

# Compliance Guideline

**GOLDBECK-Business Group**

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## INTRODUCTION BY THE MANAGEMENT

Since foundation of our business in 1969, we share common values. They form the basis for decision-making

Our pillars are humanity, responsibility and devotion. These three core values characterize our Company and our interaction with customers, business partners, suppliers and employees.

The GOLDBECK Compliance Guideline includes stipulates requirements for the compliance with national and international legislation, rules and ethical conduct. We The Guideline constitutes the basis for an ongoing successful collaboration and a sustainable development of our company. It supplements the GOLDBECK- Corporate Guidelines, that describe our selfreflected understanding, our targets and our activity standards.

The regulations stipulated here are accessible to our customers and business partners and are also binding for them.

Compliance is a task, involving all employees of our Business Group. In addition to fulfilling their exemplary function, Managers/ Supervisors therefore have the task of ensuring that employees in their area of responsibility are aware of the GOLDBECK Compliance Guideline, remain aware of it and observe it. For this purpose personal conversation as well as organisational measures are mandatory.

In parallel , in the course of digitalization, we will install Workflows which will ensure that our employees are in receipt of updated training relating to the GOLDBECK Compliance Guidelines.

Breaches of the GOLDBECK Compliance Guidelines are not tolerated.

The Management of GOLDBECK ensures the application of the defined standards in the whole Business Group and that they are actively excercised by our employees, customers and subcontractors.

Bielefeld, 01.04.2018

Jörg-Uwe Goldbeck

## **1. WE COMPLY WITH NATIONAL AND INTERNATIONAL LEGISLATION AND ETHICALLY CORRECT CONDUCT BEHAVE ETHICALLY CORRECT**

GOLDBECK's ambitious goal exceeds the mere compliance with national and international legislation.

Infringements may lead to criminal proceedings, high penalties, barring from public and private contracts, as well as claims for damages and loss of reputation.

A behavior is ethically correct if it complies with the general principles of integrity and decency. For GOLDBECK these values are documented in the Corporate Guidelines of our Business Group.

We expect ethical behavior from our employees in their business activities and in all related situations.

It is part of ethical behavior that any encounter between individuals is conducted with mutual Respect, Fairness and Appreciation regardless of their origin or function.

GOLDBECK condemns any form of forced or child labour and observes the avoidance of slavery and human trafficking internally as well as in the supply chain in purchasing, procurement, manufacturing and all related business processes (UK MSA 2015). Even all ILO-labour standards in the process chain are observed.

## **2. WE DO NOT TOLERATE CORRUPTION, BRIBERY OR MONEY-LAUNDERING**

Corruption has devastating effects worldwide. Therefore we do not accept any kind of corruption. Through transparent processes we avoid that even the impression of corrupt action arises.

Corruption occurs in various forms (financial donations, material gifts, invitations, donations, consultation contracts and various other contributions).

Demanding, accepting, offering or passing bribes directly or indirectly is inadmissible.

Admissible is the participation in customary business meals and hospitality as well as the accepting and returning of attention in the form of material gifts. For Orientation, internal regulations are available.

Corruption causes harm to the corporation and its customers. It damages the good reputation of GOLDBECK Business Group.

Corruption is a criminal offence. Criminal activity is punishable and leads to the immediate loss of employment.

GOLDBECK pays strict attention, to avoid involvement in money-laundering.

### **3. WE DO NOT TOLERATE ANY FORBIDDEN AGREEMENTS**

GOLDBECK professes to fair competition. We convince customers by the quality of our products and services which we offer at customary market conditions. We refuse competition restraining agreements.

Illegal Agreements and infringements of competitive law entail high penalties for the company and exclusion from public and private contracts. This endangers the reputation and assets of the company and the jobs of employees.

Each employee is responsible for complying with the competition regulations. Agreements, affecting competition are prohibited and lead to immediate loss of employment.

### **4. WE DO NOT TOLERATE ILLEGAL EMPLOYMENT AND UNDECLARED WORK**

We do not tolerate any form of illegal employment and undeclared work.

We commit ourselves and our business partners, to respect statutory regulations of employment of our own or foreign employees. We ensure employment and payment of employees of our subcontractors on the basis of fair and lawful contracts.

We contractually oblige our subcontractors to comply with the statutory requirements and prohibit the employment of persons (own and foreign employees) or subcontractors without working- and residence permits.

### **5. WE GENERATE TRANSPARENCY AT PRIVATE CONFLICTS OF INTEREST**

Our success benefits the entire workforce. It assumes that the individual employee acts in the interests of the company. Pursuit of private interest must not create a burden to the company.

If an employee has personal, family, financial or other connections to a GOLDBECK Partner or their employees, that might affect the objectivity of decision or action in the course of the work for GOLDBECK, this must be made clear and any further action taken, must be coordinated with the competent direct superior or, where appropriate, with the management in accordance with the transparency rules.

### **6. WE PROTECT CONFIDENTIAL INFORMATION**

Confidential Information must not be abused.

The intellectual property of our company is a competitive advantage and must be protected. No employee may disclose any knowledge about internal data, proceedings and projects without authorization.

Whoever uses Confidential Information for their own benefit or makes it accessible to other people without authorization, is considered a criminal offender and will be subject to immediate loss of employment.

## **7. SOCIAL CONDUCT IN THE COMPANY**

As incorporated stipulated within the Corporate Guidelines, we are committed to the principals of respectful, fair and loyal interaction with one another.

Any discrimination is prohibited. No one shall suffer prejudice or harassment on account of a matter of origin, gender, sexual orientation, religion or ideology, disabilities or age.

We expect all employees to contribute to a productive work environment through tolerant and considerate interaction.

Loyalty of each employee is the basis for the company's success.

We ensure the observance of human rights.

## **8. NOTICE OF MISCONDUCT:**

Observance of this Compliance Guideline is the responsibility of the entire company and therefore of every employee and our business partners. In the event of the suspicion of breach of Compliance Guidelines, each employee and business partner is obliged to notify notice GOLDBECK.

If an employee has been involved in a breach of Compliance Guidelines and his or her voluntary disclosure, can avert harm from the company, this will be taken in account in his or her favor. Deliberately circulating false suspicions will result in penal measures against the author.

To protect GOLDBECK, business partners should be notified of breaches of Compliance Unfair practices of competitors are expected to be reported.

In the event of indications of a breach, we expect all employees to report to

- Direct Superior or
- Responsible Management or
- Head of Legal Department.

For the individual or anonymous reporting of possible breaches a whistleblower-system is available to everyone under the link below, which can be called up on the Internet.

[goldbeck.whistleblownetwork.net](http://goldbeck.whistleblownetwork.net)

We appreciate any support that ensures observance of this Compliance Guideline.