

Code of Conduct

The Code of Conduct is based on our common corporate values as set out in the company's Corporate Principles. We, the AMBERO staff members, practice these principles ourselves and expect our subcontractors to do so, accordingly. It is our wish that our project partners and target groups respect our principles.

For AMBERO employees the Code of Conduct is an obligation.

This is based on the following principles:

- **Equal rights**

We work with other people without any distinction in terms of gender, marital status, skin colour, religion or world view, culture, education, social origin, disability, age, sexual identity or nationality.

- **Prohibition of sexual harassment**

We do not tolerate any form of sexual harassment in the company.

- **Compliance with contract and statute**

We fulfil our contractual agreements. We respect the law in Germany and in our partner countries.

- **Transparency**

We make sure that our actions and motives are clear and comprehensible.

- **Loyalty**

We are loyal to our company. This also means providing constructive criticism, which we express in an appropriate manner within the company.

- **Confidentiality**

We handle all business information confidentially whenever its nature necessitates discretion or if this is expressly required. The obligation to maintain secrecy also applies after the termination of an employment contract.

- **Cooperation in partnership**

We work together with our business partners, project partners and target groups in a fair and reliable manner based on mutual trust. This also applies to our behaviour towards our colleagues, which is founded on mutual respect and leaves no room for bullying. Thereby constructive conflict management is an important part of our work.

Dealing with conflicts of interest

In our work, conflicts can arise between our personal interests and company's corporate interests or those of our business partners, project partners and target groups. We immediately discuss such conflicts of interests with our superior and resolve them in a manner that is verifiable by and understandable to all parties involved.

We take the necessary care to separate business and private spheres.

We accept and practice the following rules:

Active and passive bribery

It is not permitted – either directly or indirectly – to request, accept, offer or give bribes, gifts or benefits.

For the acceptance of gifts and other personal benefits as well as the giving of gifts and granting of other benefits, there are special rules below.

AMBERO's agents, suppliers and other subcontractors receive appropriate remuneration for their services. AMBERO staff do not pay bribes intended for third parties. This is valid also for any direct or indirect bribes like 'dispatch money'.

Acceptance of gifts and other advantages

Staff do not accept gifts and other personal advantages from business partners, project partners and target groups, unless these are gifts of minor value and are within normal limits (up to a current market value of EUR 35). Dinner invitations from business partners are regarded as small gifts – even if they exceed the EUR 35 limit – provided they take place in an appropriate and standard business setting.

Giving presents and granting other advantages

AMBERO staff members may only give presents to business partners, project partners and target groups as an act of courtesy and may grant personal advantages only to the extent that no appearance of dishonesty, impropriety or binding obligation can arise as a result.

Approval of and information about extracontractual activities

Extracontractual activities requires prior written approval from the company. Paid activities (money or commodity value) undertaken for subcontractors or organisations with which AMBERO does business are only permissible if it appears that AMBERO's interests will not be impaired in any way.

Information about personal or financial connections

If staff members are aware of any connections of a personal, family or financial nature with AMBERO business partners, competitors or their employees in a way that it could compromise the objectivity of the decision or action taken in the course of the work for the company, they must notify their supervisor who decides on the further course of action.

In a contract award procedure, the employee is excluded from participating in the decision in the contract award procedure, unless this would not result in a conflict of interest for the persons concerned or the activities would not affect the decisions in the award procedure.

Employment of related persons

If an employee intends to conclude a contract (e.g. employment relationship, expert activities), with the (married) partner or another person close to the employee, he or she must disclose this to the superior for decision. The employee should not decide on the terms of employment him- or herself.

Separation of business and private

For employees involved in procurement, private business relations with contractors of the company are not permitted. As an exception, the services of contractors may be used privately if they are available to the entire workforce under specified conditions. Other exceptions and details may include work instructions issued by the departments concerned.

Explanations (help) for the rules:

Bribery and acceptance of benefits

In many cases, accepting or offering gifts and other advantages constitutes a criminal advantage-taking or bribery. Even if this is not a criminal act in the individual case, it is essential to avoid any impression that an improper relationship may exist.

The rules on the acceptance and granting of gifts and other personal benefits provide information on the delimitation of what is permitted and what is illegal or criminal.

Dispatch Money

We reject the direct or indirect payment of "dispatch money". However, if small amounts of dispatch money are unavoidable and customary for the enforcement of legal claims, exceptions are possible with the consent of the superior. But even in these cases, the goal of future avoidance must be pursued, and the principle of transparency must be observed both internally and, if possible, externally.

Gifts and other benefits

Advantages not only include gifts, but all services to which staff members have no claim and which improve their economic, legal or personal circumstances. These include free or reduced-price (private) travel, the use of vehicles, admission tickets and other discounts (to the extent that these are not expressly granted to the entire staff under contractual agreements), payment of travel expenses, dinner invitations of significant value, entry into consultancy agreements, etc. Advantage-taking can also be said to exist where advantages are given to a 'third party' (spouse, children etc.).

Small gifts

Small or token gifts are occasional presents and other advantages whose value per giver, calendar year and staff member does not exceed the current market value of EUR 35 in each individual case.

Dinner invitations from business partners are regarded as small gifts – even if they exceed the EUR 35 limit – provided they take place in an appropriate and standard business setting. For reasons of transparency, an employee should inform his or her superior if he or she is frequently invited to dinner by a business partner or if the company often bears the costs of the business meals.

Personal and financial connections

Generally, staff members' objectivity in the scope of their work is jeopardized if, for example, they place contracts with relatives or companies in which they, or persons closely connected with them, are involved.

Case of doubt

In cases of doubt, employees should contact their superior.

At AMBERO integrity is a matter for the management

AMBERO employees inform the management of any violations of the principles of integrity. All information will be examined carefully and confidentially. Any reproaches or complaints made must be convincing and coherent, and if possible, based on solid evidence.

The management ensures that there are no negative consequences for people who provide information in justified cases (whistleblowers). All references can also be sent to the e-mail address compliance@ambero.de.

These principles of integrity comply with the guidelines of the GIZ.