

Code of Conduct

We are guided by the following principles:

- **Equal rights**
In our work with other people we make no differentiation in respect of gender, skin colour, religion, culture, education, social status or nationality.
- **Respect of contractual and legal obligations**
We fulfil our contractual commitments. We respect the laws in force in Germany and in our partner countries.
- **Transparency**
We make sure that our action and our motives are understandable and comprehensible.
- **Loyalty**
We are loyal to our company. This also means providing constructive criticism, which we express in an appropriate manner and openly within the BEGECA.
- **Confidentiality**
We handle all business information confidentially whenever its nature necessitates discretion or if this is expressly required.
- **Partnership-based Cooperation**
We work together with our business partners, our project partners and target groups in a fair and reliable manner based on mutual trust. This also applies to our behaviour vis-à-vis our colleagues, whereby a constructive approach to conflict management comprises a key component of our work.
- **Environmental friendly procurement**
BEGECA's environmentally friendlier policy is to strive to purchase products and services that have less negative impact on the environment. Environmental considerations form part of the evaluation and selection criteria, which could cover, depending on goods and services to be purchased, their manufacture, transport, packaging, use and disposal.

Dealing with conflicts of interest

In our work, conflicts can arise between our personal interests and the BEGECA's corporate interests or those of our business partners, project partners and target groups. We immediately reveal such conflicts of interests to our superior and we resolve them in a manner that is objectively verifiable by and understandable to all parties involved. We take sufficient care to separate business and private spheres.

We adhere to these rules:

- **Active and passive bribery**
It is not permitted to request, accept, offer or give, directly or indirectly, bribe money or gifts or advantages. Special regulations, see below, apply to the acceptance of gifts and other personal benefits as well as the donation of gifts and granting of other advantages.
Our agents, suppliers and other subcontractors receive appropriate payment for the supplies and services they deliver. We do not pay any bribe money to be passed on to third parties. This applies in principle also to direct and indirect "dispatch money".
- **Acceptance of gifts and other advantages**
The acceptance of gifts or other personal advantages from BEGECA business partners, project partners and target groups is prohibited, unless these are small or token gifts of a low value or the respective superior has given his/her written permission.
The superior can grant his/her permission to accept gifts and other advantages when, in cases of exception, acceptance is considered an act of politeness. In this case, the gift is to be used for business or humanitarian purposes or – especially in the case of expendables - jointly with other staff members (e.g. for staff festivities, tombolas). Private use can only be permitted in exceptional cases. The procedure is to be documented in writing. Business journeys to subcontractors or companies with which the BEGECA has business relations are paid for by the BEGECA. It is not permissible for the respective subcontractor to assume the costs of the journey.

- **Donation of gifts and granting of other advantages**
Gifts as an act of courtesy are only offered and personal advantages are only granted by the BEGECA to the extent that no dishonesty, incorrectness or binding dependency can be seen to be generated as a result.
- **Conflict of interests, Extra-contractual activities**
The BEGECA must give its permission for any extra-contractual activities. Paid activities (money or in kind) on behalf of clients or organisations with whom the BEGECA entertains business relationships are only permissible if it appears that the BEGECA's interests will not be impaired.
- **Conflict of interests, personal and financial connections**
Should a staff member have any connections, be they personal, family-related, financial, or of any other nature, to BEGECA business partners, competitors or their employees, which could impinge on the objectivity of decision-making or dealings within the scope of his or her work for the BEGECA, then the respective superior must be informed hereof, so that he/she can make a decision on the further course of action.
If the matter concerns awarding of contracts, the relevant staff member is excluded from participating in the decision-making for the award procedure, except in the event that no conflicting interests exist for the person involved or if the activities have no impact on the decision-making in the contract awarding procedure.
- **Employment of closely connected or related persons**
If a staff member is intending to conclude a contract (employment contract, contract for freelance services etc.) with his/her spouse/cohabiter or any other person to whom the staff member is closely connected or related, the staff member shall inform his/her superior in order for a pertinent decision to be made. The staff member shall not make a decision him/herself on the conditions of employment or any changes thereto.
- **Separation of business and private spheres**
Staff members who award orders are not allowed to entertain private business relationships with BEGECA subcontractors. As an exception, the services of subcontractors can be drawn upon for private purposes if these services are available for the entire workforce at set conditions. Any further exceptions and details can be governed by work regulations in force in the division concerned.

Explanatory notes (Help):

- **Bribery and advantage-taking**
In many cases, the acceptance and the offering of gifts and other advantages constitutes criminal advantage-taking or bribery. In addition to the criminal law aspect, even any appearance that the recipient is in a position of illegitimate obligation must be avoided at all events.
The rules on the acceptance and granting of gifts and other personal benefits and advantages give information about the distinction between permissible and inadmissible or criminal actions.
- **Dispatch money**
In principle we do not accept the direct or indirect payment of "dispatch money". In the event, however, that dispatch money of small amounts is unavoidable and normal business practice in order to enforce legal rights, exceptions to this rule are possible with the approval of the superior. However, in these circumstances also, it is necessary to pursue the aim of avoiding such payments in future and the principle of transparency is to be accounted for both in-house and, as far as possible, externally.
- **Gifts and other advantages**
Advantages not only include gifts, but all services which staff members have no right to receive and which would enhance their status in economic, legal or personal terms. These include, e.g. gratis or reduced-price travel, the use of vehicles, entrance tickets and favourable reductions, to the extent that these are not expressly granted to the entire staff on the basis of contractual agreements; compensation for travel expenses, dinner invitations, conclusion of consultancy

agreements etc. Advantage-taking can also be said to exist when benefits are awarded to a “third party” (spouse/ partner, children etc.).

- **Small gifts**

Small or token gifts constitute occasional presents and other advantages whose value per giver, calendar year and staff member does not exceed EUR 38.00.

Dinner invitations by business partners are regarded as small gifts – even if they exceed the EUR 38.00 limit – provided they take place in an appropriate and standard business framework. For reasons of transparency, staff members should inform their superiors if they receive frequent invitations to dinner or if the BEGECA often assumes the costs of such business meals.

- **Personal or financial connections**

As a rule, a staff member's objectivity in the scope of his/her work is jeopardised when, for example, he/she places orders on behalf of the BEGECA to relatives or to companies in which the staff member or persons connected to him/her are involved. Persons connected to him/her are defined as: fiancé/e, spouse, cohabiter, relatives and in-laws in direct line, siblings, siblings' children, siblings' spouses and cohabiters and the siblings of the spouses and cohabiters, parents' siblings and foster parents and foster children.

- **Cases of doubt**

In cases of doubt, staff members should consult their superior who will then make a pertinent decision. If the superior is unsure as to the correct decision in a certain case, he/she should consult with his/her superior and/or with the integrity adviser.

- **Integrity advice**

Our business and project partners as well as our target groups and any interested members of the public can contact the BEGECA should they have justifiable grounds for believing the “Code of Conduct” has been breached. They can establish direct contact with the person responsible for the commission or consult our integrity adviser via the e-mail address “begeca@begeca.de”.

BEGECA staff members should first approach their superior directly or their superior's superior. Naturally, however, they are also at liberty to address the integrity adviser, e.g. via the integrity mailbox.

BEGECA will carefully examine all information given, maintaining confidentiality, if so desired. By way of protection for staff members, the principle that any reproaches must be conclusive and provable shall apply in all cases.