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	Akt. Stand 27.02.18		

The Organization and its employees must, at all times, comply with all applicable laws and regulations. The Organization will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. The Company strictly prohibits any form of corruption or extortion. If an Employee happens to witness one of said incidents they are to report this immediately to their superior. Actions will be taken against the crime committing Employees. All business conduct should be well above the minimum standards required by law.

### **General Employee Conduct:**

The Organization expects its employees to conduct themselves in a business-like manner. Drinking and similar unprofessional activities are strictly prohibited while on the job. Employees must not engage in sexual harassment, or conduct themselves in a way that could be construed as such, for example, by using inappropriate language or accessing inappropriate materials on their computer.

### **Conflicts of Interest:**

The Organization expects that employees will perform their duties conscientiously, honestly, and in accordance with the best interests of the Organization. Employees must not use their positions or the knowledge gained as a result of their positions for private or personal advantage.

### **Relationships with Clients and Suppliers:**

Employees must treat Clients and Suppliers fairly and provide services to Clients in a manner which protects their interests in their matter, subject to the proper administration of justice at all times. The Organization can only enter into fee agreements with Clients that are legal, and which are considered to be suitable for the Client's needs and take account of the Client's best interests. Employees will deal with Clients' complaints/questions/concerns promptly, fairly, openly and effectively.

### **Gifts, Entertainment, and Favours:**

Employees must not accept entertainment, gifts, or personal favours that could, in any way, influence, or appear to influence, business decisions in favour of any person or organization with whom or with which the Organization has, or is likely to have, business dealings.

### **Kickbacks and Secret Commissions:**

Regarding the Organization's business activities, employees may not receive payment or compensation of any kind, except as authorized under the Organization's business and payroll policies. In particular, the Organization strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.

### **Organization Records and Communications:**

Accurate and reliable records of many kinds are necessary to meet the Organization's legal and financial obligations and to manage the affairs of the Organization. The Organization's books and records must reflect in an accurate and timely manner all business transactions. The employees responsible for accounting and recordkeeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements. Employees must not make or

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engage in any false record or communication of any kind, whether internal or external.

#### **Dealing with Outside People and Organizations:**

Employees must take care to separate their personal roles from their Organization positions when communicating on matters not involving Organization business. Employees must not use organization identification, stationery, supplies, and equipment for personal matters. When dealing with anyone outside the Organization, including public officials, employees must take care not to compromise the integrity or damage the reputation of either the Organization, or any outside individual or business.

#### **Prompt Communications:**

In all matters relevant to customers, suppliers, government authorities, the public and others in the Organization, all employees must make every effort to achieve complete, accurate, and timely communications - responding promptly and courteously to all proper requests for information and to all complaints.

#### **Privacy and Confidentiality:**

When handling financial and personal information about customers or others with whom the Organization has dealings, observe the following principles:

- Collect, use, and retain only the personal information necessary for the Organization's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
- Limit internal access to personal information to those with a legitimate business reason for seeking that information. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.

#### **Commitment to competition law compliance:**

The Organization has business in multiple countries and markets and is therefore subject to the general principles, adopted in many competition laws of free and fair trade. All employees are committed to complying with all applicable laws, including the competition laws of the United States, the European Union, the United Kingdom and all other relevant jurisdictions. As part of this commitment, the Organization has produced this competition law compliance statement to provide guidance to all employees. This document is made available for all employees to understand and therefore comply with any competition law obligations.

Hermann Bauer



General Manager  
Bauer Safety Engineering GmbH