

Compliance Policy



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I. Foreword

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 trust, customer orientation, intelligence, professionalism and the will to succeed. These five core values distinguish our company and the way we deal with our customers, business partners, suppliers and employees.

The GOLDBECK SOLAR compliance guideline contains guidelines for the observance of national and international laws, regulations and ethical behaviour. We hereby lay the foundation for a continued successful cooperation and for a sustainable development of our company. It complements the GOLDBECK SOLAR corporate guidelines, which describe our self-image, our goals and the standards for our actions.

The regulations laid down 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.

In addition to fulfilling their function as role models, supervisors must therefore ensure that employees in their area of responsibility knows the compliance guidelines, is aware of remains and is pursued. This requires both per-

sonal discussions and organizational measures. Violations of the compliance guidelines will not be tolerated.

The GOLDBECK SOLAR management ensures that the standards laid down are implemented throughout the entire group of companies and are discussed with our employees, customers and suppliers.

Hirschberg 11.01.2019



Joachim Goldbeck



Tobias Schuessler

II. National and international laws

The claim of GOLDBECK SOLAR goes beyond the mere compliance with national and international laws. Violations of the law can result in criminal prosecution, heavy fines, suspension of public and private contracts, as well as claims for damages and loss of reputation. A conduct is ethically correct if it complies with the general principles of integrity and decency.

For GOLDBECK SOLAR these values are documented in the guidelines of the group of companies. We expect our employees to behave ethically in their business activities and in all related situations. Ethical conduct includes treating all people with respect and fairness and showing them appreciation regardless of their origin or function.

GOLDBECK SOLAR condemns any form of forced or child labour and observes the avoidance of slavery and human trafficking in its own operations and in the supply chain in purchasing, procurement, production and all business processes (UK MSA 2015). All core labour standards of the International Labour Organization (ILO) are also respected in the process chain.

III. Corruption, bribery and money laundering

Corruption has a devastating impact worldwide. Therefore we do not accept any form of corruption. We use transparent processes to avoid even the appearance of corrupt behavior. Corruption occurs in many different forms, e.g. (financial and material gifts, invitations, donations, consultancy contracts and other benefits). It is not permitted to directly or indirectly demand, accept, offer or give bribes.

On the other hand, it is permissible to attend generally customary business meals and entertainment, and to accept and give small gifts in kind. Internal guidelines are available for guidance. Corruption causes damage to the company and its customers. It damages the good reputation of the GOLDBECK SOLAR group of companies.

Anyone who acts corruptly is acting criminally. Acting criminally is a punishable offence and leads to immediate job loss. GOLDBECK SOLAR takes strict care not to become involved in money laundering activities.

IV. Prohibited agreements

GOLDBECK SOLAR is committed to fair competition. We convince customers by the quality of our products and services and offer them at fair market prices. We reject inadmissible agreements restricting competition. Prohibited agreements and antitrust violations result in high company losses and the exclusion of the company from public and private contracts.

This endangers the image and assets of the company and the jobs of its employees. Every employee is responsible for compliance with competition law regulations. Agreements that influence the competition are prohibited and lead to the immediate loss of the job .

V. Illegal employment and undeclared work.

We do not tolerate any form of illegal employment and undeclared work. We pledge ourselves and our business partners to observe the legal regulations, to employ our own employees and those of others.

We are committed to ensuring that the employees of our subcontractors are employed and paid on the basis of fair and legally compliant contracts. We contractually oblige our subcontractors to comply with the legal requirements and prohibit the employment of persons (our own and external employees as well as employees of subcontractors) without residence and work permits.



VI. Private conflicts of interest

Our success benefits the entire workforce. It presupposes that the individual employee acts in the interests of the company. Private interests must not be pursued at the expense of the company.

If an employee has personal, family, financial or other connections to GOLDBECK SOLAR partners or their employees, which could impair the objectivity of the decision or action within the scope of the work for GOLDBECK SOLAR, this must be made public and, within the scope of the transparency requirement, the further procedure must be agreed with the respective direct superior, if necessary the management.

VII. Confidential information

Confidential information must not be misused. The intellectual property of our company is a competitive advantage and must be protected. No employee may pass on knowledge of internal company data, processes and projects without authorization.

Anyone who uses confidential information for his own benefit or makes it available to other persons without authorization is acting criminally and will immediately lose his job .



VIII. Social behaviour in the company

As already anchored in our corporate guidelines, we are committed to the principles of respectful, fair and loyal dealings with one another. Any discrimination is prohibited. No one may be discriminated against or harassed on the basis of their origin, gender, sexual orientation, religion or belief, disability or age.

We expect all employees to contribute to a productive working environment by treating each other with tolerance and consideration. The loyalty of every employee is the basis for the success of the company. We ensure that human rights are respected.

IX. Reporting of misconduct

The observance of these compliance guidelines is the responsibility of the entire company and thus of all employees and our business partners together. If there is a suspicion of a violation of the compliance guidelines, every employee and every business partner is obliged to inform GOLDBECK SOLAR.

If an employee has been involved in violations of the Compliance Policy himself/herself and damage to the company can be averted by his/her voluntary reporting, this will be taken into account in his/her favour. Deliberately false suspicions will result in measures being taken against the originator. In order to protect GOLDBECK SOLAR, compliance violations by business partners and unfair practices by competitors should be reported.

If there are indications of a violation, we expect all employees to report it:

- to their direct supervisor or - the responsible management

We would like to thank you for any support that ensures the adherence to this compliance guideline.