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INTEGRITY POLICY

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1. SCOPE

This policy applies worldwide to all companies and employees[1] of the GEA Group. These include GEA Group Aktiengesellschaft and all companies that are affiliated with GEA Group Aktiengesellschaft in accordance with corporate law (hereafter "GEA").

2. CORRUPTION

Corruption is not tolerated at GEA. Corruption is understood to be demanding, accepting a promise or accepting (passive corruption), as well as promising or granting (active corruption) a benefit for oneself or a third party to gain unlawful influence over a decision.

Corruption is a criminal offense worldwide and can have severe consequences for employees and companies. Corruption can lead to large fines, profit confiscation, exclusion from calls to tender, and other official sanctions as well as claims for damages against the company. Disastrous consequences in terms of financial damages and loss of reputation can severely endanger the success of the company for a long time. Involved employees may also face sanctions such as imprisonment, fines or penalties. Involved employees may also be held liable for damages to GEA or third parties. Many countries, including Germany, the United Kingdom and the USA, also prosecute corrupt dealings abroad.

GEA therefore takes consistent action in suspicious cases, comprehensively investigates and clarifies these cases and ultimately, if necessary, initiates appropriate measures.

3. PERMISSIBILITY OF BENEFITS

In business, good contact with business partners is sometimes also associated with presents, invitations and other benefits. Unfortunately, presents, invitations and other benefits, insofar as they exceed a certain limit, can quickly give the appearance of corruption. To avoid this appearance, the giving and acceptance of presents, invitations and other benefits to or from third parties by GEA are only permitted under the following conditions:

3.1. Appropriateness and Transparency

The giving and acceptance of personal benefits must be transparent and appropriate to avoid any suspicion of gaining unlawful influence. Personal benefits are all benefits of tangible or intangible nature to which the recipient has no claim. This includes presents and invitations, but also preferential treatment of other kinds.
Diligently evaluate the benefit:

- Taking the whole situation into account (in particular the value of the benefit as well as the position and financial standing of the recipient, but also the occasion of the benefit and legally acceptable local customs), could the impression be given to an uninvolved third party that the benefit is designed or intended to unlawfully influence the recipient? Could the benefit be seen as consideration ("reward") for an earlier or future decision?
- Do you have a good feeling about speaking with your line managers or your colleagues about the benefit? Is the benefit permissible with your counterpart? If in doubt, talk to your counterpart about it.
- How would the public and the recipient's line managers react if they knew about the benefit?

GEA employees may not accept personal discounts, special prices and similar concessions from third parties, which they receive due to their Group affiliation, if these concessions, in the view of a third party, could influence their business decisions.

[1] Where the term "employees" is used, this refers to all managers and employees regardless of gender.

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3.2. Cash and benefits similar to cash

The giving and acceptance of cash or benefits similar to cash (e.g. checks, stocks, vouchers, precious metals, bonds and taking on private costs) of any value is forbidden. Permission for corresponding benefits is not possible.

3.3. Presents, invitations and other benefits

For the giving and acceptance of presents, invitations (in particular events, restaurant visits) and other benefits, the following apply:

3.3.1. General

Every GEA employee is responsible for ensuring that, in his area of responsibility, presents, invitations and other benefits are only given or accepted within the limits of applicable laws and the requirements in this policy.

Presents, invitations and other benefits are then only permitted if the actual circumstances cannot give the impression of improperly influencing the recipient in their decisions. If an employee is not sure whether an intended benefit is still permissible, then he must discuss this with the GEA legal department **in advance**.

In any event, benefits with a net value of EUR 100 or more per benefit recipient must be approved by the GEA legal department in advance via the Compliance Approval Tool. If an advance approval by the GEA legal department is not possible due to the circumstances (e.g. spontaneous invitation), the approval must be obtained via the Compliance Approval Tool as soon as possible after the respective benefit has been granted.

It should be noted that **benefits below EUR 100 net may also be unlawful**. This is particularly the case, if these benefits are provided repeatedly to a recipient or violate local legal obligations, including local internal regulations by GEA. For situations involving foreign currencies, the relevant value according to that day's exchange rate in the applicable foreign currency applies.

For invitations to an event, the employee offering the invitation on behalf of GEA should also be taking part in the event himself. At the events, to which employees of GEA invite others or to which they are invited, the business occasion must always prevail. This is generally not the case if the invitation is also extended to an accompanying person and the total value exceeds EUR 100 (the total for the invitee and accompanying person). **In these cases, the relevant invitation or acceptance of such an invitation is only permitted with a prior approval by the GEA legal department via the Compliance Approval Tool.**

If several GEA employees participate in invitations or events financed by GEA, it must be ensured that a manager who did not attend the event approves the reimbursement of expenses as part of an expense report. If more than one GEA manager/employee attends invitations, any one of them may pay the expenses for all attendees as long as it is ensured that, in turn, the expenses are approved by a manager who did not attend the invitation or event. If in doubt, questions must be aligned with the GEA legal department before offering or accepting the relevant invitation.

3.3.2. Special issues for public officials

In combating corruption, international law provides for particularly strict rules for public officials. Public officials are understood to include all persons who (even indirectly) look after public administration functions. Alongside traditional officers, judges and other public employees, this includes, for example, members of the armed forces, public inspectors, experts appointed by authorities, civilian employees of authorities or other public institutions, employees of public utility companies (e.g. waste disposal companies, public utility, municipal transport companies, etc.) and of other public-sector businesses organized under private law, or politically elected officials.

If, in individual circumstances, you are unsure whether you are dealing with a public official, please always contact the GEA legal department.

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For public officials in some regions, presents, invitations or other benefits are forbidden without exception, or otherwise only allowed under very narrow conditions and in a very clear context. Therefore, it should generally be assumed that presents, invitations or other benefits to public officials, apart from very minor benefits such as little promotional items, are not permitted. If an employee is not sure whether a benefit intended for a public official is still permissible, then he must discuss this with the GEA legal department **in advance**. **In any case, benefits with a value of at least EUR 20 net per benefit recipient must be approved in advance by the GEA Legal Department via the Compliance Approval Tool. If an advance approval by the GEA legal department is not possible due to the circumstances (e.g. spontaneous invitation), the approval must be obtained via the Compliance Approval Tool as soon as possible after the respective benefit has been granted.** For situations involving foreign currencies, the relevant value according to that day's exchange rate in the applicable foreign currency applies.

3.3.3. Reporting obligations if value limits are exceeded

If the aforementioned thresholds are exceeded without prior approval from the GEA legal department, there is nonetheless an obligation to notify the GEA legal department via the Compliance Approval Tool later on that the thresholds have been exceeded, describing the facts of the case.

3.3.4. Tax obligations

Every employee is required to comply with tax obligations that might arise from personal benefits he receives. Relevant inquiries should be addressed to the taxation department.

4. FACILITATION PAYMENTS

GEA opposes to the payment of facilitation payments.

The term facilitation payments is commonly understood to describe payments of small amounts to low-ranking public officials to accelerate official acts, or to initiate them at all, to which the payer already has a legal right (the official has to perform the action by law, i.e. must do it anyway). A typical example is the payment of a few euros to a customs official to achieve speedy clearance.

Granting facilitation payments is a punishable offense in most jurisdictions. Even if such payments are not consistently prosecuted and are widespread in some countries, GEA is nevertheless committed to strictly lawful behaviour in this respect. Granting facilitation payments, whether directly by GEA employees or through third parties engaged by GEA, is therefore not permitted.

5. CONDUCT IN CASES OF DEMAND AND EXTORTION

GEA supports employees who are pressured or extorted by third parties to provide benefits.

Occasionally, third parties authorized to make decisions – public officials or private business partners – demand benefits, which cannot be considered facilitation payments under the criteria mentioned above (in particular, because they involve larger sums). In rare cases, the demand is even combined with a threat to the employee, related persons, the Group or third parties.

Such cases must be reported immediately to the GEA Legal Department via the Compliance Approval Tool. Only in cases of imminent danger, i.e. if there is an urgent threat to the employee, his family members, the Group or to third parties, should the employee immediately take measures that he deems necessary. The employee must notify the GEA legal department via the Compliance Approval Tool of these cases as soon as possible.

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6. DONATIONS AND SPONSORSHIPS

Both donations and sponsorship activities must adhere to ethical standards. No doubt as to their legitimacy must arise. GEA does not try to influence decisions in favour of the company through donations and sponsorship.

Donations and sponsorship activities must always be transparent. In particular, the recipient of every donation and the actual use by the recipient must be known and clarified through a donation certificate. Donations and sponsorship activities must be suitable to promote GEA's reputation.

Donations and sponsorship activities may only be carried out in accordance with the applicable rules under company procedures. Donations and sponsorship activities may never be made to political parties, politicians or organizations associated with them.

For further information, please consult the **Community Engagement Policy** & **Sponsoring Policy**.

7. CONFLICTS OF INTEREST

Every GEA employee is obliged to always make business decisions in the best interest of GEA Group on the basis of objective criteria.

Conflicts of interest may conflict with this duty. A conflict of interest exists in case the private interests of an employee conflict with the interests of GEA or are affected by a business decision. A conflict of interest also exists if a business decision affects the known interests of relatives, partners or friends (hereinafter referred to as "related parties") of a GEA employee.

The mere existence of a conflict of interest does not constitute misconduct. However, a conflict of interest bears the risk of private interests influencing business decisions in an impermissible manner, i.e. to the detriment of GEA. In case of a conflict of interest, the employee involved must report this immediately to GEA´s Legal Department via the Compliance Approval Tool, particularly in the constellations listed below. Without prior clearance, the employee is not allowed to have any influence on the respective business decision.

- A contract should be concluded between a GEA company and a GEA employee or a related party. The following contracts with GEA employees are excluded from this:
  - the employment contract with GEA;
  - the purchase of used electronic devices (e.g. laptops, mobile phones, monitors) and used office furniture (e.g. office chairs, lamps) if the new value of all products purchased per person in a calendar year does not exceed EUR 2,000 net.
- A contract should be concluded with a company in which a GEA employee or a related party holds at least 5 % of the shares.
- A GEA employee is involved in the decision to conclude contracts with companies in which, to the knowledge of the GEA employee, a related party is employed who has a direct interest in the conclusion of the contract. This is the case, for example, in case a related party receives a commission or a salary bonus as a result of the conclusion of the contract.
- A GEA employee is engaged in secondary employment or self-employment with or for a business partner of GEA (especially customer or supplier). Irrespective of this, employment relationships of GEA employees with other companies require the prior written approval of the relevant GEA Human Resources department. Employment relationships with competitors are prohibited.
- A GEA employee or a related party holds a mandate in a decision-relevant position with an authority or other governmental agency responsible for GEA.
- A GEA employee or a related party holds an interest of at least 5 % in a business partner or competitor of GEA.
- A related party of a GEA employee is in a direct reporting line to the employee within GEA.

When renewing, amending or extending contracts and other legal relationships, the above obligation to obtain clearance from the legal department via the Compliance Approval Tool applies accordingly.

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8. Preventing money laundering and terrorism financing

GEA takes measures to prevent money laundering and terrorism financing.

All employees must take care that they always act in accordance with national and foreign regulations against money laundering or terrorism financing.

Money laundering is generally understood to be the channelling of monies or other assets gained directly or indirectly from illegal acts into legal financial circulation, whilst disguising their actual source.

In the event that national laws provide for stricter requirements than this policy, they shall take precedence.

8.1. Cash limit EUR 10,000

Giving or accepting cash of EUR 10,000 or more is prohibited without exception. The same applies to giving or accepting several cash payments which together amount to at least EUR 10,000, if there is a functional connection between the cash payments. This cash limit also extends to all cash payments in foreign currencies, taking into account the exchange rate of the cash payment at the time of payment.

8.2. Procedure in the event of suspicious circumstances with regard to money laundering or terrorism financing

In addition to cash transactions, cashless transactions also hold risks in regard to money laundering or terrorism financing offenses. If an employee becomes aware of one or more of the suspicious circumstances with regard to money laundering or terrorism financing described in 8.2.1 (hereinafter, jointly referred to as "*Suspicious Circumstances*") during establishment or in the course of a business relationship or financial transaction, he/she must proceed as described in 8.2.2.

8.2.1. Suspicious Circumstances

Within the scope of normal business processes, each employee must be alert to any abnormalities. Under the laws relating to money laundering, no further systematic review of contractual partners and business relationships is necessary. The list of Suspicious Circumstances below is not exhaustive.

- **Concealment**: Ambiguities regarding the identity of the payer or the payee (e.g. payment processing via an account not in the name of the contracting party; another person/company is listed as the billing party instead of the contracting party; vague information or information that is difficult to verify; anomalies or ambiguities relating to documents); problems in identifying the beneficiary; specification of a large number of similar addresses.
- **Background of the contractor**: Acting beyond the business purpose or economic capacity; acting in a commercially implausible manner; known criminal record of business partner or beneficiary; showing up on sanctions lists, embargoes, or relationships with fundamentalists (evidence of terrorism financing).
- **Persons involved, especially politically exposed persons (PEP):** Participation of PEPs (e.g. heads of state and government; members of parliament; ambassadors; members of the management bodies of state-owned enterprises; immediate family members of the aforementioned groups of persons) as contracting parties or beneficiaries; participation of persons in unclear functions or participation of an unusually high number of persons/companies; lack of expertise of the persons involved (indication of straw men or middlemen).
- **Payments:** Payments to GEA by third parties with whom no contractual relationship exists; cash inflow to GEA bank accounts that is not clearly related to a business transaction; settlement in a different currency is requested in deviation from the contract or invoice; multiple payment transactions from different sources to settle a single invoice; unexplained complexity of transaction behaviour; attempts to conceal or falsify details

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of a financial transaction; payments through typical offshore financial centres (e.g. British Virgin Islands, Cayman Islands, Cyprus, etc.).

- **Conduct after concluding business:** Short-notice rescissions in the context of cancellations to different accounts; transfers of overpayments back to different accounts (for example, payment was made through account A and rescission is requested through account B); exchanges or frequent replacement of counterparties; indications of prompt resale.

If business or transaction partners, or their shareholders, are domiciled in a high-risk country[2], this alone does not constitute a Suspicious Circumstance. Instead, employees must pay greater attention to whether Suspicious Circumstances described here exist and be particularly careful when dealing with such business or transaction partners.

8.2.2. Approval via the Compliance Approval Tool/Reporting suspicions

In the case of one or more of the Suspicious Circumstances described under 8.2.1 or other doubts during establishment or in the course of a business relationship or financial transaction, the **GEA Legal Department must be informed as soon as possible via the Compliance Approval Tool**. **The business relationship may not be established or continued, and the financial transaction may not occur, until clearance has been obtained from the Legal Department.** The business or transaction partner must not be informed of the investigation of the Suspicious Circumstances. The GEA Legal Department provides advice in particular in connection with reporting suspicions, which may be required under local law. The Compliance Manager is responsible for submitting the report.

9. ACCOUNTING AND DOCUMENTATION

Bribes or other unlawful payments, e.g. to create so-called "slush funds", are regularly concealed. Therefore, they are not truthfully and transparently shown in the books and records. With every action of this sort, the Group runs the risk of violating accounting regulations and tax laws.

GEA places high value on correct accounting and documentation of business transactions, in accordance with national and international accounting regulations, which call for the truthful portrayal and recording of all commercial transactions in the appropriate period, and the filing and archiving of all business-relevant documents.

For payments without a recognizable, legitimate equivalent value (in particular, bribe payments) usually a ban on tax deduction applies. If a financial authority comes across such payments in the books, they regularly notify these to law enforcement authorities.

10. ENGAGEMENT OF THIRD PARTIES

The success of GEA as a group acting worldwide also depends, to a large extent, on trusting cooperation with suppliers, subcontractors, sales agents and other third parties. However, working with such third parties can potentially result in significant corruption and other compliance risks for GEA. The engagement of such third parties is comprehensively governed by the Third Party Policy.

[2]For a current list of high-risk countries, please visit the following link: High-Risk Countries List (AML).pdf

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11. FURTHER INFORMATION & CONTACT

You can find more information about the GEA compliance program here:

https://www.gea.com/en/company/investor-relations/corporate-governance/compliance/

On the **GEA Intranet,** GEA employees can find the GEA Code of Conduct and GEA Group Policies, such as the Integrity Policy, the Competition Policy and the Third Party Policy, as well as other regulations that are important for the employment relationship.

For questions regarding all compliance matters, please contact

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Legal and Compliance (G-LC)
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Revision History

Date	Review and Revision
11. November 2019	This Policy replaces the Integrity Policy dated 1 January 2019 due to the possibility of a subsequent approval request concerning benefits.
1 June 2020	Review without changes
1 June 2021	Review without changes
6 April 2022	Incorporation of references to the Compliance Approval Tool, clarification that thresholds are net, introduction of hierarchical principle for invitations, prohibition of politically motivated donations, revision of the money laundering section, including prohibition of cash transactions of at least EUR 10,000.
8 August 2022	Amendment “approval internal meetings”
2023	Review without changes
25 November 2024	Revision of section 7 GEA Integrity Policy ("Conflicts of Interest")

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