

## CORRUPTION

Corruption harms the entire GICON Group, stifles innovation and is illegal.

All employees of the GICON Group are committed to avoiding conflicts that may put their personal interests above those of the company. We will not let our business decisions be influenced by gifts, invitations or other benefits.

Business decisions should be based solely on ability to perform. We therefore carefully select suppliers and service providers according to objective criteria.

## COMPETITION

The GICON Group acts in accordance with applicable competition law. No agreements with competitors will be made on prices, price increases, conditions or capacities with the aim to hinder, restrict or distort competition.

## DONATIONS AND SPONSORING

As a rule, the GICON Group does not donate to political parties, individuals or organizations whose aims and principles contradict a democratic rule of law or the character of the management of the GICON Group.

The GICON Group exercises its social responsibility through monetary donations and donations in kind for education and science, sports, arts and culture as well as social and humanitarian projects.

For all donations, the identity of the recipient and the proposed use are known. The reason and the purpose of the donation are legally justifiable.

## CONTACT

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as of 09/2018



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# VALUES OF THE GICON GROUP – COMPLIANCE GUIDELINES

Compliance with relevant regulatory frameworks and internally imposed rules is an implicit part of corporate governance and of the GICON Group business practices. These principles are underpinned by a compliance management system that includes the implementation of existing core company values through adherence to legal requirements and internal codes of conduct. These structures, through preventive risk mitigation, aim to avoid damage to the company, its employees and its customers.

## FOR THE GICON GROUP, COMPLIANCE ENCOMPASSES THE FOLLOWING PRINCIPLES:

- Compliance with relevant laws and regulations for the handling of business practices
- Honesty and observance of compliance rules as a core element of doing business
- Effective handling of resources and risks to the company
- Responsibility of each employee for his actions
- Adherence to moral and ethical standards

How the GICON group is overall perceived in the public depends largely on the individual employee. By aligning our actions to high ethical and legal standards, we create trust, prevent conflict situations, and protect the reputation of the company.

The individual companies within the GICON Group are convinced that social responsibility is an important factor in the long-term success of the company. It is simultaneously a result and condition of a value-oriented and sustainably-profitable corporate management.

The following compliance guidelines are derived from principles of the GICON quality policy:

## GOVERNING LAW

For the implementation of our business processes, we comply with all relevant laws and regulations at both a national and international level.

In dealings with public authorities and institutions, we always act honestly and transparently and in accordance with applicable law.

## TRUST AND RESPECT

The GICON Group aims to create value for its clients and business partners who put their trust in our companies and our services. Our group believes that cooperation and mutual business conduct must be characterized by respect, honesty and fairness. We are committed to providing our services to high quality standards and promote innovation and a working environment in which the value and dignity of every individual is recognized and where business partners and employees treat each other with courtesy, honesty and dignity.

The GICON Group is committed to responding to any concerns and suggestions of employees. The Compliance Manager and all persons responsible are always ready to provide guidance and support. There are means of confidentially providing information within the company, so that views or information can be expressed without hesitation or fear of reprisals.

## FINANCIAL INTEGRITY

Our employees protect property and confidential information of the GICON Group and our clients and business partners, and document business transactions in accordance with the rules for financial reporting.