

GICON®

Großmann Ingenieur Consult GmbH



Code of Conduct for Employees of the GICON® Group

[1] PRELIMINARY REMARKS

Dear Associate,

The GICON Group is conscious of its role in society as well as its responsibility to its employees, customers, partners and clients.

The GICON® Group is therefore committed to clear principles which set the framework for our corporate and social activity, in particular for value-based, ethical and law-abiding corporate governance.

The reputation and image of the GICON® Group to the public is strongly influenced by the actions and behavior of each individual associate. Every single GICON Group employee therefore shares the responsibility to live up to our social and corporate responsibilities.

This Code of Conduct for employees of the GICON Group provides a guide for appropriate conduct of each individual associate. In conjunction with the other rules and regulations of the GICON® Group such as the Quality Management Manual, this Code of Conduct provides the framework to ensure that we all behave appropriately and do the right thing. Internalize this Code of Conduct and live and breathe it. Do not hesitate to at any point in time ask the questions you may have in the context of this Code of Conduct.

We are convinced that together with our associates we have the ability to abide by the values and standards we set ourselves. We thank you for your cooperation.

Your GICON Group Management Team

[2] PRINCIPLE CONDUCT REQUIREMENTS

[2.1] LAW ABIDING CONDUCT

The GICON Group complies with the legal system of each country and state where it operates.

Each employee is obliged to comply with the respective laws and regulations. Each employee has, regardless of the respective statutory penalties, to expect disciplinary consequences if he or she violates laws or fails to comply with regulations.

[2.2] GICON GROUP VALUES

Human rights, labor laws and social rights are firmly established within the GICON Group.

We are committed to the following basic principles:

- We reject any form of forced labor.
- We do not tolerate discrimination based on age, disability, race, sexual identity, gender and belief.
- We do not tolerate sexual harassment or other personal assaults against our associates
- We reject employment of individuals below the age of 16.

We shall ensure that we cooperate only with companies who also feel obliged to adhere to these principles

Furthermore, we have established the following GICON® Group values everyone is obliged to adhere to:

[2.2.1] CUSTOMER SATISFACTION

Customer satisfaction is front and center of our undertakings because successful and long term business relationships are the core of our entrepreneurial activity.

Our work is based on adhering to quality, scheduling and budget requirements of the projects we handle. We incorporate the current state of technology as well as applicable laws and regulations.

[2.2.2] PROMOTING INNOVATION

Innovative action is a prerequisite for our aspiration to deliver superior engineering services. Through our own research and cooperation with educational and research institutions, we want to determine the state of science and technology in our key areas of expertise.

[2.2.3] SELF RELIANCE AND EMPLOYEE QUALIFICATIONS

Our strength is the interdisciplinary composition of our company that comes to fruition through the work of the self-reliant team members. The expertise of our employees is continuously improved through regular training. The management of each GICON Group company as well as the employees themselves are responsible for this continuously ongoing qualification improvement.

[2.2.4] QUALITY MANAGEMENT

Quality assurance covers all relevant processes in our company. Each employee is responsible for the quality of his or her work.

The respective group company management as well as the GICON Group management are responsible for quality policy; quality assurance is managed by the respective quality managers.

Department heads and project leaders are principally responsible for implementing the quality policy. All employees regularly receive training and participate in audits. The quality policy implementation is based on the quality management manual.

[2.2.5] ECONOMIC VIABILITY AND ERROR PREVENTION

Increased efficiency and prevention of errors when processing projects are required to achieve economically viable performance across all GICON Group companies. The organizational structure of the GICON Group ensures the implementation of these principles. Management and associates are entitled to mutual review and criticism.

[2.2.6] INDEPENDENT QUALITY

The GICON® Group of companies provides its services as an independent engineering service provider and free of third supply party interests. By carefully selecting our partners and suppliers we ensure consistent quality of our services and products.

[2.2.7] APPLICABLE LAWS

We adhere with the implementation of our business processes to all relevant laws and regulations. In dealing with the authorities and public institutions, we always act honestly and transparently.

[2.2.8] FINANCIAL INTEGRITY AND CONFIDENTIALITY

Our employees protect property and confidential information of the company as well as of our customers and business partners. We document business transactions in compliance with the rules on financial reporting.

[2.2.9] TRUST AND RESPECT

The GICON® Group strives to create value for its customers and business partners who put their trust in our GICON® Group and our services. Our companies believe in the need of respect, honesty and fairness for co-operation and mutually successful business transactions. We are committed to providing our services at high quality standards and require innovation and a work environment that recognizes the value and dignity of every individual and where business partners and employees treat each other with courtesy, honesty and dignity.

All Group companies commit to be responsive to all concerns and suggestions communicated by the associates.

The compliance officer and all persons in charge are always available for guidance and assistance. The company provides confidential information channels which can be used for sharing information without hesitation or fear of reprisals.

[2.2.10] STRICT REJECTION OF CORRUPTION

Corruption harms the companies, stifles innovation and is illegal. All GICON® Group employees commit to avoid conflicts that may put their personal interests above the company. We do not let ourselves be influenced in our business decisions by gifts, invitations or other benefits.

Business decisions must be solely based on performance. We therefore carefully select suppliers and service providers based on objective criteria.

[2.2.11] ACCEPTANCE OF COMPETITION

The GICON Group companies act in accordance with applicable competition laws.

We do not engage in collusive behavior with competitors with respect to prices, price increases, conditions or capacities with the aim of preventing, restricting or distorting competition.

[2.3] RESPONSIBILITY OF MANAGEMENT

Integrity and law-abidance start with management of each individual GICON Group company.

Each manager has organizational as well as supervisory duties and has responsibility for the employees entrusted to him or her.

Our executives are obliged to always act exemplary in line with the values of the GICON Group. With regards to the Code of Conduct, our executives are especially required to adhere to the following principles:

- Ensure that the employees under your supervision understand the responsibilities set by the Code of Conduct as well as the other regulations of the GICON Group.
- Explain that violation of laws are disapproved and will result in consequences as applicable by labor laws.
- Create opportunities where employees can openly voice concerns and without fear of negative consequences.
- Never encourage an employee to resort to ethically questionable behaviors.
- React to questions and concerns of your employees.
- Always provide your employees with complete and precise tasks.

[2.4] RESPONSIBILITY FOR THE REPUTATION OF THE GICON GROUP

Each employee, through his or her behavior towards colleagues and business partners as well as the general public contributes to the reputation and image of the GICON Group companies.

Please be aware of this responsibility. The inappropriate conduct of an individual associate can negatively impact the reputation of the entire GICON Group.

[2.5] REVIEW YOUR CONDUCT AND ASK FOR SUPPORT

When in doubt regarding your conduct, please ask yourself:

- Is the conduct in compliance with the Code of Conduct?
- Is the conduct ethically undisputable?
- Is the conduct legally unscrupulous?
- Does the behavior reflect well on myself as well as the GICON Group?
- Does my conduct withstand public scrutiny?

In case your answer is “no” to any of the above questions, please refrain from the behavior in question.

If you are unsure with respect to the answers to the above questions, please consult with:

- your management,
- the GICON Group legal department,
- members of the Compliance Management System team.

[3] FAIR COMPETITION

Each employee is obliged to comply with competition and antitrust laws.

As the GICON Group, we solely rely on our innovation, our performance, our know-how as well as the quality of our service and products in order to compete. We strictly reject ethically questionable or illegal behavior.

We feel obliged to report any incidents to the respective authorities in a prompt and concise manner.

We expect our executives, managers and all employees to refrain from any ways and means that affect fair competition.

It is difficult for the individual employee to be familiar with all competition and antitrust laws of all countries where the GICON Group operates. We are therefore guided by the following general principles:

- We never engage in collusive behavior with competitors regarding prices and conditions.
- We do not make arrangements with competitors regarding waivers, limitations or allocation of customers, markets, regions and portfolios.
- We do not submit sham offers.
- We reject all forms of espionage, bribery and theft of information well as the distribution of knowingly erroneous scientific information

[4] AVOIDING CONFLICT OF INTEREST

When in doubt with respect to conflict of interest, please ask yourself:

- Do my personal interests affect the interests of the GICON Group?
- Is it possible that other GICON Group employees would act differently in my situation?

[4.1] SECONDARY EMPLOYMENT BY ASSOCIATES

Taking on or continuing a secondary employment has to be reported by the employee to the respective personnel department and to be approved. Approval shall be denied if the secondary employment is viewed to be in conflict with the interest of the GICON Group and the employee's work for the GICON Group.

Volunteering and community related activities by the GICON Group employees are explicitly encouraged.

[4.2] CONTRACT ASSIGNMENT TO AFFILIATED INDIVIDUALS AND RELATIVES

Many of our employees have relatives, friends and acquaintances who are employed by customers, partners or clients of the GICON Group.

If you have business transactions with these companies, please ensure that the personal relationship does not interfere or appears to interfere with your ability to act in the interests of GICON Group. The personal relationship should not influence business-related decisions. The decisions in the context of procurement procedures have to be objectively justified and be based on qualifications, performance, skills and experience of the customer, partner or client.

If you are unsure please consult your line manager or members of Compliance Management System Team.

[4.3] INVESTMENTS IN AND MANAGEMENT OF THIRD COMPANIES

No GICON Group employee may be directly or indirectly involved with a company that is engaged in direct competition with the GICON Group.

[4.4] GIFTS AND ENTERTAINMENT

Do not accept any gifts, entertainment or other favors from customers, partners, or clients if this could affect the ability for objective decisions in the interests of GICON Group or could appear to affect this ability.

With regards to gifts, entertainment and other favors which may not impact your ability to make objective decisions, we have created guidelines which are described in a separate manual. These guidelines include value limits and are mandatory for every GICON Group employee.

If you are offered a gift or an entertainment invitation which goes beyond the set limits, please politely decline and explain the rules set in this Code of Conduct. If the other party is offended by your decline, please accept the gift or entertainment invitation and advise your line manager or members of the compliance team accordingly. They will assist you will sharing the gift with the other employees or to arrange donation to a charity organization.

As a GICON Group employee, you must never ask for a gift or other personal favor.

These principles also apply to gifts and favors from relatives of the employee.

[5] HANDLING OF EQUIPMENT AND FACILITIES

The GICON Group maintains work-related equipment such as telephones, copiers, printers, computers and software at each of its locations and subsidiaries, as well as numerous machines at manufacturing locations. These are exclusively used for the GICON Group tasks. Exceptions must in each case be agreed with the immediate supervisor.

Please use GICON Group owned materials and equipment in a responsible manner.

[6] HANDLING OF COMPANY INFORMATION AND DATA

[6.1] CONFIDENTIALITY

Confidential GICON Group company information is subject to absolute secrecy. Non-public information of customers, partners, clients and other third parties have to be handled in compliance with legal and contractual confidentiality requirements.

[6.2] DATA AND IT SECURITY

Each employee is required to properly store GICON Group data and information for ongoing and consistent accessibility and maintenance.

In our daily work, we regularly use IT systems for data processing. Here, appropriate safety measures, such as the establishment of passwords, approved technologies and licensed software are required to ensure the protection of intellectual property and personal data. Please comply with our IT policy

Disregarding our safety standards can result in serious consequences for the GICON Group. Since digital information can quickly distribute and be multiplied in unlimited areas, each employee has to pay special attention to the content of e-mails, attachments and files.

[6.3] ACCURACY

Each employee must strive for accuracy in the compilation of information and data. Errors may occasionally occur accidentally. In contrast, deliberate attempts to distribute incorrect, out of context or otherwise falsely manipulated information are a violation of the Code of Conduct.

[6.4] EXTERNAL COMMUNICATION

Management is in charge of external communication with media and media representatives. Official statements to media must be made after prior agreement with management via the GICON Group Public Relations Department. In order to maintain a professional, corporate presentation, each associate is obliged to inform the PR Department via their supervisor of any media inquiries or requests.

[7] SUSTAINABILITY

The GICON® Group aims to promote sustainable use of natural resources. Therefore, we are committed to a responsible use of energy, water, materials and areas.

[7.1] ENVIRONMENTAL PROTECTION

We are engaged in environmental protection.

Every GICON Group employee is obliged to consider the impact of activities and decisions on the environment and to avoid potential impact. Each employee is obliged to comply with the environmental requirements.

[7.2] OCCUPATIONAL SAFETY

The safety of our employees at work is one of the most important responsibilities within our daily work.

Due to the diverse areas of activity of the GICON® Group companies and thus also our employees, we have implemented corresponding OSH instructions. Please keep these constant-

ly in mind. Please be also considerate to your colleagues and do not be afraid to bring possible risks to their attention.

Each GICON Group employee takes the utmost care of himself or herself as well as their colleagues.

[8] COMPLIANCE MANAGEMENT SYSTEM

[8.1] ANONYMITY AND CONFIDENTIALITY

Should you have knowledge of a possible violation of this Code of Conduct, we encourage you to share this with us. To do so you can approach your department head or department director as well as management and the compliance management system team (CMS team).

If you decide to contact the CMS team, you have the option to remain anonymous. We do, however, recommend that you identify yourself. The CMS team members will ensure that your identity remains anonymous outside the CMS team. In order to support the CMS team in this effort, we ask you to refrain from discussing the incident with other employees.

The CMS team members will protect employees who have genuine concerns. This does not mean that your concerns have to be justified. You have, however, to be convinced that your information is correct. A deliberately incorrect accusation is a violation of the Code of Conduct. Genuine and appropriate information will never result in negative consequences for the reporting employee.

[8.2] INVESTIGATIONS

CMS team members take your concerns seriously. They will confidentially investigate the reported incident and internally decide if this incident can be classified as a violation of the Code of Conduct or of applicable laws. The fact that you genuinely submitted the information on the incident will not negatively impact on your employment.

[8.2] MEASURES IN CASE OF AN ACTUAL VIOLATION

In case of an actual violation, the primary purpose of this Code of Conduct is to advise the employee concerned in detail why they have violated the rules, and to convince them to change their behavior. This, however, always depends on the relevance and severity of the particular offense and is in addition to any direct action under the applicable labor law provisions

Exceptions to the rules set in this Code of Conduct are not permitted without a valid reason. Such an exception may also be only approved by the respective managing board in collaboration with the CMS team.

[9] COMPLAINT AND INFORMATION SYSTEM

We have set up a system that allows our employees to convey their complaints or information with respect to compliance relevant matters at any time.

We explicitly encourage you to use this system!



[10] CONTACTS

Your points of contact for all questions and suggestions with respect to this Code of Conduct of the GICON Group as well as the Compliance Management System are:

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