

CODE OF CONDUCT

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**CES
CONSULTING ENGINEERS SALZGITTER GMBH**

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IMPLEMENTATION OF THE CODE OF CONDUCT

The trust that CES receives from our customers, owners, employees and the public depends directly on the conduct of everyone in the company. It has its origin on strict compliance with applicable laws and with all of our internal rules.

We are fully aware of our accountability to the society, and we must act accordingly. As stated in our mission it is the duty of our company and all of us to work for improved living conditions, every day. The purpose of this Code of Conduct is therefore to summarize the norms that must be followed by all of us in everything we do.

At CES the managing directors are responsible for implementing and enforcing our company's Code of Conduct (CoC). CES provides its employees information to help them complying with the Code of Conduct. If employees have questions, they can submit them to the managing directors, the project directors or the coordinators. Every question will be treated with utmost consideration.

The managing directors maintain and further develop the Code of Conduct. An annual review takes place. Compliance will be checked by spot checks within the framework of the annual audits of the management system.

Any employee can and has the right to report a violation or suspected violation of our Code of Conduct. At the employee's discretion, the contact for this purpose can be the direct supervisor, the management system representative or the managing directors.

If suspicions involve the supervisor or the management or if, for whatever reason, the employee wishes to take the issue to someone else who is not involved into the CES day to day operations, then the employee should report the matter to:

Dr.-Ing. Detlef Hugin
+49 531 31704-103
hue@ces.de

An employee who, with a reasonable, good faith basis, honestly believes that the Code of Conduct has been or might have been violated and who makes use of the right to report will not suffer any kind of retaliation. In each such case, all necessary steps are taken to protect the employee against such retaliation. To the extent possible and legally permissible, CES will maintain absolute confidentiality about the identity of any employee who follows this procedure to report a violation or suspected violation of the Code of Conduct. The same applies to the identity of employees who cooperate in the investigation of such violations or suspected violations. In case an employee will not reveal its identity to the CES management, the employee can channel its request through the works council.

MISSION STATEMENT

"As a team of passionate engineers and specialists we are committed to improve living conditions. Worldwide"

SAFETY AND HEALTH

Health, safety and welfare of us and others who may be affected by our business has the highest priority. Organizational arrangements are established to ensure prevention, monitoring of legal compliance and a fast and professional reaction in case of emergency. All team members must apply ongoing improvement and awareness to achieve our objective: zero accidents and no physical and/or mental strains. The responsibility for safety at work rests upon us all.

Our company provides healthy, safe, friendly and environmentally-friendly work circumstances as much as possible. While establishing the working conditions, we strive to maintain and safeguard the health of our colleagues. To ensure the safety of workers, we provide protective work equipment as well as work safety training and emergency plans.

We insist on our staff and the subcontractors to comply with our health and safety principles.

FAIR EMPLOYMENT AND SOCIAL POLICY

We are committed to human rights and we support the UN Universal Declaration of Human Rights and the International Labor Organization (ILO) basic labor standards.

At CES, progress lays in hard work, performance, integrity and ability. Our employment policy is designed to support the individual initiatives, induce cooperation and help our colleagues to reach their full potential. Recruitment, selection and promotion are based on individual merits and the principle of equal opportunities and non-discrimination. Tolerance and respect are among our core values. Our principle is protection against all forms of discrimination, such as age, gender, marital status, ethnicity, nationality, religion, political beliefs and gender orientation.

We support the personal and professional development of our colleagues.

PROTECTION OF ASSETS

We expect that all tangible and intangible assets of the company are respected and protected. These assets include property, equipment, and inventory stocks; securities and cash; office equipment and supplies; information systems and software; patents, reputation and know-how. Violations of the law such as fraud, theft, embezzlement, and money laundering will be prosecuted. Assets of CES shall only be used for work-related activities unless private use is particularly permitted. Internet users must take care not to communicate any information that could incite racial hatred, glorify violence or other crimes, or have an offensive content.

QUALITY

We are committed to deliver services in the highest quality to our customers. Our overall aim is always to meet or exceed our customers' expectations. Such outstanding services require the highest working accuracy in all fields and activities and an ongoing optimization of our way of working. Everyone is responsible for the quality of his/her work and thus for the quality of our common performance. The individual contribution of anybody working for our company is important to ensure our overall success.

CLIENTS

We know that the success of our business lays in the relationship with our clients. We believe, that mutually beneficial business is based on honesty, sincerity, and trust, therefore, we strive to establish and sustain such relationships.

SUPPLIERS

Our suppliers are key to our company's performance. We expect them to be quality-driven, innovative and effective, always act in accordance with the legislation in force as well as our ethical practice. The Code of Conduct and our procurement policy include our requirements and procedures to ensure that we are solely working with suppliers with whom we share our core values. Our suppliers are committed to ethical business practices and respect for human rights, health, safety, and the environment. We aim to work with local SMEs, when possible, to support the local economy.

BUSINESS PARTNERS

Our business partners include associated companies, sub-consultants, representatives, business consultants and affiliated company partners. Our business partners contribute to our business affairs, when we need expertise in a given business area, or in a specific geographic area. All of our business partners are selected with the utmost care. We document every contractual engagement to ensure compliance.

FAIR COMPETITION

Independently whether we act in our name or on behalf of our clients, we respect the rules of fair competition and support all efforts to preserve a free market and open competition, both nationally and internationally. All employees are required to obey the laws against restraint of trade. Formal or informal agreements with competitors for obstructing competition are therefore prohibited. The same applies to behavior based on tacit understandings. We expect the same behavior of our competitors, suppliers and business partners.

ANTI-BRIBERY & BUSINESS FACILITATION BENEFITS

At CES, we do not tolerate any form of bribery. If you act on behalf of CES, it is strictly forbidden to offer, pay, request or accept bribes. We must always comply with the related legislations, regardless of habits and business practices. Business facilitation benefits are also prohibited. Our anti-bribery principle protects CES from being associated with illegal or corrupt payments, or the risk that such payments would be made on our behalf.

ANTI-MONEY LAUNDERING

CES does not allow and does not support any kind of money laundering. Our employees must pay attention to appearing irregularities, especially high value cash payments and any anomaly about transactions. Additionally, we are responsible to review our partners and report any suspicious behavior.

INTELLECTUAL PROPERTY

CES is highly committed to the protection of intellectual property and expects the utmost awareness on this subject from all staff members. In the course of our operations, we do not work with any type of intellectual property, that we are not entitled to use. Our company uses legal software.

All rights of intellectual property created by CES members related to their work on our projects belong exclusively to CES. All types of intellectual property, such as designs, written materials, know-how, processes, logos, contracts, manuals, etc. are subject to this regulation.

DATA PROTECTION

Our company has a high respect for the privacy and dignity of our people. The personal data of employees and subcontractors is requested and retained solely on purpose and for the time necessary for the operation of the company and the applicable law – e.g. the fulfilment of the administrative obligations. Our company is fully aware of the legislation on treatment of personal data. In connection with the operation of our company, in particular financial data, business plans, technical information, personal and sensitive data, we declare and ensure, that such information cannot be disclosed to unauthorized persons.

LEGAL REQUIREMENTS

Our company is committed to stay compliant with all prevailing legal requirements, such as tax and social security legislations, labor law, licenses and declarations. Transparency is of utmost importance within our company, therefore, we require from all our members and business partners to act accordingly. We do fulfil all the administrative and payment obligations to the authorities.

ENVIRONMENT

We are fully aware that everything we do has environmental impacts. It is our duty to minimize negative impacts of our doing wherever possible and to apply pollution prevention and waste reduction by reducing, reusing and recycling. Legal compliance, our environmental policy and an ongoing improvement in every aspect we do shall guide us on our way.

SOCIAL RESPONSIBILITY

CES, as a service provider working on international infrastructure development projects, has a strong commitment to social responsibility, incorporated in its activity itself. Cooperating with various internationally recognized laboratories, universities, research institutes and scientific associations, we work on the reinforcement of tolerance, intercultural relations, integrity, development and the overall well-being of both the direct and indirect stakeholders of our business. We are an ethical employer and support corporate diversity.

UN GLOBAL COMPACT

We are fully aware of our accountability to the society as well as the environment and we live respect, fairness and diversity. Our long-term strategic actions and our organizational structures are based on our company's commitments, policies and strategies. As a participant of the UN Global compact initiative, we fully support the UN sustainable development goals and we committed ourselves to the following ten principles:

HUMAN RIGHTS

- Businesses should support and respect the protection of internationally proclaimed human rights; and
- make sure that they are not complicit in human rights abuses.

LABOUR

- Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- the elimination of all forms of forced and compulsory labour;
- the effective abolition of child labour; and
- the elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

- Businesses should support a precautionary approach to environmental challenges;
- undertake initiatives to promote greater environmental responsibility; and
- encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

- Businesses should work against corruption in all its forms, including extortion and bribery