

Ethics, Integrity and Misconduct

We are committed to compliance with the laws, national regulations and ordinances both in Germany and in project countries. In addition, we expect not only our staff members but also our business partners to act with honesty, decency and high standards of ethics and integrity.

We have a zero-tolerance policy for any illegal activities or violation of our CMS. This particularly applies to any form of misconduct such as fraud, corruption, collusion, coercion or obstruction. Those actions are illegal and not consistent with our corporate culture. We take robust measures to counter any of the above and to prevent them from occurring. We do not engage in projects with compliance risks that we deem too high.

Donations to charities and other institutions in need are made transparently and without expectation of return. Sponsoring forms part of our publicity related activities and is not done in pursuit of other objectives. Both are approved by the company management.

To preserve our independence, we refrain from political activities in host countries and also make no political or financial contributions to their political systems. We act with neutrality.

Compliance Organization, Implementation, Whistleblowers

In applying these principles, we strengthen our credibility, integrity and standards of ethical conduct. We expect the same from our Business Partners. Only if these principles are put into practice, will it be possible to strengthen our reputation and protect future viability.

All staff members are obliged to inform us about actual or suspected misconduct, whether to a supervisor, a company director, the Chief Compliance Officer for the Fichtner Group or the External Compliance Officer for the Fichtner Group. Reporting any misconduct will not lead to any reprisals against the reporting person. Fichtner will not tolerate retaliatory acts by staff or third parties against the reporting person. We also encourage all third parties to report any possible, suspected or actual misconduct to the CCO and the ECOG.

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Fichtner Group (CCO)**

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