

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 behavior 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 ISO 37001 "Anti-corruption management systems" of the FIDIC Integrity Management System FIMS, 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 / contractual partners to comply with the aforementioned minimum standards, in particular the following:**

Conformity to the Law

As is known, ignorance is no defense. 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, Prohibition of Corruption, Fair Competition, Conduct with integrity

GAUFF Engineering and its contractual partners will consistently apply the company-wide principles for the avoidance of corruption and other serious conflicts of interest for this purpose, which are regulated in detail in the Company Directive OA_1.3-01 "Anti-Corruption Directive".

In the case of consortiums (German abbreviation: ARGE) or joint ventures (JV) with partner companies, anti-corruption guidelines are jointly regulated in the consortium or joint venture contract. If partner companies have their own anti-corruption guidelines, the partners shall retain their respective guidelines. Otherwise, the partner company undertakes to comply with the present Anti-corruption Directive (Company Directive OA_1.3-01).

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.

Protection of the 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.

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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.

Whistleblower Protection Act / Internal Reporting System:

Contact details upon request.

Issuer:

GAUFF GmbH & Co. Engineering KG
Passauer Str. 7
90480 Nuremberg
Tel.: +49 911 42465 - 0
Fax: +49 911 42465 - 215
E-Mail: gauff-nue@gauff.net
Internet: www.gauff.net

Private limited partnership, Nuremberg; Register Court Nuremberg HRA 11308
Partner liable to unlimited extent: GAUFF GmbH, Nuremberg; Register Court Nuremberg HRB 15152
VAT.Reg. No.: DE 195709031
Managing Directors: Petra Eckert, Stefan Tavares Bollow, Michael Fischer