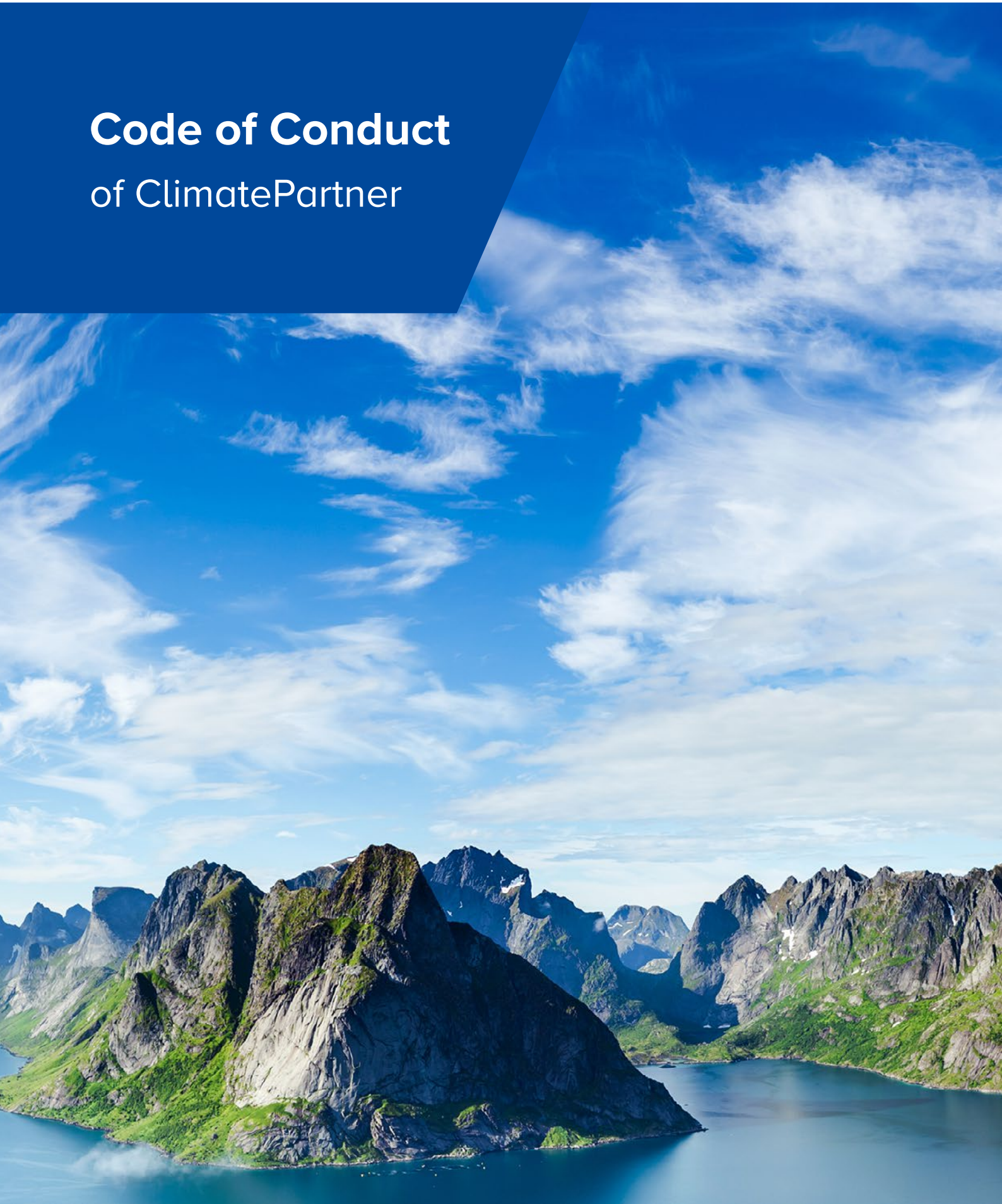


# Code of Conduct of ClimatePartner



# Preamble

For ClimatePartner, observing the principle of legality as well as practising business responsibly and fairly have always been of highest priority. In order to implement these values into daily business, this Code contains rules for fair treatment and integrity within the company itself and towards business partners, customers and competitors. The Code defines the ClimatePartner global understanding, position and handling of compliance issues relating to:

Anti-bribery and corruption,  
Standards for gifts and entertainment,  
Conflicts of interest,  
Competition and antitrust law,  
Preventing money laundering,  
Dealing with information,  
Equal treatment and non-discrimination,  
Sustainability, and protection of environment and climate,  
Compliance management and training.

Compliance with law, rules and regulations is an essential basic principle of responsible business conduct for ClimatePartner.

To show this in a globally recognised manner, ClimatePartner has signed up to the **UN Global Compact** <https://www.unglobalcompact.org/>

## Anti-bribery and corruption

- (1) ClimatePartner does not tolerate corruption in any form. Bribery is the giving or receiving of anything of value to obtain or confer an advantage or influence contrary to the principles of honesty and integrity.
- (2) The persons and partners covered by this policy according to the preamble must never, directly or indirectly, give or accept a bribe in any form. Third parties acting on behalf of ClimatePartner are prohibited from giving or accepting monetary bribes in any form or from accepting or giving bribes in any other form.
- (3) ClimatePartner neither offers nor grants public officials any benefits for carrying out or expediting official acts and abides by this regardless of whether it is legally entitled to the official act, or the public official behaves in a manner that violates their official duties.
- (4) ClimatePartner strictly prohibits all acts of bribery and corruption, regardless of the identity or position of the parties involved: ClimatePartner does not and will not engage in bribery or corruption or any activities that could be perceived as such. This means that all persons and partners covered by this policy according to the preamble have to abstain from any acts of bribery or corruption, whether direct or indirect via the means of any intermediaries.

## Standards for gifts and entertainment

- (1) All persons and partners covered by this policy according to the preamble must handle any gifts, invitations, free seminars and entertainment carefully with due consideration of bribery and corruption risks as well as potential conflicts of interest. They must consider and ensure that they only give or accept gifts and entertainment that are in line with all external and internal legal requirements and policies that are applicable.
- (2) All gifts and invitations to entertainment occasions must be supported by legitimate, reasonable and appropriate justification without any expectation of any commercial or other favour of any nature in return. These special types of donations may never be offered or received: cash payments or cash equivalents like vouchers, gift certificates, disproportionately favourable employment or contract conditions or any kind of dubious offers.

- (3) Handling of gifts and entertainment: Employees must inform their employer of all offers or receipts of gifts, invitations, free seminars and entertainment that have a value equal to or exceeding € 100.00 (including sales tax). Branded advertising materials and giveaways are excluded from this regulation. If individual countries or subsidiaries hold more stringent regulations, the stronger rules shall prevail. Invitations to business meals can be accepted to the usual extent, which will be described in more detail by a country list adapted regularly by ClimatePartner.
- (4) Donations in cash and in kind for charitable and non-profit purposes are permitted. The term “donation” covers voluntary services, which are given without any consideration in return, but usually with a certain purpose. The term “sponsorship” covers benefits in the form of money, goods or services with a reputation-enhancing motive as ClimatePartner supports social, cultural and environmental activities as part of its corporate strategy. In all sponsoring activities, care must be taken to ensure that no conflicts of interest arise.

## Conflict of interests

- (1) ClimatePartner promotes that personal relationships and interests should never affect business activities or influence decision-making in any way, and therefore is careful to avoid situations where a conflict between private and professional may arise – or, of equal importance, where it may appear to do so.
- (2) A conflict of interest occurs where personal gain may influence professional judgement and any investment, or where entering into a relationship may cause others to doubt fairness, integrity or the ability to perform duties fairly objectively. Employees must keep their private interests and ClimatePartner’s strictly separated from each other. Particular attention must be paid to contracts with close persons or orders to companies in which related persons work in decision-making positions.
- (3) All cases of suspected conflict must be raised internally without delay.

## Competition and antitrust laws

- (1) ClimatePartner observes the rules of fair competition as defined by applicable law. In particular, competitors are forbidden to exchange information or reach agreements on allocation of territories and customers, prices and components of prices, supply relationships and the conditions governing them, production capacities, and the terms and conditions of bids.
- (2) The same applies to exchanges of information concerning market strategies and investment strategies. ClimatePartner is aware that it is prohibited not only to make written agreements in this respect, but also to make any verbal agreements in this context.
- (3) ClimatePartner will not restrict customers' and purchasers' freedom to set their own resale prices or make any attempt to exercise such influence.
- (4) All persons and partners covered by this policy according to the preamble must not engage in any interactions with competitors (horizontal interactions) that aim to restrict competition in the Relevant Market in a manner violating applicable antitrust laws. The same applies to vertical agreements (agreements between undertakings at different levels of the market).
- (5) Any contact with competitors to discuss the aforementioned competition aspects, even on an informal/social level, may be cause for antitrust concerns and is forbidden. Employees are informed to terminate such contact or correspondence and to immediately inform of the incident internally.

## Preventing money laundering

- (1) Money laundering is a deliberate attempt to move cash or assets derived from criminal activities into legal and legitimate financial activities.
- (2) ClimatePartner only does business with reputable partners who operate within the law using resources from legitimate sources. ClimatePartner carefully checks the identity and credentials of potential customers, business partners and other third parties (Know Your Customer KYC Process) and takes all reasonable measures to ensure transparent business relationships.

- (3) ClimatePartner fulfils its legal obligations to prevent money laundering and does not participate in any money laundering activities. In cases of doubt, all employees are required to report unusual financial transactions, especially those involving cash, which could give grounds to suspect money laundering, to the responsible finance, legal or compliance department for review.

## Dealing with information

- (1) All written documents, records and reports, whether internal or external, must be accurate and truthful. ClimatePartner observes generally applicable accounting principles, which require that data and other records must always be complete, correct and up-to-date according to the applicable trade law.
- (2) Confidential company information must be kept secret. This obligation remains in effect after employment contracts end. ClimatePartner labour contracts are drafted accordingly. Employees shall treat all company information as confidential.
- (3) In all business processes and in compliance with the applicable statutory requirements, ClimatePartner ensures that privacy is safeguarded, personal data is protected and all confidential business information is kept secure. Technically and organisationally, and with regard to protection against unauthorised access and loss, an appropriate standard that reflects the state of the art and takes account of the associated risks is applied.

## Equal treatment and non-discrimination

- (1) A culture of equal opportunities and mutual trust and respect is of great importance to ClimatePartner. Equal opportunities and the prevention of discrimination in the recruitment, promotion, training and development of employees is mandatory. All employees are treated equally, regardless of gender, age, race, culture, ethnicity, sexuality, disability, religion or world view.
- (2) ClimatePartner respects internationally recognised human rights, supports their observance and rejects all forms of forced and child labour. The right to appropriate compensation is recognised for all employees. Pay and other benefits shall at least comply with the respective national or local

legal standards or the standards in the national economic sectors/industries and regions.

- (3) The safety and health of employees are corporate objectives of equal standing with the quality of ClimatePartner services and commercial success.
- (4) Occupational safety and health protection are an integral part of all business processes in all technical, economic and social considerations. All employees shall promote safety and health in their work environment and comply with the health and safety regulations. All managers are obligated to instruct and support their employees in meeting this responsibility.

## **Sustainability and protection of environment and climate**

For ClimatePartner, sustainability, environmental and climate action, and resource efficiency are the key corporate objectives. Climate action is the core business of ClimatePartner, by developing new strategies and services. ClimatePartner makes sure its environmental and climate impacts are kept to a minimum.

## **Compliance management and training**

- (1) ClimatePartner uses reasonable means to protect from retaliation individuals who report alleged or actual compliance cases in good faith and in compliance with applicable regulations. This applies regardless of whether any compliance case turns out to be substantiated or not.
- (2) Depending on the seriousness of a Compliance Incident and any consequent implications, ClimatePartner will apply appropriate corrective measures and actions, or mitigating activities aiming at correcting behaviour. Disciplinary action is always subject to applicable laws and a fair procedure.
- (3) Disciplinary matters will be handled with as high a degree of confidentiality as is practicable and only on a need-to-know basis.
- (4) Training on specific areas of this Policy will be offered regularly. Employees shall complete all mandatory compliance training in a timely manner.

## Your partner for climate action

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