



# GSG Group

## [GSG Group Code of Conduct]

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## 1. This Code of Conduct

This Code of Conduct sets out GSGroup's expectations, commitments and requirements for all conduct in connection with our business operations. It applies to all of GSGroup's employees, hired contractors and any other external personnel working for GSGroup. GSGroup also expects all of its counterparties to adhere to the standards set out in this Code of Conduct and all applicable laws.

All of GSGroup's Policies, Procedures, Instructions and Guidelines are an integral part of and are incorporated into this Code of Conduct.

This Code of Conduct is a living document and will be reviewed and evaluated for potential changes regularly.

## 2. GSGroup's Commitment

In our business operations, we will comply with all applicable laws, act in an ethical manner, practice good corporate governance and respect internationally recognised human rights. Where this Code of Conduct conflicts with other applicable laws, the most stringent requirement shall be adhered to.

## 3. Your Responsibilities

GSGroup expects high ethical standards of anyone who acts on our behalf. It is your responsibility to comply with this Code of Conduct, other governing documents and applicable laws to your work.

You are expected to familiarise yourself with this Code of Conduct, all other governing documents and applicable laws relevant to your work. You must act comfortably within our ethical standards and the boundaries set by all applicable laws. If you need advice or guidance in that regard, you are expected to disclose this issue to your immediate manager/leader or Legal & Compliance. You must also participate in required training and confirm annually that you have familiarised yourself and will comply with this Code of Conduct.

In all your work activities, you are also required to exercise good judgment, high degree of care and skill and consideration. To that end, you must among other things take all steps necessary to ensure GSGroup lives up to its customers' legitimate expectations and complies with its contractual obligation. Such steps include but are not limited to familiarising yourself with our obligations to our customers and asking questions of your leaders/managers or others in case of any doubt as to our ability to deliver on our promises and undertakings to our customers. In addition, you are expected to conduct yourself in a highly professional manner at all times.

You are expected to live out GSGroup's Core Values of Caring, Skilled and Inventive.

## 4. Responsibility for Managers/Leaders

GSGroup expects its managers/leaders to demonstrate ownership and commitment to our ethical standards by what they say and do. As a manager/leader, you must ensure that activities within your area of responsibility are carried out in accordance with this Code of Conduct, other governing documents and applicable laws. To that end, you are required to promote (including but not limited to through your action) and monitor compliance with this Code of Conduct among those answerable to you.

## 5. Asking Questions, Reporting Concerns and No Retaliation

GSGroup has an open communications policy. It is your duty to stay vigilant, raise questions or seek advice when you are in doubt as to how to proceed in any given situation. If you suspect a possible violation of this Code of Conduct or other unethical conduct, it is your duty to report this immediately (either to your leader/manager, Legal & Compliance or any other member of GSGroup's management).

GSGroup will not tolerate any form of retaliation against anyone who has raised an ethical or legal concern in good faith.

## 6. Consequence of Breaches

Any breaches of this Code of Conduct or any applicable laws will not be tolerated. Measures for any such breaches may include termination of employment contract and reporting to relevant authorities.

## 7. Privacy and Data Protection

We are committed to protecting the privacy rights of our employees and any other individuals using our products or services. To that end, we take all appropriate measures to comply with GDPR and any other local privacy laws.

## 8. Anti-Corruption

GSGroup has zero tolerance for corruption in any form, including but not limited to bribery, facilitation payments and trading in influence. We will comply with all applicable anti-corruption laws and regulations and take active steps to ensure that corruption does not occur in relation to our business operations.

## 9. Conflict of Interest

GSGroup expects you to always act independently from third parties' influence and in GSGroup's best interest in connection with our business operations. You must avoid situations that could be perceived as a conflict of interest. You must be open, disclose and discuss with your immediate manager/leader any situation that might lead to an actual or perceived conflict of interest.

A conflict of interest occurs when a person to whom this Code of Conduct applies has a personal or outside interest that conflicts with GSGroup's best interests. A personal interest could be a financial interest in another company or in a transaction, a personal relationship, including but not limited to a family relationship, or interest or relationship that could improperly affect judgment or decision-making in connection with GSGroup's operations.

## 10. GSGroup Property

GSGroup expects you to safeguard its property against loss, theft and misuse. Such property includes facilities, equipment, computers, software, information, intellectual property rights and financial assets.

## 11. IT Systems and Information Management

The use of GSGroup's IT Systems must be based on our business needs. Information produced and stored on our IT Systems is GSGroup property and may be accessed in accordance with applicable law. Our IT Systems may be monitored to protect GSGroup from malicious activity.

You must never use GSGroup's IT Systems to perform illegal or unethical activities. You must be vigilant of cyber threats and malicious activity such as phishing and immediately report any such incidents. Limited use of our IT Systems is permitted, but it should be kept to a minimum, have no adverse cost to GSGroup, IT Security or productivity.

We will protect information created by us (including but not limited to through your work), or given to us, to ensure appropriate confidentiality and integrity. To that end, you must not use such information for personal advantage or for the purpose of competing with GSGroup. You are also responsible for keeping confidential all matters that could provide third parties with unauthorised access to confidential information. In addition, your duty of confidentiality applies even after your employment or assignment at GSGroup has ended.

For this purpose, "information" includes, but is not limited to, information, knowledge, ideas, documents or materials that are owned, developed or possessed by GSGroup, or that in some other fashion is related to confidential or proprietary matters of GSGroup, its business, customers, shareholders, or employees. It includes all business, products, marketing, financials, accounting, personnel, operations, suppliers, technical and research information. It also includes internal changes and restructuring, computer systems, software, documentation, creations, inventions, literary works, developments, discoveries and trade secrets.

You must also comply with GSGroup's Information Security Policy, which forms an integral part of and is incorporated into this Code of Conduct.

## 12. Recordkeeping

GSGroup must keep accurate books and records that maintain the integrity of our financial reporting.

### 13. Competing Fairly

We will comply with all applicable competition laws and will not tolerate anyone who engages in anti-competitive behaviour. This means among other things that you must never share non-public commercially sensitive information with competitors.

### 14. Caring for People and Environment

We will treat everyone with fairness, respect and dignity. We will not tolerate any harassment (including but not limited to sexual harassment), discrimination or intimidation of colleagues or others affected by our business operations. We will provide a safe working environment for all our personnel, with focus on employees' health and safety. To that end, GSGroup expects everyone to follow all applicable HSE laws wherever they work.

We respect, support and acknowledge the fundamental principles of human- and labour rights as defined in the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, and international legal standards against slavery and child labour. We are committed to ensuring that these standards are adhered to in connection with all of our business operations.

GSGroup shall act responsibly, with the ambition of reducing any direct and indirect negative influence on the external environment. We shall adhere to relevant international and local laws and standards, seeking to minimise our environmental impact.

### 15. Social Media

GSGroup respects the freedom to use social media in both professional and personal contexts. You are expected to show care, respect and discretion to our customers and employees and others connected to our business operations.