



CODE OF CONDUCT AND INTEGRITY

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Related Policies and Directives	<ul style="list-style-type: none"> - Cultural Principles - Policy on Protection against Sexual Harassment - Human Rights Directive - Directive for the Avoidance of Conflict of Interest - Directive on Accepting and Granting of Gifts
Approved by	Managing Directors Moritz Lörcher, Thomas Hentschel
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1 COMPLIANCE CULTURE

Our actions are based on our cultural principles as well as economic, social and ecological responsibility and ethics, integrity, sustainability and innovation.

We comply with laws, guidelines and rules and try not to circumvent anything. We do not tolerate corruption and bribery.

Integrity and acting with integrity are deeply rooted in our self-image and corporate culture. This applies to our day-to-day communications within the firm as well as with our clients and partners.

Projekt-Consult's corporate value system focuses on:

- clients and partners as drivers of (product) development,
- employees and freelance consultants working with us as the most crucial asset.

Managerial staff act as role models in line with Projekt-Consult's leadership model, therefore, have a decisive impact on the importance awarded to the compliance system and strict adherence to it.

Only the employees can ensure that Projekt-Consult will meet all requirements of the compliance system. This requires competence, commitment and motivation from everyone.

2 BASIC PRINCIPLES

Projekt-Consult GmbH as a member of the GFA Group adheres to the same [Code of Conduct](#) as the latter. We, the Projekt-Consult staff members, practice these principles ourselves and expect our business partners to do so as well. It is our expectation that our project partners and target groups respect our principles.

In line with Projekt-Consult's - GFAs cultural principles and corporate values and in order to safeguard Projekt-Consult's business integrity, Projekt-Consult is committed to and accountable for upholding the highest ethical standards to avoid any involvement in fraud, corruption, coercion, money laundering, human trafficking or terrorism, as well as any behaviour, which aims at unfair competition or gives rise to respective suspicions. Projekt-Consult is equally committed to and accountable for the prevention of any form of violation of human rights, sexual exploitation, abuse, and harassment, racism, as well as any other ethical breaches.

Projekt-Consult employees are guided by the following principles.

2.1 Ethical Standards

Projekt-Consult provides management services to private and donor-financed projects under terms and conditions that comply with the internationally accepted ethical standards of corporate governance and competitive practices, such as the United Nations' Global Compact Principles.

2.2 Equal Rights

Projekt-Consult does not tolerate discrimination or stigmatization on any grounds; including gender, skin colour, and religion, nationality, and HIV status. Instead, Projekt-Consult engages with its clients and partners based on mutual respect, and insists upon equal rights and equal treatment in all corporate activities.

2.3 Legal Compliance

Projekt-Consult respects and conforms to the rule of law in all of its activities and meets its contractual obligations both in Germany and in any country in which it provides services.

2.4 Transparency

Projekt-Consult makes sure that its actions and motives are clear and comprehensible and engages in fair and transparent partnerships with its business partners, freelancers and other stakeholders.

2.5 Cooperation in Partnership

Projekt-Consult works together with our business partners in a fair and reliable manner based on mutual trust. This also applies to our behaviour towards our colleagues - permanent as well as freelancers - based on mutual respect and the rejection of bullying.

2.6 Active and Passive Corruption

Projekt-Consult does not offer or accept remuneration of any kind that seeks to unduly influence tender, procurement, employment, management, or other decision making processes in our services.

2.7 Confidentiality

Projekt-Consult treats all information related to business activities and the review of compliance with this Code of Conduct with strict confidentiality. This obligation also applies after termination of a contract of employment. It does not apply to information that is in the public domain or which in terms of significance does not require secrecy.

3 WHO IS COVERED BY THE CODE OF CONDUCT

Compliance is an essential task that each one of us is called to answer. Projekt-Consult relies on all employees, management, and business partners working with Projekt-Consult to play key roles in ensuring Projekt-Consult's integrity. We have to act with integrity and in accordance with this Code of Conduct, and fully understand the ethics of serving clients.

Only a business that is based on a set of values, as outlined above, has the preconditions for sustained growth and for solutions to the challenges arising in a world of change. A commitment to these values means assuming responsibility; for clients, business partners, employees and for the protection of the environment. Projekt-Consult is committed to ethical, legally correct and socially responsible business management. We also expect this standard of conduct from everyone, working with us and with whom we do business.

We expect you to share this commitment and to make reasonable efforts to promote the compliance of your colleagues at home and abroad as well as business partners with the principles of this Code.

Adopting a zero tolerance policy against all forms of bribery and corruption, Projekt-Consult feels a responsibility to work with business partners that share our ethical approach and adhere to these or similar standards.

4 AREAS AT RISK

We are all judged by our behaviour - whether or not we abide by the law and how we live integrity. We all like to believe that we are honest, responsible, respectful, trustworthy, reliable and loyal. However, our integrity may be tested in unexpected ways, especially in an international business environment.

When it comes to compliance, the main areas at risk are:

- Different national customs and legal systems;
- Public contracts;
- Intense competition;
- Temporary project teams made up of external experts; and
- Large financial volumes.

To avoid and minimise the risk of non-compliance we are all required to:

- Be aware of relevant laws and regulations;
- Comply with all Projekt-Consult policies, directives and procedures; and promptly
- Report all suspicions or violations of the law, of our Code of Conduct and Integrity, policies, directives and procedures.

5 OUR CORE PROCESSES AND INTEGRITY

We work in complex environments with governments, government-controlled bodies and public international institutions as well as private companies, employees and experts. Integrity is the core of our values, and this attitude is embedded in our policies, directives and in our procedures for acquisition and project management.

Therefore, it is essential to

- understand and comply with our procedures for acquisition and project management and with laws, rules and regulations pertaining to anti-corruption, public procurement, data protection and disclosure;
- ensure that we comply with tax regulations in Germany and abroad,
- apply a mindful attitude when we handle personal data of employees and freelance consultants,
- know and apply our policies, directives and procedures, which have been designed to guide you and help us comply.

To act fairly and with integrity, when dealing with our clients and business partners is not only our duty but also deeply rooted in Projekt-Consult's self-conception and the essential spirit of our culture. However, notwithstanding all attentiveness, it may happen at any time - whether intentionally or unintentionally - that our integrity is undermined.

Please refer to our Directive for the Avoidance of Conflict of Interest and our Directive on Accepting and Granting of Gifts for further guidance.

6 REPORTING MATTERS

At Projekt-Consult, we live a culture of transparent communication between colleagues and within the structure. That does not only hold true for technical and leadership issues but also for compliance matters. However, as this may not be possible at all times, Projekt-Consult maintains a whistle-blowing function within Projekt-Consult and externally:

Internally, you may report your concern about any possible violation or suspicion to

- Moritz Lörcher, Phone: +49 (40) 60306-741, E-mail: moritz.loercher@projekt-consult.de

- Susanne Eggers, with regard to Sexual Harassment/Human rights (female).
Phone: +49 (0)40 60306 105, E-mail: susanne.eggers@gfa-group.de

Susanne Eggers is the GFA commissioner for data protection and privacy, occupational safety, and health management.

- Niklas Leverenz, with regard to Sexual Harassment/Human rights (male).
Phone: + 40 88886860, E-mail: niklas@leverenz.net

Niklas Leverenz is an independent lawyer with twenty years of intimate knowledge of GFA, Projekt-Consult's sister company.

Externally you may report your concern

- With regard to Sexual Harassment to the Fürstenberg Institute. You can contact the Institute by Phone 0800 387 78 36 or via website. www.fuerstenberg-institut.de.

- With regard to Compliance and Human Rights GFA / Projekt's - Consult Ombudsperson¹
Dr Malte Passarge.

Dr Passarge is an experienced confidence lawyer retained by several companies and also the director of the confidential contact office of the Hamburg business community, www.Pro-Honore.de. You can contact him by phone +49 (40) 41 52 51 72 or Email Passarge@pro-honore.de

After you have submitted your report, either openly or anonymously, you can request your identity to stay confidential while still keeping a line of communication open.

The ombudsperson, the compliance officer, the data protection officer and the contact persons for human rights and sexual harassment shall respect your wish for confidentiality. You can find more information here:

- Projekt-Consult Policy on Protection against Sexual Harassment
- Projekt-Consult Human Rights Directive

¹ The main task of the ombudsman office is the confidential receiving of indications concerning illegal business activities, such as corruption, breach of trust, fraud or any other illicit behaviour of serious nature, as well as any other company-related criminal offences or violations of rules. The ombudsman office is the charge of an external lawyer who receives any indication concerning potential wrongdoing by telephone, email, or upon request during a personal interview.