



CODE OF CONDUCT





We are GG – we work with passion,
inspired minds and full of energy to develop
and deliver the best solution for our customer,
wherever our customer needs us.

The purpose of our Code of Conduct is to perform the business of the GG group in accordance with all applicable laws, rules, regulations, procedures and with the highest standard of ethics and values. The content mentioned in this Code of Conduct is of the utmost importance to the owners, GG group employees and other stakeholders.

GG group is committed to conduct business fairly and honestly.

Our Code of Conduct is valid to all Employees of GG globally and is in accordance with our GG Sustainability Policy. We expect all our Employees to act in accordance with the highest standards of personal and professional integrity, ethical conduct, and honesty. GG group is committed to conduct business fairly and honestly.

The main guideline is: “Ask first, act later”.

If you are unsure of what to do in any situation, always seek guidance from your superior or other appropriate personnel.





1. RESPONSIBILITY FOR IMPLEMENTATION

Each individual Employee is responsible for complying with and implementing this Code of Conduct.

Employees shall use common sense when interpreting this Code of Conduct and consider whether a specific act could give rise to criticism based on reasonable ethical and moral standards. Country specific rules and customs shall be considered. There is no discretion as to compliance with applicable laws and regulations.

Every Employee can seek advice and assistance from his or her direct superior in case of questions or confusion about the Code of Conduct.

2. SUSTAINABLE BUSINESS AND CODE OF CONDUCT

Sustainable business activities and development are part of our organization's core values, and our Code of Conduct involves the following key areas:

CODE OF CONDUCT – KEY AREAS

- 1 Business Ethics
- 2 Environment
- 3 Human Rights and Working Conditions
- 4 Legal Compliance



2.1. BUSINESS ETHICS

RESPONSIBLE SOURCING OF MATERIALS

Our sustainability policy includes using resources responsibly, carefully and reducing environmental impacts. By consistently optimizing our production processes and raising employee awareness, we are continually improving our environmental performance and creating the basis by dealing with the environment in a responsible way.

We work and deal with our suppliers in a way to source raw materials (used in our products) responsibly. Responsible sourcing of material is also a part of our Sustainability policy for GG suppliers.

COUNTERFEIT PRODUCTS

GG Group requires its Suppliers to implement and maintain effective methods and processes to identify and minimize the risk of introducing counterfeit parts and materials into the supply chain. Therefore, the Supplier is requested to purchase all preliminary products and raw materials directly from the manufacturer or through distributors released by the manufacturer.

FINANCIAL RESPONSIBILITY / ACCURATE RECORDS

The management is able to make proper decisions based on accurate and complete business records. Providing incorrect information could potentially lead to legal penalties for GG group. All records shall be accurate, complete and up to date. We are not talking only about financial records, but also such data as sales records, records relating to performance, inspection records, technical and engineering records, etc. Deliberate concealment, manipulation and falsification of records will not be accepted and tolerated.

PRIVACY

Information in any form (e.g. on paper, stored on electronic media, conversation) and information processing systems are indispensable for the execution of critical business processes. As a result, the confidentiality, availability, and integrity of information has a top priority at GG group. Violating a criterion could result in far-reaching consequences for the company. Clearly defined regulations and principles are required to protect critical business and other relevant information in the best way possible.

All our employees have to act according to GG ISMS (Information security management system) policies and guidelines. A GG Chief Information Security Officer is in place and GG ISMS Awareness Training is carried out on regular basis.

An Information security management system (ISMS) is fully implemented, maintained and continuously being improved.





CORRUPTION / BRIBERY / ACCEPTANCE OF GIFTS

All Employees are strictly prohibited from offering or accepting, directly and indirectly, benefits meant to influence business transactions in a prohibited manner or if even the mere appearance of such purpose could arise. Exceptions to this rule are solely gifts of nominal value and hospitality, both within the limits of ordinary business practice – maximum limits of value might be announced by GG separately e. g. via internal guidelines or corporate instructions.

All other presents shall be refused or returned, and the Employee's immediate supervisor shall be informed. Always consider the context, nature and intent of the gift or entertainment when determining what is appropriate, reasonable and justified. Local laws and practices are to be observed.

THE KEY PROVISIONS OF THIS DIRECTIVE ARE:

- 1 Cash gifts are prohibited
- 2 The appropriateness of giving or receiving entertainment must be approved in advance by your disciplinary supervisor
- 3 Under no circumstances shall any gift or entertainment given or received violate this Code or applicable laws and regulations
- 4 All Gifts and Entertainment to any government official must be pre-approved by the Board of Management, however we must never:
 - Give or offer a government or union official anything of value, directly or indirectly, that is intended to influence his or her judgment in the performance of official duties
 - Make “facilitation payments,” that is, payments made to “speed things along,” like payments to a government official for quicker building permits for a new site
 - Ask a third party to make any payment, or do any other act, that would be in-appropriate for our Company to do directly





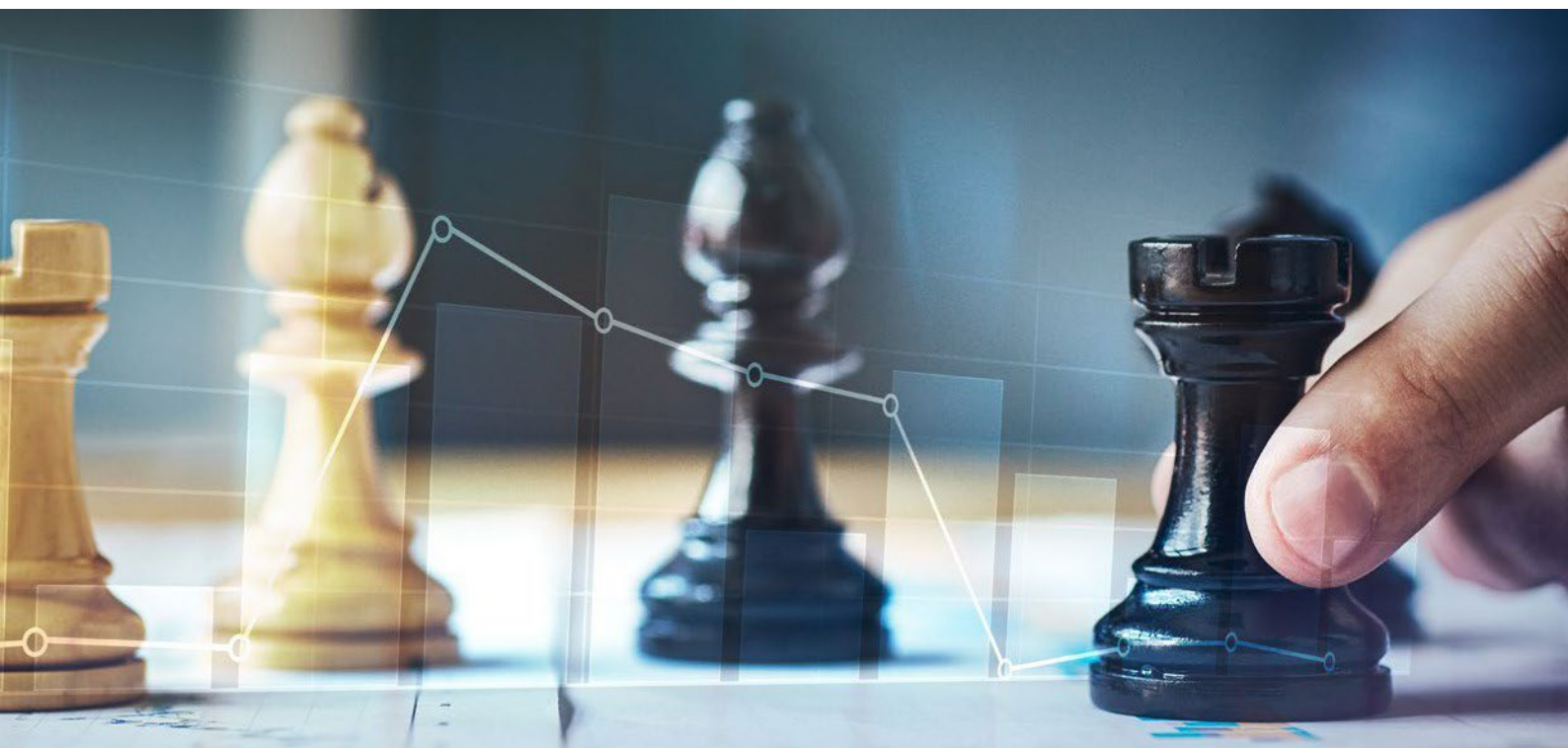
DISCLOSURE OF INFORMATION

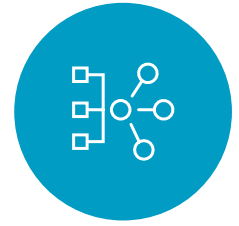
Disclosure is a formal-sounding term for making information accessible to interested and affected parties. GG group disclose financial and non-financial information in accordance with applicable regulations and prevailing industry practices.

COMPETITION AND ANTITRUST

You are expected to comply with applicable domestic and international antitrust and competition laws. Engaging in, conspiring to or agreeing to do any of the following actions may be very likely prohibited:

Price Fixing	Communicating with competitor(s) regarding prices, terms or conditions of sale, output or production
Bid Rigging	Agreeing with competitor(s) regarding bids to be submitted
Group Boycott	Agreeing with competitor(s) not to deal with vendors or distributors, other competitors or customers
Territory or Customer Allocation	Agreeing with competitor(s) to split territories or customers
Bribes or Kickback	Offering to pay bribes or kickbacks in an attempt to do any of the above





CONFLICTS OF INTEREST

During the course of business, it is possible that Employees encounter situations in which their personal or economic interests come or may come into conflict with the interests of GG. In such situations, GG expects Employees to act solely in the interest of the Group. Most importantly, GG requires its Employees to deal with such situations in a transparent manner.

Every Employee is required, without being requested to do so, to fully disclose any and all actual or potential problem, even if it only appears that such a conflict of interest could arise and – if necessary – to seek specific approval of a course of action. Prompt and full disclosure is always the appropriate first step towards identifying and resolving any potential conflict of interest problem.

EXAMPLES OF POTENTIAL CONFLICTS OF INTEREST INCLUDE:

- 1 An Employee, or immediate family member, which includes your spouse (even if he or she does not live with you); parents and stepparents; children and stepchildren; siblings; mothers and fathers-in-law; sons and daughters-in-law; and brothers and sisters-in-law and any other person (other than tenants or Employees) sharing your household, receives improper personal benefits as a result of such individual's position in or relationship to GG
- 2 Loans to an Employee and/or his or her immediate family members by a supplier customer of GG
- 3 An Employee works simultaneously as an Employee of a competitor, customer or supplier of GG
- 4 An Employee works for a competitor as a consultant or board member (or in an equivalent position)
- 5 An Employee attempts to influence the selection of a particular vendor or supplier where a family



INTELLECTUAL PROPERTY

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Any unauthorized use of GG intellectual property has to be reported via ombudsman or direct superior.



EXPORT CONTROLS AND ECONOMIC SANCTIONS

The aim of GG is to be in compliant with export control and sanctions, legal requirements and it is important for us to be engaged in international trade as violation of these legal requirements can lead to severe penalties as well as damage of reputation.

Any type of business with persons or companies identical with those in the list of sanctions is prohibited. GG shall comply with all provisions for import and export of goods and services.

PROTECTION OF IDENTITY, WHISTLEBLOWING AND PROTECTION AGAINST RETALIATION

Whistleblower protection is protection from discriminatory or disciplinary action for employees who disclose to the competent authorities in good faith and on reasonable grounds wrongdoing of whatever kind in the context of their workplace.

Our employees have an obligation to report wrongdoing (e.g. corruption, fraud, sexual abuse, etc.). The wrongdoing can be reported to relevant superior/manager or to GG Compliance Committee. GG ensures protection of identity for wrongdoings reported through anonymous channels. The retaliation is a misconduct. The Organization has a duty to protect whistleblowers against retaliation and address wrongdoing by taking disciplinary action as appropriate.

The GG Compliance Committee provide confidential advice, initiates review/investigation and makes recommendations for protection of who reported the wrongdoing.





FREEDOM OF ASSOCIATION, COLLECTIVE BARGAINING AND POLITICAL CONTRIBUTION

Participation in associations and in particular attendance at association meetings is material for the representation of the interests of industrial and economical groups in the national and international legislation process. However, the principles and guidelines for conduct as set out above and the provisions of antitrust laws are to be observed also in the context of association work.

If Employees become aware of anti-competitive conduct of other participants in such committees or in the context of such association events generally, such Employees shall immediately withdraw from the respective committees and associations and notify their superiors.

No Employee may make any political contribution of any kind in the name of GG or by utilizing GG funds, assets, services or facilities. Furthermore, you cannot require, nor should you request, a supplier or vendor to make a political contribution of any kind as a condition of doing business with GG. As an Employee, you are free to make a personal political contribution or engage in personal political activities in case these contributions or activities are lawful, do not interfere with your work responsibilities or give the appearance of a conflict of interest.

GG enables collective bargaining following the principles mentioned in the standard of International Labor Organization (specifically the standard C154 – Collective Bargaining Convention, 1981 (No. 154). Any trade union or similar organization is a relevant and fully acceptable partner for GG.





2.2. ENVIRONMENT

Our sustainability policy includes using resources carefully and reducing environmental impacts. By consistently optimizing our production processes and raising employee awareness, we are continually improving our environmental performance and creating the basis by dealing with the environment in a responsible way. Our most important sustainability issues, that we have identified as key pillars for environment are:

WATER QUALITY AND CONSUMPTION

GG aim here is effectively reduce, reuse, and recycle water with responsible treatment of wastewater discharges to protect the environment and improve overall water quality. Using water sparingly is a major resource issue. As we manufacture our different products, we need water primarily to cool cables and re-cool emulsion. We have a cooling basin with a cooling tower installed at Poysdorf plant. This enables the necessary cooling water to be circulated. This supplies all the machines with cooling water in a closed loop. The cooling water is cleaned centrally. We are continually analyzing the quality and contents of the circulating water. As a result, only small quantities of the circulating water need to be replaced.

ENERGY CONSUMPTION AND RENEWABLE ENERGY

We strive for energy reduction and increase of renewable energy in accordance with our Sustainability policy. The energy consumed by our production activity correlates with the great production depth of our broad product portfolio. GG is continually analyzing potential savings and implements them via suitable initiatives throughout the company.

AIR QUALITY AND GREENHOUSE EMISSIONS

There is a decision in place to measure carbon footprint according to ISO 14064/2018 Green house gas and implement relevant opportunities for improvement in frame of the long-term goal to achieve carbon neutrality in future. The following environmentally relevant emissions occur in our production process: aerosols from drawing wire with emulsion, hydrogen fluoride from generating fluoropolymer cables, hydrocarbon vapors from Signator washing places and ozone. We make appropriate efforts to ensure our employees are protected by complying with all the regulations and by continually analyzing and measuring these materials so that maximum workplace concentration values are not exceeded.



NATURAL RESOURCE MANAGEMENT & WASTE REDUCTION

Materials most frequently used to manufacture our products are aluminum, copper and plastics. Most of these raw materials are bought in Europe. The plastics used at GG are standard plastics such as polyvinyl chloride and polyethylene composites, special isolating materials like polyurethane, thermoplastic elastomers and fluoropolymers. The manufacturing area (Harness division) mainly uses ready-made components like plug-in connector cables, fasteners, electronic components and molded parts. Sustainability and transparency in the supply chain are crucial for responsible procurement. We purchase our raw materials from a large number of different suppliers, so we strive to protect ourselves from any overreliance on specific large suppliers and regional fluctuations on the world market. In respect of dealing with the conflict mineral tin, which we use, we ask our suppliers every year for the information we need about the origin of the materials and to confirm it. We ask for traceability and transparency in the supply chain and we help our customers to satisfy their requirements. Production waste made from aluminum, copper and plastics is of particular value. By properly separating materials, we send a large part of our production waste for recycling. At our production facilities, we keep logs that note all the relevant details about the waste volumes in production. Based on these analyses, appropriate measures are taken to ensure significant improvements. Our modern, process-based production ensures that the separation is done properly.

ANIMAL WELFARE

GG is respecting applicable laws on animal protection and welfare, as well as to ensure compliance along the supply chain through adequate processes.

RESPONSIBLE CHEMICAL MANAGEMENT

As a manufacturing company, certified under the relevant sector regulations and standards for management systems such as IATF 16949 and ISO 14001, GG complies with applicable (i) standards and (ii) laws (legal requirements), in the environmental area. The EU's directive on End-of-Life Vehicle 2000/53/EC and the REACH regulation (European Union Regulation addressing the production and use of chemical substances, and their potential impact on both human health and the environment, abbreviation) are specific requirements, which we make sure that we comply with them.





2.2. HUMAN RIGHTS AND WORKING CONDITIONS

Human rights protect human beings and their dignity in war and in peacetime. GG group respects and supports international human rights. We are committed to complying with the UN Human Rights Conventions.

WE STRICTLY REJECT IN ANY FORM

Child labor and young workers

It is not tolerated. The age of employment for young workers must meet or exceed legal regulations and local labor laws.

Forced labor, modern slavery and human trafficking

This is strictly prohibited.



There are our other key pillars in this area:

WAGES AND BENEFITS

We pay fair wages and salaries (including overtime) and adhere to local legal and social regulations with respect to the payment of minimum wages and salaries. We provide compensation and benefits that comply with applicable local laws, including those relating to minimum wages, overtime compensation, and legally mandated benefits.

WORKING HOURS

We comply with all applicable local law regarding working hours, including overtime.

NON-DISCRIMINATION AND DIVERSITY

Discrimination is unfairly treating a person or group of people differently from other people. At all our locations, our company supports the diversity of our employees. We are dedicated to the equal treatment of our employees regardless of nationality, ethnic or social origin, sexual orientation, religion, gender, race or political opinion. We prohibit any form of discrimination or threat.

HARASSMENT

Harassment is unwanted and unwelcome words, deeds, actions, gestures, or behaviors that make someone feel uncomfortable. Sexual harassment means any unwanted, unwelcome or uninvited behavior of a sexual nature, which a reasonable person in the circumstances would find humiliating, intimidating or offensive. Sexual harassment does not have to be repeated or ongoing. Sexual harassment takes many forms, from sexual comments to actual physical violence. We clearly state we have zero tolerance to any form of harassment/sexual harassment.

HEALTH AND SAFETY

The life, safety and health of each of our employees constitute our top priority in the organization of our business relations. The management is committed to provide safe and healthy working conditions for the prevention of work-related injury and ill health (ZERO accidents philosophy) & to protect of the environment including prevention of pollution. We strive for continual improvement of HSE management system.

SECURITY FORCES

If private or public security forces are deployed to protect local production plants, we ensure that they also respect internationally recognized human rights and standards. This is also implemented in the case of internal specifications.



2.4. LEGAL COMPLIANCE

COMPLIANCE WITH LAWS AND OTHER EXTERNAL AND INTERNAL RULES

In all countries where we operate, we strive to follow the local laws and regulations. In places where the local regulations are in conflict with our sustainability guidelines, we will make every effort to increase human rights awareness, and set a good example with our business activities.

Any and all applicable laws and regulations as well as other external and internal (Group) rules must be strictly observed in all business conduct and decisions. All Employees are required to inform themselves comprehensively about all laws and regulations and internal guidelines and rules applicable to their area of responsibility and to contact the competent departments if in doubt.



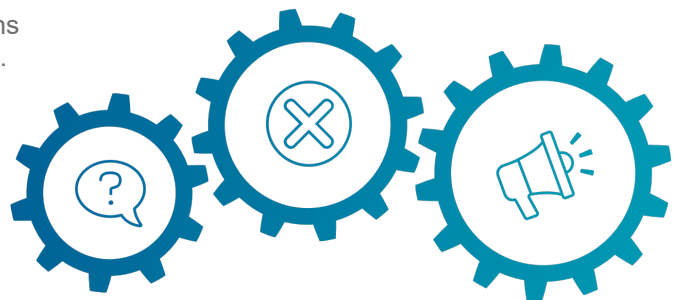
REPORT AND ESCALATION OF MISCONDUCT

Employees of GG that become aware of violations of this Code of Conduct, Sustainability Policy, Occupational Health and Safety Policy and other internal guidelines, or of laws or regulations have a duty to report the violations. But how do you know if there's really a problem?

ASK YOURSELF THE FOLLOWING QUESTIONS:

- 1 Does something not feel right?
- 2 Is the action not in compliance with the law?
- 3 Is the action in violation of our Code and policies?
- 4 Would you be uncomfortable if the action were made public?

- Make sure you have all the facts.
- Discuss the problem with your supervisor, Human Resources representative or any member of Management or report it to the e-mail address below.
- You may report ethical violations or concerns in confidence and without fear of retaliation.



Employees are free to report any such misconduct identified by them as follows:

✉ compliance@gg-group.com via the anonymous (compliance/whistleblower) channel on GG's intranet or GG's external website or can report it to a local representative.

Compliance violations should primarily be reported clearly and openly. All reports received shall be carefully investigated and, upon request, treated confidentially.



To promote open and honest communication, it is expressly noted that Employees reporting violations of laws or regulations, this Code of Conduct or other internal guidelines and rules shall not suffer any adverse consequences whatsoever because of the report. This shall also apply to other persons contributing material information to the investigation of misconduct.

GG expressly reserves the right to take disciplinary action against Employees who intentionally or gross negligently make false accusations. All actual or potential non-compliances must be reported to the Compliance Committee (compliance@gg-group.com) – regardless of severity or apparent financial impact. Thus, it is anticipated that in some instances, a simple mistake, a human error, or an immaterial non-compliance will be reported. It is the responsibility of the contacted ombudsman, HR-employee or supervisor to escalate the matter immediately to the compliance committee.

3. WAIVERS OF THE CODE

A waiver of compliance with this Code for anybody may be made only by the Company's Board of Management.

