



CODE OF CONDUCT



The management
of the pfenning group

Responsible behavior in all our actions

“Our company is constantly in relationship with large numbers of different people and organizations considering different interests and values. The image of pfenning group depends on the company’s external and internal conduct as well as the individual behaviour of each employee. With our Code of Conduct, we create a mandatory behavioral orientation that ensures lawful and morally honest actions by the company and its employees at all times and beyond doubt.”

*The Managing Board
of the pfenning group*



Entrepreneurial engagement in accordance with ethical principles

For the pfenning group, entrepreneurial behaviour and the application of ethical principles go hand in hand. Accordingly, our Code of Conduct lays down the foundations for all guidelines and regulations related to ethical behavior within all activities in the pfenning group.

It applies to all employees working for our company based on international conventions and guidelines. These include the Universal Declaration of Human Rights, the Conventions of the International Labour Organization and the United Nations Global Compact. In order to protect human rights, to apply labour standards including the abolition of child labour and to protect the environment the United Nations Global Compact has been established. It also regulates ways of anti-corruption and represents along with its 10 principles a mandatory policy within the pfenning group applying in each business unit.

**PART
OF
YOUR
PROCESS**

Protect human rights, respect different points of view

Based on human rights contained in the UN Charter, respect, honesty, openness and tolerance towards our employees and customers are representative keystones of pfenning's Code of Conduct. Equal opportunities, transparency as well as clear position against discrimination are defined as the main priority. Conscious of our socio-economic and social responsibility we respect human rights within our sphere of influence. We lead our business in a manner that makes us exemplary as employer and contractor.

All human beings are equal, and yet different due to varied and individual value systems

Based on our Code of Conduct we are obligated to behave in an ethical way, which provides also a basis for respecting other characteristics or particularities due to different origins. Therefore, it is possible to address regional laws, values, customs and business practices by making appropriate adjustments. Local codes may also contain additional, specific guidelines or regulations. Under no circumstances, however, may terms or formulations contradict this Code of Conduct or fail to meet pfenning's requirements and objectives.





Committed to loyalty and correct behavior

We expect our employees to be highly motivated, creative and efficient. That is why we take responsibility for their professional qualification. In turn, loyalty towards the company as well as a respectful behaviour to colleagues and business partners are also expected.

Corruption and bribery are absolutely prohibited. Employees are not allowed to accept benefits, especially personal gifts, resulting from business relationships. Potential conflicts of interest must be actively reported. Company and business secrets as well as information obtained in the course of work must be treated confidentially. Each employee must also comply with the applicable principles in order to protect all data of employees and customers.

All employees must ensure a safe and healthy working environment. All these obligations apply even after terminating the employment relationship. They are required to use the provided resources and work equipment in an appropriate way, carefully, and economically. To comply with the accident prevention regulations is an indispensable condition and has to be fulfilled at any time.

None of our employees may suffer personal or professional disadvantages at work complying with the law and the requirements of these rules of conduct. This also applies regarding possible or actual violations with respect to our Code of Conduct.

No discrimination at pfenning group

The company pfenning group stands up for equal opportunities, promoting cultural diversity and tolerance. We evaluate our employees only based on their abilities, performance and ethical behaviour.

At pfenning group we do not accept any form of discrimination. No one is discriminated against or hindered in their development because of gender, race, religion, age, disability, sexual orientation, origin or other legally protected characteristics. Every employee, as well as all customers and suppliers, is called upon to contribute to an atmosphere of respectful behaviour in which any kind of personal harassment is excluded. We do not tolerate workplace harassment, unwanted sexual advances, unwanted physical contact, indecent propositions, or a work environment marred by offensive jokes, remarks, and humiliation – and we take active action as soon as we are informed.

Our employees are required to report such violations of ethical guidelines or principles. The first point of contact is the respective supervisor. If an employee does not wish to approach his or her immediate supervisor, he or she can contact the Managing Board directly.

The Code of Conduct at pfenning group: A compass and guideline for all our actions

Our Code of Conduct is intended to create trust – among employees, customers, partners and in public. We follow a value system in which entrepreneurial behaviour goes hand in hand with ethical principles. This is how our Code of Conduct becomes a compass pointing us in the right direction in order to make the right decisions in difficult or critical situations.

At the same time, our system of values helps to evaluate our actions and decisions. By assuming responsibility and creating trust the Board together with the staff will do their best to actively embody the Code of Conduct at pfenning group.

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pfenning group

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