities. We implement a system of continuous improvement in the areas of health, safety and the environment in strict compliance with all national laws to ensure the sustainability of the measures:

All managers and employees of the GBA Group should therefore ensure that all health and safety measures are followed at all times, that the relevant regulations and work instructions are followed and that all necessary protective equipment is used. Our employees shall have regard for their own health and safety and that of their colleagues. They must follow the safety rules and prevent dangerous situations in order to avoid accidents.

We treat our environment with care. We comply at all times with all applicable legal regulations and internationally recognised environmental standards. Our behaviour towards our environment should minimise the use of energy, raw materials and other substances and should avoid any negative impact on our environment.

As part of our commitment to health and safety at work, we do not tolerate violence or threats in the workplace. To keep our workplace free from violence and intimidation, weapons and other dangerous objects that are not necessary for our business are prohibited on GBA Group premises. Any exceptions due to local law or work regulations must be authorized in advance by the management of the respective company in the GBA Group.

During working hours, employees must not be under the influence of medication, alcohol, drugs or other substances that impair their ability to work.

8. Communication, Information Systems, Emails and Data Protection

The reputation of the GBA Group is particularly dependent on the business actions and integrity of our employees.

As an employee who represents the GBA Group to the outside world, you must ensure that this is done exclusively in the form intended for it with coordinated content. Under no circumstances should incomplete or falsified information be passed on. External enquiries will only be answered by the responsible specialist departments.

Employees are prohibited from using or copying software from GBA Group IT systems for private purposes and from installing private software at their workplace. Please also be aware that even charging a mobile device on a GBA Group computer can result in automatic software installations.

Email services, Internet access and telephone are provided solely for business purposes, unless private use is exceptionally permitted under a corporate policy or separate agreement.

Under no circumstances may you use GBA Group's IT systems, Internet access, email accounts or other information and communication media for illegal or unethical purposes. The search, downloading or distribution of information with racist, propaganda or pornographic content or the glorification of violence constitutes abuse and may result in severe penalties.

GBA Group employees must act professionally, honestly and appropriately when dealing with social media and preserve the private character of communication. Do not discuss matters that involve confidential and proprietary GBA Group information. If you make a statement about professional matters, make it clear that you are expressing your personal opinion and pay particular attention to protecting the GBA Group and yourself. The use of social media for business purposes (e.g. recruitment or public relations) requires the consent of your supervisor. Reference is also made to the GBA Group social media guidelines.

In the normal course of our business, we may process or use personal information about various individuals, including employees, customers and others with whom we do business. The GBA Group is committed to collecting and storing only personal information that is reasonably required for business or employment purposes. We treat this information confidentially and protect it in accordance with applicable law.

9. Confidentiality

Openness and transparency are indispensable values within the GBA Group. However, in certain cases openness and transparency must take a back seat to the obligation to confidentiality. Some information must be protected in order to protect the rights of our customers, partners or employees or our own business interests. This includes all information which is not accessible to the general public and for which it is in our interest to keep confidential, such as:

- Information about the GBA Group's business activities, such as information about customers, market or financial data, methods and processes
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- Information provided by third parties on condition of confidentiality.
- Information about personal data of employees.

This confidential information may not be disclosed to any other person and may not be used for personal gain. If confidential information about the business activities of the GBA Group must be disclosed in the course of business, all measures must be taken to protect its confidentiality. Confidential information concerning third parties may only be disclosed with their permission.