

GOLDBECK Compliance Guidelines



Preface from the management

We at GOLDBECK have shared common values ever since the company was founded in 1969. They form the basis for the decisions we make.

Humanity, responsibility and a passion for performance are the values that form the basis of our family business. These three core values distinguish our company and the way we treat our clients, business partners, suppliers and employees.

GOLDBECK's Compliance Guidelines contain stipulations for compliance with national and international legislation, rules and regulations, and standards of ethical conduct. These guidelines are the basis for ongoing successful collaboration and the sustained growth of our company. They serve as a supplement to our GOLDBECK Corporate Guidelines, which outline our identity, goals and the standards for our actions.

Compliance is the responsibility of all employees at our company. That's why managers, besides serving as role models, also have the task of ensuring that the employees under their supervision are familiar with the Compliance Guidelines, remain conscious of them and observe them. This requires personal meetings as well as organisational measures. Parallel to this, as part of our digitalisation efforts, we will be implementing workflows that ensure our employees are always trained in the latest GOLDBECK Compliance Guidelines.

The regulations stipulated here are also accessible to, and binding for, our clients and business partners.

The management at GOLDBECK undertakes to guarantee that the specified standards are implemented in the entire company and put into practice with our employees, clients and subcontractors. Violations against the Compliance Guidelines will not be tolerated.

Bielefeld, 03.01.2022



Jörg-Uwe Goldbeck

01 We comply with national and international laws and are committed to ethical conduct

GOLDBECK aspires to do more than simply comply with national and international laws.

Violations of the law can result in criminal proceedings, hefty fines, blockage of public- and private-sector contracts, compensation claims and damage to one's reputation.

Conduct is considered ethical if it corresponds to the general principles of proper conduct. At GOLDBECK, these values are documented in the Corporate Guidelines.

We expect our employees to conduct themselves ethically in their area of responsibility and in all situations relating to their work.

Ethical conduct includes treating all people with respect and fairness, and showing appreciation for them regardless of their function, race, religion, gender, sexual orientation, age or any disability.

GOLDBECK condemns any form of forced labour or child labour and is careful to avoid modern slavery and human trafficking both in its own operations and in its supply chain, including procurement, production and all business processes (UK MSA 2015). Furthermore, the company observes all ILO core labour standards in its process chain.

02 We do not tolerate corruption, bribery or money laundering

Corruption has devastating consequences around the world. We therefore denounce every form of corruption. Through transparent processes, we endeavour to avoid even the slightest appearance of corrupt behaviour.

Corruption exists in many different forms (monetary gifts or gifts in kind, invitations, donations, consultancy contracts and other contributions).

It is not permissible to demand, accept, offer or pay bribes, whether directly or indirectly.

It is, however, permissible to participate in customary business dinners and hospitality, and to accept or give courtesies in the form of small non-cash gifts. Internal guidelines are available to provide further orientation in this matter.

Corruption is harmful to both the company and its clients. It damages the good reputation that GOLDBECK holds.

Corrupt behaviour is criminal behaviour. Criminal behaviour is punishable and will result in the immediate loss of one's job.

GOLDBECK takes the strictest care not to become involved in money laundering activities.

03 We do not tolerate collusion

GOLDBECK is committed to fair competition. We win clients through the quality of our products and services, which we offer at prices that are in line with the market. We expressly reject prohibited anticompetitive agreements.

Collusion and antitrust violations result in severe financial penalties and exclude the company from being awarded public- and private-sector contracts. This jeopardises the company's image and assets as well as employees' jobs.

Every employee is responsible for complying with regulations relating to competition law. Agreements that affect competition are prohibited and will result in the immediate loss of one's job.

04 We do not tolerate illegal employment or undeclared work

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

We commit ourselves and our business partners to observing the legal regulations concerning the employment of both the company's own employees and third-party workers. We advocate that our subcontractors' employees work and are compensated on the basis of fair and lawful employment contracts.

We contractually require our subcontractors to comply with statutory provisions, and we prohibit the employment of individuals who do not have the necessary residence or work permit. (This applies both to the company's own employees and third-party workers and to those of our subcontractors.)

05 Transparency is required in cases where personal conflicts of interest may arise

Our success is beneficial to our employees as a whole. This requires that each and every person acts in the interest of the company. Personal interests may not be pursued at the company's expense.

If an employee has a personal, family, financial or other type of relationship to GOLDBECK partners or their employees which could in any way impair the employee's objectivity in decisions or actions taken within the scope their work for GOLDBECK, the employee must make this known and must coordinate the further course of action with the relevant direct manager, and possibly with the corporate management, within the framework of the company's transparency requirements.

06 We protect confidential information

Confidential information may not be misused.

Our company's intellectual property is a competitive advantage that must be safeguarded. Employees are not permitted to share their knowledge of internal data, processes or plans without authorisation.

Anyone using confidential information to their own advantage or making it accessible to others without authorisation is acting unlawfully and will immediately lose their job.

07 Social behaviour in the company

As already enshrined in the Corporate Guidelines, we are committed to the respectful, fair and loyal treatment of one another.

Every form of discrimination is prohibited. No one may be discriminated against or harassed on the basis of race, gender, sexual orientation, religion or worldview, disability or age.

We expect all employees to contribute to a productive work environment through their tolerant and considerate behaviour towards each other.

The loyalty of every employee is the basis for our company's success.

We undertake to ensure that human rights are defended.

08 Reporting misconduct

These Compliance Guidelines apply to the entire company, including all employees and our business partners. Any employee or business partner who suspects that a violation has occurred against the Compliance Guidelines is expected to report this to GOLDBECK.

If an employee was personally involved in a violation against the Compliance Guidelines and can avert damages to the company by voluntarily reporting the infraction, this will be considered in the employee's favour. There are consequences for intentionally casting false suspicion on a person.

In order to protect GOLDBECK, employees should report any compliance violations on the part of business partners and any corrupt practices on the part of competitors.

If there is evidence of a violation, we expect of all employees that an applicable notification be given to

- the employee's direct superior or
- the responsible member of management or
- the head of the legal department.

Additionally, a whistleblower network is available to all employees, allowing for the individual or anonymous reporting of possible violations. The system can be accessed at the following internet link:

→ goldbeck.whistleblownetwork.net

We are grateful for all support that ensures adherence to these Compliance Guidelines.