**Gliszen Code of Conduct (GCC)**

**I. Principles**

Gliszen.com is a multilateral alliance of various stakeholders from different regions of the world. Nevertheless, Gliszen.com, its distributors and its cooperating business partners are bound by local laws.

Our network acts on the basis of honesty and probity, which is a prerequisite for interacting for us or with us.

Personal gain through abuse of business position, immoral or corrupt practices, toleration of bribery and any form of corruption will not be accepted and will also be sanctioned.

Each member of the team, regardless of their contractual relationship with the Group, is also a representative and contributes to the standing of the entire network through their actions, regardless of where they operate, which is why it is imperative that we are guided by the cultural characteristics of the country in which we operate, in all aspects of our operational mission.

All participants in our business model, and in particular the employees of Gliszen.com, as well as the distributors of the company, contribute in their daily interaction to a corporate culture that lives on the basis of our values and is characterised by openness, honesty, appreciation and tolerance.

Gliszen.com employees, our distributors and our cooperation partners are reliable business partners who keep their promises.

Management employees of the organisation have a role model function of which they are aware. They earn the recognition of their employees through exemplary behaviour in dealing with their staff, setting an example of openness, honesty and fairness, and they lead by performance. They fulfil the organisational and supervisory duties that we require of them, and in doing so, create space for their staff to develop in a professional manner on their own responsibility.

In assigning this leadership role, they are given the special responsibility of ensuring that Gliszen.com values are upheld.

The leaders of the organisation, regardless of the level to which they belong, have a role model function of which they are aware. They earn the recognition of their staff through exemplary behaviour in dealing with their employees, exemplify openness, honesty and fairness and lead through performance. They fulfil the organisational and supervisory duties we require of them and thus create room for the independent and professional development of their staff. By assigning this leadership task, they bear the special responsibility for maintaining the Gliszen.com values.

**II. Fairness**

Gliszen.com and all those who trade with the company do so under consideration of the highest ethical principles and respect for nationally applicable competition laws, antitrust prohibitions, such as the prohibition of price fixing, and refraining from other agreements and conduct that could adversely affect competition.

**Bribery and acceptance of advantages**

According to Gliszen.com's multilateral business relations, a strict demarcation between bribery and the acceptance of advantages cannot be clearly distinguished, contrary to local customs and good practice. Facts that in some regions of the world would be labelled "corrupt" are commonplace in other regions, are part of good custom and non-acceptance would be interpreted negatively as disrespectful and impolite.

Therefore, it is above all the trust in our employees, in their ability to act according to ethical and moral principles, that gives us the certainty to characterise ourselves, as an organisation as a whole, as incorruptible.

Our business decisions are made free of personal interests on the basis of the company's goals, and serve solely to increase customer benefit and achieve sustainable business success.

In order to maintain our independence, employees at all levels may not solicit gifts or other gratuities, personal services or favours from business partners, as well as the acceptance of offered gratuities that interfere with an objective and fair decision.

As a general rule, the acceptance of gifts or benefits exceeding a value of € 50 may not be accepted. In the event of refusal, the respective business partner must be politely informed of the Gliszen Code of Conduct.

In exceptional cases where the rejection of a gift would be considered impolite and acceptance would not entail a conflict of interest, the relevant supervisor will be informed and the gifts received will be handed over.

Attempts by external parties as well as by cooperating partners to influence Gliszen.com employees in their decision by offering unjustified advantages will - depending on the individual case - generally lead to the termination of the business relationship.

**Offering and granting benefits to business partners and office bearers**

Gliszen.com prohibits itself, its employees, and all of its collaborators, to offer, promise or grant and authorise to office bearers and/or other business partners - directly or indirectly - any unfair advantage, except in accordance with applicable local laws. Any activities, offers, promises, gratuities and gifts that may lead to the interpretation of an attempt to bribe in order to obtain business advantages from them shall be strictly avoided.

**Travel, invitations and hospitality**

Invitations from business partners to business meals or to events can only be accepted if they are granted voluntarily, the acceptance serves a justified business purpose and takes place within the scope of ordinary cooperation.

The assumption of travel or accommodation costs by third parties is not permitted.

**Transparency in the awarding of contracts**

Gliszen.com distinguishes between 2 types of suppliers.

1. supplier in the form of a cooperating manufacturer who uses our service to display his goods on the portal with the intention of selling them through the Gliszen.com portal.
2. supplier in the sense of a subcontractor who provides his service and / or tools to the company in the course of daily work in order to fulfil the work (subcontractor).

The following provisions apply to employees who are directly employed by Gliszen.com and whose work for the company influences the selection of suppliers in accordance with points 1 and 2, and / or otherwise have an effect on the selection.

For the suppliers and service providers defined under point 1, the customer is solely responsible for placing orders with the help of our portal.Gliszen.com does not exert any influence here, but merely offers options.

For point 2 applies:

* Subcontractors, according to point 2, are treated equally when competing for orders.
* Conflicts of interest that exist in connection with the defined work task have to be reported to the supervisor.
* Existing family relationships with owners of subcontracting companies have to be reported. In such cases, the employees concerned shall be excluded from the specific awarding process.
* It is not permitted to award contracts to Gliszen.com employees, nor is it permitted to award contracts to companies in which a Gliszen.com employee is a shareholder, unless this has been expressly approved in writing and the competitive advantage is for the benefit of all Gliszen.com employees.
* Subcontracting with companies in which former employees of the management of Gliszen.com are active requires the express written permission of the management.
* It is not permitted to execute or have executed private orders from companies with which Gliszen.com has a business relationship. This applies in particular to employees who are directly or indirectly involved in the awarding of contracts or who can otherwise influence the decision to award contracts.

**III. Avoiding conflicts of interest**

Gliszen.com encourages its employees to develop professionally, but asks to be informed if an employee is engaged in another activity that is not in direct or indirect competition with the company itself. Should such a conflict arise, the employee must immediately inform his or her supervisor.

**Non-compete clause**

Depending on the area of responsibility, our employees have access to sensitive data, all of which requires the utmost discretion, including, but not limited to, customer data entrusted to us by our clientele.

Gliszen.com strongly condemns the misuse of any data provided by us, and reserves the right to pursue, sanction and, if necessary, prosecute any misuse by current or former employees that is communicated to us and/or discovered by us.

To prevent such abuse, we reserve the right to include non-competition clauses in our employment contracts in individual cases. The company punishes reputational losses equally and with the same degree of severity as financial losses.

**Permitted and unauthorised secondary employment**

In principle, all Gliszen.com employees are free to engage in secondary employment, provided that their own work performance is not impaired. Should the secondary employment conflict with the legitimate interests of the company or should there be a risk of a conflict of interest, we reserve the right to prohibit this secondary employment.

**Social commitment and political activities**

Gliszen.com is committed to, and in part supports, social responsibility and engagement. However, each of our employees, co-operators and partners is required to take and maintain precautions to ensure that the company does not become involved in political campaigns or public disputes.

**Public Relations and Media Presence**

All media enquiries relating to the Gliszen.com company as such are to be referred to the management. Only shareholders, directors and authorised company spokespersons are permitted to make statements to the media.

Official statements by the organisation, including but not limited to press releases and interviews, must be cleared prior to publication.

Exempted is the right to advertise Gliszen.com's products for sale as such, provided it is for the overall purpose of promoting the product and is in accordance with the provisions of the Gliszen Code of Conduct. Furthermore, the company naturally grants every employee his or her fundamental right to express his or her opinion if it is expressly designated as a personal expression of opinion and can be identified as such.

**Protecting trade secrets and preserving corporate assets.**

The provision and exchange of information is an essential part of Gliszen.com's success story.

It is imperative that this confidential asset be protected, which is why the respective duty of confidentiality under the employment contract must be upheld. In this regard, the organisation does not distinguish between information of which the company itself is the originator and information provided to Gliszen.com by external parties.

**IV. Confidentiality**

The organisation trusts that matters within the organisation will be kept confidential. Information about the company and its cooperation partners that is not publicly known must be treated confidentially and may only be passed on to employees and / or contractual partners who are authorised to obtain knowledge of it by virtue of their duties.

**Information protection**

In the interest of the company, every employee must protect confidential company information that is only intended for a restricted group of people from access by unauthorised persons.

This applies both to information provided internally and even more so to information provided to Gliszen.com, whether by our partners or by our clients.

**Data protection**

The organisation treats all personal information about employees, customers, business partners and suppliers carefully, confidentially and in compliance with all data protection laws. This is our unshakeable commitment to maintain the internal and external relationship of trust. Information to investigating authorities will only be provided by the management of Gliszen.com if there is a legal obligation to do so.

**Responsible handling of assets**

It is the duty of every employee to handle company property responsibly and to treat it with care and protect it against loss, damage, misuse, theft, misappropriation or destruction.

This includes the protection of intellectual property such as trademarks, patents, copyrights and know-how, and the duty of care towards business and corporate plans, technical knowledge, databases and websites, product samples and designs as well as business papers and reports.

**Strictly confidential business records**

All employees with access to highly confidential information about the organisation or about a company with which the organisation has a business relationship are required to maintain confidentiality. Special care shall be taken in handling business records and information. This includes handling plans and reports, as well as information about new products, mergers, acquisitions or divestments, negotiations, contracts, business relationships, litigation, business performance or financial ratios.

**Reporting**

All internal management reporting, including financial statements and annual reports, in electronic or printed form, must be protected as a matter of priority and disclosure to outside organisations or persons is strictly prohibited.

**V. Fairness and diversity**

**Diversity**

With a globally structured distribution system, and the trend of growth in this regard, Gliszen.com prides itself on the diversity within its structures, and more than this, the company benefits and learns from the increasing number of employees, distributors and cooperation partners from different corners of the globe.

The organisation strives to recruit, train, retain and promote the most competent employees, regardless of origin, sexuality or faith.

In compliance with anti-discrimination laws, only qualifications, quality and potential are considered as evaluation criteria for recruitment and promotion within the organisation.

**Remuneration**

Gliszen.com respects the right to adequate remuneration, which is based on legally guaranteed minimum wages, the performance of the employees and the respective labour market. All employees receive remuneration commensurate with their work.

**Dissociation from discrimination and harassment**

Gliszen.com supports, that human rights must be considered fundamental and universal based on accepted international laws and practices, including the United Nations Declaration of Human Rights.

With this in mind, the organisation promotes a working environment of diversity and refuses to categorise its employees on the basis of race, gender, colour, religion, nationality, age, marital status, sexual orientation, ancestry, social status or disability. We intend to set an example and will therefore investigate any allegations of discrimination, harassment or intimidation of any kind, as well as mental and physical violence, and, if confirmed, sanction them internally and, if necessary, prosecute them in accordance with the laws of the country in which they occur. Our employees are therefore subject to a reporting obligation should they observe violations under these provisions, or even become victims themselves. Violations are to be communicated to the management or the office of the Compliance Officer is to be contacted.

In light of these values, Gliszen.com will also immediately disassociate itself from cooperation and business partners should it become known that they are violating the principles set out here and/or are advocating discriminatory actions and thoughts.

We reject any form of forced labour and child labour in the company and with our business partners.

**Quality & Environmental Protection**

Highest quality and continuous quality improvement are essential for the growth and success of the company and its cooperation partners. All employees are called upon to fulfil the expectations of our clientele within the framework of the opportunities presented and to constantly contribute to the optimisation of internal processes.

Analogous to our self-perception and our self-claim, Gliszen.com has of course also set the bar very high with regard to the cooperating manufacturers, service providers and all other cooperating parties, as their contribution represents an essential aspect of the Gliszen.com quality standard. For this reason, the company always strives to include manufacturers in the circle of partners who maintain a high-quality standard, and to appoint service providers who understand their business.

Gliszen.com is aware of its responsibility towards aspects of environmental protection but, due to its multilateral structure, can only exert an extremely limited influence. Wherever we are able to take action, we will do so.

**Commitement**

Compliance with this Code is mandatory for all. Failure to comply will not be tolerated by the organisation and may result in legal action. Supervisors must ensure that employees are aware of the Gliszen Code of Conduct and comply with it.

**VI. Procedure in case of ambiguities and questions**

**Who to contact?**

If there is a problem with the interpretation of this Gliszen Code of Conduct, employees should contact their supervisor or the Management Committee. If clarification has not been obtained, employees may contact the Compliance Officer. At *compliance@gliszen.com*, the Compliance Officer team is available around the clock. All matters will be treated confidentially upon request.