

Code of Conduct.

LATEST REVISION: SEPTEMBER 2026

1. Introduction

Purpose of the Code

This Code of Conduct outlines the ethical principles and expectations that guide our actions and decisions. It reflects our commitment to integrity, fairness, and respect in all our business dealings.

How to Use the Code

This document is a resource for understanding our company's standards. Employees, management, vendors, and partners are expected to adhere to these guidelines in their daily activities. Consult this Code when facing ethical dilemmas or uncertain situations.

Company Values and Principles

Our values include integrity, innovation, collaboration, and respect for people and the environment. These principles underpin our business practices and interactions. We are dedicated to maintaining a positive, productive, and respectful work environment.

2. Expectations

This Code applies to all our employees, contractors, vendors, and partners. Everyone associated with Global Management Logic AG (GML) and/or its subsidiaries is expected to uphold these standards.

General Expectations

We expect all parties to:

- Act with integrity and honesty in all business dealings.
- Comply with all applicable laws and regulations.
- Respect others, fostering a work environment free from discrimination and harassment.
- Protect company assets and confidential information.
- Report any unethical behavior or violations of this Code.

3. Labor & Human Rights

Freely Chosen Employment

We prohibit forced, bonded, or indentured labor, involuntary prison labor, slavery, or trafficking of persons. Employment must be freely chosen, and employees are free to leave upon reasonable notice.

Child Labor & Young Workers

We do not employ workers under the minimum age for employment as defined by local law. Young workers must not perform work that is likely to jeopardize their health or safety.

Employment Practices

- Wages, benefits, and working hours must comply with local laws and industry standards. We ensure that overtime is voluntary and compensated at a premium rate.
- Employment agreements must be transparent and clearly communicate the terms of employment.

Equality and Fairness

- We are committed to providing a workplace free from discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, or any other legally protected characteristic.
- Harassment, whether physical, verbal, or sexual, is strictly prohibited. All employees deserve to work in an environment where they feel safe and respected.
- We promote a culture of inclusion and equal opportunity. Decisions regarding hiring, promotion, and compensation are based on qualifications, performance, and company needs.
- We actively encourage diversity and inclusivity through awareness initiatives, open dialogue, and training programs.

Community Engagement

We encourage employees to engage in community and charitable activities, provided that these activities do not conflict with their work responsibilities or the company's interests.

Privacy & Data Protection

- We respect and protect the personal data and privacy of our employees, customers, and partners. Personal information must be collected, processed, and stored in compliance with relevant data protection laws.
- We implement appropriate security measures to protect against unauthorized access, loss, or misuse of personal data. This includes regular audits and updates to our data protection policies.
- Employees must handle personal data responsibly and access or use it only for legitimate business purposes. Sharing personal data without proper authorization is prohibited.

4. Health, Safety & Environment

Worker Health and Safety

- We provide a safe and healthy working environment. This includes regular training on safety practices, proper maintenance of equipment, and prompt response to any health or safety concerns.
- Employees must follow all safety guidelines and report any unsafe conditions or incidents immediately. Participation in safety programs is mandatory.
- We conduct regular safety inspections and risk assessments to identify and mitigate potential hazards. Safety equipment and personal protective gear must be used as required.

Process Safety

- Safety protocols must be followed to prevent accidents and injuries. This includes wearing appropriate personal protective equipment (PPE) and adhering to safety guidelines.
- We ensure that all processes, particularly those involving hazardous materials, are designed and managed to prevent accidental releases, fires, or explosions. Regular drills and simulations are conducted to prepare for potential incidents.

Emergency Preparedness & Response

- We maintain emergency plans and conduct regular drills to ensure preparedness for natural disasters, fires, and other emergencies. Employees must be familiar with these plans and participate in drills.
- Clear procedures for evacuation, communication, and emergency response must be followed during any crisis. Emergency contact information should be accessible to all employees.

Environmental Sustainability

- We are committed to minimizing our environmental impact. This includes reducing waste, conserving energy and water, and promoting recycling and sustainable practices.
- Environmental goals and targets are set and reviewed regularly to drive continuous improvement. Employees are encouraged to contribute ideas for sustainability initiatives.
- We support the use of eco-friendly materials and technologies in our products and processes. Suppliers and partners are also expected to adhere to our environmental standards.

Environmental Authorizations

- We obtain and maintain all required environmental permits and adhere to regulations regarding emissions, waste disposal, and resource usage.
- Regular audits and inspections ensure compliance with environmental laws. Any violations or potential issues must be reported and addressed promptly.

5. Management Systems

Commitment & Accountability

Our leadership is dedicated to upholding this Code and ensuring compliance. Managers are responsible for fostering a culture of integrity and ethical behavior.

Contract Management

All contracts must be fair, transparent, and comply with applicable laws. We ensure that contract terms are clear and mutually agreed upon.

Risk Assessment & Risk Management

We regularly assess and manage business risks. This includes identifying potential risks, implementing mitigation strategies, and monitoring outcomes.

Business Continuity

We have plans in place to ensure business continuity during disruptions. Employees must be familiar with these plans and know their roles in executing them.

Continual Improvement

We strive for continuous improvement in all our processes and practices. Feedback and suggestions for improvement are encouraged and valued.

Use of Company Assets

Company assets, including equipment, technology, and confidential information, must be used responsibly and only for legitimate business purposes.

Fraud and Money Laundering Prevention

We actively work to prevent and report fraudulent activity and money laundering. Employees must remain vigilant and report suspicious activity.

6. Ethical Business Practices

Business Integrity

- We conduct our business with honesty and integrity. Misrepresentation of facts, fraudulent behavior, and unethical practices are strictly prohibited.
- Employees must act in the best interests of the company, avoiding any actions that could harm our reputation or financial standing.

Bribery and Corruption

- We do not tolerate bribery or corruption in any form. Employees must not offer, give, receive, or solicit any form of bribe or kickback.
- All business dealings must be conducted transparently and ethically. Gifts and hospitality must be reasonable and not intended to influence business decisions.

Trade Controls and Sanctions

- We comply with all applicable trade controls, export and import laws, and sanctions. Employees must be aware of and adhere to these regulations.
- Accurate documentation and reporting are required for all cross-border transactions. Violations of trade laws can result in severe penalties.

Fair Competition

- We compete fairly and ethically in the marketplace. Anti-competitive practices, such as collusion and price-fixing, are prohibited.
- We respect the intellectual property rights of others and avoid unfair business practices that could harm our competitors or customers.

Accuracy of Business Records

- All business records and financial reports must be accurate and truthful. Falsification of records or misrepresentation of financial data is not tolerated.
- Employees are responsible for ensuring that all information is recorded honestly and reflects the true nature of the transactions.

7. Maintaining Personal Integrity

Conflicts of Interest

- Employees must avoid situations where personal interests conflict with the interests of the company. Any potential conflicts must be disclosed to management.
- Decisions should always be made in the best interests of the company and must not be influenced by personal relationships or financial gain.

Gifts and Hospitality

- Gifts and hospitality must not influence business decisions. Accepting or giving gifts that could be perceived as a bribe is prohibited.
- Any gifts or hospitality offered or received must be reasonable, transparent, and properly documented. Lavish or inappropriate gifts are not allowed.

Social Media Use

- Employees must use social media responsibly, ensuring that their activities do not harm the company's reputation or disclose confidential information.
- Personal opinions expressed on social media should not be presented as the views of the company. Employees must not engage in online behavior that could damage the company's image.

Personal Conduct and Professionalism

- Professional conduct is expected at all times. Employees must treat colleagues, customers, and partners with respect and professionalism.
- Behavior that could be considered offensive, discriminatory, or inappropriate is not acceptable. This includes interactions in person, in writing, and online.

8. Speaking Up

Identification of Concerns

Employees are encouraged to report any concerns about unethical behavior or violations of this Code.

Reporting Mechanisms

- Multiple channels are available for reporting, ensuring that employees can choose the one they are most comfortable with.
- Reports can be made to supervisors; the Head of HR; the COO; a member of our Board of Directors who serves as the Company's Senior Ethics Officer; the Ethics Office; or through the designated mailbox at ethics@globalmanagementlogic.com. All reports will be treated with the utmost confidentiality.

Protection from Retaliation

- We protect those who report concerns from retaliation. Retaliation against employees who report issues in good faith is strictly prohibited.
- Any form of retaliation will be treated as a serious violation of this Code and will be subject to disciplinary action.

Resolving Ethical Dilemmas

- Employees should seek guidance when unsure about the right course of action.
- Supervisors, the Head of HR, the COO, the member of our Board of Directors who serves as the Company's Senior Ethics Officer, and designated advisors are available to provide support and advice.

Whistleblower Protections

- Whistleblowers are protected, and their reports are investigated thoroughly. We are committed to addressing all concerns raised.
- Confidentiality is maintained to the fullest extent possible, and whistleblowers are kept informed of the progress and outcomes of investigations.

9. Enforcement & Disciplinary Actions

Compliance Monitoring

- We regularly monitor compliance with this Code. Audits and assessments are conducted to ensure adherence.
- Continuous monitoring helps identify and address potential issues before they become significant problems.

Investigations

- All reports of violations are investigated promptly and thoroughly. Cooperation with investigations is mandatory.
- Investigations are conducted impartially, ensuring that all parties are treated fairly and the facts are accurately established.

Disciplinary Actions

- Violations of the Code may result in disciplinary action, up to and including termination of employment.
- Disciplinary actions are proportional to the severity of the violation and are intended to reinforce the importance of ethical conduct.

Consequences of Violations

- Failure to adhere to this Code can lead to serious consequences, both for the individual and the company, including legal action and damage to reputation.
- The company is committed to taking corrective actions to prevent future violations and improve our compliance program.

10. Contact Information

For any questions or concerns, contact ethics@globalmanagementlogic.com or our Head of HR.