

# CODE OF CONDUCT FOR EMPLOYEES

VALID FROM JANUARY 2025

# TABLE OF CONTENTS

<b>1. BEHAVIOURS</b> .....	<b>5</b>
1.1. Values and principles.....	5
1.2. Role models and training.....	5
1.3. Compliance with laws .....	5
1.4. Reports and notifications .....	5
1.5. Breaches and consequences .....	6
<b>2. RIGHTS AND WORKING CONDITIONS</b> .....	<b>6</b>
2.1. Employment law.....	6
2.2. Human rights.....	6
2.3. Diversity and inclusion .....	6
2.4. Further education and training.....	7
2.5. Pay and sharing in company success .....	7
2.6. Having a voice .....	7
<b>3. HEALTH, OCCUPATIONAL SAFETY, ENVIRONMENT, SOCIETY</b> .....	<b>7</b>
3.1. Health, occupational safety and prevention .....	7
3.2. Environmental protection, resources, energy and CO <sub>2</sub> .....	8
3.3. Social responsibility and dialogue .....	8
<b>4. PRODUCTS AND PROCESSES</b> .....	<b>9</b>
4.1. Product responsibility – product liability .....	9
4.2. Advertising, marketing and sales.....	9
4.3. Processes .....	9

<b>5. OWNERSHIP AND PATENTS .....</b>	<b>10</b>
5.1. Protection of company property and assets.....	10
5.2. Intellectual property and patents .....	10
5.3. Fraud and theft.....	10
<b>6. FAIR COMPETITION.....</b>	<b>10</b>
6.1. Antitrust legislation.....	10
6.2. Bribery, corruption, favours.....	10
<b>7. COMMUNICATION AND DATA PROTECTION .....</b>	<b>11</b>
7.1. Dealing with information technologies.....	11
7.2. Data protection and confidentiality .....	11
7.3. Communication, media contacts, investor relations.....	12
7.4. Contractual obligations and documentation standards.....	12
<b>8. EXTERNAL RELATIONSHIPS .....</b>	<b>12</b>
8.1. Conflicts of interest, donations .....	12
8.2. Insider trading / insider dealing.....	13
8.3. Donations, sponsorship, political donations and positions .....	13
8.4. Code of Conduct for Suppliers and Business Partners.....	13
<b>9. INSPECTION .....</b>	<b>14</b>
9.1. Validity.....	14

# FOREWORD

Dear Employees

As an international company, we provide top-quality products and services in sanitary technology across the globe. In doing so, we always take our social, economic and environmental responsibility seriously. Our success – both present and future – is determined by our commitment.

This Code of Conduct specifies what the Geberit Group expects of its employees. It forms the basis for how we work on a day-to-day basis in a constantly changing international environment and applies to all Geberit employees. The Code contains practical guidelines and references to additional useful information.

We are aware that we cannot describe every possible daily situation and provide appropriate instructions. In the event of uncertainty, your manager or the HR department are available to answer any questions you may have. If you have any concerns regarding compliance with the Code of Conduct, this should be addressed. We check all notifications and react consistently in the event of misconduct.

We do not just measure our performance by our results, but also by the way in which they have been achieved. If we all follow this Code, we make a contribution to a good work culture.



Christian Buhl, CEO Geberit

# 1. BEHAVIOURS

## 1.1. VALUES AND PRINCIPLES

Our actions are based on high ethical standards and four core company values: integrity, modesty, collaboration and responsibility. These values guide our actions and interactions with one another and with our stakeholders, such as customers, suppliers and the general public. A strong, living corporate culture ensures our long-term success. Our employees form the foundation of this culture. That is why we take our task of creating an environment that reflects and supports our values seriously as a company. We have summarised our company values in the Geberit Compass, which can be found on the Intranet and on our websites.

## 1.2. ROLE MODELS AND TRAINING

Our Code of Conduct is available to the public. In this way, our customers, suppliers, investors and other external partners also know how we understand ethical business and what they can expect from the company. We encourage our employees to lead by example.

It is essential that managers and employees not only know the Code of Conduct but also act in accordance with it. Continuous training and measures for raising awareness are therefore essential in order to adequately address ethical issues. An interactive training programme on the Geberit Intranet covers the most important aspects on which our Code of Conduct is based and supports their incorporation in day-to-day work.

## 1.3. COMPLIANCE WITH LAWS

We follow all local, national and international laws, directives, norms and standards. In doing so, we often go beyond the legal minimum requirements.

## 1.4. REPORTS AND NOTIFICATIONS

Anyone who reports incidents that violate applicable laws, ethical standards or our Code of Conduct is acting in compliance with our company values. Employees are encouraged to first organise a personal meeting with their manager or the HR department in the event of any incidents.

An Integrity Line is also available. This allows for the anonymous reporting of cases such as sexual harassment or bribery. The Integrity Line is run by an external specialist company and is available 24 hours a day. It can be accessed by phone or via a secure website in all countries in which Geberit is represented. It is to be understood as a point of contact for interests worthy of protection or as a last resort.

All reports are treated in the strictest confidence. If a report is received, a thorough investigation will be carried out. In the event of a breach, appropriate measures will be taken. Additional information on the Geberit Integrity Line can be found on the Geberit Intranet.

## 1.5. BREACHES AND CONSEQUENCES

This Code of Conduct is binding for all employees. Breaches result in consequences that are determined by the severity of the breach. In addition to warnings, dismissals may also be issued in the event of serious violations.

# 2. RIGHTS AND WORKING CONDITIONS

## 2.1. EMPLOYMENT LAW

We comply with all laws regarding employment as well as local, national and international behavioural codes and conventions. We are also committed to upholding the core labour standards of the International Labour Organization (ILO).

## 2.2. HUMAN RIGHTS

We respect the principles of the Universal Declaration of Human Rights and undertake to respect human dignity and human rights, and to protect the personality of every single person in the workplace. We categorically reject all forms of child and forced labour. We also expect the same from our suppliers and other business partners. We therefore require our suppliers to adhere strictly to extensive standards and the provisions governing employment law. (→ 8.4.)

## 2.3. DIVERSITY AND INCLUSION

Our company is committed to diversity and inclusion. We want to create an environment in which all employees can reach their full potential, regardless of gender, background or other aspects.

We do not tolerate discrimination, bullying or harassment based on personal characteristics such as race, gender, sexual orientation, religion, nationality, age, political views, marital status, or physical or mental disability.

We want to promote the reconciliation of work, family and private life, insofar as the interests of the company permit. Depending on the job requirements, employees can benefit from flexible working hours, part-time work and job sharing.

We also see the integration of disadvantaged people in the labour market as part of our social responsibility. We specifically search for collaborations with social institutions and ensure that people with physical, mental or psychological disabilities receive meaningful work and thus participate in the labour market and society.

## 2.4. FURTHER EDUCATION AND TRAINING

We are committed to the personal and professional development of our employees. We offer development programmes for prospective and experienced managers. Career opportunities, promotions and management positions are open to everyone in the interests of equal opportunities.

We are committed to the vocational training of young people and offer them apprenticeships in a wide range of professions. As a matter of principle, we aim to keep them on in our company once they have successfully completed their apprenticeship. We not only give young people specialist knowledge, but also encourage them to develop their own initiative, a sense of self-responsibility and teamwork skills, and support them in their early development. We also see our vocational training as an important contribution to education and social development.

## 2.5. PAY AND SHARING IN COMPANY SUCCESS

Geberit pays market-driven wages and adheres to the minimum wage stipulated by law. The remuneration of our employees is based on performance and does not depend on gender or other personal characteristics. Regular and systematic reviews ensure fair remuneration for everyone in comparable positions.

In many countries, employees can share in the economic success of the company at attractive conditions through share participation plans. Additional market-driven benefits complement the offer for employees at the various locations.

## 2.6. HAVING A VOICE

Employees have the right to organise themselves in trade unions or to join an association of their choice without fear of negative consequences. In many countries, employee representatives, works councils or other comparable employee representative bodies, who work on behalf of the employees vis-à-vis the company, also allow employees to have a voice.

# 3. HEALTH, OCCUPATIONAL SAFETY, ENVIRONMENT, SOCIETY

## 3.1. HEALTH, OCCUPATIONAL SAFETY AND PREVENTION

The health and safety of our employees is our top priority. We ensure a workplace and working environment that promotes physical and mental well-being. Through our Geberit Safety System (GSS), we strive for continual improvement. All health and occupational safety regulations must be followed. Any shortcomings or breaches must be reported immediately and dealt with as quickly as possible.

We regularly train our employees in the areas of health, occupational safety and accident prevention. We systematically carry out risk assessments of workplaces and reduce the potential risk of hazards or eliminate them completely. In doing so, we ensure safe and healthy workplaces and actively involve our employees in their design.

As part of regular safety audits, we monitor compliance with both legal and internal regulations. In the event of accidents, we systematically analyse them, put measures in place and check their effectiveness. Furthermore, we have implemented a monitoring system and regularly report on the status of employee health and occupational safety, both internally and externally. In difficult situations or cases of social distress, we offer our employees the best possible support and also refer them to external specialists if necessary.

### 3.2. ENVIRONMENTAL PROTECTION, RESOURCES, ENERGY AND CO<sub>2</sub>

Geberit's commitment to sustainability is widely recognised. We endeavour to keep achieving high standards in this area in the future too. We set ourselves clear targets as part of our sustainability strategy and ensure the availability of the information and resources required to achieve the objectives. We are constantly improving our environmental and energy management system and strive to continuously improve our environmental and energy-related performance. This includes the economical use of energy and resources, especially water, as well as the reduction of our CO<sub>2</sub> and other emissions. One of Geberit's key contributions to the circular economy is to achieve the longest possible product life thanks to high-quality materials and strict quality requirements. When procuring systems and services and optimising our production processes, we make sure that they have a positive impact on our energy footprint and eco-balance. Environmental criteria are incorporated into all activities and decision-making processes along the entire value chain.

We also involve customers, suppliers and other stakeholders in our environmental commitment. With our CO<sub>2</sub> strategy, we consistently focus on transparency, short- and medium-term targets and results, as well as an internal CO<sub>2</sub> pricing approach that includes CO<sub>2</sub> emissions as external costs in the company's key business processes. Our CO<sub>2</sub> reduction targets are an integral part of the performance assessment and influence the level of annual variable remuneration for the entire Group management and all employees in Switzerland.

### 3.3. SOCIAL RESPONSIBILITY AND DIALOGUE

We promote economic and social solidarity at the locations in which we operate. We actively contribute to the well-being of society here, for example by supporting education, cultural and sporting activities.

With our social projects, we want to help people in developing regions get access to better basic sanitary care and knowledge. The focus here is on helping people to help themselves and creating perspectives and better livelihoods through vocational training programmes. In doing so, we make a contribution towards achieving the UN Sustainable Development Goals (SDGs) of the 2030 Agenda for Sustainable Development. We not only supply funds and materials for the social projects – we also plan, manage and coordinate the projects with our own employees and apprentices.

## 4. PRODUCTS AND PROCESSES

### 4.1. PRODUCT RESPONSIBILITY – PRODUCT LIABILITY

We develop innovative, reliable and top-quality products which we hope will improve people's quality of life in a sustainable manner. When developing our products, we strive for top-quality performance.

The Product Development department ensures that our products fulfil all standards and legal specifications. Our intention is to avoid accidental faults whenever possible: Geberit attaches great importance to ensuring that our products pose the lowest possible risks for customers. We identify potential hazards within the framework of comprehensive quality planning and assurance. This includes development, certification, manufacture and storage through to the use and disposal of the products. We guarantee the safety and responsible use of our products across their entire life cycle. Our employees and customers receive thorough training in how to handle the products. In the event of potential risks, our customer service team ensures transparent communication.

### 4.2. ADVERTISING, MARKETING AND SALES

We run our marketing, advertising and sales activities ethically and in compliance with all applicable laws, data protection regulations and behavioural codes. We communicate the quality and efficiency of our products and comparisons with competitors – if permitted by law – in a fact-based and accurate manner. In marketing and sales, special attention is paid to strict compliance with the antitrust provisions in accordance with Section 6.1.

### 4.3. PROCESSES

We ensure the high quality of our products and services by mastering our business processes. The Geberit Management System (GMS) describes our processes – collaboration within the company as well as interactions with our customers and external partners – as well as the links between the processes.

Within the framework of process management, we strive to fulfil the expectations of our customers and other interested parties in the best possible way. To do this, we check and evaluate our processes on an ongoing basis and continuously work to improve them and minimise risks. As an integrated management system, the GMS is also a central element for the Group's ISO certifications. In addition, training for employees involved in the processes is an important success factor for achieving the process objectives.

## 5. OWNERSHIP AND PATENTS

### 5.1. PROTECTION OF COMPANY PROPERTY AND ASSETS

We expect our employees to treat the property and assets of the company with care and to protect them against damage, destruction and theft. All company resources are to be used exclusively for business purposes. They must not be used for personal gain under any circumstances.

Internal company data and information created by us regarding research and development, production, finances, business strategies and methods are our property and are not disclosed to external parties without explicit permission, unless this is required by law. The data protection directives also apply. (→ 7.2.)

### 5.2. INTELLECTUAL PROPERTY AND PATENTS

The know-how and intellectual property developed by our company include copyrights, patents, utility models, designs and brands. All employees are obliged to protect them. The strictest duty of confidentiality applies. By the same token, our company policy states that we respect the rights of third parties to their intellectual property and will not breach the valid patent rights of others.

### 5.3. FRAUD AND THEFT

We ensure that all cases of fraud, embezzlement and theft associated with our company are immediately reported and investigated, and that the people concerned are prosecuted and removed from the workplace, if necessary. Even suspected cases must be reported immediately. Reports of any kind must be made to the manager, the HR department or the Integrity Line.

## 6. FAIR COMPETITION

### 6.1. ANTITRUST LEGISLATION

Our company is unreservedly committed to fair competition. Geberit employees are expected to adhere to all applicable provisions prescribed by competition and antitrust laws. We follow antitrust and competition laws in all business activities and in all business agreements. Price rigging, cartels and other activities that distort competition are forbidden.

### 6.2. BRIBERY, CORRUPTION, FAVOURS

We do not tolerate bribery or any other type of corrupt business behaviour and strictly adhere to all relevant provisions. As a member of Transparency International, we are committed to the highest standards of integrity and ensure that we and our business partners strictly adhere to these standards.

Nobody acting on behalf of Geberit may offer or grant individuals or companies any unfair advantages to make business deals. This includes unauthorised discounts, bribes, payoffs, underhand payments and all other comparable unfair advantages.

Breaches of provisions and laws that forbid unfair competition can result in prosecution in the civil and criminal courts against Geberit and the responsible employees. Corruption considerations are taken into account during inspections of the production plants and sales companies by the internal auditing department. If Transparency International states that a country has an increased corruption risk or if we consider there to be an increased risk, the company in question will undergo a particularly intensive inspection.

Our employees are only permitted to make or receive donations to or from business partners within the framework of our internal donation guidelines, which are in line with the statutory regulations. Third parties must not be used to circumvent the existing regulations. An internal donation guideline is in place to combat corruption (→ 8.1.). This guideline can be found on the Intranet.

## 7. COMMUNICATION AND DATA PROTECTION

### 7.1. DEALING WITH INFORMATION TECHNOLOGIES

Due to the constant development of information technologies, risks associated with IT systems are one of the greatest threats for companies – and thus also for Geberit. Employees are obliged to take all necessary measures to prevent unauthorised access to Geberit IT systems.

Employees of the Geberit Group must therefore be aware of the corresponding risks when using all information technologies and strictly adhere to the Geberit Group directives in digital communication. The IT guidelines can be found on the Intranet. They are also obliged to take part in training on IT security.

All employees are personally responsible for the protection of the IT systems and must immediately report security incidents or vulnerabilities to the IT hotline or local IT support. This also applies to the loss or theft of information or hardware.

Contractual obligations such as insider regulations and non-disclosure agreements also apply to digital communication. Guidelines on conduct when using social media can also be found on the Intranet.

### 7.2. DATA PROTECTION AND CONFIDENTIALITY

The processing of personal data of employees, customers and suppliers is treated with the utmost confidentiality and in accordance with local data protection laws and the EU's General Data Protection Regulation. Within this framework, Geberit has adopted internal directives and processes that must be adhered to without exception for every form of data processing within the Geberit Group and when working with third parties. These data protection directives can be found on the page on data protection on the Intranet (under "Compliance"). Data breaches must be reported to the local Data

Protection Officer. In addition, employees are obliged to take part in regular training sessions on data protection.

Confidential information such as technical details about products and processes, customer data, trade secrets or business strategies are important company assets. They warrant the same protection as physical commodities. Our employees must ensure that information of this nature remains confidential to third parties and is not disclosed to unauthorised persons inside or outside the company. This obligation will continue to apply even after the end of the employment for an indefinite period of time.

### 7.3. COMMUNICATION, MEDIA CONTACTS, INVESTOR RELATIONS

We communicate transparently and honestly, both internally and externally. In doing so, we treat the various stakeholders equally. Whenever possible, external stakeholders receive the same information at the same time as our employees. The Corporate Communications / Investor Relations department is responsible for communication with the media, analysts and investors. All employees are required to forward enquiries from the media, investors and other external stakeholders to this department. This does not apply to local trade media; these are supported by the local sales companies, provided that the enquiries do not concern higher-level aspects of the Group.

### 7.4. CONTRACTUAL OBLIGATIONS AND DOCUMENTATION STANDARDS

We work diligently to fulfil our contractual obligations. We ensure that all business deals are correctly documented according to the legal regulations and the applicable accounting standards. We keep accurate and complete business records and ensure that they are created and stored in accordance with the applicable law and the relevant standards used by the company.

Our document management comprises the correct creation, saving and destruction of documents. We store all business-related documents for the duration specified by law. Misleading or incorrect entries in books and records belonging to the Geberit Group are strictly forbidden. Our employees must ensure that they do not exceed their own internal authorisations and are not involved in impermissible activities.

## 8. EXTERNAL RELATIONSHIPS

### 8.1. CONFLICTS OF INTEREST, DONATIONS

The interests of Geberit must always be safeguarded in all activities and transactions carried out by employees. Geberit employees must refrain from external employment, business or investments that are contrary to their duties towards the company. They are required to avoid personal or family-related conflicts of interest and to not bring about situations in which obligations towards the company could be compromised. Employment at Geberit may not be misused in order to obtain unjustified personal benefits or benefits for family, friends or companies.

Managers are forbidden from influencing the selection, recruitment or promotion of persons close to them, whether through family, friendship or other close personal relationship.

It is also prohibited to accept or grant unfair advantages as part of business relationships with third parties that could raise doubts as to the personal integrity or independence of Geberit. This is based on our donation guidelines that are binding for all employees. These can be found on the Intranet.

Conflicts of interest cannot always be avoided. However, they can be resolved in a manner that is acceptable for both the employees concerned and the company by creating comprehensive transparency at an early stage. Should a conflict of interest arise, the employees concerned should contact their direct line manager in order to create the appropriate transparency and find an appropriate solution.

## 8.2. INSIDER TRADING / INSIDER DEALING

We encourage employees to buy shares in our company. However, all employees are required to comply with insider trading laws during investment transactions. Employees with corresponding points of contact must therefore sign a confidentiality agreement when joining the company. Our employees are forbidden to use confidential information as the basis for trading shares in Geberit or another company for personal gain or to the benefit of another person. We do not disclose important, private information to third parties. Breaches of these principles will be prosecuted in the civil and criminal courts.

## 8.3. DONATIONS, SPONSORSHIP, POLITICAL DONATIONS AND POSITIONS

We do not make any donations to political parties, political organisations or to individuals who occupy political offices. We support non-political institutions, such as in the social sector or in education, with appropriate monetary and non-monetary donations. Our commitment to aid projects is based on the principle of "helping others help themselves", whereby the aid project must be related to our products or to the core topic of water. Primarily, we make materials available to those in need and teach them what we know. We do this because we want to help improve their situation in the long term.

## 8.4. CODE OF CONDUCT FOR SUPPLIERS AND BUSINESS PARTNERS

As an international company, we see it as our duty to incorporate our ethical principles into our relationships with business partners too – especially suppliers, subcontractors and sales partners. The standards we expect from our employees also apply to our business partners. Our suppliers are required to consistently comply with the Geberit principles set forth in the Code of Conduct for Suppliers. They must maintain records that prove their compliance with these requirements and must be able to provide these records at any time upon request. We consider non-compliance to be a serious breach of the contractual agreement, which may result in the termination of the business relationship. With the Integrity Line, Geberit provides suppliers and other external business partners with a special communication channel for reporting violations of the principles of this Code by Geberit or Geberit employees. The Integrity Line is operated by an independent service provider. The Code of Conduct for Suppliers can be found on the global website.

## 9. INSPECTION

Compliance with the Code of Conduct is checked as part of external reporting in the form of an annual survey of all Geberit companies, which must be answered and signed by the management of the respective companies. The results are included in the sustainability report.

### 9.1. VALIDITY

This Code will be checked periodically and amended if necessary. Related documents, regulations and directives associated with this Code are not affected by this check and can be adapted on an individual basis.