

GOLDBECK

# Compliance Guidelines





# Foreword by the CEO

Here at GOLDBECK, we have shared common values ever since our company was founded in 1969. They form the basis for all the decisions we make.

Our core values are humanity, responsibility, trust, performance and pioneering spirit. These five core values distinguish our company and the way we treat our customers, business partners, suppliers and employees. We take responsibility for the sustainability of our actions and their commercial, ecological and social impact. We act responsibly – both in our interactions with our colleagues and business partners and with regard to the society and the environment.

The GOLDBECK Compliance Guidelines apply to all of our business areas, including our subsidiaries in Germany and abroad. It contains guidelines for compliance with national and international laws, regulations and ethical behaviour. These Guidelines are the basis for continued successful collaboration and the sustained growth of our company. It supplements the GOLDBECK Corporate Guidelines, which describes our self-image, our goals, and the standards for our actions.

Compliance is a responsibility for all employees of our company. In addition to acting as role models in this regard, this means that supervisors are also required to ensure that employees in their area of responsibility are aware of the Compliance Guidelines, remain aware of them, and comply with it. This can only be achieved through a combination of both one-to-one meetings and organisational measures. At the same time, as part of the digitalisation process, we will implementing workflows that ensure our employees always trained in the GOLDBECK Compliance Guidelines.

The regulations stipulated in these Guidelines are also available and binding for our customers and business partners. They are completed by our GOLDBECK Grundsatzerklärung, including the regulations listed therein – in particular the Code of Conduct, to which we bind ourselves as well as our customers and business partners.

The management at GOLDBECK undertakes to guarantee that the standards defined in these Guidelines are implemented throughout the entire company and put into practice by our employees, customers and subcontractors. Violations against the Compliance Guidelines will not be tolerated.

Bielefeld, February 2025



Jörg-Uwe Goldbeck

## 01 **We comply with national and international law and behave in an ethically correct manner**

GOLDBECK's claim goes beyond than simply comply with national and international law.

Violations of the law can result in criminal proceedings, high fines, bans on public and private contracts as well as claims for damages and loss of our company's reputation.

A behaviour is ethically correct if it complies with the general principles of integrity and fairness. For GOLDBECK, these values are documented in our Corporate Guidelines.

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

Ethical behaviour includes treating all people with respect and fairness, and showing appreciation regardless of their function, origin, religion, gender and sexual orientation, age or any disability they might have.

GOLDBECK condemns any form of forced or child labour and observes the prevention of slavery and human trafficking (UK MSA 2015) as well as bribery (UK Bribery Act) itself and in the supply chain in purchasing, procurement, production and all business processes. Furthermore, the company observes all ILO core labour standards at every stage of its process chain.

## 02 We don't tolerate corruption, fraud, bribery or money laundering

Corruption has devastating consequences around the world. We therefore denounce every form of corruption. We use transparent processes to avoid not only actually corrupt behaviour, but also anything that could be interpreted as such.

Corruption exists in many different forms, including monetary gifts, gifts in kind, invitations, donations, consultancy contracts, and other contributions.

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

However, with the exception of public officials, it is permissible to participate in customary business dinners and hospitality, and to accept or give courtesies in the form of small non-cash gifts. Internal guidelines are available to provide further orientation in this matter.

Corruption is harmful to both the company and its clients. It damages the good reputation that GOLDBECK holds. Corrupt behaviour is criminal behaviour. Criminal behaviour is punishable and will result in the immediate loss of one's job.

GOLDBECK takes the strictest care to avoid becoming involved in money laundering activities. In addition to this, we also comply with the applicable EU sanctions.

We condemn all types of fraud and actions that are incompatible with our values and could damage the reputation of our company. Employees and business partners must refrain from all direct and indirect fraudulent behaviour. GOLDBECK pursues a zero-tolerance policy in this respect.

### 03 We do not tolerate any prohibited collusion

GOLDBECK is committed to fair competition. We win clients through the quality of our products and services, which we offer at prices that are in line with the market.

We expressly reject all unlawful collusion and agreements that would restrict competition.

Violations of collusion and antitrust law results in high fines for our company, and exclusion of the company from participation in public and private contracts. This jeopardises the company's image and assets as well as the jobs of the employees.

Every employee is responsible for complying with regulations relating to competition law. Agreements that affect competition are prohibited and will result in the immediate loss of one's job.

### 04 We do not tolerate illegal employment or undeclared work

We commit ourselves and our business partners to observing the legal regulations concerning the employment of both the company's own employees and third-party employees. We advocate that our subcontractors' employees are employed and compensated on the basis of fair and lawful employment contracts.

We contractually oblige our subcontractors to comply with the legal requirements, and prohibit the employment of persons (our own employees, third-party employees or employees of subcontractors) without residence or work permits.



## 05 National and international tax laws must be observed

Taxes are an essential element for states to be able to provide society with the necessary infrastructure, education and social services.

A responsible approach to taxes is an integral component of sustainable business activity in a functioning society. We fulfil our tax obligations as a contribution to society and do not tolerate tax evasion.

All employees who come into contact with tax-related matters are responsible for ensuring compliance with tax regulations. In cases of doubt, employees have access to guidelines or the central Corporate Tax Department in Germany or local contact person in Europe.

## 06 In case of private conflicts of interest, transparency must be created

When we are successful, all our employees reap the benefits. In order to achieve this, everyone must act in the interest of the company. Private interests must not be pursued at the expense of the company.

If employees have any personal, family, financial or other connection with GOLDBECK partners or their employees that could affect the objectivity of a decision or actions in the course of their work for GOLDBECK, this must be made public and, in the context of the transparency requirement, the further procedure must be coordinated with either their direct manager or the Executive Board.

## 07 We protect data

We comply with all legal, contractual and internal company rules and regulations with regard to our IT infrastructure. We have implemented and put into practice legal and internal regulations that ensure compliance with data protection regulations, in particular the EU General Data Protection Regulation, and IT security requirements both internally and externally.

## 08 We protect confidential information

Confidential information are treated confidentially and may not be misused. Anyone who uses confidential information for their own benefit or makes it accessible to other persons without authorisation is acting criminally and will lose their workplace immediately.

Our company's intellectual property is a competitive advantage that must be protected. Employees are not permitted to share their knowledge of internal company data, processes or projects without authorisation.

Anyone using confidential information for their own advantage or making it accessible to others without authorisation is acting unlawfully and will immediately lose their job.

## 09 Healthy and Safety

GOLDBECK ensures that all workplaces and construction sites comply with the applicable safety requirements.

We guarantee health in the workplace and offer comprehensive preventative health measures.

A modern working environment and optimal working conditions are provided to promote a positive working atmosphere by supporting flexible working hours, ergonomic workplaces and regular team-building measures.

## 10 Sustainability in the company

We have made it our mission to become “best in class” for sustainability within our industry. And to do justice to the responsibility we bear. Buildings are the backbone of our economy – at the same time, their construction and operation are responsible for a significant proportion of the climate-damaging emissions we produce as a society.

We believe that building, operation and sustainability don’t have to be mutually exclusive. Sustainability requires a balance between ecology and social responsibility and economic efficiency.

Both within our company and through our products and services, we have developed tools that help us to forge the right path and achieve our goals.



## 11 Social conduct at our company

As stated in our Corporate Guidelines, we are committed to respectful, fair and loyal treatment of one another.

Every form of discrimination is prohibited. It is forbidden to discriminate against or harass anyone on basis of their race, gender, sexual orientation, religion or worldview, age or any disabilities they may have. Internal and external counselling is available in the event of inappropriate behaviour.

We expect all our employees to contribute a productive working environment by exercising tolerance and consideration when interacting with one another.

The loyalty of all our employees forms the basis for our company's success.

We undertake to ensure that human rights are defended. Our Declaration of Principles with regard to Respect for Human Rights applies throughout the GOLDBECK Group.

## 12 Reporting of misconduct

Ensuring that these Compliance Guidelines are observed is a responsibility shared by our entire company – this includes all our employees, and our business partners as well. Anyone who suspects a breach of the Compliance Guidelines is required to inform GOLDBECK accordingly.

If an employee has themselves been involved in breaches of the Compliance Guidelines and, by voluntarily reporting this action, is able to prevent damage to the company, this will be counted in their favour when reviewing the breaches in question. There will be consequences for anyone who intentionally casts false suspicion on someone else.

In order to protect GOLDBECK, employees should report any compliance violations on the part of our business partners, as well as any corrupt practices on the part of competitors. GOLDBECK provides comprehensive legal protection for whistle-blowers.

We expect any employee who finds indication of a violation to report this accordingly to one of the following:

- // Their direct manager
- // The responsible member of the Executive Board
- // The head of the Legal Department

To facilitate individual and anonymous reporting of potential violations, we also have a whistle-blower system. This is available to everyone online via the following link:

[→ Whistle-blower system](#)

We would like to take this opportunity to thank you in advance for all your assistance in ensuring that these Compliance Guidelines are upheld.





## Legal information

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