

Gelsenkraft GmbH

Code of Conduct

Document owner	Management, Gelsenkraft GmbH
Approved by	Roger Boeing, Managing Director
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1. Purpose and Scope

This Code of Conduct sets out the ethical principles and standards of behaviour that Gelsenkraft GmbH (“Gelsenkraft” or “the Company”) expects of itself in all of its business activities. It reflects our commitment to acting with integrity, respecting people, and complying with the law wherever we operate.

This Code applies to all directors, managers, employees and temporary staff of Gelsenkraft. We also expect our suppliers, contractors and business partners to act in line with the principles set out here and in our related policies.

2. Our Values

Our conduct is guided by four values that we apply consistently in our daily work:

- Integrity – we are honest, fair and accountable for our actions.
- Transparency – we communicate openly and keep accurate records.
- Responsibility – we consider the impact of our decisions on people, society and the environment.
- Respect – we treat colleagues, partners and customers with dignity and fairness.

3. Compliance with Laws and Regulations

Gelsenkraft complies with all applicable laws and regulations in every jurisdiction where it operates, including labour, environmental, competition, data-protection and anti-corruption law. Where this Code sets a higher standard than local law, the Code applies. Where there is a conflict, we comply with the law and seek to uphold the spirit of this Code.

4. Ethical Business Conduct

We conduct business fairly and honestly. We do not engage in deceptive, fraudulent or misleading practices, and we compete on the merits of our products and services. We honour the commitments we make to our customers and partners.

5. Anti-Bribery and Corruption

Gelsenkraft maintains a zero-tolerance approach to bribery and corruption in any form, whether involving private parties or public officials. Detailed requirements are set out in our Anti-Corruption Policy, which forms part of this Code.

6. Human Rights and Labour Standards

We respect internationally recognised human rights and provide fair, safe and non-discriminatory working conditions. We do not tolerate child labour, forced labour or modern slavery in our operations or supply chain. Our full commitments are set out in our Human Rights Policy, which forms part of this Code.

7. Health, Safety and Environment

We provide a safe and healthy working environment and comply with applicable occupational health and safety requirements. As an energy-sector company, we recognise our environmental responsibility and work to reduce the environmental impact of our operations, use resources efficiently, and support the transition to lower-carbon energy.

8. Fair Competition

We support free and fair competition and comply with applicable competition and antitrust law. We do not enter into unlawful agreements with competitors regarding prices, markets, customers or tenders, and we do not misuse confidential competitive information.

9. Conflicts of Interest

Employees must avoid situations in which personal interests conflict, or appear to conflict, with the interests of the company. Any actual or potential conflict of interest must be disclosed to management so that it can be managed appropriately.

10. Gifts and Hospitality

Gifts and hospitality may only be offered or accepted where they are modest, transparent, customary in the context, and never intended to improperly influence a business decision. Anything beyond this requires prior approval from management. Further detail is provided in the Anti-Corruption Policy.

11. Confidentiality and Data Protection

We protect confidential business information belonging to the company, our customers and our partners. We process personal data lawfully and in accordance with the EU General Data Protection Regulation (GDPR) and applicable national law, and only for legitimate business purposes.

12. Reporting Concerns

Anyone who becomes aware of a breach of this Code, or has a good-faith concern about unethical or unlawful conduct, is encouraged to report it to management without fear of retaliation. Reports can be made directly to a manager or to info@gelsenkraft.com. Gelsenkraft does not tolerate retaliation against anyone who raises a concern in good faith. Concerns will be treated confidentially as far as reasonably possible.

13. Governance, Responsibility and Review

The management of Gelsenkraft is responsible for the implementation of this Code and leads by example. Because of our size, oversight of sustainability and ethics topics rests directly with management, which ensures that the principles in this Code are applied in day-to-day

operations. New employees are made aware of this Code, and existing employees are periodically reminded of its content.

This Code is reviewed at least annually and updated as needed to reflect changes in our business, applicable law and stakeholder expectations.

This Code is supported by our Human Rights Policy and Anti-Corruption Policy.