Compliance Policy

Goldbeck Solar
Message from the Management

Since the foundation of the Company in the year 2001, we share common values in our company. They are the basis of decision-making.

Our pillars are humanity, responsibility and willingness to perform. These three values distinguish our company and the way we deal with our customers, business partners, suppliers and employees.

The Goldbeck Solar Compliance Policy contains guidelines for compliance with national and international laws, rules and ethical conduct. We hereby lay the foundation for continued successful cooperation and for the sustainable development of our company.

The regulations stipulated here are accessible to our customers and business partners and are also binding for them.

Compliance is a task for all employees of our group of companies. Therefore, the managers in addition to fulfilling their role model function, have the task of ensuring that the employees are aware of the compliance guideline in their area of responsibility, and that this remains conscious and followed. Personal conversations are necessary as well as organizational measures.

In parallel, we will install workflows in the course of digitizing, which ensure the training and updating of the employees via the Goldbeck Solar compliance rules.

Violations of the compliance policy will not be tolerated.

Goldbeck Solar Management is responsible for ensuring that the established standards are implemented throughout the group and are lived with our employees, customers and subcontractors.

Hirschberg, 09.10.2018

Joachim Goldbeck

Björn Lamprecht
1. WE ADHERE TO NATIONAL AND INTERNATIONAL LAWS AND BEHAVE ETHICALLY CORRECT.

The claim of Goldbeck Solar goes beyond the mere compliance with national and international laws.

Violations of the law may be subject to criminal prosecution, high fines, blocking to public and private orders, as well as claims for damages and reputation losses.

A behavior is ethically correct if it complies with the general principles of integrity and decent action.

We expect our employees to behave ethically in their business and in all situations related with their job.

Ethical behavior means also dealing with all people with respect and fairness and to give them appreciation regardless of their origin or function.

Goldbeck Solar condemns all forms of forced or child labour and respects itself as well as in the supply chain in purchasing, procurement, manufacturing and all business processes the prevention of Slavery and Human Trafficking (UK MSA 2015). All ILO core labour standards are also maintained in the process chain.

2. WE DO NOT TOLERATE CORRUPTION, BRIBERY AND MONEY LAUNDERING.

Corruption has devastating effects worldwide. That is why we accept no form of corruption. We avoid through transparent processes that even the impression of corrupt behavior arises.

Corruption occurs in a variety of forms (money and gifts, invitations, donations, consultant contracts and other benefits).

It is not permissible to demand, accept, offer or give bribes directly or indirectly.

On the other hand, participation in general business lunches and hosting as well as the acceptance and devotion of attentions in the form of small gifts is permissible.

Corruption deals damage the company and its customers. It damages the reputation of the Goldbeck Solar.

Those who act corrupt are criminals. Criminal activity is punishable and leads to an immediate loss of the workplace.
Goldbeck Solar pays strict attention not to be involved in money laundering operations.

3. WE DO NOT TOLERATE ANY PROHIBITED AGREEMENTS

Goldbeck Solar is committed to fair competition. We convince customers by the quality of our products and services and offer them at market-fair prices. We are opposed to unlawful restrictive agreements.

Prohibited collusion and anti-trust infringements result in high corporate fines and the exclusion of the company from public and private contracts. This jeopardises the company's image and assets and the jobs of its employees.

Every employee is responsible for compliance with competition law regulations. Agreements affecting competition are prohibited and lead to immediate loss of the workplace.

4. WE DO NOT TOLERATE ILLEGAL EMPLOYMENT AND UNDECLARED WORK.

We do not tolerate any form of illegal employment and undeclared work.

In order to comply with the legal regulations for the employment of both own and foreign employees

We commit ourselves and our business partners to comply with the legal regulations for the employment of both own and extern employees. We are committed to the fact that the employees of our subcontractors are employed and remunerated on the basis of fair and legally compliant contracts.

We contract our subcontractors to comply with the legal requirements and prohibit the employment of persons (own and foreign employees) as well as subcontractors without residence and work permits.

5. IN THE CASE OF PRIVATE CONFLICTS OF INTEREST, TRANSPARENCY IS MANDATORY

Our success is benefiting the whole of our employees. It assumes that the individual employee is acting within the meaning of the company. Private interests must not be pursued at the expense of the company.

If an employee has connections of a personal, family, financial or other kind to Goldbeck Solar partners or their employees, who could impair the objectivity of the decision or action in the context of the work for Goldbeck Solar. This should be communi-
cate d and be made clear, within the framework of the transparency bid. The further action will be coordinated with the respective responsible supervisor and if necessary with the top management.

6. WE PROTECT CONFIDENTIAL INFORMATION
Confidential information must not be misused.
The intellectual property of our company is a competitive advantage and must be protected. No employee is allowed to pass on knowledge of internal data, processes, operations and projects without authorization.
Anyone who uses confidential information for his own benefit or makes it accessible to other persons is criminal and immediately loses his work place.

7. SOCIAL BEHAVIOUR IN THE COMPANY
As already enshrined in the corporate guideline, we are committed to the principles of respectful, fair and loyal handling.
Any discrimination is prohibited. No one may be disadvantaged or harassed because of its origin, gender, sexual orientation, religion or belief, disability or age.
We expect all employees to contribute to a productive working environment through a tolerant and respectful approach to each other.
The loyalty of each employee is the basis for the success of the company.
We ensure that human rights are respected.

8. REPORTING OF MISCONDUCT.
The fulfillment with this compliance policy is the responsibility of the entire company and therefore of all employees and our business partners. If there is a suspicion of violation of the compliance guideline, every employee and every business partner is obligated to communicate this to Goldbeck Solar.
If an employee has been involved in violations of the compliance policy itself and may be prevented from doing so by his or her voluntary report, this is taken into account in his favor. Deliberately false suspicions take action against the author.
In order to protect Goldbeck Solar, any compliance violations from business partners and unfair practices by competitors should be reported. If there are signs of an infringement, we expect all employees to provide an appropriate notice to:

• The direct supervisor or
• The responsible management or
• The head of the legal department.

We would like to thank you for any support that help us to ensure the compliance with this policy.