

CODE OF CONDUCT

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1. FOREWORD

Dear colleagues,

GEA is an internationally acting company that has to pay attention to diverse commercial, political and legal frameworks at home and abroad. Even supposedly minor infringements of the law by employees can ruin the company's image considerably and cause great harm, including severe financial and other damages. In addition, legal violations can have serious personal consequences for the employees involved. Therefore, at GEA compliance with all applicable laws and internal regulations issued by GEA has the highest priority.

This code of conduct comprehensively describes the values, principles, policies and guidelines that guide the corporate conduct of GEA. It offers a binding reference framework and applies to each of us equally – to the Board, to management and to each individual employee. Together, we are responsible for the reputation of our company. The code of conduct and the related internal regulations and policies reflect GEA's goal, of ensuring compliance with all applicable legal provisions throughout the company and thereby protecting the interests of GEA and its employees. They also serve to create a working environment that is characterized by integrity, respect, and fair and responsible conduct.

GEA follows the guidelines on corporate social responsibility (ISO 26000) and, as a member of the United Nations Global Compact, fully recognizes the ten principles on fair working conditions, environmental protection, human rights, and the fight against corruption and financial crime. Furthermore, GEA observes the core labour standards of the United Nations International Labour Organization (ILO), applies the OECD Guidelines for Multinational Enterprises, and thus respects the Accountability Principle as well as transparency, stakeholder interests, the rule of law, compliance with international standards, and ethical behaviour. If these principles and standards, as well as the relevant case law, are more stringent than the local legal requirements, they take precedence. GEA expects its managers to organize their areas of responsibility at all times in such a way that the rules are complied with. Thereby it is especially expected from managers to act as role models ("tone at the top") and set a good example. GEA expects all employees to abide by the rules and equally set a good example.

This code of conduct applies globally to all employees of GEA.

Düsseldorf

The Executive Board of GEA Group Aktiengesellschaft

2. SCOPE & PURPOSE

This code of conduct applies globally to all companies and employees¹ 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**").

The code of conduct offers a frame of reference for all GEA employees and defines fundamental, globally valid standards of conduct. Further substantiating rules are formulated in the corresponding internal company policies and guidelines. These policies and guidelines are valid and binding on all GEA companies and employees without limitation.

3. GENERAL PRINCIPLES FOR OUR CONDUCT

3.1. Observance of laws and internal regulations

The observance of all applicable legal requirements as well as the internal regulations of GEA is the essential foundation of all conduct by GEA and its employees. All employees of the company are required to inform themselves of the legal requirements and internal regulations applicable to their area of responsibility within GEA, and in cases of doubt, to obtain advice from their line managers and other competent departments of GEA.

Violations of laws and other binding rules, as well as internal regulations, may result in criminal, occupational and civil law consequences for involved GEA employees. For GEA, such violations can lead to high fines, exclusion from calls to tender, official sanctions, claims for damages from customers or competitors, as well as significant reputational damages. Such risks and damages can have a permanent effect on the competitiveness and survivability of the affected group companies as well as GEA as a whole. Inappropriate conduct therefore ultimately endangers the jobs of all employees at GEA. In addition, official investigations, internal investigations or negative press coverage due to violations of an applicable law or other set of rules interfere with the operation of the business for a long time.

If, in individual cases, the rules under applicable laws are stricter than the rules in this code of conduct or other internal regulations, then the legal rules prevail. Accordingly, if the applicable law is less strict, then the stricter rules in this code of conduct or other internal GEA regulations prevail.

3.2. Honest conduct

GEA's claim goes beyond mere compliance with laws and other binding rules: GEA expects from its employees honest, genuine and loyal conduct in their professional activity and in all situations arising in connection with this activity.

Whenever someone is acting on behalf of GEA, he carries the responsibility as a representative of the Group. Proper conduct also includes being aligned with the apparent sense of our policies and guidelines and not trying to circumvent them with formalistic reasons. Furthermore, supervisors and managers must live up to their function as role models.

4. GENERAL PRINCIPLES FOR OUR CONDUCT

4.1. Fighting corruption

Corruption hinders progress and innovation, distorts competition and can seriously damage GEA and its employees. Therefore, GEA objects to any form of corruption and even avoids the mere appearance thereof ("Zero Tolerance").

It is strictly prohibited to gain influence over decisions through the granting of personal advantage of any kind. This applies equally to public officials and to employees of other companies and other institutions at home and abroad.

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

Employees of GEA are not open to bribery and obtain no benefits from their activity from third parties apart from the remuneration (salary and other remuneration components) paid to them by GEA (so-called kick-backs).

For further information, please consult the **Integrity Policy**.

4.2. Fair competition

Free and fair competition is subject to protection by national and international competition and anti-trust laws. Violations of competition and anti-trust law are prosecuted globally by anti-trust and law enforcement authorities. They can lead to existence-threatening sanctions in the range of millions of euros as well as exclusion from invitations to tender for companies involved and to considerable personal sanctions for employees.

GEA wants to impress customers and the market with the quality of its services and applications and competitive prices. We are committed to fair competition and reject any improper anti-competitive agreements or practices.

For further information, please consult the **Competition Policy**.

4.3. Compliance and sustainability in the supply chain

GEA maintains diverse business relationships with suppliers and subcontractors. These relationships put GEA in a position to offer its own services at a competitive price. GEA therefore carefully selects its suppliers and subcontractors exclusively according to their ability to perform and their reliability and requests cooperation with regard to sustainability-related criteria.

GEA supports the principles and practices of sustainable action along the entire value chain and considers procurement ethics to play an important role. GEA also expects integrity and law-abiding conduct from its business partners. In its business relationships with business partners, in particular suppliers, service providers, subcontractors and sales agents, GEA works to ensure compliance with the applicable standards for each scenario. For that reason, GEA has published the **Code of Conduct for Suppliers and Subcontractors**, which aims to support a sustainable supply chain. We expect our suppliers explicitly to follow the conduct of GEA in the sense of a sustainable social, environmental and company policy.

In addition, GEA monitors the supply and procurement of conflict materials such as tin, tantalum, tungsten or gold. For further information, please consult the **Conflict Materials Policy**.

4.4. Avoidance of conflicts of interest

At GEA, commercial decisions are made exclusively in the best interests of the company. Conflicts of interest with private matters or other activities, even from relatives or other close persons or organisations must be avoided right from the start. The avoidance of conflicts of interest also requires employees of GEA, in business contacts with competitors, advisors, customers, suppliers, service providers and other business partners of GEA, to avoid even the impression of favoritism due to personal proximity.

Possible conflicts of interest must be declared to their line managers by those affected and checked by their line managers.

For further information, please consult the **Integrity Policy under Paragraph 7**.

4.5. Combating money laundering and the terrorism financing

Money laundering is understood to be the channelling of illegally generated funds or illegally obtained assets into legal financial and economic circulation. Terrorism financing occurs if monies or other funds are made available for terrorist crimes or to support terrorist organisations. GEA fights every form of money laundering and terrorist financing and takes precautions against becoming involved in money laundering or terrorism financing.

For further information, please consult the **Integrity Policy under Paragraph 8**.

4.6. Data protection and data security

Particular legal rules exist to protect personal data. GEA is fully committed to complying with these rules. Personal data of all kinds must therefore be carefully protected against unauthorized access and misuse.

Information technology (IT) and electronic data processing (EDP) have become an integral part of everyday working life at GEA. However, they involve a multitude of risks. GEA takes these risks very seriously, in its own interest as well as in the interest of its business partners and tackles potential weaknesses preventatively and as soon as they become known. GEA employees are obliged to familiarize themselves with applicable IT/EDP guidelines and observe the regulations contained therein.

For further information, please consult the **Data Protection Handbook**.

4.7. Responsible handling of company assets and confidential information

The material and intellectual property of GEA serves the wellbeing of the company. It must be protected against misuse for private and external purposes. GEA expects its employees to handle the company's assets in a responsible manner.

Care and responsibility are also required in handling confidential information that employees encounter in the context of their activity. It must not be misused for personal purposes or passed on to third parties without permission.

4.8. Transparent reporting

For GEA, honest, transparent and reliable reporting and communication of the company's relevant business transactions with respect to all stakeholders (e.g. investors, employees, customers, business partners, the general public and state institutions) is essential. This includes appropriate documentation of our dealings within the company and with respect to third parties. All GEA employees are therefore obliged, as a result of their contractual work duties and tasks, to fully, diligently, accurately and punctually record and report relevant business transactions within GEA. This is the basis for the credibility of GEA in the business world and in the capital market. Line managers must ensure that the documentation in their area of responsibility is carried out properly.

4.9. Insider information and ad hoc publicity

GEA takes all legally and actually necessary precautions to prevent the unlawful use or publication of insider information. GEA expects all employees to comply with relevant legal and internal regulations and neither undertake insider trading nor unlawfully disclose insider information.

Due to its stock exchange listing, GEA must publish insider information without delay (so-called ad hoc publicity). GEA takes all legally and actually necessary precautions to comply with this duty. In particular, employees of GEA are obliged to disclose potential insider information to the Board of GEA without delay in strict confidence.

For further information, please consult the **Insider Policy**.

4.10. International trade, trade restrictions

GEA and its employees comply with all applicable regulations regarding national and international trade and all relevant trade restrictions under national and international law. These include, in particular, relevant embargoes in the form of supply and import bans.

4.11. Human and labour rights

GEA respects general human rights and ensures their observance within the scope of its regional influence and vis-à-vis its business partners. GEA rejects any kind of forced labour and child labour. GEA combats all forms of violence and discrimination. This includes gender-based violence and workplace harassment.

GEA recognizes the right to a fair living wage/remuneration for all employees. Remuneration and any other benefits (social benefits, holidays, etc.) take the principle of fairness into account and correspond to the national and legal norms and standard wages.

4.12. Diversity and inclusion

GEA creates a work environment that promotes diversity, equality and inclusion. This means that equal opportunities are guaranteed for employees regardless of demographic and other personal characteristics, in particular but not limited to age, disability, gender, sexual orientation, gender identity, race, skin colour, nationality, ethnic or national origin, religion or belief, as well as characteristics related to the socio-economic context. In addition, GEA provides a corporate culture where everyone feels valued and included in working successfully within GEA and has equal access to opportunities and resources.

4.13. Discrimination and harassment

GEA prohibits any form of discrimination and any kind of sexual as well as non-sexual harassment. GEA has a zero-tolerance policy and takes active and consistent action against such behaviour. GEA promotes a culture of respect and tolerance and encourages reporting concerns upon noticing discrimination or harassment of any kind. Even the indication of ethical violations or harassment will not be tolerated.

4.14. Occupational health and safety

Occupational health and safety are GEA's highest priority. GEA and all participants jointly create a working environment in which workplace-related illnesses and accidents are eliminated as far as possible. In this sense, GEA works to ensure, expand and finetune safe working conditions.

GEA strongly encourages all stakeholders to exercise their special right of proposal on occupational health and safety.

4.15. Working hours

Working hours, including overtime, must not exceed the statutory and collectively agreed requirements in the respective countries or any other international standards.

GEA fundamentally rejects overtime as a substitute for insufficient basic wages. If overtime is paid, remuneration follows the respective statutory, contractual or collectively agreed regulations.

4.16. Career development and training

Training and education play a particularly important role in individual personnel development at GEA. GEA is convinced that well-founded training and education, and the option to continue to learn in all stages of life, lead to a fulfilled work life.

4.17. Employee representation and trade union rights

Within the applicable local statutory framework, GEA recognizes the employees' right to assemble freely, to form and join an employee organization of their choice, to be represented and to bargain collectively. GEA strives for a fair relationship between the economic interests of the company and the interests of its employees. GEA supports social dialogue, for example in the form of negotiations, consultations or exchange of information between employers, employee representatives (trade unions) and employees on economic and social matters that are in the common interest.

All GEA employees and managers, as well as all employee or union representatives, must adhere to basic democratic principles to ensure that employees can freely and fairly decide for themselves whether they wish to form or join a representative body, and that in such a case they can freely choose a representative.

GEA and its managers must remain neutral and may not influence the free choice of employees by exerting pressure or intervening in any other improper manner.

4.18. Marketing and contract practices

GEA is committed to ensuring that contractual practices are fair and that information is accurate and provided in an understandable manner. Methods or messages that are false, misleading or deceptive are prohibited.

4.19. Health protection and product security for customers and end users

GEA is committed to providing safe products and services. Therefore, GEA provides clear instructions for safe use, including assembly, maintenance, decommissioning and disposal.

Using efficient process technology, GEA strives to eliminate negative health impacts of production processes, products or services and to respond to the macroeconomic trends of a growing global population, urbanization and resource scarcity.

4.20. Treatment of the environment

GEA aims to shape value creation processes responsibly and to contribute to sustainable management and the protection of natural resources with increasingly efficient products and process solutions for customers and in its own production. Efficiency refers in particular to the lowest possible use of energy, careful handling of water and other raw materials, and high recyclability with optimized benefit in each case.

4.21. Social responsibility

GEA is a major taxpayer and employer in the regions where it operates. In compliance with local, regional and international laws and regulations, GEA contributes to the creation and development of wealth and income.

As a globally active company, GEA participates in a large number of international, regional and local initiatives and projects and exchanges views on technical and market-related topics in relevant trade and industry associations.

GEA's social commitment – for example in the form of donations or sponsoring activities – focuses on charitable projects in the direct sphere of activity of GEA sites as well as on other activities related to mechanical engineering and in the area of sustainable action.

5. IMPLEMENTATION, ADVICE AND REPORTING

5.1. Responsibility of line managers

The management of GEA is expected to lead by example ("tone at the top"). Our managers are the first contacts for questions on understanding the rules and ensure that the employees in their area of responsibility know and follow the code of conduct and the associated Group policies and guidelines. This means that personal talks are just as necessary as organizational measures.

5.2. Cases of doubt

If there are any questions about the code of conduct and internal policies, employees can turn to senior managers, the respective specialist departments and, in particular, the GEA Legal Department.

5.3. Notification of violations/GEA whistleblower system

Due to the far-reaching importance of compliant behaviour by all employees, adherence to the code of conduct and the associated policies and guidelines is a collective task. If indications of a violation are present, GEA expects all employees to notify line managers or the competent specialist department accordingly (e.g. legal, HR, accounting, tax or sustainability department). GEA managers shall ensure that serious misconduct, particularly in the areas of corruption, competition law and data protection, is reported to GEA's legal department (to the Compliance & Principle Legal Matters team).

In addition, the "GEA whistleblower system" is available for reporting (anonymously, if desired) violations of this Code of Conduct, such as compliance incidents, discrimination, harassment or environmental violations. The GEA whistleblower system offers employees of GEA and external people the opportunity to report selected, particularly relevant topics via an internet-based system, as long as this is allowed in the respective country. The GEA whistleblower system is available on the internet under the following address:

<https://www.bkms-system.net/IntegritySystem>

Furthermore, GEA employees and external parties can submit reports by telephone (anonymously, if desired). An independent law firm was commissioned for this purpose. The dedicated hotline can be reached between 9am–6pm Central European Time at the following number:

+49 30 235987050

No employee who, with sincere intent, reports (presumable) violations of laws, the code of conduct or the associated policies, and has done nothing wrong himself, has any need to fear any repercussions due to the report. If an employee was party to the violation of laws, the code of conduct or the associated policies and guidelines, and averts damage to GEA through voluntarily reporting, then this will be taken into account in his favour. Whoever recklessly or knowingly raises false suspicions or allegations must expect consequences.

6. FURTHER INFORMATION & CONTACT

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

<https://www.gea.com/de/company/investor-relations/corporate-governance/compliance/index.jsp>

For further information on sustainability at GEA, please consult:

[Sustainability at GEA | Engineering for a better World](#)

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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Peter-Müller-Str. 12
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Revision History

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1 June 2020	Review without changes.
1 June 2021	Review without changes.
6 April 2022	Introduction of references to further policies and updates to the whistleblower system as well as integration of the regulations from the Code of Corporate Responsibility.