

*#CodeOfConduct*



# CODE OF CONDUCT OF THE GROB GROUP



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# 1. PREAMBLE

## Dear Employees,


GROB is an internationally active family business that can look back on almost 100 years of corporate tradition and is characterized by its regional ties to its headquarters in Mindelheim as well as to its subsidiaries around the world. Thus, we never view our social, ecological, as well as economic obligations as purely local concerns, but always as global ones, and therefore also align ourselves with international frameworks in order to ensure compliance with ethical standards in our business activities.

Important sources of our understanding of ethics are the UN Global Compact and the UN Guiding Principles on Business and Human Rights. We also recognize the importance of the UN Convention on the Elimination of All Forms of Discrimination against Women (UN Women's Rights Convention), the Convention on the Rights of Persons with Disabilities (UN Disability Rights Convention) and the UN Declaration on the Rights of Indigenous Peoples. Another reference is the core labor standards of the International Labor Organization (ILO). Apart from this, our actions are based on national and international laws and industry standards. We derive our commitment to internationally recognized principles and respected guidelines from all of these legal sources and thus primarily, but not solely, address the areas of human rights, labor standards, environmental protection, anti-corruption, antitrust law and export control law.

With this Code of Conduct ("CoC"), we not only define the legal framework for our business and entrepreneurial activities, ethical principles and standards of conduct, but also reaffirm our conviction that our success is not only measured by financial indicators, but also by our contribution to a fairer, safer, and more sustainable world. We therefore encourage all employees of the GROB corporate family to actively contribute to this vision and thank you for being part of our shared commitment to excellence and responsibility.

This CoC is supplemented by the declaration of principles on the GROBGroup's human rights strategy. In it, we refer to the Supply Chain Due Diligence Act that has been in force in Germany since January 1, 2023 and specifically document our commitment to respecting internationally recognized human and environmental rights, our expectations of our employees and suppliers based on this, and the processes we have established to implement our human rights and environmental due diligence obligations. Like our CoC, the GROB Group's declaration of principles is also freely accessible on the GROB website <https://www.grobgroup.com/>.

Mindelheim, May 1, 2024

  
Wolfram Weber  
Vice Chairman  
of the Board & CFO

  
Christian Grob  
Chairman of the  
Supervisory Board

  
Florian Grob

  
German Wankmiller  
Chairman  
of the Board & CEO

  
Christian Müller  
Member of the  
Board & CSO

GROB attaches great importance to diversity and equality. To improve readability, we have not used the different language forms for male, female, and diverse (m/f/d).



## 2. SCOPE OF APPLICATION

This CoC comes into force on May 1, 2024 and thus replaces the GROB Group's compliance guideline valid since March 2018. It extends to all hierarchical levels and business units of our corporate family and is binding for all employees of GROB-WERKE GmbH & Co. KG and its subsidiaries (hereinafter "GROB" or "GROB Group").\*

In this context, we expect our managers to act as role models for compliant and ethical behavior and to set a good example. In addition, we naturally see it as the duty of all GROB employees to comply with the requirements of the CoC and to bring the guiding principles contained therein to life.

\* There may be separately addressed deviations in content for individual GROB subsidiaries that are caused by mandatory law or factual circumstances.



## 3. OUR CORPORATE PHILOSOPHY

As a globally active family business, we at GROB consider it our responsibility to make our actions as sustainable as possible. We view this not only as an entrepreneurial obligation, but also as a decisive basis for long-term business success.

Value-based action has been the foundation of our economic success for four generations now. This understanding has been anchored in our corporate strategy from the very beginning. To achieve this goal, we rely on fair cooperation. This includes not only complying with applicable laws and legal standards, but also fulfilling the expectations and wishes of our customers and employees – without ever subjecting ourselves to trendy, short-term ideas or actions.

Our guiding values – innovation, quality, efficiency and responsibility – are not just buzzwords for us, but the benchmark for our past and future actions. They are the foundation of all our business activities and describe how we want to work with others.

With this CoC, we want to give shape to these values and define rules for working together with integrity and responsibility with our employees and fellow human beings, our environment and our business partners.

**For cooperation with integrity and a sense of responsibility**

# 4. OUR INTERACTIONS WITH OUR EMPLOYEES AND FELLOW HUMAN BEINGS

As a family-owned company, GROB strives not only to form a strong team together with its employees, but also to be a fair partner for those who work with us. This means that we treat ourselves and others with respect at all times. For this reason, we at GROB have adopted the following guidelines for interactions with our employees and fellow human beings.

## 4.1 HUMAN RIGHTS

GROB assumes responsibility towards its employees and third parties. That is why we respect and support internationally recognized human and labor rights in all our business areas.

**It is important to us to create an open and sincere climate at all of our sites**

To this end, we set clear standards and value a working environment based on respect, dignity, and the fair treatment of one another. In concrete terms, this means that we in particular do not tolerate the following practices:

- ✦ Torture, corporal punishment and cruel, inhumane, discriminatory or degrading treatment of any kind.
- ✦ Child labor in any form.
- ✦ Forced labor and human trafficking.

We would like to promote the discussion of human rights in all our operating facilities.



## WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

Suppose you witness a heated discussion between a department manager and one of his employees. The department manager's interactions then become physical.

We do not tolerate such behavior under any circumstances; depending on the specific individual case, it may not only be relevant under criminal law, but also clearly contradicts our understanding of our values. If necessary, find colleagues who can help you to de-escalate the situation or inform plant security. In any case, report this incident to the Compliance department.



## 4.2 FAIR WAGES, SAFE WORK, AND FAMILY COMPATIBILITY

GROB attaches great importance to fair wages. We therefore ensure that our employees are remunerated appropriately, transparently, and at least in accordance with country-specific requirements, including applicable collective wage agreements (where applicable). Statutory working hours are respected and any overtime is remunerated fairly.

At GROB, safety and health in the workplace are part of everyday practice. That is why we are committed to ensuring a working environment that is not only safe, but also beneficial to the health and lives of our employees and third parties. To this end, we ensure that all necessary measures are taken in accordance with the respective national standards to minimize potential risks and to protect the physical integrity of our employees and third parties as best as possible. In particular, this includes effective occupational safety, especially by providing appropriate protective equipment, the reduction of unnecessary stress and unnecessary noise pollution, fire protection,

emergency, incident and accident management and, if in the particular GROB subsidiary available, also various services offered by the company physician to proactively identify and minimize potential risks. We also work continuously on targeted preventative measures, such as safety training and instruction for our employees.

**At GROB, safety and health in the workplace are part of everyday practice**

In addition to appropriate remuneration and ensuring health and safety in the workplace, GROB constantly strives to promote the satisfaction of its employees. This also includes the compatibility of family and career.



## WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

Suppose you witness an employee working on a grinding machine without wearing the required protective equipment, in particular safety goggles.

Such behavior can endanger the health of the employee and contradicts the contents of the risk assessment for this workplace. Please fulfill your duty to assist and kindly advise your colleague to wear the protective equipment provided. If you repeatedly observe non-compliance with the applicable occupational safety regulations, we encourage you to inform your colleague's supervisor or the Occupational Safety department or the company physician (where available).

Proactively use your special right to make suggestions on occupational health and safety – this will help you to advance occupational health and safety together with the specialist departments!



### 4.3 NON-DISCRIMINATION, DIVERSITY, AND INCLUSION

GROB pursues a zero-tolerance policy towards discrimination of any kind. We firmly believe that true diversity is only achieved when every employee is treated equally, regardless of personal characteristics and attributes such as national and ethnic background, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief system.

We do not tolerate any form of bullying or harassment. Actions that we clearly condemn include intimidation of any kind, demeaning comments based on a person's ethnic or social background, gender or age, isolation from workplace communication, or the exclusion of individuals. We say NO to sexual harassment. This means that unsolicited advances and physical contact must also be avoided. With a clear commitment to combating discrimination, we are working together to create a working environment in which everyone, regardless of their personal background, feels at ease and in which everyone can develop their full potential.

**With a clear commitment to combating discrimination, we are working together to create an inclusive and beneficial working environment**

We strive to ensure that the diversity of our workforce is reflected in all areas of the company. We see the promotion of inclusion as a valuable contribution to our joint success. By ensuring that every employee can take advantage of opportunities and overcome previous limitations, we not only create an inclusive working environment, but also a sustainable foundation for innovation and growth.



### 4.4 FREEDOM OF ASSOCIATION AND ASSEMBLY

GROB respects freedom of expression and is committed to freedom of association and assembly and the right to collective bargaining

#### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?



Suppose you witness that a colleague is obviously being sexually harassed by another colleague.

We do not tolerate such behavior under any circumstances; depending on the specific individual case, it may not only be relevant under criminal law, but also clearly contradicts our understanding of our values. We therefore encourage all our employees not to remain inactive in such cases, but to offer the harassed person help loudly and clearly and, if necessary, to inform plant security. In any case, report the incident to the Compliance department. Thanks to your courageous intervention and the report, we will be able to investigate the matter and take the necessary actions.



#### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?



Suppose you are a department manager at GROB and have an employee who is actively involved in a large trade union.

You respect your employee's attitude and do not discriminate against them because of their commitment.



## 5. OUR INTERACTIONS WITH NATURE

GROB takes responsibility for the environment and is actively committed to protecting it as part of its business activities. That is why we attach great importance to the development and promotion of sustainable processes and products that make a positive contribution to the conservation of our natural environment. We focus particularly on the areas of climate, environment, land use, biodiversity, species diversity, and animal welfare and consider these in relation to both our own production process and the use of the products we put into circulation.

Our contribution to global greenhouse gas reduction is at the heart of our efforts. We are actively working to continuously reduce greenhouse gases emitted by us and the use of our products, in particular by promoting their energy efficiency and using and expanding renewable energies in our operations.

### **We make our contribution to the reduction of global greenhouse gases**

We are committed to preserving ecosystems, ensuring that our supply chains are sustainable, and promoting the responsible use of resources in order to minimize negative impacts on biodiversity. This means, for example, avoiding and reducing waste, recycling materials, and using water sparingly in day-to-day operations.

Our processes established for this purpose are based on the globally applicable ISO14001

(Environmental Management) and ISO50001 (Energy Management) standards.

This comprehensive commitment to environmental protection reflects our efforts not only to fulfill legal requirements, but also to actively contribute to an environmentally-friendly future. We see environmental protection not only as an obligation, but also as an opportunity to harmonize innovation and responsibility and to shape a sustainable future together.



### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

Suppose you notice that a colleague is disposing of hazardous operating materials on the premises improperly and contrary to internal company regulations.

Such behavior could not only be in conflict with applicable laws, but could also lead to potential – and possibly irreversible – environmental pollution. One of our core values consists of a responsible approach to our environment. We therefore aim to prevent potential environmental risks from arising as early as possible in our business activities. We therefore encourage all our employees not to remain inactive in such cases, but to inform their colleagues of the misconduct and to contact the Waste and Recycling Management Coordinator so that they can take the necessary steps to minimize or rectify the damage.



# 6. OUR INTERACTIONS WITH CUSTOMERS

GROB's commercial success depends on our customers being satisfied with the performance and quality of our products. Product quality, product safety, and the protection of our customers' interests are therefore essential for long-term business success and the reputation of the GROB brand. To ensure this, we have adopted the following rules:

## 6.1 PRODUCT QUALITY AND PRODUCT SAFETY

Our entire product portfolio is set apart by optimized quality and maximum reliability. The coordinated efficient design and continuous improvement of our processes and products are an elementary part of our work culture and secure our competitive advantage. Our quality management system established for this purpose is based on the international quality assurance standard ISO 9001.

In doing so, we keep an eye on all relevant legal regulations – such as the Product Safety Act and other international and national regulations relating to our products, such as the EU Regulation on the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) and the EU Directive on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (RoHS) – as well as the requirements

of our customers. Our employees play a decisive role in implementing these standards. We promote awareness of product quality and product safety through training and sensitization. Each individual contributes to ensuring that our products are not only technically superior, but also meet the highest safety requirements.

**Our entire product portfolio is set apart by optimized quality and maximum reliability**

Should a defect or fault nevertheless occur in one of our products, we will act immediately and without delay to rectify it in accordance with the statutory regulations, contractually agreed obligations, and internal quality standards.



## 6.2 PROTECTION OF CUSTOMER INTERESTS

For GROB, the protection of customer interests and compliance with contracts are the indispensable basis for trusting cooperation. Therefore, we do not engage in activities that are based on embezzlement, extortion, theft, fraud, misappropriation, or that could otherwise result in harm to our customers.

Through appropriate measures and internal processes, we ensure the protection of our customers' confidential information to which we have access. We want to ensure that every interaction with our customers is characterized by integrity, transparency, and trust. In our daily work, we rely on transparent communication and strengthen long-term partnerships.

**Transparent communication  
Long-term partnerships**



### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

Suppose you notice that a colleague in production is using measuring equipment without a valid calibration label for quality control of a component.

To ensure our quality standards, conformity to standards, and product safety, only inspection equipment with a valid calibration label may be used as a rule. The colleague's behavior thus contradicts GROB quality assurance standards and could cause potential risks for the end product. You point out to the colleague that test procedures must only be carried out with proper inspection equipment and arrange for the test procedure to be repeated with calibrated inspection equipment.



### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

Suppose you notice that a colleague has disposed of a folder containing the customer's project documents in a freely accessible waste container on the GROB premises. Due to the situation, you fear that the customer's business secrets could be involved.

The disposal of the folder containing project documents constitutes a violation of our customer's interests and generally leads to a breach of existing confidentiality obligations towards our customer. In such a case, we encourage all our employees not to stand by idly but to step in and dispose of such documents only in the security containers intended for confidential documents (the contents of these containers will be destroyed by a certified waste disposal company in compliance with all necessary security standards) and to talk to the respective colleague. In addition, report the matter to the Compliance department. This behavior helps us to be a reliable and trustworthy business partner for our customers.





# 7. ACTING IN ACCORDANCE WITH LAWS AND ETHICS

We take responsibility, and set a high standard for ourselves. Acting in accordance with the rules in our daily routine must be the norm for each of us. That is why we formulate clear rules and expectations that help us and our employees to behave ethically and in accordance with the rules in our day-to-day work. Our joint efforts in the area of compliance are crucial for the sustainable success and ethical foundation of the GROB Group.

## 7.1 ANTI-CORRUPTION AND MONEY LAUNDERING

GROB regards integrity as an indispensable building block of entrepreneurial activity. Our CoC therefore defines binding guidelines for dealing with corruption and money laundering to ensure that our employees comply with legal standards in every business interaction. By working together to promote integrity, we strengthen our reputation as a trustworthy partner and create a working environment that is characterized by fairness, transparency, and sustainable success. Our commitment to combating all types of corrupt behavior is not just a legal obligation, but a central pillar of our corporate culture. We therefore clearly reject any behavior that could even give the impression of being able

to influence business decisions in an inadmissible manner ("zero tolerance"). This refers to gifts of any kind, such as monetary gifts in any form and currency as well as gifts in kind, but also invitations (to dinner). Circumventing such inadmissible business practices by involving third parties is also not permitted. Our employees and all agents are prohibited from procuring, accepting, demanding, or being promised unlawful advantages from business partners or their employees or other third parties with the aim of unlawfully influencing the actions and decisions of the respective recipient of such an advantage. Binding rules of conduct, applicable value limits, and the procedure to be followed are set out in the GROB gift guidelines and must be observed by all employees without restriction. If in doubt, contact the Compliance department.



### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

Suppose you work for the GROB Group's Purchasing department and are currently negotiating with a representative of a potential new supplier. The representative offers you an expensive wristwatch with the words "I hope your decision will be in our favor with this."

Such behavior is relevant under criminal law and therefore clearly contradicts GROB's values. You remember GROB's gifts policy, which prohibits the acceptance of gratuities that go beyond customary social courtesies, such as small promotional gifts, and firmly reject the wristwatch. You should also inform your supervisor or the purchasing manager and the Compliance department about all the circumstances of the case. By responding responsibly, you are actively helping to maintain GROB's integrity and ethical orientation.



**Our CoC defines binding guidelines for dealing with corruption and money laundering to ensure that our employees comply with legal standards in every business interaction**

We also pursue a zero-tolerance policy with regard to money laundering and terrorism financing and comply with our legal obligations. We reject cash transactions from the outset as part of our business activities.

In the event of violations of the above principles, disciplinary measures up to and including termination of the respective employment relationship or the termination of other existing contractual relationships as well as claims for damages for any damage caused by the misconduct must be expected in individual cases.

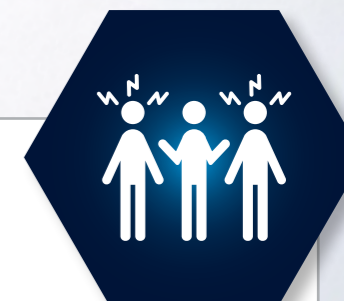
## 7.2 PERSONAL CONFLICTS OF INTEREST

GROB prevents conflicts of interest in order to maintain the integrity and fairness of our business practices. Employees should ensure that personal interests do not conflict with the interests of the company. This includes financial interests in competitors or customers and personal relationships that could influence business decisions and impair objectivity.

The aim must always be to avoid, to the best of your knowledge and belief, all situations that could give the appearance of a potential conflict of interest.

**GROB prevents conflicts of interest in order to maintain the integrity and fairness of our business practices**

Possible conflicts of interest in business dealings with competitors, consultants, customers, suppliers, service providers, and other business partners of GROB must be disclosed by the persons concerned to their superiors in advance and subjected to a review by the Compliance department.



### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

Suppose you notice that your brother's company has applied for a tender for an external contract.

Personal interests must not conflict with the interests of the company. You should therefore disclose any such potential conflict of interest immediately to your supervisor and the decision-makers responsible in the specific case so that the matter can be investigated. Through your prudent actions, you ensure the integrity and fairness of our working methods.



## 7.3 FOREIGN TRADE, EXPORT CONTROL, INTERNATIONAL BUSINESS, AND SANCTIONS

International trade ensures GROB's corporate success. Compliance with all applicable laws and regulations in the area of foreign trade and export control is essential for us. This includes compliance with sanctions and embargoes to ensure that our business practices are in line with legal standards and international sanctions.

### GROB focuses on international trade

Without exception, our employees are instructed to exercise the utmost care in international business activities and to ensure that

- export<sup>2</sup> of goods<sup>3</sup>,
- the provision of services, in particular technical support,

- the conclusion or brokering of legal transactions (e.g., contracts), in particular commercial and brokerage transactions, and
- the domestic transfer of goods

are handled properly and in accordance with applicable export control laws. This includes the review of end uses, compliance with export licenses, and the avoidance of business relationships that may violate sanctions.

<sup>2</sup> The term "export" includes both deliveries or transfers of physical goods, software and technology to other countries outside the customs territory of the EU ("exports") and deliveries or transfers of goods, software and technology to other countries within the customs territory of the EU ("shipments").

<sup>3</sup> The term "goods" includes physical goods, software, and technology. The export of software and/or technology can take place physically or electronically, e.g., by e-mail or as a download or access to a server. Goods that have been specially designed or modified for military purposes ("military or armaments goods") and goods that can be used for both civilian and military purposes ("dual-use goods") are particularly relevant under export control law.



## WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

Suppose you work in sales for the GROB Group. A dealer contacts you with a request for a system that requires an export license, including a large spare parts package. The statements on the end use are not clear; the delivery condition is "Ex Works", the system is to be packed for shipment by sea, but transportation is to be by land.

The violation of (EU) sanction regulations can have serious legal, reputational, and economic consequences for GROB. Compliance with internationally applicable import and export restrictions is therefore essential. Covert procurement attempts in particular are proving to be an increasing challenge, as they are often difficult to detect. This requires diligence, vigilance, and extensive information gathering. In a best case scenario, anyone who conscientiously investigates suspicious facts ("red flags") can dispel existing doubts or uncover an inadmissible attempt at circumvention and thus prevent the export goods from ending up at an illegal destination.

In order to avoid violations and the associated consequences, always consult with the internal export control department before concluding a transaction; use particular caution in case of new customers. Through your prudent actions, you help to ensure that all international business activities comply with the applicable regulations and that potential legal risks are identified at an early stage and thus avoided.



## 7.4 ANTITRUST LAW AND FAIR COMPETITION

GROB is committed to fair and open competition in all global markets. We therefore undertake not to use unfair business practices to the detriment of competitors and other market participants in any of our business activities. Agreements with other companies, decisions by associations of companies, and concerted practices that have as their object or effect the appreciable restriction of competition are excluded for us. This

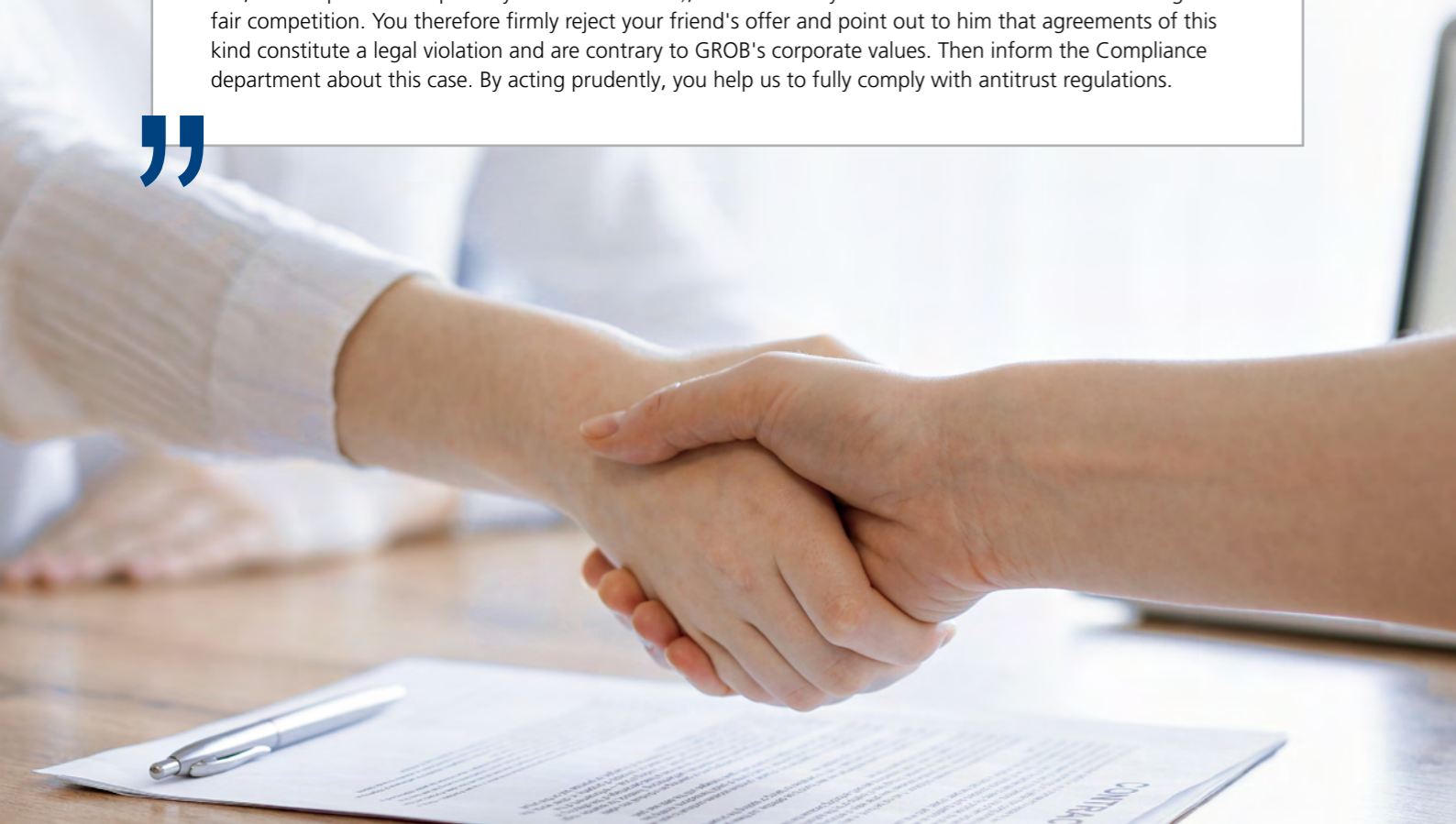
applies in particular to anti-competitive price agreements, market sharing, and the anti-competitive exchange of business and trade secrets, but also to all other violations relevant under antitrust law. Nor do we ever consider abusing a dominant market position.



### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

At a trade fair, you meet an old acquaintance who now works for a competitor. He offers the possibility of cooperating in future tenders in order to achieve higher prices. In his view, this would be in the interests of both GROB and his company.

Offers of this kind may sound tempting at first, but they not only clearly violate applicable law (antitrust law, in this specific case possibly even criminal law), but also clearly contradict our values of maintaining fair competition. You therefore firmly reject your friend's offer and point out to him that agreements of this kind constitute a legal violation and are contrary to GROB's corporate values. Then inform the Compliance department about this case. By acting prudently, you help us to fully comply with antitrust regulations.



## 7.5 DATA PROTECTION AND INFORMATION SECURITY

Data protection and information security are firmly anchored in GROB's governance structures.

Our employees are required to treat sensitive data – regardless of whether it is personal data, our own business secrets, or customer data – with the

utmost care and to ensure that it is only used for legitimate business purposes. Information security is an integral part of our business processes. To this end, we implement robust security measures to ensure the confidentiality, integrity, and availability of our data and work continuously to improve them.



### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

After an external event at which you have collected address lists of participants, a colleague asks you to hand over these addresses for sales purposes.

The legal requirements stipulate that this data may not be used for purposes other than those for which it was originally intended without the explicit consent of the participants.

In this case, the data was only collected for inclusion in the participation list. Remind your colleague that disclosing the data for sales purposes therefore violates our data protection regulations and refer him to the GROB Group Data Protection Officer. With this action, you not only protect the privacy of the participants, but also contribute to GROB's ability to comply with all legal requirements on data protection and information security.





## 7.6 DEALING WITH ARTIFICIAL INTELLIGENCE

We see great potential in the use of artificial intelligence ("AI"), which we would like to exploit more in the context of digitalization. We focus just as much on transparency, data protection, and information security

as on compliance with ethical principles. Decisions based on AI technologies are carefully reviewed to ensure that they are in line with our company's values and objectives and do not violate legal regulations.

## 7.7 INTERNAL KNOWLEDGE, CONFIDENTIALITY, COMPANY PROPERTY AND ASSETS

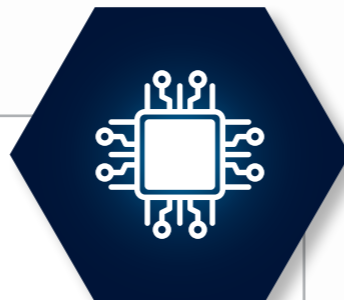
All employees are required to treat internal knowledge and information obtained in the course of their work confidentially and with due care. This includes data of all kinds, in particular trade secrets and all sensitive company-related information, innovative developments, patents, as well as trademarks and copyrights.

Confidentiality and the requirement of proper handling also extend to our company property and assets. Employees may not use these resources for personal purposes or pass on information without authorized approval.

### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

Suppose you find an innovative AI-supported software/app (e.g., ChatGPT) that you would like to use in your professional work.

Regardless of whether the software/app is free or fee-based, please remember that its use at GROB must first be checked and officially approved for use by IT, the Information Security Officer and the Group Data Protection Officer in accordance with the applicable processes. Make other employees aware of the required process, as well. Through your risk-aware behavior, you make a decisive contribution to ensuring that the use of AI does not infringe any interests of GROB that are worth protecting – be it because the application uses the input for learning purposes and thus makes company internal information and business secrets public – or third party data such as employee and customer data, are breached.



### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

Suppose you work in GROB's IT department and you notice that a large amount of data was copied from a computer in the Engineering department to an external storage medium the night before.

There is a concrete risk here that internal company data could be extracted without authorization in order to use it for improper purposes. The damage to GROB can be considerable under certain circumstances. We encourage you to act in a risk-aware manner in such cases and to report the matter to your supervisor immediately.



## 7.8 SOCIAL COMMITMENT

For GROB, donations and sponsorship are valuable measures for making a positive contribution to our society, education, and charitable causes, thereby fulfilling our corporate responsibility. However, GROB does not make any party donations to specific political groups. Any form of sponsorship, whether for events or organizations, must be clarified transparently and unambiguously in advance. This includes a careful review to ensure that the values and objectives of the supported activities are in line with GROB's principles. Our employees are encouraged to become involved socially and/or politically and to participate in social life

through their activities. At the same time, we demand absolute transparency and integrity in any political or lobbying activity connected with GROB. All such social and political activities must be carried out within the framework of corporate values and legal regulations.



### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

Suppose you are asked to sponsor a charitable event as part of your work as a GROB employee.

Do not make any uncoordinated commitments and refer to the internal approval process at GROB. Sponsoring can only take place after prior internal approval. Contact the Compliance department so that we can check the case. By acting responsibly, you ensure that any sponsorship is in line with company guidelines and values.



## 7.9 ACCOUNTING, FINANCIAL REPORTING, AND TAXES

reporting, the timely submission of tax returns, the correct calculation and payment of taxes and cooperation with tax authorities in the event of any audits or inquiries.

GROB ensures the correct fulfillment of all tax obligations. This includes proper and careful bookkeeping and storage of relevant documents and receipts, transparent financial

We place these requirements not only on our Accounting department, but on all employees working in the company.



### WHAT DOES THAT MEAN FOR ME AS AN EMPLOYEE?

Suppose you, as a manager, have organized a team event for your team. The catering company now asks you to pay the amount in cash and does not give you an invoice. You then write your own receipt for the expenses incurred and submit it to the financial accounting department as expenses to be reimbursed for company events.

This is not acceptable. For expenses that constitute operating expenses, proper invoices must be requested from each business partner and submitted to the financial accounting department as original receipts. We do not support "moonlighting" or create the potential for untaxed income for business partners. Issued receipts must always be checked for authenticity, correctness, and proper tax disclosure.



## 8. GROB WHISTLEBLOWER SYSTEM

GROB takes compliance with ethical standards and legal regulations extremely seriously. Our whistleblower system offers our employees, as well as external third parties, the opportunity to confidentially report potential violations or questionable situations with a professional context or within the supply chain.

We encourage our employees and affected third parties to make active use of this tool in order to jointly promote a corporate culture of integrity and ethics.

We ensure that whistleblowers enjoy special protection and do not have to expect any negative consequences for providing information. No employee who reports (suspected) violations of laws, this CoC, or internal company guidelines in good faith and who has not been guilty of any wrongdoing must fear any disadvantages because of a report. However, anyone who recklessly or knowingly makes false suspicions or accusations may have to face consequences themselves.

The exact procedures and contact details for the whistleblower system can be found on the company website at "Compliance" and the Procedure Rules, [https://sicher-melden.de/whistle/#/mainpage/icom53606/grob\\_werke\\_gmbh\\_co\\_kg](https://sicher-melden.de/whistle/#/mainpage/icom53606/grob_werke_gmbh_co_kg)

The digital whistleblower system available there can also be used to submit reports anonymously if desired.



Whistleblowers can also use the following contact options:

- ✦ **E-mail:** [compliance@grobgroup.com](mailto:compliance@grobgroup.com)
- ✦ **Postal address:** Compliance, GROB-WERKE GmbH & Co. KG, Industriestraße 4, 87719 Mindelheim, Germany
- ✦ **Phone:** +49 (8261) 996-0
- ✦ **In person:** OE Legal & Compliance, Dr. Korbinian Feller and/or Dr. Monika Glogger, B6, 8th Floor, Room 809

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