

GOPA Com. S.A.

Code of Conduct for Business Partners

Purpose

As a member of GOPA Consulting Group, GOPA Com. S.A. shares the ethical values of integrity and compliance by following the key principles and standards as specified in GOPA Group's Code of Ethics.

The principles underlying GOPA Com.'s collaboration with business partners are integrity, fairness, transparency and partnership. Business partners are non-GOPA Group companies and individuals who enter into a contractual relationship with GOPA Com. in order to provide goods or services.

GOPA Com. stands for reputable and honest business dealings in the course of everyday business which comply with the relevant rules and regulations. GOPA Group's values and principles are based on the principles of the United Nations Global Compact, the International Chamber of Commerce's Business Charter for Sustainable Development and the relevant conventions of the International Labour Organisation. As member of the GOPA Group, GOPA Com. expects its business partners to implement and comply with the principles and values set out in this Code of Conduct for Business Partners throughout their organizations worldwide.

I. Key Principles

Quality

GOPA Com. expects from its business partners that they make sure that the resources mobilized meet their respective contractual obligations.

Respect and Equal Rights

Those working for GOPA Com. shall understand respect as common duty. It means that they should have a high regard for others and the resources entrusted to them. Entrusted resources may include people, money, reputation, the safety of others, and natural or environmental resources.

GOPA Com. expects from its business partners to work with people without making any differentiation in respect of gender, age, nationality, ethnic origin, religion, culture, education, social status, disabilities, or sexual orientation. Equal rights principles need to be observed. All forms of bullying/mobbing, sexual harassment, child abuse and racism are not tolerated.

Legal Compliance

Business partners are expected to respect the laws in force in their home countries and in the countries where they are operating.

II. Fields of Application

Conflict of interests

The business partners take care to separate business and private spheres and to immediately reveal to GOPA Com. conflicts between personal interests and their corporate interests in order to resolve them in a verifiable and understandable manner for all parties involved.

Bribery/Corruption

Business partners disassociate themselves from active and passive bribery and they neither encourage nor tolerate the direct or indirect acceptance of bribes or the offering of bribes.

Gifts

Within the context of this Code of Conduct, GOPA Com. expects from its business partners not to accept gifts from or to make gifts to other parties, except for small giveaways such as pens, stickers, etc., which do not exceed a commercial value defined by the applicable law/regulation per employee or business partner per year. The acceptance or granting of gifts in the form of cash payments, jewelry and travel are not permitted.

Collusive behavior

GOPA Com.'s business partners strictly adhere to all regulatory provisions (procurement rules, competition laws, anti-trust regulation) which rule their markets. GOPA Com. expects from its business partners to refrain from any agreement aimed at distorting the market competition.

Hiring of former public officials

In cases business partners seek contractual arrangements with former public officials and with entities and persons associated or related to them they have to make sure, that services provided by the former official do not relate directly to the functions held or supervised by this person and over which they continue to be able to exercise material influence.

III. Communication and Sanctions

Violations

If a GOPA Com. business partner considers that the principles of this Code of Conduct for Business Partners are not being upheld, he/she shall address GOPA Group's Compliance and Integrity Officer (compliance@gopa-group.org), who acts independently and autonomously. Any information will be handled with strict confidentiality.

Whistle blower protection

GOPA Com. expects its business partners not to tolerate any discrimination against persons who report violations of this Code of Conduct to GOPA Group's Compliance and Integrity Officer.

Consequences

While working for GOPA Com. the principles and standards mentioned above are mandatory and are part of every contractual arrangement. A violation of this Code of Conduct is a breach of contract and can lead to a termination of the contract between GOPA Com. and its business partner.

Place, date

Name:

Signature

Company seal