

# Code of Conduct

Principles of conduct for the employees of the Fire Holding Group companies

*How we act makes the difference.*

## 1. Preamble

This Code of Conduct („Code“) applies to all companies<sup>1</sup> within the Fire Holding Group, that is, to all employees of the companies, the management of Fire Holding GmbH as well as to all boards of the companies. Not only does it represent the aspiration we have of ourselves to live up to the values and principles listed in the Code, it also signals to the outside world that we pursue a responsible mode of conduct towards our business partners, customers and employees. After all, our daily actions do matter; they make the difference between failure and success.

## 2. Management commitment

We see it as our duty to act with integrity and with economic, social and environmental awareness. We strive to conduct our business competently and on an ethical and moral basis and to compete fairly in all markets in which we operate. This includes compliance with applicable laws, in particular the acceptance of anti-trust prohibitions and restrictions on competition. We are aware of the structural risks in the construction industry, but avoid gaining undue advantage over customers, suppliers or competitors.

We also very much welcome ecologically, economically and socially responsible corporate governance among our business partners and regard this as the basis for building a fair business relationship.

## 3. Implementation and enforcement

The Fire Holding Group takes every effort to implement and enforce the principles and values described in this Code. The managing directors of all companies shall be responsible for the preparation, promulgation, updating of and compliance with the Code. Any identified deficits shall be remedied as quickly as possible.

Kirchheim, 09.08.2021



Edward Skube  
CEO Fire Holding GmbH



## 4. Social responsibility

Within the scope of our corporate social responsibility, we are mindful of the observance of human rights and categorically reject any form of child or forced labor. Children of compulsory school age (younger than 15 years) may not be employed even if the legal requirements of the respective country of our supplier would permit this. Furthermore, we guarantee that the statutory maximum number of hours under the applicable national law is not exceeded and that the remuneration is at least equivalent to the respective legally defined minimum wage. We are also mindful of this with respect to our suppliers and partners. In addition, we explicitly condemn illegal employment and undeclared work – both on our own areas of responsibility and those of our subcontractors. We ensure full and timely payment of taxes and social security contributions as well as appropriate and fair working conditions and also hold our subcontractors responsible to this.

## 5. Team spirit, constructive cooperation

We constantly question existing solutions and develop new ideas for the benefit of our customers. To this end, we promote constructive teamwork among our employees. Their interests and the demands they place on us are key for our work and further development. Successful cooperation is a result of the diversity of our employees and their dedication within the business areas.

## 6. Standards of cooperation

We expect our employees to act in accordance with the highest professional standards as well as the applicable law, the Code and internal company rules, whether online or offline, at all times.

## 7. Open communication with staff

We do not cover up misconduct. If employees report actual or suspected misconduct in good faith, we will not tolerate intimidation or retaliation against them. We understand „in good faith“ to mean that the employee is convinced that their account is true. This applies regardless of whether a subsequent investigation confirms the employee's version or not.

## 8. Dialogue with cooperation partners

All business information of our partners and their trade secrets are treated sensitively and confidentially as a matter of principle. Required documents are properly prepared, stored or, if necessary, destroyed after the end of the cooperation.

## 9. Customer orientation

We always behave fairly and honestly towards our customers and business partners. We record the wishes, needs and expectations of our customers and business partners in order to ensure that they are implemented in products, services or other processes in a focused manner. Our primary goal is to build long-term and stable relationships with our customers and business partners on the basis of trust.

## 10. Bribery and corruption

We do not tolerate any form of bribery and corruption, regardless of whether this damages the assets of our companies or the assets of third parties. We deploy precautionary and control mechanisms to ensure that bribery, theft, embezzlement, fraud, tax evasion or money laundering are prevented. Special care must be taken in dealings with civil servants, e.g. in the context of public contracts.

Our employees are prohibited from accepting or granting favours of any kind (cash, travel, gifts, ...) that are linked to an undue advantage (award of contract, project award, ...).

## 11. Gifts and benefits

None of our employees may solicit gifts or other personal benefits from customers, suppliers or other business partners. Accepting and giving gifts and other benefits is prohibited in particular if it appears likely to influence pending business decisions or violates a law, regulation or directive. Even without the intention to influence, any giving of gifts or other benefits to civil servants, employees or representatives of the public sector is prohibited. Likewise, cash gifts are never customary in business and thus always prohibited.



Gifts and other benefits are permitted if they are customary and ethical. Since situations differ in everyday business transactions, considerations regarding the customary nature of gifts should be clarified in advance with the Compliance Officer. In order to exclude potential influence, any gifts accepted shall be handed in to the administration team of the respective company and raffled off once a year as part of an employee raffle or donated to a good cause.

## 12. Donations

As a matter of principle, we do not donate to political parties. In addition, we do not donate to individuals or to organisations whose objectives contradict our corporate philosophy or damage our reputation. The grant of donations is always transparent and documented. Individual donations shall not exceed 2.500 € and may not be attached to any consideration in return.

## 13. Avoidance of conflicts of interest

Personal interests must not unjustifiably influence our professional judgement. Possible conflicts of interest must be anticipated and disclosed to the manager or the Compliance Officer in advance so that they can be avoided by organisational measures.

## 14. Dealing with petty cash

In some cases, petty cash is kept for small expenses. Handling cash entails higher documentation demands in order to avoid damage to the company. Records of each cash transaction shall be prepared in a timely manner in accordance with accounting requirements and countersigned by at least one other person.

## 15. Confidentiality / data protection

We treat all personal data of our customers, business partners and employees with the utmost care. This includes names, addresses, telephone numbers as well as dates of birth or information about the current state of health. Our employees are obliged to take all data-security measures that are suitable for protecting our IT system against internal as well as external data theft. This concerns in particular misused passwords as well as unauthorised downloading of files, especially of inappropriate content from the Internet.

## 16. Protection of the environment

The treasures of nature are vital for humanity. For that reason, it is a top priority for us as a company to protect nature and the environment as best as we can and to handle them responsibly. Our employees are required to treat all natural resources used in our company with care. Our employees are expected to adopt a responsible approach to the procurement, production and distribution of our products and services.

## 17. Compliance with applicable law

We require our managers to familiarise themselves with the laws, regulations and rules relevant to their area of responsibility and to comply with them without exception. Our managers in particular are subject to significant responsibility in complying with the Code.

The business practices of our business partners and their suppliers must also comply with applicable laws. This applies in particular to the import, export and domestic trade in goods, technologies or services, as well as to the movement of payments and capital.

Any violation of economic embargoes as well as trade, import and export control regulations must also be ruled out by our business partners, as must the financing of terrorism.

## 18. Health protection and occupational safety

We firmly believe that the safety and well-being of our employees are essential to our economic success. We place great emphasis on following our health and safety guidelines. We strive to sustainably promote the physical and mental well-being of our employees. Our goals are efficient and committed employees in the long term as well as lower rates of sickness and occupational accidents. We practice the promotion of health as a key element in sustainable productivity and the quality of our services.



## 19. Fair competition

We are committed to fair competition and comply with the applicable laws and rules in this regard. We do not participate in arrangements concerning prices, conditions and strategies with competitors, suppliers, other companies and traders that hinder fair competition or in any anti-competitive boycotts. If we are approached by suppliers or competitors with anti-competitive intentions, we actively terminate these conversations, document them and report them immediately to the Compliance Officer so that appropriate measures may be initiated.

## 20. Prohibition of discrimination

Any form of discrimination is prohibited as a matter of principle, regardless of whether it pertains to a person's nationality, ethnicity, age, gender, sexual orientation, marital status, pregnancy, disability, religion or belief. Promotions and new appointments are always made free of discrimination. We do not tolerate personal or sexual harassment.

## 21. Dealing with company and third-party property

We treat company property and other company assets with care. We protect and respect the property of third parties, especially our business partners.

## 22. Freedom of association and collective bargaining

We respect the right of employees to form company organisations, join inter-company organisations and engage in collective bargaining in accordance with applicable national law.

## 23. Financial integrity

It is our policy that all business transactions, assets and liabilities are recorded and documented in accordance with legal requirements. When preparing financial records, we always ensure that they are complete as defined by the applicable accounting principles and that they are always prepared correctly and in a timely manner.

## 24. Plagiarism

We have developed, implemented and maintain appropriate methods and processes to minimise the risk of plagiarism being introduced into deliverable products and to detect plagiarism at an early stage.

## 25. Indications of misconduct

All employees are requested to report any indications of violations of applicable law, the Code or internal company rules by email to [compliance@fire-holding.de](mailto:compliance@fire-holding.de). All reports are taken seriously, treated confidentially and carefully reviewed.

No employee shall fear disadvantages because of a report made for the protection of the company, provided they are not guilty of anything themselves.

## 26. Violations

If employees violate applicable law, the Code or internal company rules, this may lead to legal action and/or disciplinary measures.

## 27. Training

The Code shall be handed out to every employee. We want to empower all employees to behave in accordance with the rules and contribute to a deeper understanding through regular compliance communications and training.

All employees are obliged to familiarise themselves with the content of the Code and to participate in the relevant training.



## 28. Questions

Questions regarding the Code and/or proper conduct should be clarified in good time with the responsible department or the Compliance Officer Mr. Mike Lingner (tel.: +49 (89) 99119-124, email: [compliance@fire-holding.de](mailto:compliance@fire-holding.de)).