

## Code of Conduct for Suppliers and Business Partners

### Foreword

Our understanding of compliance is the observance of all applicable laws, internal guidelines, internationally recognised standards of conduct and voluntary commitments in all our business activities. We see compliant behaviour as the central basis for successful business development. Integrity and compliance are therefore integral components of our strategy and corporate culture.

The following Code of Conduct defines the principles and requirements for our suppliers and business partners with regard to their responsibility for people and the environment as the basis for making business relationships successful. If suppliers or business partners engage third parties (e.g. subcontractors or agents) within the scope of the business relationship, gat expects these third parties to also commit to the basic principles set out in this Code of Conduct for Suppliers and Business Partners.

We all „live“ our slogan *automation made by experts* at gat every day: employees, management and shareholders – and we expect the same from our partners.

Welcome to gat!



Karsten Hofmann  
Managing Director

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00	04.02.2022	New Code of Conduct for suppliers & business partners		Karsten Hofmann

## 1. Corporate responsibility

The following Code of Conduct defines the principles and requirements for our suppliers and business partners with regard to their responsibility for people and the environment as a basis for making business relationships successful. If suppliers or business partners engage third parties (e.g. subcontractors or agents) in the course of their business relationships, we expect these third parties to likewise commit to the basic principles laid down in this Code of Conduct for Suppliers and Business Partners.

The following is hereby declared:

## 2. Compliance with the law

- Comply with the laws and regulations of the applicable jurisdictions.

## 3. Human rights and labour practices

- To ensure that all internationally proclaimed human rights are respected by avoiding causing and participating in human rights abuses. Increased attention shall be paid to respecting the human rights of particularly vulnerable rights-holders or groups of rights-holders, such as women, children, migrant workers or (indigenous) communities. In particular, attention shall be paid to:

### 3.1 Prohibition of forced labour

- Nor use neither contribute to slavery, servitude, forced or compulsory labour, or trafficking in human beings.

### 3.2 Prohibition of child labour

- Not to employ workers who are at a minimum age of 15 years. In countries that fall under the developing country exception of ILO Convention 138, the minimum age may be reduced to 14 years.
- Not to hire workers for hazardous work who do not have a minimum age of 18 years under ILO Convention 182.

### 3.3 Respect for and non-discrimination against employees

- Promote equal opportunities and treatment of its employees regardless of their colour, race, nationality, ethnicity, political affiliation, social origin, any disability, sexual identity and orientation, religious beliefs, gender or age.
- Not to tolerate inappropriate treatment of workers, such as psychological hardship, sexual harassment or discrimination, including gestures, language and physical contact that are sexual, coercive, threatening, abusive or exploitative.

### 3.4 Working hours, remuneration and fringe benefits for employees

- Recognise the right of employees to form and join existing trade unions and to engage in collective bargaining; neither favour nor discriminate against members in employee organisations or trade unions.
- Comply with applicable working time regulations worldwide.
- In the case of cross-border deployment of personnel, to comply with all applicable legal provisions, in particular with regard to minimum wages.

### 3.5 Health and safety of employees

- To act in accordance with applicable legal and international standards relating to health and safety in the workplace and provide safe working conditions.
- Provide training and ensure that all employees are trained in health and safety at work.
- Establish and implement an appropriate health and safety management system.

### 3.6 Grievance mechanism

- Provide employees with access to a protected procedure to report possible violations of the principles of this Code of Conduct.

## 4. Environmental and climate protection

- To act in accordance with applicable legal norms and international standards with respect to the environment. Minimise environmental pollution and continuously improve environmental protection.
- To establish and apply an appropriate environmental management system.
- To use natural resources sparingly and to reduce energy consumption and emissions.

## 5. Fair operating practices

### 5.1 Anti-corruption and bribery

- Not to tolerate any form of corruption or bribery and not to engage in it, directly or indirectly, and not to offer, give or promise gratuities to government officials or private sector counterparties to influence official actions or gain an unfair advantage. This includes refraining from giving or accepting improper acceleration payments.

### 5.2 Fair competition, antitrust and intellectual property rights

- To act in accordance with national and international competition laws and not to engage in price fixing, sharing of markets or customers, market collusion or bid rigging.
- To respect intellectual property rights of others.

### 5.3 Conflicts of interest

- Internally and vis-à-vis gat, avoid and/or disclose all conflicts of interest that could affect business relationships and to avoid even the appearance of such conflicts of interest.

### 5.4 Money laundering, terrorist financing

- Not to directly or indirectly promote money laundering or terrorist financing.

### 5.5 Data protection

- Process personal data confidentially and responsibly in accordance with the GDPR, respecting the privacy of all and ensuring that personal data is effectively protected and used only for legitimate purposes.

### 5.6 Export control and customs

- Comply with applicable export control and customs regulations for the import and export of goods, services and information.
- You indicate gat a possible authorisation requirement in the case of a delivery that is (could be) subject to export control, irrespective of possible export countries.

## **6. Sourcing materials responsibly**

- Take appropriate measures to avoid the use in its products of raw materials sourced from conflict and high-risk areas that contribute to human rights abuses, corruption, funding of armed groups or similar negative impacts.

## **7. Supply chain**

- To make reasonable efforts to ensure that its suppliers comply with the basic principles of this Code of Conduct.
- To comply with the principles of non-discrimination in the selection of suppliers and in its dealings with suppliers.

Geesthacht, February 2022