



# CODE OF CONDUCT

## OF TH. GEYER

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Growing global business relationships with customers and suppliers have made sustainable actions into a daily routine in our company. As a medium-sized, family-run company, it is our responsibility towards all participants along the supply chain to build a sustainable, social, economic and ecological economic structure and to provide future generations with a stable basis for living and working. Th. Geyer respects the cultural, ethical, religious, social and political diversity of nations and societies.

In recognition of these principles, Th. Geyer has introduced a code of conduct that defines our own standards for a social and ecological environment. Th. Geyer was guided in this process by international regulations and legislation. The United Nations Global Compact sets out 10 principles to provide primary guidance. In addition, Th. Geyer complies with the regulations of the International Labour Organization (ILO), the OECD's economic policies and the Charter of Fundamental Rights of the European Union.

Th. Geyer ensures that the above principles and guidelines are implemented with binding effect within the entire Th. Geyer Group, both at national and international level. It also ensures that the Code of Conduct is communicated to both employees throughout the Group and to its suppliers. Th. Geyer expressly supports and encourages its business partners to incorporate this Code of Conduct into their own corporate policies. Changes and modifications to the above regulations and legislation may also result in amendments to the Code of Conduct.

Renningen, 1 November 2023



**Oliver-Alexander Geyer**  
Managing Partner



**Ralf Streicher**  
Managing Partner



**André Meise**  
Managing Director



## PRINCIPLES

### HUMAN RIGHTS

**Principle 1: Companies shall support and respect the protection of internationally proclaimed human rights within their sphere of influence.**

The Declaration of Human Rights is the fundamental basis for all internal company processes. Th. Geyer assumes the responsibility to safeguard human rights both at the workplace and within the company's general sphere of operations. Respect for human rights contributes to the improvement of society and Th. Geyer is fully aware of this social responsibility.

**Principle 2: Companies shall ensure that they are not complicit in any violations against human rights.**

Due to its global business relationships, Th. Geyer is aware of its international responsibility. Therefore, Th. Geyer prohibits and distances itself from any communication with business contacts who perpetrate human rights violations. Th. Geyer also expects companies within the supply chain to comply with the Occupational Safety and Health Guidelines of the International Labour Organization (ILO).

### LABOUR STANDARDS

**Principle 3: Companies shall uphold freedom of association and recognise the right to collective bargaining in practice.**

Companies shall recognise and respect the right of workers to form or join organisations in accordance with ILO Convention No. 87 (Freedom of Association and Protection of the Right to Organise Convention, 1948) in order to make their voices heard before the law. Due regard shall be given to national circumstances. Similarly, the right to conduct collective bargaining in accordance with ILO Convention No. 98 (Right to Organise and Collective Bargaining Convention, 1949) shall not be adversely affected.

**Principle 4: Companies shall support the elimination of all forms of forced labour.**

Th. Geyer shall expressly undertake to prohibit all forms of forced labour in accordance with ILO Convention No. 29 (Forced Labour Convention, 1930) and No. 105 (Abolition of Forced Labour Convention, 1957). All labour shall be voluntary and every employee shall have the right to terminate an employment relationship with reasonable notice. Furthermore, Th. Geyer shall focus on national statutory requirements as well as on the existing labour market situation with respect to reasonable remuneration and shall observe national statutory requirements for working hours. Employees are guaranteed regular recreational leave paid in accordance with national legal requirements.

**Principle 5: Companies shall comply with national labour standards regarding remuneration, benefits and working hours.**

Th. Geyer shall focus on national statutory requirements as well as on the existing labour market situation with respect to reasonable remuneration and shall observe national statutory requirements regarding working hours. Workers are guaranteed regular paid recreational leave in accordance with national legislation.

**Principle 6: Companies shall advocate the abolition of child labour.**

Th. Geyer shall only employ workers who are above the legal minimum age in accordance with the Convention on the Rights of the Child and ILO Convention No. 138 (Minimum Age Convention, 1973). Furthermore, the Group shall refuse to tolerate any form of exploitative child labour. Work where young employees are at risk shall be prohibited by Th. Geyer.

**Principle 7: Companies shall qualify and train their employees.**

A high level of motivation and qualification of employees is of great importance to Th. Geyer. Training needs are therefore determined at regular intervals and employees are given the opportunity to attend the required basic and advanced training programs. In addition, Th. Geyer shall ensure that all employees attend training courses prescribed by law or regulations.

**Principle 8: Companies shall maintain and promote health and safety at work.**

Th. Geyer fully complies with prevailing national health and safety laws at the workplace. This shall include assessing actual and potential health and safety risks at the workplace and training employees to prevent accidents and occupational illnesses as far as possible. Th. Geyer shall also ensure compliances with national working time regulations and laws.

**Principle 9: Companies shall promote diversity.**

Th. Geyer shall not tolerate any discrimination at the workplace based on gender, ethnic origin, social or religious background, skin colour, nationality, age, sexual orientation, disability, marital status, health condition or any other grounds prohibited by law. Th. Geyer shall promote inclusion and diversity within the company in the best possible way, e.g. at the recruitment stage.

## INFORMATION SECURITY

### **Principle 10: Companies shall ensure the protection of personal data.**

Legal regulations exist for the correct handling of personal data in order to protect privacy and personal rights. The acquisition, processing, storage and use of personal data shall only be permitted if there is a legal or contractual basis for this purpose or if the data subject submits his or her consent. Data protection breaches violate the rights of data subjects and can lead to considerable fines and image risks for the company.

Every one of us contributes to protecting the rights and interests of employees and business partners by handling personal data responsibly while averting risks to the Company.

### **Principle 11: Companies shall ensure data security and the protection of IT systems.**

Information processing plays a key role in fulfilling our tasks. All essential strategic and operational functions and tasks are largely supported by information technology.

We place a high priority on IT and data security.

## ENVIRONMENTAL PROTECTION

### **Principle 12: Companies shall ensure the protection of the environment.**

Th. Geyer shall comply with all prevailing national laws, regulations and standards regarding environmental protection. The aim is to minimise environmental pollution and hazards and to improve environmental protection in daily operations, in particular in the use of products and materials as well as transport systems. Preventive measures shall ensure that no avoidable and, above all, irreversible damage can occur. Compliance shall be ensured with legislation and guidelines for handling products and chemicals. Regular training is a preventive measure and shall continue to be an effective tool for avoiding environmental pollution.

### **Principle 13: Companies shall take the initiative to create a greater sense of responsibility for the environment.**

Th. Geyer shall adopt an organised and systematic approach to tackling environmental issues. The formulation of objectives and compliance with existing laws, regulations and permits shall provide the basis for company-wide action.

### **Principle 14: Companies shall promote the development and deployment of eco-friendly technologies.**

Th. Geyer is committed to a sustainable, stable and ecologically sound business policy. Efficient, modern and eco-friendly technologies shall be promoted and introduced wherever possible.

## DUE DILIGENCE IN SUPPLY CHAINS

### **Principle 15: Companies shall comply with the Supply Chain Due Diligence Act, even if they are not required to do so by law.**

Th. Geyer shall comply with human rights and environmental due diligence obligations and, where possible and applicable due to the scope of application, with their propagation among business partners within the supply chain, as described in the Supply Chain Due Diligence Act (LkSG) and set down in the questionnaire on the report of the Federal Office for Economic Affairs and Export Control (BAFA) – without being legally obliged to do so due to the size of the company.

## CONFLICT MINERALS

### **Principle 16: Companies shall promote sustainable sourcing of conflict minerals.**

Th. Geyer assures that it is committed to the responsible extraction of conflict minerals and compliance with all prevailing laws.

## FIGHT AGAINST CORRUPTION

### **Principle 17: Companies shall work to combat corruption in all its forms, including extortion and bribery.**

Th. Geyer shall undertake to prevent all forms of bribery. Compliance shall be assured by implementing prevailing laws to prevent corruption. The high ethical standards set by Th. Geyer in its own company shall also be implemented by its business partners. We shall expressly distance ourselves from partners within the supply chain who fail to adhere to this principle.

#### **Principle 18: Compliance with principles and reporting non-compliances.**

The Th. Geyer Code of Conduct combines prevailing legal and operational regulations. The obligation to comply with the principles listed here arises either directly from laws, company regulations, company policy and guidelines or as an ancillary obligation from the employment contract.

Since risks can only be minimised and damage to the Th. Geyer Group, its employees and business partners be averted if rules and standards are observed, Th. Geyer expects its managers and employees to comply with these rules and standards.

The goal is to detect, process and stop misconduct and corresponding risks at an early stage. Deliberate violations of laws, this Code of Conduct or the guidelines issued by Th. Geyer shall have consequences under prevailing regulations. In addition, violations of the law may result in criminal and civil action.

If an employee becomes aware of risks arising from improper conduct taking place at Th. Geyer, he/she shall first discuss this with their superior. Violations of this Code of Conduct, such as suspected corruption, other criminal offences and similar serious irregularities that could harm the Th. Geyer Group, should be reported directly to the Compliance Officer.

If the employee wishes to remain anonymous, he/she can choose to use the whistleblowing system established with an external ombudsman.

**<https://th-geyer.hinweis.digital/>**

Any pressure on whistleblowers or their discrimination will not be tolerated. The rights of employees shall remain unaffected.

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## **REFERENCES**

UN Global Compact  
**[www.unglobalcompact.org](http://www.unglobalcompact.org)**

International Labour Organization ILO  
**[www.ilo.org](http://www.ilo.org)**

Universal Declaration of Human Rights, dated 10 December 1948  
**[www.ohchr.org](http://www.ohchr.org)**

Organisation for Economic Co-operation and Development  
**[www.oecd.org](http://www.oecd.org)**

United Nations Convention against Corruption  
**[www.unodc.org](http://www.unodc.org)**

This declaration entered into force for the first time on 1 July 2010 and was revised in 2023.