



**CODE OF CONDUCT**

## **Code of Conduct – Code of Conduct for all Companies of the Euro poles Group**

### **Preamble**

Employee satisfaction is closely related to the culture lived within a company. For Euro poles this means to live collective values with all employees. In order to implement this it is important to have a basis that shows orientation and identity. For this reason we have formulated a Code of Conduct that shows the values we share, and that forms the basis for our current and future actions.

Many guidelines and process instructions at Euro poles ask us to act in compliance with applicable law as well the rules applicable within the corporation. The most important content is compiled in this Code of Conduct to make it easier for employees and executives to comply with the regulations.

We expect executives to be active role models for the principles defined in this Code of Conduct and to actively communicate these principles.

All provisions will apply to interactions between the employees of the Euro poles Group, and at the same time they serve as a commitment to act responsibly when interacting with business partners and the general public.

### **Ethical Principles**

- The actions of Euro poles and its employees are guided by values of loyalty and integrity. We place trust in all employees to live up to these expectations
- We observe the laws and regulations, especially those pertaining to working times and occupational health as well as those pertaining to product and occupational safety
- Our express intent is to fulfil all customer requests and requirements in a timely and appropriate manner
- We treat our business partners and employees with respect
- We create trust by being reliable and transparent, and our thoughts and actions are customer-oriented
- The integrity and good reputation of our company is dependent on our management and employees
- We recognize our social responsibility
- We define joint objectives and they guide our actions

- Innovation is the foundation for our future
- Continually improving efficiency ensures that our company will remain competitive
- We place great value on the professional development of our employees
- Our success is based on teamwork and communication
- Nobody will be at a disadvantage through complying with this Code of Conduct

### **Management Culture and Collaboration with Employees**

The skills and dedication of our employees are our most valuable assets. We support each other and use our experience throughout all departments and specialty areas. Relationships between management and all employees in all corporate units and regions are based on mutual openness, honesty and the collective understanding of a trusting collaboration. Superiors encourage employees to act in compliance with the rules by providing information on a regular basis and by explaining duties and authorizations relevant for the employee's area of work. The superior places trust in his/her employees, agrees on clear, measurable, realistic and motivating goals, and gives employees freedom to act and make decisions. We communicate openly and directly and have constructive discussions when there are differences in opinion. We interact with mutual appreciation, tolerate mistakes and are open to constructive criticism. We promote individual responsibility and on-going professional development in our employees and expect that they are business-minded and act independently.

Equal opportunity is an important part of our human resource policies. Therefore, we promote diversity and tolerance with the objective of achieving the highest level of productivity and efficiency.

### **Safety and Health**

Compliance with applicable health and occupational safety guidelines is especially important to us because our employees are entitled to a safe and healthy work environment.

We want to promote the physical and mental well-being of our employees.

We continually review our processes and directly implement any potential improvements with the participation of our employees. The health management system implemented at EuroPoles is an important aspect for human resource management and development. Employees receive preventive information and offers to actively promote their health.

### **Bribery and Corruption**

We separate our private and corporate lives and strictly refrain from taking any actions that may create illegitimate, direct or indirect advantages for business partners, authorities and their employees or other third parties (such as offering or granting monetary or personal benefits). This applies in particular if the type and scope of these benefits may be used to influence the actions or decisions of the recipient in an illegitimate manner.

Corruption, coordination among competitors, embezzlement and fraud distort competition and lead to higher costs. These actions may be associated with significant fines and may damage a company's image, and in the end also puts jobs at risk. Furthermore, corruption destroys trust in proper executive management and affects relationships with customers and suppliers.

Granting personal advantages to officials, such as government officials or public service employees with the objective of obtaining advantages for the company, personal advantages or advantages for third parties is not permitted.

### **Handling Gifts Responsibly**

In general, gifts should neither be handed out nor accepted. This applies to cash as well as non-cash gifts. Promotional gifts should be of a nature that no binding dependence arises for the recipient in accepting the gift. If applicable, a superior should be notified or his/her decision should be obtained. Travel, free tickets for sporting and cultural events, dinner invitations, services, referral bonuses and discounts should also be considered gifts.

In certain countries gifts may be considered to be a tradition and a courtesy. Here, it should also be ensured that no binding dependence arises for the gifting party or the receiving party and the international statutory provisions must be complied with.

## **Donations**

Europoles generally does not make donations to political organizations, parties or individual politicians. Donations to non-political recipients have to be compliant with applicable law and have to be approved by human resource management and executive management.

We make cash and non-cash donations for scientific and educational purposes, for culture and sports and for social causes. We focus on support of local, non-government institutions such as associations in which our employees actively participate.

## **Avoiding Conflicts of Interest**

Loyalty towards Europoles and our employees is the foundation for our business principles. We avoid situations where personal or financial interests may be in conflict with our company's interests. We expect our executives and employees to act ethically when there are conflicts of interest. Employees should immediately notify the company of any relationships to individuals or companies that may lead to conflicts of interest, such as for example family relationships, partnerships or business partnerships.

Employees must notify Europoles in writing of any secondary employment and such employment is subject to approval by Europoles.

## **Confidentiality and Data Protection**

Intellectual property is valuable and has to be protected from unauthorized access and disclosure. This includes business secrets and confidential information, irrespective of whether the intellectual property is in the possession of Europoles or business partners.

For this reason Europoles undertakes to keep confidential employee, company and business secrets and not to illegitimately disclose any confidential documents and information to third parties or provide access in any other manner.

Unless already disclosed to the general public, our employees may not disclose information for their personal enrichment or for the benefit of third parties. This includes technical data, financial information, business information, customer information and other information related to the business operations of our company and its business activities and future plans.

## **Environmental Protection**

Europoles is aware of the ecological impact of its business activities and undertakes to protect the soil, water, air, biological diversity as well as cultural goods. Within the meaning of a sustainable business, all employees have to prevent actions that are damaging to the environment when performing their work by taking the necessary measures. Employees have to handle natural resources with care. Environmental laws have to be observed and environmental responsibility has to be promoted among employees.

## **Four Eyes Principle**

All contracts (in writing, electronic or in other form) and all explanations and determinations under which obligations or liabilities arise (or may arise) for Europoles or under which Europoles waives rights are subject to the four eyes principle. The four eyes principle ensures an independent review and assessment by two employees involved in the business transaction and authorized to sign for the company. Signature authorizations are defined in our signature regulations.

## **Contacts / Compliance**

Employees may need assistance in understanding guidelines, in making difficult decisions or in supporting the corporation in implementing this Code of Conduct. Europoles offers a point of contact that can give binding information about compliance with individual regulations. By implementing suitable organizational measures Europoles works towards all employees being compliant with this Code of Conduct, especially by introducing and maintaining appropriate checks and plausibility tests (internal compliance management system).

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