

ÜSTRA Code of Conduct

RULES FOR A GOOD AND FAIR COOPERATION



ÜSTRA code of conduct is a rulebook that is binding for all ÜSTRA employees in daily working life and its application is the basis of our action.

1. Cultural principles and principles of conduct

ÜSTRA especially stands for a culture of open communication and treating the established rules and principles, to which we all conform, respectfully.

1.1 Laws, regulations, and guidelines

We are obliged to follow the applicable laws and external and internal regulations. In case of questions on what is right or wrong, we contact our superiors or our compliance contact persons.

1.2 Confidentiality

We have to handle company data and information carefully and maintain secrecy regarding all the company secrets. This regulation also applies beyond the employment relationship.

1.3 Protection of company's property

We are responsible for the utility objects entrusted to us and handle them with care. Electronic information systems should especially be protected with regard to a legally and ethically impeccable use and protection of ÜSTRA's own data.

1.4 Financial integrity

In order that you trust us in all areas, not only internal, but also external, it is obligatory we have consistently truthful and accurate reporting and public image.

1.5 Information security, data protection and confidentiality

The information that we process and generate is subject to the provisions of data protection. We always pay attention to the appropriate protection of personal data and trade secrets from third parties – conforming to the current statutory provisions and internally specified regulations. We always treat all information this as confidential.

2. Business partners and public authorities

Our partner organisations are an important success factor for our company. Therefore, we are always loyal, discrete, trustworthy, and fair in our behaviour with our business contacts and public authorities. A

2.1 Fair competition

As a contractor and customer, we adhere to specifications for competition and do not enter into agreements that influence prices and conditions or do not in any other ways restrict fair competition in an impermissible way. We would rather forgo business than violate a law.

2.2 Selection of business contacts

We select business contacts and collaborations within the framework of verification of business partner by objective and transparent criteria and free of personal interests. We expect our partner organisations

to act in accordance with the principles of this code of conduct and comply with all the statutory provisions.

2.3 Cooperation with public authorities / use of funds

ÜSTRA always collaborates transparently and cooperatively with all the public authorities and sovereign agencies.

We pay special attention to the proper execution of grant approvals. Our actions are characterised by a resource-conserving and economic handling of public assets.

Prevention of corruption

Corruption is the misuse of entrusted power for private gains or benefit. ÜSTRA publicly declares to not tolerate corruption under any circumstances.

The demand, acceptance, or offering of allowances in money, other representational gifts, free services or services at reduced prices and other

privileges to provide a benefit is forbidden for all employees of ÜSTRA.

We may not demand, accept, offer, or grant any unauthorised benefits in our business activities.

3.1 Conflicts of interest

We design our processes such that we do not come into a conflict between our private and official interests in our activities. Our conduct towards the interest groups is neutral and we consistently reject illegitimate attempts to exert influence.

An open and transparent communication protects us and business contacts from the suspicion or semblance of a conflict of interest.

3.2 Cash or non-cash benefits

We commit to not accept privileges in the form of cash or non-cash benefits and services from persons or companies with whom ÜSTRA maintains business relationships, either in our own name nor for third party. Exceptions to this are small gifts of negligible value in the form of occasional courtesy and promotional gifts.

3.3 Gifts and invitations

The acceptance of invitations and gifts should always be well considered. In principle: gifts or other benefits from the same business contact may not exceed a maximum value of euro 25.- in a year.

4. Leadership and working together

The management board and the senior executives of ÜSTRA have an exemplary function, to which they do justice every day by their exemplary honesty and fairness.

4.1 HR policy

We especially stand for:

- · upholding the collective wage contract
- recognition and abiding by the applicable laws and regulations of the labour law
- a modern work structure for balancing family and professional-life

In the field of human resource development, we offer:

- · qualification measures
- development perspectives
- · development opportunities

4.2 Appreciation and no-discrimination rule

We value the individual diversity of the employees and never discriminate based on

e.g., gender, ethnic origin, nationality, religion,

age, disability, sexual orientation.

4.3 Management

The senior executives bear a special responsibility. They contribute to the company's success, are responsible for the management of the employees and shaping the work environment. At the same time, they also have an exemplary function. We support our senior executives in the best possible way in exercising the responsibilities assigned to them and offer these executives opportunities for further development of their management skills.

4.4 Outward appearance

An appropriate form of appearance is important for us to show the professionalism of ÜSTRA with a proper appearance even in business community.

4.5 Health and safety

Protection of health and the safety of our employees at their workplace are of the highest priority for us. We have high demands of occupational safety, quality of workplaces as well as personal conduct in daily working life. Our action conforms to the applicable occupational health and safety guidelines.

5. Social responsibility

5.1 Responsibility towards the environment

We adhere to the specifications for environmental protection and actively support a sustainable design of the society, economy, and environment. We contribute to these

objectives by the use of new technologies as well as studies of the public contractors.

5.2 Social commitment

ÜSTRA supports social and charitable institutions and welcomes the volunteer work of its employees.

You can find more information on the Internet at www.uestra.de/unternehmen/ueber-uns/compliance/



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