



**Business Ethics**

**General Managers, Region Heads, Plant Managers: Statement of Conformity**

In line with its long-lasting corporate culture [REDACTED] has been striving to act according to high ethical standards in all of its business transactions. Therefore [REDACTED] welcomed and signed the initiative of the World Economic Forum to implement anti-corruption principles for companies in the Engineering & Construction field around the world („Partnering Against Corruption Initiative – PACI“).

With the acceptance of these PACI-Principles, [REDACTED] strongly endorses and is committed to a zero-tolerance policy towards bribery and corruption and has implemented an anti-corruption policy. This policy extends to all business dealings and transactions in all countries in which [REDACTED] operates.

All general managers of [REDACTED] Organizations/Units will be requested by the Chief Compliance Officer (CCO) to annually issue this „Statement of Conformity“ as regards anti-corruption and send it to the CCO by email and post mail until 30.09.

As General Manager / responsible Manager of [REDACTED], I fully commit myself to the PACI-Principles and confirm the following (check the relevant boxes or explain reasons for not checking the boxes):

- I fully adhere to [REDACTED] anti-corruption policy.
- I have undertaken the necessary steps to ensure that management and employees of my unit are aware of [REDACTED] anti-corruption policy and of key risk areas.
- All concrete anti-corruption initiatives have been implemented in my unit.
- An effective communication strategy of [REDACTED] anti-corruption policy has been set up by my unit and the anti-corruption policy is communicated to all management and employees of my unit.
- [REDACTED] compliance policy, in particular with regard to the zero-tolerance policy towards bribery and corruption, has been constantly communicated as “Tone from the Top” to my unit.
- Both basic and refresher anti-corruption training has been set-up by my unit.



- All management and employees of my unit have participated in the basic anti-corruption training and afterwards, following a two-years-rhythm, in anti-corruption refresher trainings.
- The participation of all management and employees of my unit in an anti-corruption training has been recorded and in an auditable way filed (including participant lists signed by participants).
- The e-learning modules have been done with regard to anti-corruption by all employees and with regard to the other modul(es) by the employees selected by CCO at the latest on 31st August. The successful completion was documented by filing the respective certificate at the end of the corresponding module in the personnel files.
- We have displayed the internal and external helpline contact details for my unit's management and employees.
- The functionality of the external and internal helplines has been periodically tested and can be confirmed.
- We will react strongly to anti-corruption incidents in my unit, record them in an appropriate way and report them to the CCO as soon as possible.

Reasons for not checking one or several boxes:



Place and date \_\_\_\_\_

