

Corporate Policies & Sustainability

Our Corporate Approach

At GNR GROUP®, corporate success is not measured by financial performance alone.

Its durability depends equally upon the principles, governance discipline, sense of responsibility and ethical standards through which such performance is achieved.

We conduct our activities in accordance with the principles of long-term value creation, prudent risk management, compliance with law, business integrity, respect for human dignity, quality, responsible stewardship of resources and accountability to our stakeholders.

Our corporate culture places enduring reputation above short-term advantage, sustainable development above uncontrolled growth, and responsible conduct above mere formal compliance.

1. Corporate Governance and Accountability

GNR GROUP® adopts a governance framework in which authority is inseparable from accountability and responsibilities, controls and decision-making processes are clearly defined.

Our governance approach is designed to support:

- clearly established responsibilities and limits of authority,
- decision-making at the appropriate management level,
- timely assessment of material risks,
- protection of corporate assets,
- effective internal controls,
- traceability of significant transactions,
- prevention and management of conflicts of interest,
- financial and operational accountability.

No title or position confers unrestricted authority to act on behalf of the Company.

2. Ethics and Business Conduct

All persons acting for or on behalf of GNR GROUP® are expected to conduct themselves with integrity, reliability, impartiality, professionalism and good faith.

GNR GROUP® does not tolerate:

- bribery,
- corruption,
- fraud,
- embezzlement,
- improper payments,
- facilitation payments,
- misuse of authority for personal benefit,
- improper influence over commercial or administrative decisions.

Compliance with law represents the minimum expected standard.

Where GNR GROUP® policies establish a higher standard of conduct, that higher standard should be observed to the extent permitted by law.

3. Anti-Bribery and Anti-Corruption

GNR GROUP® has no tolerance for bribery or corruption in any form.

Employees, managers, representatives, consultants, intermediaries and other persons acting on behalf of the Company must neither directly nor indirectly offer, request, provide or accept an improper advantage.

The commercial value or strategic importance of a transaction can never constitute an exception to our ethical principles.

4. Gifts, Hospitality and Representation

Gifts, hospitality, travel, entertainment and representation must never influence, or reasonably appear to influence, independent business judgement.

Cash gifts or items readily convertible into cash may neither be offered nor accepted.

Any benefit capable of creating reasonable doubt regarding the impartiality of a business relationship should be disclosed to the appropriate management level before acceptance.

5. Conflicts of Interest

Any actual, potential or perceived conflict between personal interests and the interests of GNR GROUP® must be disclosed without undue delay.

Family relationships, ownership interests, external positions, personal investments, supplier relationships, customer relationships and comparable circumstances must not impair independent judgement.

Failure to disclose a conflict may constitute a more serious compliance concern than the existence of the conflict itself.

6. Fair Competition

GNR GROUP® supports free, fair and lawful competition.

We do not engage in practices capable of restricting competition, including: • price fixing, • market or customer allocation, • bid coordination, • artificial restrictions on production or capacity, • unlawful exchange of competitively sensitive information.

Competitive intelligence must be obtained only through lawful and legitimate means.

7. Financial Integrity and Accurate Records

Financial and commercial records must accurately and completely reflect the underlying transaction or event and be recorded in a timely manner.

Off-book accounts, falsified documents, misleading accounting entries, arrangements designed to conceal the true nature of a transaction and unexplained payments are not acceptable.

Material financial transactions must be supported by appropriate authorisation, documentation and records.

8. Tax Responsibility

GNR GROUP® is committed to meeting its tax obligations in accordance with applicable law.

Transactions should reflect genuine commercial substance, and accounting and tax records should accurately represent actual business activities.

Tax planning cannot be separated from the principles of legal compliance and commercial substance.

9. Enterprise Risk Management

Risk management forms an integral part of the GNR GROUP® decision-making framework.

We seek to identify, assess, mitigate and monitor financial, operational, legal, commercial, environmental, technological, cyber, supply-chain, occupational health and safety, reputational and business-continuity risks.

Material risks should be escalated to the appropriate management level and, wherever reasonably practicable, addressed preventively before their consequences arise.

10. Business Continuity and Crisis Management

GNR GROUP® adopts a risk-based approach to maintaining critical operations during exceptional circumstances.

Appropriate planning is encouraged for events including earthquakes, fires, power interruptions, critical machinery failure, cyber incidents, supply-chain disruptions, logistics failures and other emergencies.

During a crisis, priorities are considered in the following order: 1. human life and safety, 2. protection of the environment, 3. continuity of critical operations, 4. protection of corporate assets, 5. accurate communication with customers and stakeholders.

11. Delegation of Authority, Signature and Corporate Commitments

No employee or manager may create financial, commercial, legal or operational obligations on behalf of GNR GROUP® beyond the authority granted to them.

Contracts, procurement decisions, banking transactions, investments, commercial commitments and material pricing or customer decisions are subject to established approval and authority mechanisms.

A commitment made in the name of the Company may create an obligation for the Company and must therefore be made only by duly authorised persons.

12. International Trade, Sanctions and Export Compliance

Applicable rules governing international transactions, including: • import and export controls, • economic sanctions, • customs requirements, • rules of origin, • end-user requirements, • trade restrictions must be considered where relevant.

Commercial documents must be accurate, and the actual parties to a transaction must not be concealed.

13. Human Rights

GNR GROUP® regards respect for human dignity as a fundamental element of its corporate culture.

Forced labour, child labour, human trafficking, unlawful discrimination, harassment, intimidation and working conditions incompatible with human dignity are not tolerated.

Where appropriate, we expect suppliers and business partners to uphold comparable standards.

14. People and Equal Opportunity

Recruitment, remuneration, training, promotion, reassignment and professional development are to be guided by merit and equal opportunity.

We support professional development, constructive employee participation and a working culture founded upon mutual respect.

Unlawful discrimination and workplace harassment are not tolerated.

15. Occupational Health, Safety and Well-being

No production target, delivery pressure or commercial interest takes precedence over human health and safety.

Occupational health and safety is managed through: • identification of risks at source, • elimination or reduction of hazards, • appropriate protective measures, • training, • employee participation, • review of incidents and near misses, • emergency preparedness, • continual improvement.

Certification or management-system claims are communicated publicly only where they are current and verifiable.

16. Sustainability

GNR GROUP® regards sustainability not as a separate communications exercise, but as part of long-term corporate management.

Environmental, social and governance considerations should, where relevant, be incorporated into investment, manufacturing, procurement, quality, human resources, risk management and customer relations.

Priorities are assessed according to: • impact on the business, • significance to stakeholders, • associated risks and opportunities, • contribution to long-term value creation.

17. Environment and Climate

We recognise that natural resources are finite and must be managed responsibly.

Our environmental approach encompasses: • energy efficiency, • responsible water use, • waste reduction, • recovery and circularity, • emissions monitoring, • responsible management of chemicals, • mitigation of environmental risks, • resource efficiency.

Environmental performance claims should be based upon measurable and verifiable information.

18. Energy and Carbon Management

We recognise energy consumption as both an economic and an environmental performance matter.

Where practicable, significant energy uses associated with production machinery, utilities, cooling systems, compressed air, lighting and other operations should be monitored and opportunities for efficiency assessed.

Claims concerning carbon footprints, emissions reductions or carbon neutrality should not be communicated publicly without appropriate measurement, methodology and supporting evidence.

19. Responsible Supply Chain

Supplier evaluation extends beyond price and delivery performance.

Quality, reliability, ethical conduct, occupational health and safety, human rights, environmental responsibility, legal compliance and continuity of supply are also relevant considerations.

Where material risks are identified, GNR GROUP® may seek additional information, corrective actions, enhanced monitoring, audits or reconsideration of the business relationship.

20. Supplier Standards of Conduct

GNR GROUP® expects suppliers to: • reject bribery and corruption, • prohibit child and forced labour, • provide safe working conditions, • comply with applicable environmental requirements, • protect confidential information, • disclose conflicts of interest, • support product and material traceability, • maintain accurate records.

21. Quality, Product Safety and Traceability

Quality is not confined to final inspection; it is managed as an end-to-end corporate process.

Appropriate quality and traceability controls should be maintained from design and procurement through raw materials, production, measurement and delivery.

Product safety, customer technical requirements, regulatory conformity and traceability must never be subordinated to production or cost objectives.

22. Information and Cyber Security

Information is a material corporate asset of GNR GROUP®.

Trade secrets, technical data, intellectual property, customer and supplier information and corporate systems must be protected against unauthorised access, loss, misuse, cyberattack and improper disclosure.

Access should be limited according to business need and authorised responsibility.

Access rights should be appropriately reviewed and, where necessary, revoked when an individual changes role or leaves the Company.

23. Responsible Use of Artificial Intelligence and Digital Systems

Artificial intelligence and digital technologies can provide substantial opportunities for efficiency and innovation, but their use remains subject to corporate responsibility and oversight.

Confidential Company, employee, customer or supplier information must not be transferred to unauthorised artificial-intelligence systems.

Artificial-intelligence outputs must not replace appropriate human judgement in critical commercial, technical, legal or employment-related decisions.

24. Records and Document Management

Legal, commercial, technical, financial and operational records must be created accurately, retained appropriately and protected against unauthorised alteration.

Records are retained in accordance with applicable law, contractual obligations and Company procedures.

Documents relevant to a legitimate audit, investigation or legal proceeding must not be improperly altered or destroyed.

25. Confidentiality and Intellectual Property

Trade secrets, manufacturing information, technical drawings, processes, software, customer information, pricing, contracts and comparable confidential information are protected as corporate assets.

Intellectual property belonging to GNR GROUP® or third parties must be used lawfully.

Confidential information obtained through employment or business relationships may not be used for personal benefit.

26. Speak-Up and Non-Retaliation

Employees and relevant stakeholders should be able to raise ethical, legal or compliance concerns in good faith.

Retaliation against any person who makes a good-faith report, participates in an investigation or refuses to comply with an unlawful instruction is not tolerated.

Confidentiality, impartiality, due process and fair assessment are fundamental principles of the reporting process.

Knowingly false or malicious reports may themselves constitute misuse of the ethics framework.

27. Political Neutrality

GNR GROUP® conducts its business on professional and commercial grounds.

Corporate vehicles, systems, personnel, financial resources and other assets may not be used to support personal political activities.

Employees' lawful personal political views and activities remain private matters provided they are not represented as positions of GNR GROUP®.

28. Society and Stakeholder Relations

We regard the creation of lasting economic and social value in the communities in which we operate as part of responsible corporate citizenship.

Relationships with employees, customers, suppliers, public institutions, local communities and other stakeholders are founded upon: • integrity, • mutual respect, • transparency, • professionalism, • long-term trust.

29. Responsible Corporate Communications

Public statements made in the name of GNR GROUP® should be accurate, balanced, traceable and verifiable.

Claims concerning: • certification, • membership, • environmental performance, • sustainability objectives, • carbon reduction, • social impact, • corporate achievements must not be made without an appropriate and current basis.

We do not present what we have not measured as performance, nor do we present what we cannot verify as corporate achievement.

30. Continual Improvement

Corporate policies are not static documents.

GNR GROUP® seeks to review and develop its policies and management systems in light of changes in law, recognised good practice, technological developments, stakeholder expectations and experience gained through its operations.

A sustainable corporate structure is created not merely by publishing policies, but by implementing, measuring, reviewing and continually improving them.

The GNR GROUP® Principle

Long-term value can only be built upon trusted governance, verifiable performance, responsible manufacturing and uncompromising business integrity.