



Code of Conduct

This Code of Conduct serves as both a guide for decision-making and a framework for how we conduct our business and interact with one another, our customers, partners and the world around us.

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Message from the CEO

As GETEC continues to evolve and transform, one thing that remains constant is our company's commitment to maintaining the highest ethical standards and creating a culture where integrity, transparency, respect and innovation thrive. The principles outlined in this Code of Conduct represent how GETEC runs its business and how our employees interact with one another, with our customers and partners, and with the world around us.

We want to achieve our goals in the right way. We keep our standards high and make sure everything we do reflects our culture, values and dedication to acting responsibly and fairly, both as individuals and as a company. The GETEC Code of Conduct is the blueprint of the GETEC culture. In situations where we are not sure what the right decision is, the Code of Conduct provides the necessary guidance. It ensures that we make decisions that are in line with our shared values.

All GETEC employees are expected to understand and apply the principles outlined in this document and have the full support of the leadership team in upholding these standards. Should any employee ever feel uncertain about what is expected or find themselves in a situation where ethical considerations are at stake, seek guidance from your direct manager, your Human Resources (HR) partner, the Ethics & Compliance Officer or any executive leader. At GETEC, we are all committed to maintaining an environment where we uphold the law and everyone feels respected, valued and safe.

Thank you for your ongoing dedication to our mission. Together, we will continue to build a company that succeeds with purpose, responsibility and integrity.

Pierre-Alain Graf,
CEO





Our guiding principles

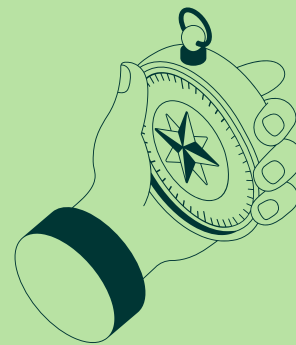
Our vision is to be the European trusted leader in shaping the energy transition to a digital and decarbonised world.

Our mission is to empower our customers' success by delivering reliable, decarbonised energy and infrastructure solutions for today's industries and tomorrow's world.

Our promise to our customers is to deliver value, in providing reliable, decarbonised energy and developing, financing and running critical infrastructure so that our customers can focus on their core business.

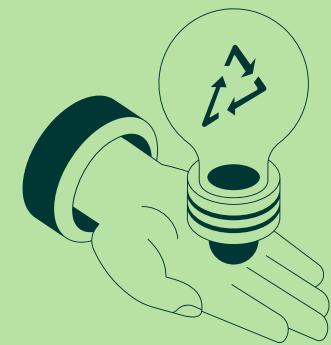
Our values are our core beliefs. They serve as a compass for our actions and decisions.

GETEC values



Pioneering spirit

Think big, act fast! Be a trailblazer in shaping the future of energy. Turn challenges into breakthroughs. We strive for operational excellence while maintaining the highest safety and quality standards.



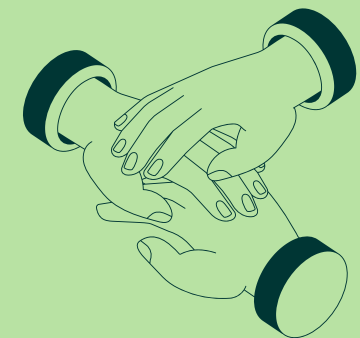
Impact

Make every action count! Our work drives us towards a sustainable world. We are committed to sustainable energy solutions that benefit both businesses and society.



Reliability

Take responsibility! By delivering on our promises, we build trust. Reliability matters. We take ownership of our actions and their impact on society, the environment and future generations.



Unity

Think "we"! Collaborate with colleagues and customers to build a thriving future. We value diversity and human rights and we treat all individuals with dignity and respect. Genuine collective harmony requires each individual to act with integrity. We act honestly and ethically in all business dealings, maintaining trust with stakeholders through transparent and accountable practices.

The GETEC leadership principles

The GETEC leadership principles address behavioural expectations for leaders and help them to master everyday or complex situations with clarity and confidence.

People managers and supervisors are expected to lead by example, promote ethical behaviour, ensure their teams receive appropriate training, create an environment where concerns can be raised safely and take appropriate action when violations are identified.

What is leadership?

There are many definitions of leadership. At GETEC, we believe that anyone can be or become a leader. Our leaders are individuals who live our values – who have a **pioneering spirit**, build trust through **reliability**, value and respect others in order to create **unity** and make a difference by driving **impact**. They use their social influence and integrity to motivate, empower and strengthen others, so that they can contribute to the achievement of common goals and the success of our customers and our colleagues.

Leading myself

I take ownership.

I solve problems proactively, take end-to-end accountability and focus on delivering results.

I provide clarity.

I simplify complexity, set priorities and align on what matters most.

I lead by example.

I act as a role model with integrity, continuously reflecting and evolving.

Leading others

We build trust.

We foster teamwork and build a safe, inclusive environment where everyone thrives.

We empower.

We invest in people, unlock potential and inspire growth.

We thrive when working together.

We break silos, foster engagement and create a positive and motivating atmosphere.

Leading the business

We make customers our priority.

We understand their needs, create the best solution and measure results for our joint success.

We embrace agility.

We challenge the status quo, adapt and innovate and turn challenges into opportunities.

We drive meaningful impact.

We align strategy, ambition and sustainable growth, making bold decisions to shape the future.

Introduction



Purpose and scope

This Code of Conduct represents the GETEC culture and values. It establishes the fundamental principles that guide our company’s operations across all jurisdictions where we conduct business.

The guidelines and principles expressed in this Code of Conduct reflect the ethical and professional standards we expect from ourselves, our contractors and our stakeholders, and they serve as a guide for employees on how to work together and do business. GETEC adheres to the ten principles of the United Nations Global Compact to support the vision of a more inclusive and sustainable economy for the benefit of all people.



Implementation and training

The Code of Conduct is shared with every employee and contractor. We expect every employee to read, understand and comply with its contents, as well as complete all the required training courses. It is reviewed annually and published on the intranet and our [public website](#).

The legal department and the Ethics & Compliance Officer are always available to answer questions. Our aim is to enable employees to find an answer for how to do things right.



Other policies

The provisions of the Code of Conduct are not exhaustive and are supplemented by compliance policies. These policies are communicated to all employees and must be adhered to.



Speak up!

If you have a question or want to report a concern, speak up! GETEC encourages a culture of integrity and accountability where all stakeholders – including employees, customers and partners – are aware of their own impact and the impact of others, and take responsibility by reporting suspected violations promptly.

Any report made is kept confidential to the fullest extent possible. A report may be made anonymously, unless prohibited by law. We will investigate any concerns and follow up promptly. When reporting a suspected violation, please provide as much detail as you can and, if possible, remain available to answer follow-up questions and cooperate in the investigation.

If you are an external stakeholder, use the whistleblower channel on [our website](#)

Within GETEC, you can access the whistleblower channel via the GETEC intranet and report your concerns anonymously. Alternatively, you can talk to your direct manager, HR, the Ethics & Compliance Officer or any member of the executive team. Take responsibility.

GETEC does not tolerate retaliation under any circumstances. Reporting a potential act of misconduct or an infringement of the Code of Conduct is doing the right thing. We encourage everyone to raise any concerns through the available channels. All forms of retaliation are taken seriously, and each one is investigated thoroughly. We take appropriate action as required. Retaliation is an act of misconduct and will result in disciplinary action up to termination of employment.



The GETEC commitment

At GETEC, we are committed to the [Universal Declaration of Human Rights](#) and the standards of the [International Labour Organization](#).

We foster a positive and inclusive work environment where integrity, respect and excellence are at the core of everything we do. Diversity in all of its forms – across race, ethnicity, gender, age and more – strengthens our organisation. Discrimination or harassment is not tolerated. We are committed to providing equal employment opportunities based on merit, qualifications and performance. By adhering to this Code of Conduct,

we ensure that our workplace remains productive, respectful and aligned with our values.

At GETEC, we promote social dialogue between management and employees, and encourage employees to join and communicate with the workers' council. We regularly hold information events (such as town hall meetings) at which our management team informs employees about company-related matters and answers questions.



Our responsibilities

Everyone:

- Treat everyone with respect and be professional, honest and ethical
- Understand the laws and policies relevant to your job
- Complete all required training
- Raise questions if you are not sure what the right action is
- Report violations of laws, our Code of Conduct and our policies
- Be accountable for your actions.
Be reliable

People managers:

- Follow our leadership principles
- Lead with integrity and compassion
- Think “we”! Enable and promote an inclusive work environment
- Create psychological safety for people to raise questions and concerns
- Never retaliate or allow others to retaliate against team members who raise concerns or who express a difference of opinion
- Provide people with clear guidance to ensure they know what is expected



Health and safety

Safety, health and protection are of crucial importance to us. We are committed to maintaining safe working conditions that comply with all applicable regulations. We provide necessary training and protective equipment, implement robust emergency response procedures, conduct regular safety assessments and ensure continuous improvement. We take care of ourselves, our colleagues, our business partners, society and the environment.

We comply with the GETEC occupational safety regulations as outlined by our Health, Safety, Environment, Quality (HSEQ) team and strive to be a role model for safe working.

Integrity



Anti-bribery and anti-corruption

Bribery and corruption have no place in our business practices. Employees must not offer, give, solicit or accept any bribe or illegal payment, whether in cash or in kind, in order to influence a decision or obtain an improper advantage. This applies to dealings with government officials, customers, suppliers and any other business partner. Any employee found violating this policy will face disciplinary action, up to and including termination.

Speak up! You are encouraged to report any suspected bribery or corruption.

We conduct appropriate due diligence on business partners, including agents, consultants, joint venture partners and other intermediaries, to ensure they operate with integrity and comply with our anti-bribery and anti-corruption standards.

For more details, please consult the GETEC Anti-Bribery and Anti-Corruption Policy.

Always remember:



- Refuse any offer of cash, gifts, favours or other benefits intended to influence a decision
- Report any suspected bribery or corruption
- Seek advice when in doubt, especially when dealing with public officials



- Offer, promise or give any bribe or facilitation payment
- Accept any benefit that could create the impression of improper influence
- Use third parties as intermediaries to make improper payments



Gifts, meals and entertainment

Gifts, meals and entertainment are common business activities that can foster professional relationships. However, we must be careful to avoid any potential or actual conflict of interest, improper influence or the appearance of improper influence.

Special caution needs to be taken when dealing with representatives of public institutions such as employees of state-owned enterprises. Always check with the legal department or the Ethics & Compliance Officer.

Always remember:



- Ensure gifts, meals or entertainment are for a legitimate business purpose and avoid gifts that improperly influence
- Stay open and transparent
- Ensure gifts are reasonable, appropriate and accurately recorded



- Send a gift to a private address
- Provide money or cash equivalents such as vouchers
- Offer personal favours or services
- Present gifts in the context of a contract award



Anti-money laundering

We undertake all measures to fight and prevent financial crimes. In order to meet our high standards, we request you stay alert for signs of potential money laundering and financial crimes. By establishing sound screening processes, we ensure that we only conduct business with reputable third parties and engage in legitimate business activities.

Always remember:



- Perform due diligence and background checks before engaging with a new business partner
- Follow our screening processes for customers, suppliers and partners
- Seek advice from the Ethics & Compliance Officer if unsure about a transaction



- Ignore unusual payment methods or requests
- Facilitate or assist in hiding the origin of funds
- Do business with suspected or high-risk entities without prior clearance



Conflict of interest

Employees must avoid and prevent any situation that may be perceived as a conflict between personal interest and the interests of GETEC. Conflicts can occur when personal, financial or other private interests interfere with our responsibilities, such as if an employee has a financial interest in or family connections with a supplier. Potential conflicts of interest must be disclosed to the legal department or the Ethics & Compliance Officer for review.

Always remember:



- Disclose any personal, financial or family connections to suppliers, customers or competitors
- Seek guidance from the legal department or the Ethics & Compliance Officer when in doubt
- Keep relationships with business partners professional and transparent



- Use your position for personal benefit
- Hide any personal ties that could affect your professional judgement
- Engage in business that could compete with GETEC without authorisation



Insider trading

You are prohibited from using any non-public material information about the company or any other company you have access to through your employment for personal gain or to trade in securities. This includes information about financial performance, mergers and acquisitions, and other strategic decisions before they are publicly disclosed.

- Confidential information: you must not use confidential information for personal gain, whether directly or indirectly. All company information must remain classified
- Reporting: any suspicious activity or concerns regarding insider trading should be reported immediately

Always remember:



- Keep non-public information confidential and secure
- Only discuss sensitive information with authorised individuals who need to know
- Report any suspected insider trading to the legal department or the Ethics & Compliance Officer



- Share insider information with friends, family or others
- Use confidential company information for personal financial gain
- Spread rumours or unverified internal information in the market



Business



Fair dealings

It is part of the GETEC DNA to be a reliable partner. Our business operations are based on integrity, respect, fair trading and ethics. We want to build and maintain strong relationships of mutual respect and trust with our customers and business partners. In all the markets where we operate, we compete fairly, honestly and with respect. We expect those with whom we do business to do the same: by honouring contractual commitments, providing accurate information and respecting intellectual property rights.



Export control and sanctions

Export controls and economic sanctions regulate where and with whom we can do business. Failure to comply with the respective local laws can seriously impact our business and reputation, lead to significant fines and even result in the loss of export privileges. We must comply with all applicable laws and regulations governing the export of goods, services and information. This includes compliance with international sanctions, embargoes and trade restrictions. We need to verify and ensure that any transaction does not involve sanctioned or otherwise restricted entities, individuals, countries or regions.

- You must follow our internal verification processes to ensure that GETEC does not engage in transactions that violate the applicable export control laws and regulations
- Consult with the legal department or the Ethics & Compliance Officer early on in a business transaction if in doubt



Supply chain and ethical sourcing

We believe in the importance of conducting business in a way that is socially responsible, transparent and sustainable. Our commitment to ethical business practices extends beyond our internal operations to the companies and individuals with whom we choose to work. We recognise the significant impact that our supply chain decisions have on people, communities and the environment, and we hold our suppliers to the same high standards of integrity and ethics that we uphold in our own business practices.

We expect our suppliers and business partners to comply with all applicable laws and regulations and to adopt responsible, sustainable and ethical practices in their operations.

- This includes, but is not limited to:
- Fair labour practices: ensuring fair wages, safe working conditions and no tolerance for forced or child labour
 - Environmental responsibility: complying with environmental laws and striving for practices that minimise environmental impact
 - Human rights: upholding and respecting the fundamental rights and dignity of all individuals
 - Anti-corruption: maintaining zero tolerance for bribery, corruption and unethical conduct in business dealings

By holding ourselves and our partners accountable, we ensure that our business practices align with our commitment to sustainability, human rights, the environment and social responsibility.



Anti-competitive behaviour

GETEC is subject to various laws protecting legitimate competition. We are committed to not disturbing or hindering legitimate competition in any anti-competitive manner. We especially avoid:

- Imposing restrictions on customers or business partners that prevent them from dealing with GETEC competitors, such as with exclusivity arrangements
- Abusing a position of market dominance
- Entering into anti-competitive agreements with competitors, including price fixing, bid rigging, market allocation and segmentation

Company



Company assets

Employees are responsible for using GETEC assets, including physical assets (such as laptops and phones) and confidential information, with care. We help protect these assets from the threats of the physical and cyber world. This includes:

- Safeguarding all company property from theft, damage or misuse
- Avoiding the use of company assets for personal purposes and beyond their intended usage
- Protecting GETEC confidential information and that of our customers and business partners by never discussing sensitive data in public places or unsecured communication channels
- Securing user IDs and passwords



Accurate records

Our shareholders trust us to provide accurate and complete information about our business, maintain processes that ensure all transactions are properly approved and documented and comply with all applicable laws and regulations. GETEC books and records must always be complete, fair, accurate and timely, and reflect our operations and business activities. This includes internal management reporting as well as statutory filings.



Data security and data privacy

Data security and privacy are a shared responsibility. Phishing attempts may find their way to an employee’s corporate email account. Employees are required to:

- Report any suspicious email
- Speak with the IT department if in doubt
- Follow IT guidelines on how to use GETEC-owned devices
- Update corporate software regularly to protect against vulnerabilities
- Avoid installing unauthorised software

Data privacy affects all of us. We all play a key role in ensuring that the personal data of our coworkers, customers and other business partners is protected:

- Collect, access, use and share personal data in accordance with applicable data privacy laws, regulations and the GETEC policies
- Limit access and the amount of information shared to only those who need the information to do their job
- Collect or share data only if it is necessary for a legitimate business purpose and delete it if it is no longer needed
- Print and store any physical copies that contain personal data securely
- Report any suspected breach immediately to the Data Privacy Officer or the Chief Information and Security Officer



Public relations and social media

All external communication must be accurate, truthful and consistent with GETEC policies. Every communication regarding our company affects our reputation. Employees are responsible for helping to protect our brand by ensuring that all external communications are approved by the Marketing & Communication department. They are the contact for all questions relating to internal, external and marketing communications for the entire GETEC group.

Unless an employee is designated as a spokesperson, enquiries from the media need to be directed to the Marketing & Communication department. Our commitment to communicating responsibly extends to our social media activities.

- When engaging on social media:
- Think before you post – online communications are forever
 - Do not disclose confidential or proprietary information about GETEC, our customers or our business partners
 - Do not post anything that would be considered harassment, bullying or discriminatory
 - Clearly identify personal views as your own and avoid making statements that could be attributed to the company



Environmental responsibility

GETEC is committed to doing business responsibly and in compliance with all applicable environmental laws and regulations:

- Promote sustainability: responsibly manage resources and make decisions that minimise environmental impact
- Reduce emissions: aim to reduce greenhouse gas emissions by making environmentally-friendly decisions when travelling or making purchases
- Prevent pollution: properly store, handle and dispose of hazardous materials and avoid practices that result in the release of harmful substances into the air, water or soil
- Sustainability oversight: reinforce accountability by assigning oversight to the GETEC Executive Team and the Advisory Board
- Risk management: conduct sustainability due diligence across all relevant operations of GETEC

Review of the GETEC Code of Conduct

This Code of Conduct represents our commitment to the highest standards of business integrity and ethical behaviour. It serves as both a guide for decision-making and a framework for building and maintaining stakeholder trust.'

Employees have a personal responsibility to uphold these standards and contribute to a culture of integrity throughout our organisation. When in doubt, we encourage you to seek guidance and remember that doing the right thing is always the best course of action.

This document will be reviewed annually and updated by the Ethics & Compliance Officer and approved by the GETEC CEO to reflect evolving business practices, legal requirements and stakeholder expectations.



Code of Conduct
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