

Code of Conduct
for Contractual Partners of
GAUFF GmbH & Co. Engineering KG
and its affiliated companies and subsidiaries



As an internationally operating company, **GAUFF** GmbH & Co. Engineering KG, its affiliates and subsidiaries ("**GAUFF** Engineering") are aware of the necessity of universal values and a common understanding of "right or wrong". We as **GAUFF** Engineering are convinced that values must be lived. Therefore, in our opinion sustainable entrepreneurship is inextricably linked to the respect of ethical principles.

This Code of Conduct is more than a guide for daily business. It includes the principles of corporate culture and the policy for fair, responsible and righteous behaviour of **GAUFF** Engineering and its staff. This Code of Conduct accrued on the basis of the Universal Declaration of Human Rights, the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO), the principles of the Rio Declaration on Environment and Development, the Guidelines for Multinational Enterprises of the OECD, the UN Convention against Corruption and the UN Global Compact.

The Code of Conduct of **GAUFF** Engineering is not only aimed to its own employees as a binding standard of conduct. We expect our business partners to comply with the aforementioned minimum standards, in particular the following:

Conformity to the Law

As is known, ignorance is no defence. Therefore, the Contractual Partner commits himself to do everything possible to ensure compliance with all applicable laws and regulations in the countries in which he is acting as an entrepreneur, and to fulfil his respective obligations honestly and responsibly.

Conflicts of Interest

GAUFF Engineering and its contractual partners will not make decisions but on a purely professional basis and shall never be guided by personal interests of individuals involved.

Prohibition of Corruption

The Contractual Partner will refrain from corrupt practices in commercial / business relations. In fact, any action of the Contractual Partner is characterized by absolute integrity, in particular the criminal law on corruption respectively applicable must be adhered to strictly.

Fair Competition

The Contractual Partner will adhere to legally correct and accepted business practices, provide fair competition and amongst others will not participate in unfair trading agreements hindering a free market.

Human Rights

The Contractual Partner supports and respects adherence to human rights in the sense of the UN-Charter of Human Rights.

Compliance with the ILO Fundamental Labour Standards

The Contractual Partner will always adhere to the fundamental Labour Standards of the ILO (i.a. ban on child labour and forced labour, respect of the employees' rights, ban on discrimination) and promote its enforcement.

Health and Safety Protection

The Contractual Partner will ensure that occupational safety and health at work of his employees are always guaranteed in accordance with the applicable regulations and the specified maximum working time in the country is maintained.

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Protection of Environment

The Contractual Partner will fulfil the applicable regulations concerning environmental protection related to his factories at the respective sites. At any time he ensures that environmental damages are minimized and environmental protection is continuously improved. He will support and encourage the environmental awareness of his employees. In addition, the Contractual Partner will act responsibly when using natural resources in accordance with the principles of the Rio Declaration on Environment and Development, June 1992.

Business Secrets

The Contractual Partner will commit his employees to preserve trade secrets and confidential information and not to forward sensitive documents or make them accessible to third parties otherwise without authorization.

Business Partners of the Contractual Partner

The Contractual Partner will do his utmost to ensure that the principles of this Code of Conduct are also recognized by his immediate business partners, in particular, he will actively impart the contents of this Code of Conduct and recommend compliance with it. Anyway, he will be guided by these principles in choosing its business partners and preferably select business partners after an integrity check in that sense.

The Contractual Partner will perform all appropriate and reasonable efforts to continuously implement, apply and optimize the principles and values set out in this Code of Conduct. Violations of this Code of Conduct and suspected cases are reported immediately to **GAUFF** Engineering and it will be elucidated as comprehensively as possible in constant and active cooperation between the Contractual Partner and **GAUFF** Engineering.

The Contractual Partner will announce and communicate the principles and values of this Code of Conduct together with the resulting obligations to his employees.

GAUFF Engineering reserves the right to terminate the relationship with the Contractual Partner on the basis of existing contractual or legal rights with immediate effect in the event of the Contractual Partner violating a valid law, this Code of Conduct and / or obligations arising therefrom.

Furthermore, **GAUFF** Engineering reserves the right to reasonably adjust and amend this Code of Conduct and requests an acceptance by the Contractual Partner of such modifications.

Contact for the contractual partner is Mr. Michael Rausch, Lawyer (Company Lawyer), Passauer Str. 7, 90480 Nuremberg, Tel.: +49 911 42465 - 277, E-Mail: recht@gauff.net.

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