

Code of Conduct for Suppliers and Business Partners

GASAG AG (referred to hereinbelow as "GASAG") is an energy company in Berlin that complies with applicable laws at all times and at all locations, respects fundamental ethical values, and acts sustainably.

GASAG embraces the principles set out in the UN Global Compact in the fields of human rights, labor, the environment, and anti-corruption. Furthermore, GASAG takes account of the labor standards laid down in the Conventions of the International Labor Organization (ILO). GASAG has also established a set of Compliance rules and regulations and has established a Code of Conduct setting out binding guidelines for responsible conduct. GASAG expects its suppliers (i.e. all contracting parties supplying GASAG with goods, materials, or services) and business partners (including business partners with an intermediary or representative function who are acting in the interests of GASAG or on its behalf, such as consultants, agents, cooperation partners, etc.) as well as their employees to act responsibly and to commit themselves to the fundamental principles established in the present "Code of Conduct for Suppliers and Business Partners." Inasmuch as the suppliers or business partners award contracts to third parties (such as subcontractors or representatives) in the context of their business relationship with GASAG, these third parties are likewise expected to commit to the fundamental principles established in the present "Code of Conduct for Suppliers and Business Partners."

1. Social Accountability

The principle of social accountability entails the obligation to comply with all laws and statutory regulations in force. In particular, GASAG expects its suppliers and business partners to comply with the following fundamental principles:

1.1 Human Rights

GASAG's suppliers and business partners respect and protect the regulations in force worldwide to protect human rights as fundamental and generally valid requirements. This also means, and particularly so, that GASAG's suppliers and business partners refrain from employing forced or child labor. GASAG's suppliers and business partners comply with the rules laid down in ILO Convention 138 concerning the minimum age for admission to employment.

1.2 Equal Opportunity and Non-Discrimination

GASAG's suppliers and business partners do not discriminate on grounds of ethnic or national origin, race, sex, religion, belief, age, disability, sexual orientation, or other characteristics protected by law.

1.3 Protection of the Environment

GASAG's suppliers and business partners accept responsibility for the demands of environmental protection and comply with all statutory requirements relating to the environment and sustainability. They use natural resources sparingly and keep strains on the environment to a minimum. They will put in place an appropriate environmental management and deploy it.

1.4 Product Safety

The suppliers and business partners of GASAG comply with all respectively applicable stipulations and requirements of the laws governing product safety, particularly statutory requirements pertaining to safety, labeling, and packaging of products, as well as to the use of hazardous substances and materials.

1.5 Safety at the Workplace

GASAG's suppliers and business partners comply with the respectively applicable statutory requirements governing health and safety at the workplace. They promote the further development and improvement of working conditions.

1.6 Remuneration and Working Hours

GASAG's suppliers and business partners safeguard the appropriate remuneration of their employees. At a minimum, the remuneration and benefits paid or granted for a normal working week correspond to the respective minimum standards in place nationally (as set out in the Mindestlohngesetz, the German Minimum Wage Act), or, respectively, the minimum standards applicable within the domestic economic sectors concerned.

1.7 Employees' Representatives

GASAG's suppliers and business partners recognize the right of their employees to become members of a union. They will neither give preferential treatment to members of employee organizations and unions, nor will they discriminate against them.

2. Transparent Business Relationships

In commercial practice, openness and transparency are key factors for establishing credibility and trust. GASAG expects its suppliers and business partners to observe the following fundamental principles in particular:

2.1 Avoiding Conflicts of Interest

GASAG's suppliers and business partners take their decisions exclusively on the basis of objective criteria; they do not allow personal interests or relationships to influence them.

2.2 Prohibition of Corruption

GASAG's suppliers and business partners do not tolerate corruption. They safeguard that their employees, subcontractors, or representatives do not grant or offer any bribes, enticements, impermissible donations, or other inadmissible payments or benefits to customers, officials, or other third parties, and that they do not accept any such bribes etc. from such parties. This also applies to so-called "facilitation payments" (such as, for example, unlawful payments made for the purpose of accelerating routine administrative matters).

2.3 Gifts, Hospitality, and Invitations

GASAG's suppliers and business partners do not offer, either directly or indirectly, any inappropriate benefits to GASAG employees or third parties in the form of gifts, hospitality, or invitations for purposes of unduly influencing them. Likewise, they do not ask for such inappropriate benefits nor do they accept them.

Gifts and hospitality are deemed acceptable exclusively where they are made or provided in a context that does not go above and beyond usual, ethically sound business practice and the applicable laws.

2.4 Dealing with Government Agencies

GASAG's suppliers and business partners strictly comply with the statutory provisions in dealing with governments, government agencies, and public institutions, and abide by the rules of free and fair competition.

2.5 Consultants and Agents

GASAG's suppliers and business partners employ consultants or agents of their own exclusively in a manner in keeping with the laws in force. In particular, they ensure that the remuneration paid to such consultants or agents serves exclusively to compensate them for consultancy and agency services actually rendered, while also safeguarding that such remuneration is appropriate to the performance provided.

3. Fair Conduct on the Market

GASAG is a market participant acting fairly and responsibly and one fulfilling its contractual obligations. GASAG expects its suppliers and business partners to do the same, and especially expects them to observe the following fundamental principles:

3.1 Free Competition

GASAG's suppliers and business partners comply with the antitrust laws in force. Specifically, they do not enter into any arrangements violating the laws governing unfair competition with competitors, suppliers, or customers and do not abuse any dominant position they may have on the market.

3.2 Export Controls

GASAG's suppliers and business partners ensure compliance with all applicable statutory provisions governing the import and export of goods, services, and information.

3.3 Money Laundering

GASAG's suppliers and business partners enter into and maintain business relationships with business partners exclusively if they have satisfied themselves of their integrity. They ensure that the statutory provisions governing money laundering are not violated.

3.4 Business Information

GASAG's suppliers and business partners publish business data and reports about their business activities truthfully and in accordance with the laws respectively applicable.

4. Protection of Data, Business Secrets, and Company Assets

Confidential data, business secrets, and company assets must be protected. Specifically, GASAG expects its suppliers and business partners to observe the following fundamental principles:

4.1 Data Protection

GASAG's suppliers and business partners observe all respectively applicable laws governing the protection of the personal data of employees, customers, suppliers, and other parties affected.

4.2 Protection of Know-how, Patents, Trade and Business Secrets

GASAG's suppliers and business partners respect the know-how, patents, trade and business secrets of GASAG and third parties. They do not disclose such information to third parties without having previously obtained the express written approval from GASAG nor do they do so in any other inadmissible manner.

4.3 Dealing with Company Assets

GASAG's suppliers and business partners respect the tangible and intangible assets owned by GASAG and do not use them for unfair or improper purposes or for purposes other than those of the enterprise. They ensure that their employees as well as any third parties to whom they award contracts in the context of the business relationship (such as subcontractors or representatives) neither damage GASAG's assets nor use them improperly, i.e. contrary to GASAG interests.

5. Binding Nature of the "Code of Conduct for Suppliers and Business Partners"

The suppliers and business partners of GASAG will do everything in their power to observe the fundamental principles laid down in the present Code of Conduct.