

Geiger Group Code of Conduct

Dear colleagues,

Conduct characterised by integrity and compliance with regulations forms the foundation of our company's success. The trust of our customers, business partners and employees is our most valuable asset. At a time of changing regulatory requirements and societal expectations, we at the Geiger Group aim to set the standard for responsible business practice in our industry.

This Code of Conduct is our shared guide to ethical behaviour and compliance. It aligns our values with current legal requirements and provides guidance for our day-to-day actions. Compliance is our absolute priority – above all sales targets, financial indicators and competitive successes.

We, as the Executive Board and all managers, have a particular responsibility to lead by example. However, every employee bears personal responsibility for upholding this Code and actively putting it into practice. Any misconduct – from trainees right up to the Executive Board – can cause lasting damage to our company and our reputation.

We encourage all employees to approach us proactively if they have any doubts or concerns. Together, we are shaping a corporate culture in which integrity, sustainability and responsibility are a matter of course.

Rötha, June 2026



Adalbert Geiger

Chief Executive Officer (CEO) / Managing Director

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1. Fair treatment of employees and business partners

We treat our business partners, customers, sales partners, suppliers and employees with sincerity, courtesy and fairness. Our relationships are based on mutual reliability and sustainability – they are at the heart of everything we do.

1.1 Human rights standards and working conditions

For us, fair conduct means:

- **Free choice of employment:** the prohibition of forced or slave labour, human trafficking and child labour
- **Dignified treatment:** treating one another with respect in the workplace
- **Diversity and inclusion:** No one must be discriminated against or harassed on the grounds of race, skin colour, nationality, ethnic origin, gender, sexual identity, religious beliefs, worldview, political views, age, physical condition or appearance

1.2 Supply chain responsibility

We take responsibility for our entire supply chain and expect our business partners to adhere to comparable standards:

- **Human rights due diligence:** Regular risk assessments to identify human rights risks
- **Environmental responsibility:** Taking environmental standards into account when selecting business partners
- **Preventive measures:** Implementation of appropriate measures to prevent breaches

Examples of appropriate behaviour

- Fostering a positive working atmosphere through friendliness, politeness and respectful behaviour
- Setting an example of ethical behaviour
- Making and communicating decisions in a transparent and comprehensible manner
- Advocate for fair working conditions amongst our business partners as well
- Do not discriminate against anyone and respect cultural differences
- Report any suspected human rights violations in the supply chain

2. Fair competition

We regard fairness in competition as an indispensable standard. This means not only complying with competition law and prohibiting cartel agreements but also taking the interests of our customers and business partners into account in our business decisions.

2.1 Competition law requirements

Breaches of competition law can result in significant damage to the company. Employees who act unlawfully face personal fines, prison sentences, consequences under employment law and claims for damages.

The following are already considered prohibited agreements:

- Informal discussions
- Informal agreements
- Co-ordinated behaviour

2.2 Prohibited coordination

Even the appearance of concerted behaviour must be avoided. This includes agreements on:

- Prices and price changes
- Terms and conditions
- Production volumes
- Sales territories
- Customer breakdown
- Other factors influencing competition

Examples of appropriate conduct

- Do not enter into agreements with competitors regarding prices, terms, quantities or territories
- Do not influence the setting of prices or terms of sale by our customers and distribution partners
- Involve the Compliance Department in any projects that may have anti-competitive effects
- Attend regular training sessions on competition law

3. No corruption

We regard fair competition as an essential requirement of business conduct and aim to win customers over through the quality of our products. We expect all employees to avoid even the appearance of potential corruption. We do everything in our power to ensure that we neither bribe others nor suffer harm because of third parties being bribed.

3.1 Definition of corruption

Corruption is a criminal offence both for those who offer or grant a personal advantage and for those who demand or accept it.

It is prohibited, in connection with official duties, to offer or accept personal advantages in order to secure preferential treatment in the initiation, award or execution of a contract:

- Demanding
- Accept
- To offer
- Granting

3.2 Gifts and invitations

Giving or accepting invitations and gifts may be permissible but must be agreed with the Compliance Officer on a case-by-case basis. The guiding principle is: what is socially acceptable – what you would buy for yourself or where you would go for a meal in your private life.

3.3 Special protection regarding public officials

Any form of granting benefits to civil servants or other public officials, both at home and abroad, is prohibited. This also includes:

- Facilitation payments for lawful official acts
- Gifts to public officials
- Invitations to public officials that go beyond what is socially acceptable

3.4 Third parties

Consultants, agents, distributors or other third parties acting on behalf of Geiger must also not offer or grant any unauthorised benefits.

Examples of appropriate conduct

- Reject attempts at bribery and report them immediately to the Compliance Officer
- Do not make business decisions contingent on receiving a personal benefit

- Contact the Compliance Officer before accepting business invitations or gifts that go beyond what is socially customary
- Handle gifts or invitations from or to business partners, within reasonable limits, exclusively via the business address
- Ensure the integrity of third parties when working with them

4. Avoiding conflicts of interest and private activities

We expect all employees to carry out their duties in the interests of the company. We require all employees to disclose any relationships or circumstances that could lead to a conflict of interest with our company's objectives.

4.1 Conflicts of interest

The impression that personal interests are influencing business decisions must be avoided. Such situations may arise when private and personal interests or relationships conflict with Geiger's interests. These include:

- Own business (secondary) activities
- Initiating or awarding contracts to family members or close personal friends
- Holdings in business partners or competitors

4.2 Duty of disclosure

To prevent conflicts of interest from arising in the first place:

- The Human Resources department must be informed before taking up any secondary employment and its consent must be obtained
- Actual or potential conflicts of interest must be disclosed to the line manager and the compliance officer
- Failure to disclose conflicts of interest may result in consequences under employment law

Examples of appropriate conduct

- Disclose any actual or potential conflicts of interest to the relevant line manager or the compliance officer
- Delegate decisions in which you are subject to a conflict of interest to colleagues or your line manager
- Inform the Human Resources department before taking up any secondary employment

- If you are unsure about a potential conflict of interest, ask proactively

5. Handling Company Property

Every employee is obliged to treat Geiger's assets and facilities with care and to use them exclusively for business purposes.

5.1 Duty of care

The workplace and all facilities used by staff or for business purposes must be always kept in good order. Any damage must be reported to a line manager.

5.2 Restrictions on use

Without the express consent of the relevant line manager, company property must not:

- Used for private purposes
- Be removed from the company's premises

Examples of appropriate behaviour

- Protect company property from loss, damage or misuse, and report any such incidents immediately
- Use the work equipment provided by the company sparingly and with care
- Never use company property for illegal or other unauthorised purposes
- Be vigilant for any attempts by third parties to damage Geiger's company assets (theft, fraud, cyber-attacks)
- Use resources consciously and sustainably

6. Handling of trade secrets and IT security

Our trade secrets and our know-how are of particular importance to the long-term success of our company. Every employee protects these from unauthorised disclosure and access by third parties.

6.1 Intellectual Property

By intellectual property, we mean:

- Production technologies developed in-house
- Trade secrets (details regarding customers, suppliers and pricing policies)
- Strategic information and plans

6.2 IT Security and Data Protection

The proper use of IT security measures is essential:

- Observe password and access policies.
- Do not use software or hardware not provided by the company.
- Keep business documents exclusively at your workplace within the company, unless business reasons require otherwise.
- Do not store company data on personal electronic devices.
- Do not use personal email accounts for company data.
- Do not store data in the cloud (e.g. Dropbox) without authorisation.
- Do not connect personal electronic devices or devices of unknown origin to the company network.

6.3 NIS2 requirements

We are committed to complying with the requirements of the NIS2 Directive on network and information security:

- Implementation of a comprehensive risk management framework for ICT security
- Regular training on cyber security
- Obligations to report security incidents
- Protection against cyber threats and data breaches

6.4 Duty of confidentiality

The obligation to maintain the confidentiality of trade secrets and know-how continues even after the employment relationship has ended. The deliberate disclosure of trade secrets is a criminal offence. The trade secrets of our business partners must also be respected.

Examples of appropriate behaviour:

- Keep confidential information secret during and after the end of the employment relationship and do not disclose it to unauthorised persons (including family and friends).
- Store or save documents and files only in the designated locations and protect them from unauthorised access.
- Do not disclose any confidential information when using social media.
- Do not take photographs or record videos, particularly in production-related areas, without authorisation.

- Report any suspected security incidents or data breaches immediately.
- Install regular updates and security patches in consultation with the IT department.

7. External Communication

We aim to speak with one voice to the outside world. All external communication is permitted only after prior consultation with a line manager. In particular, we do not issue any price forecasts regarding precious metal prices.

7.1 Media enquiries

Employees are not permitted, without prior consultation with their line manager, to:

- Take part in public discussions (e.g. public speaking events, online forums)
- To disclose company-related information publicly (e.g. on the internet)
- To respond to media enquiries independently

Examples of appropriate behaviour

- Refer all media enquiries to their line manager without exception
- Coordinate external speaking engagements with your line manager in advance
- Do not make any public statements without express authorisation
- If in doubt about whether a statement is permissible, ask for clarification

8. Export control and customs regulations

Regulations restricting the free movement of goods must be observed without exception.

8.1 Compliance with regulations

Every Geiger company and its employees involved in such activities must comply with the relevant customs regulations in both import and export transactions.

8.2 Embargoes and sanctions

Embargos and sanctions lists must be strictly observed. Breaches of these regulations may:

- In addition to the consequences for the business unit concerned
- Seriously damage the reputation of the entire group
- Have incalculable legal and economic consequences

Examples of correct conduct:

- Check and comply with the relevant customs regulations when conducting import and export transactions.
- Observe embargoes and sanctions lists and update them regularly.
- If in doubt, consult the compliance department or the relevant specialist department.
- Ensure that all relevant export and import transactions are documented.

9. Health and Safety at Work

As a company, we recognise that we share responsibility for the health of our employees. We not only comply with the relevant health and safety regulations, but also strive to promote the health and well-being of our employees by designing the working environment accordingly.

9.1 Health and Safety Regulations

All employees must strictly adhere to health and safety regulations, both in their own interests and in the interests of their colleagues.

9.2 Management Responsibility

Every manager is responsible for the protection of their staff and must, accordingly:

- Provide training
- Provide training or ensure they receive training
- Supervise

Examples of appropriate behaviour:

- In particular, when handling hazardous substances, comply with safety regulations and exercise particular caution.
- Develop an awareness of hazards through prudent behaviour and prevent situations that pose a safety risk from arising in the first place.
- Report any potential hazards and near-misses immediately to the relevant line manager.
- Take part in health and safety training on a regular basis.
- Always use safety equipment!

10. Protection of personal data

The protection of personal data relating to our customers, business partners and employees is becoming increasingly important as a result of digitalisation.

10.1 Data protection requirements

Personal data such as names, addresses, tax numbers or information about health status may only be disclosed and processed in accordance with the applicable laws (in particular the GDPR and the BDSG). Breaches of the applicable legal provisions may result in heavy fines.

10.2 Data minimisation

The principle of data minimisation must be observed: is the data truly essential for carrying out the task in question, or not?

Examples of correct behaviour:

- If you have any questions regarding data protection matters, contact the Data Protection Officer or the Compliance Officer.
- Observe the principle of data minimisation: only collect data that is truly necessary.
- Protect personal data from unauthorised access.
- Store documents containing personal data exclusively in the designated secure locations within the company.
- Attend regular training sessions on data protection.

11. Financial integrity and anti-money laundering

All business transactions must be properly recorded in the accounts, balance sheets and tax returns. We structure our contractual arrangements and the organisation of our company in such a way that business relationships with us cannot be misused for the purposes of money laundering.

11.1 Definition of money laundering

Money laundering refers to the process of concealing the origin of illegally obtained funds (for example, from terrorism, drug trafficking, bribery and other criminal offences) by channelling them into the legal economic cycle, thereby creating the appearance of legitimacy.

11.2 Due diligence obligations

To prevent this, we have put measures in place to ensure that we always comply with our identification, documentation and reporting obligations.

11.3 Suspicious Circumstances

Examples of suspicious behaviour include:

- The customer attempts to circumvent the identification process (e.g. by reducing the quantity purchased to remain below the identification threshold).
- The customer abandons the transaction as soon as identification is requested or enquiries are made regarding an identification that has already taken place.
- A regular customer suddenly increases the quantities purchased significantly without providing a plausible explanation.
- The documents presented at the time of purchase (e.g. customs documents, certificates) contain discrepancies.
- Payment or a deposit is made in unusual denominations (e.g. only 10, 20 and 50 banknotes; crumpled or worn notes).
- The goods are collected by a third party who has no discernible connection to the buyer

Examples of correct behaviour

- Comply with accounting regulations.
- Do not conduct business outside the usual processes.
- Archive all documents relating to business transactions in an organised manner.
- Do not conclude transactions if there are indications of money laundering.
- In any case of doubt, discuss the matter with the relevant manager and the designated anti-money laundering officer.
- Do not arbitrarily alter or destroy documents that are, or could be, relevant to regulatory investigations or civil litigation.

12. Sustainability and supply chain responsibility

We take responsibility for sustainable business practices throughout our entire value chain. This encompasses environmental, social and governance-related aspects.

12.1 International Standards for Responsible Sourcing

We align ourselves with internationally recognized standards for responsible sourcing in the precious metals industry, in particular:

- **LBMA Responsible Sourcing Guidance:** The London Bullion Market Association (LBMA), as the world's leading precious metals trading organization, offers standards for responsible sourcing that are specifically tailored to gold and other precious metals.
- **OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas:** These internationally recognized guidelines form the basis for many responsible sourcing standards and serve as a reference framework for fulfilling our due diligence obligations along the supply chain.
- **UN Guiding Principles on Business and Human Rights:** These principles constitute the global reference framework for corporate responsibility to respect human rights.

The application of these standards includes:

- **Risk analysis:** Regular analysis of human rights and environmental risks in the supply chain
- **Preventive measures:** Implementing appropriate measures to prevent breaches
- **Remedial measures:** Taking action in the event of identified breaches
- **Complaints procedure:** Establishing a complaints procedure for affected individuals
- **Documentation and reporting:** Documentation of all measures and annual reporting

12.2 Human rights standards

We are committed to complying with internationally recognised human rights standards, including:

- Prohibition of forced and child labour
- Freedom of association and the right to collective bargaining
- Equal opportunities and non-discrimination
- Safe and healthy working conditions
- Fair remuneration

12.3 Environmental responsibility

We are committed to protecting the environment and to the sustainable use of resources:

- Reducing greenhouse gas emissions
- Efficient use of energy and resources
- Prevention of environmental pollution
- Promoting the circular economy

12.4 Expectations of business partners

We also expect our business partners to adhere to comparable standards. Anyone who does not share the principles of our sustainability responsibility cannot be a business partner for us.

Examples of appropriate behaviour

- Take sustainability criteria into account when selecting business partners.
- Report any suspected human rights violations or environmental breaches.
- Take part in training on sustainability topics.
- Using resources consciously and sparingly in day-to-day work.
- Put forward suggestions for improving sustainability within the company.

13. Sustainability reporting and ESG responsibility

We are committed to transparent reporting on our sustainability performance in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD).

13.1 Principle of double materiality

We report on both:

- **Inside-out perspective:** the impact of our business activities on people and the environment
- **Outside-in perspective:** the impact of sustainability issues on our business development, performance and position

13.2 Reporting obligations

We produce an annual sustainability report as part of our management report in accordance with the requirements of the CSRD. This report:

- Is subject to an external audit
- Is disclosed
- Meets the requirements of the European Sustainability Reporting Standards (ESRS)

In implementing our sustainability reporting, we also take into account the findings from our application of the LBMA Responsible Sourcing Guidance and the OECD Guidelines, in particular for the materiality analysis regarding our supply chain.

13.3 Governance Responsibility

Executive Board:

- Bears overall responsibility for sustainability reporting
- Ensures that all necessary data is available and reliable
- Integrates sustainability into the corporate strategy

Supervisory Board:

- Oversees the sustainability reporting process
- Is involved in the selection of the auditor
- Monitors the quality of the audit
- Is regularly briefed on sustainability issues

13.4 Data quality and integrity

All employees are obliged to exercise the same level of care when providing sustainability data as they do with financial data. Manipulation or deliberate misrepresentation of sustainability data constitutes a breach of compliance.

Examples of appropriate conduct

- Work carefully and accurately when providing sustainability data.
- Report any suspicious discrepancies or inconsistencies in sustainability data.
- Take part in training on ESG topics.
- Contribute to the continuous improvement of our sustainability performance.

14. Special responsibilities of managers

Managers and senior management should serve as role models for the integrity of our company. They bear a particular responsibility for ensuring compliance with the Code of Conduct.

14.1 Setting an example

Managers should:

- demonstrate integrity and thus act as role models.
- Act as points of contact for staff and support them in applying the Code of Conduct.
- Ensure the health and safety of their employees in the workplace.

- Consistently ensure compliance with the Code of Conduct and, where necessary, take corrective or disciplinary action.

14.2 ESG Responsibility

Managers bear a special responsibility for implementing our ESG objectives:

- Setting an example in adhering to sustainability standards
- Promoting a sustainable corporate culture
- Ensuring data quality for sustainability reporting
- Proactive management of ESG risks

Examples of appropriate behaviour

- Demonstrating integrity in day-to-day actions
- Regular discussions with the team on compliance and sustainability issues
- Responding consistently and fairly to breaches
- Actively promoting training and further education on the Code of Conduct
- Promoting an open feedback culture

15. Scope

This Code of Conduct applies to all employees of the Geiger Group (Geiger Holding GmbH, Sachsenerz Bergbau GmbH and Geiger Edelmetalle AG).

15.1 Obligation to familiarise oneself with the Code

All employees must familiarise themselves with the content of this Code of Conduct, be aware of it and act in accordance with it. Where specific guidelines or other regulations exist, these are binding.

15.2 Obligations of business partners

We also expect our business partners to be familiar with this Code and to adhere to it. Anyone who does not share the principles of this Code of Conduct cannot be a business partner of ours.

15.3 Further Development

This Code of Conduct is reviewed regularly and adapted to new legal requirements and business developments.

16. Conduct in cases of doubt and points of contact

All employees are expected to seek advice and assistance from their line manager or the compliance organisation in the event of legal doubts regarding their own conduct or if they become aware of legally questionable activities in the workplace.

16.1 Importance of reporting

Breaches of laws, guidelines and other regulations can lead to:

- Significant financial losses;
- Risks of criminal prosecution and fines for Geiger and its staff;
- Damage to image and reputation;
- Failure to obtain licences
- Exclusion from markets

It is therefore essential that breaches are identified in good time to avert harm to Geiger and its employees and to ensure fair cooperation.

16.2 Whistleblowing scheme

If you observe a breach of the rules or have reason to suspect that a breach may have occurred, do not hesitate to raise the matter. The whistleblowing scheme is available to all employees to report breaches of the rules.

16.3 Whistleblower Protection Act (HinSchG)

Our whistleblowing system complies with the requirements of the Whistleblower Protection Act (HinSchG). Whistleblowers are protected from reprisals. Reports are handled with strict confidentiality.

16.4 Integration of Responsible Sourcing Standards

Our internal reporting office also serves as a complaint procedure under our Responsible Sourcing Standards (LBMA Responsible Sourcing Guidance, OECD Guidelines). Reports of human rights and environmental violations in the supply chain can be submitted through the same system.

16.5 Confidentiality

The highest level of confidentiality is ensured when handling reports until the procedure is concluded.

16.6 Contact details

Whistleblowing System



<https://app.whistle-report.com/report/6554ab77-251d-4242-a065-75cd26e0843c>

General compliance enquiries to the Compliance Officer, Ms Susan Becker

- **Email:** compliance@geiger-edelmetalle.de
- **Telephone:** 034206/6949-130

16.7 Support

We encourage all staff members to get in touch proactively if they are unsure or have any doubts. It is better to ask once too many times than once too few. Your report helps to make our company safer, fairer and more sustainable.

This Code of Conduct was last updated in June 2026 and reflects the current legal requirements as well as our corporate values.