

CODE OF CONDUCT OF GIS AG

MAY 2025





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1. FOREWORD CEO



Dear GIS employees, dear GIS partners

The success of our company is based first and foremost on its most valuable asset, its employees, who bring the company to life and allow it to flourish through their commitment and behaviour.

Since taking over the management of the company in 2010, it has been a personal concern of mine to handle this precious resource with care. All employees in the gears of our company are valuable and deserve honest respect and recognition.

Trust, teamwork and a shared understanding of values are the basis for our interactions with each other as well as with our customers, suppliers and business partners. It is therefore important to us not only to live these principles internally, but also to represent them externally. This also includes our environment.

Our Code of Conduct summarises the key rules and principles that guide our daily actions and that we expect our partners to adhere to. It stands for our team's willingness to take personal responsibility and to behave in a legally compliant and ethically correct manner at all times.

I am firmly convinced that it will continue to be crucial for us as a GIS family in the future that everyone can rely on each other, both inside and outside the company.

Ivan Muri
CEO

2. PURPOSE AND SCOPE

This Code of Conduct of GIS AG defines our fundamental values and principles according to which we conduct business, and are intended to help us implement highly ethical, professional and legal standards. The Code of Conduct applies to all employees of GIS AG.



3. OUR FUNDAMENTAL VALUES

We plan and act in accordance with our fundamental values, which represent a common foundation for all employees of GIS AG.

These fundamental values serve as the basis for acting as a reliable partner for all stakeholders. And they set a standard we want to use to measure ourselves.

OUR VALUES ARE:

- Long-term cost-effectiveness
- Expertise in providing solutions
- Commitment
- Customer focus
- Continuity
- Quality



4. CORPORATE MANAGEMENT

The corporate management of GIS AG acts with a long-term horizon in order to create sustained success for all stakeholders, such as customers, employees, suppliers and owners. We view long-term success as more desirable than short-term maximization of profits.

We foster a corporate culture of responsibility, reliability and continuity. We view it as our corporate responsibility to ensure the future of our business and our company for the next generation, taking account of social and environmental concerns.

We promote a culture of mutual trust, respect and open dialog, and we strive to achieve an optimal balance between a fiscally conservative approach and our corporate ambitions. Our committed and entrepreneurial-thinking managers should serve as examples and motivate their staff by acting with a sense of responsibility and humaneness.

We communicate in a professional manner and the information that we provide to customers, employees, suppliers, the media and the public is clear, correct and transparent.



5. ENVIRONMENT

GIS AG abides by the principle of sustainability and accepts its environmental responsibility. We develop high-quality products that meet our customers' needs and, thanks to their functionality, precision and energy efficiency, conserve natural resources and comply with applicable environmental protection laws and regulations.

We take account of environmental concerns in our business activities, whether this involves the development of new products or the planning of new production systems and building infrastructure. We continuously improve the efficiency and performance of our products and production facilities. GIS AG makes sustainable and efficient use of resources such as energy, water and materials.



6. HUMAN RIGHTS, WORKPLACE AND EQUAL OPPORTUNITY

Our employees are the backbone of our success. We protect the health of our employees by setting up workstations and production facilities to avoid potential hazards that can lead to accidents, illnesses or other safety-related risks. Safety and health concerns that have been identified or reported are addressed immediately.

GIS AG respects and supports the upholding of the internationally recognized human rights of the United Nations and

- respects the human dignity, privacy and personal rights of all individuals,
- protects and preserves the right to freedom of opinion and freedom of expression,
- does not tolerate any unacceptable treatment of employees such as physical and psychological abuse.

GIS AG does not tolerate any type of harassment or discrimination in the workplace, especially harassment or discrimination based on nationality, race, gender, age, religion, sexual orientation, potential disability, or any other legally protected personal attribute. We respect diversity among employees.

GIS AG does not accept any forms of forced, compulsory or child labor.



Ban on child labor

GIS AG does not tolerate child labor. We only hire employees that have at least reached the local statutory minimum age and demand the same of our business partners and suppliers.

Ban on forced and compulsory labor

All forced and compulsory labor is prohibited. The business partner must not force their employees to surrender their identification card, passport or work permit as a condition for employment.

Remuneration

We comply with the applicable laws and labor standards with regard to the maximum permitted working hours and ensure that the working hours, including overtime, do not exceed the maximum limits as permitted by law.



7. CUSTOMER FOCUS

We focus our activities on customer benefits.

An open work and corporate culture is a prerequisite for seeking and finding innovative solutions for products and services in the interest of customers. We make no compromises with respect to quality, precision and customer service.

We view it as our obligation to ensure that our products are safe and reliable for our customers. We abide by industry standards and comply with all applicable product safety laws and regulations.

Our global distribution network consists of representatives who position themselves as specialists and strong partners with technically and communicatively skilled sales and service professionals. To serve our customers, they always keep their expertise up to date thanks to continuous training.

Where consumer interests are concerned, we abide by regulations that protect consumers as well as by appropriate sales, marketing and information practices.



8. SUPPLIERS

We expect our suppliers to comply with the principles of this Code of Conduct or to apply an equivalent Code of Conduct. Furthermore, we encourage them to implement this Code of Conduct in their supply chains as well.

We reserve the right to verify the application of this Code of Conduct by our suppliers on an ad hoc basis to request documents. This may take place in the form of visits and assessments, for example.

Should there still be doubts about compliance with this Code of Conduct, the supplier will be requested to take suitable corrective actions and report this to their responsible contact at GIS AG. If necessary, the cooperation will be ended.

8.1 HANDLING CONFLICT MATERIALS:

We take actions with the care necessary to avoid using conflict minerals in our products to prevent violations to human rights, corruption and the financing of armed groups or similar.

GIS suppliers are instructed not to use goods and materials to produce their products in an illegal or unethical manner and not to use minerals from conflict or high-risk areas. Problematic minerals include tin, tantalum, tungsten, cobalt and gold in particular.

9. INTEGRITY AS PART OF OUR BUSINESS ACTIVITIES

We conduct business fairly and honestly, and comply with all applicable laws and regulations as well as our internal guidelines. We follow both the letter and the spirit of these regulations.

9.1 Confidentiality and data protection

All of our confidential and internal information, including business secrets and knowledge, must be protected and secured against unauthorized and inappropriate dissemination and disclosure. Employees are prohibited from using, stealing, sharing or disclosing confidential information for personal gain, or for inappropriate or unlawful purposes.

By law, breaches of confidentiality, data protection law or data security must be reported immediately. We observe the applicable laws and regulations related to data protection. We refrain from the falsification or misrepresentation of information.

We take the protection of the personal data of employees, suppliers and customers seriously. In compliance with local data protection laws, the personal data of GIS employees is only processed to the extent necessary to meet mutual obligations and to achieve our business purposes.

9.2 Account books and business documents

All relevant business processes are documented by us correctly, completely, in a timely fashion and in a true and fair manner.

Our account books and other business documents are protected and archived against prohibited changes and falsifications as well as against unauthorized access.



9.3 Business property and assets

Property, intellectual property and assets, as well as GIS equipment, must be protected, secured and maintained with appropriate measures. Such property and assets are to be used exclusively for business purposes in the interests of GIS AG and must not be used for personal gain, or for inappropriate or unlawful purposes.

All work results in connection with employee activities are the exclusive property of GIS AG. We respect the property, intellectual property and assets of third parties.

9.4 Conflicts of interests

We avoid all actions and activities that conflict with the interests of GIS AG, that might disadvantage the interests of GIS AG or that might give the appearance of serving only our personal advantage or benefit. This may be the case, in particular, if an employee performs additional activities and maintains obligations outside of GIS AG, has agreements with business partners in which family members or close friends are involved, or maintains participations in business activities that compete with the business activities of GIS.

Existing or potential conflicts of interest must be immediately reported to your line manager or the managing director, so a review can be conducted to determine whether there actually is a conflict of interest and how the situation can best be resolved in a fair and transparent manner. Where necessary, affected persons must abstain from the decision-making process.

9.5 Corruption and bribery

We are incorruptible and do not accept any form of corruption.

We only offer or accept gifts, invitations and personal favors in connection with our business activities if the value and frequency of such gifts, invitations and personal favors are reasonable, in line with the circumstances and in compliance with local customs and standards, and the applicable law. We ensure that such gifts, invitations and personal favors do not affect our business decisions. We avoid offering or accepting gifts, invitations or personal favors if they involve cash or a comparable form of payment, if such gifts, invitations or personal favors might give the appearance that they have been used to unduly obtain or maintain orders, transactions or other services, or if they might cause a conflict of interest for the parties involved. We avoid promising, offering or granting employees or other representatives (or family members or friends of such persons) of customers and business partners bribes or kickbacks, other unlawful payments or benefits of any value.

9.6 Competition and cartel law

We maintain fair competition with other market participants based on quality, service and price, and comply with all applicable competition and cartel law provisions and regulations. In particular, we do not participate in arrangements, agreements or the exchange of information with competitors regarding pricing, market divisions/market restrictions or boycotts/the rejection of business relationships.

9.7 Money laundering prevention

Money laundering is the process of smuggling money or assets obtained illegally into the legal financial and circular flow of income. We meet our legal obligations to prevent money laundering and do not enter into any transactions that serve to conceal or integrate criminally or illegally obtained assets.

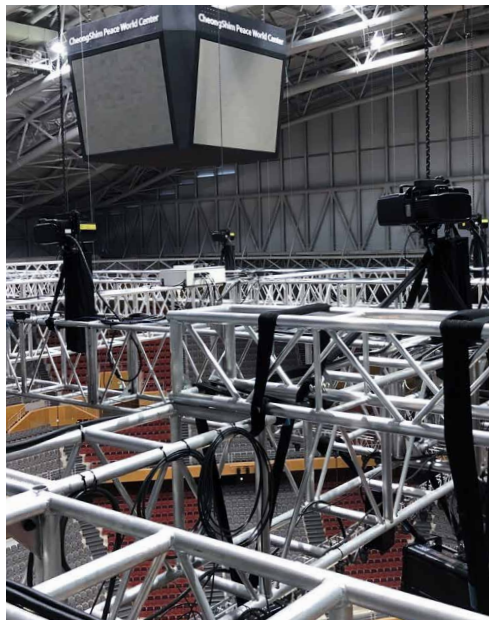
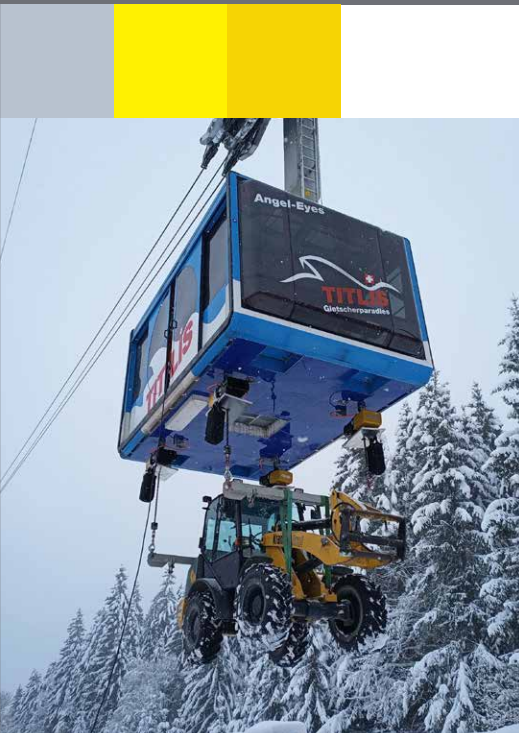


9.8 Foreign trade, export inspection and customs regulations

GIS AG complies with all regulations, ordinances and provisions regarding foreign trade, customs, embargos, CBAM and counterterrorism as well as related regulations and ordinances for payment transactions that apply in the respective countries of the business activity, and expects compliant behavior from its business and trade partners.

All employees must comply with the foreign trade and customs regulations applicable to their area of responsibility, as well as import and export regulations for the cross-border movement of goods, technologies or services.

The realisation of imports and exports must be checked in advance on the basis of the applicable rules and regulations.



10. IMPLEMENTATION

10.1 Ethical business decisions

We make decisions on a daily basis that involve ethical considerations and that may impact the assets, success or reputation of GIS AG. In order for us to make well thought-out business decisions, we should ask ourselves the following questions:

- Is the decision in the long-term interest of GIS AG?
- Would I be embarrassed if my decision or the consequences of the decision were published in a newspaper?
- Is my ability to represent the interests of GIS AG externally and to make the appropriate decisions compromised?
- Is the decision within my area of responsibility and the risk tolerance of GIS AG?
- Are we doing the “right thing” and is it legal?

If there are any concerns or uncertainties, consult your line manager for advice or instructions.

10.2 Compliance

We expect all employees to be familiar with this Code of Conduct and to abide by its provisions accordingly. A breach of the Code of Conduct may lead to disciplinary measures, including termination of the employment relationship.

10.3 Reports and complaints

Employees and business partners who in good faith assume that certain behaviors violate this Code of Conduct or result in violations of law are encouraged to report such behavior via the neutral “Integrity Hotline” whistleblowing system at <https://gis-ag.integrityline.io/>.

These reports are treated as confidential. Employees who report possible violations to the Code of Conduct in good faith do not have to fear any negative consequences with regard to their employment relationship due to their report. Reports and complaints submitted by employees are reviewed and handled in a timely manner.

