



CONSULTING GROUP

CODE OF CONDUCT AND INTEGRITY



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GFA Consulting Group (GFA) can look back on nearly forty years of corporate history. In the course of its growth, GFA developed a set of distinct values that shaped the company’s corporate identity. As GFA grows, processes and structures change continuously. This enables GFA to provide and further develop its wide range of services with an increasing number

of staff. Well-defined corporate values create a framework within which GFA can continue to develop authentically. The reflection of corporate values is an ongoing process. This includes continuously questioning, discussing and clearly formulating our corporate values.

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1.1 COMPLIANCE CULTURE – TONE FROM THE TOP

- Our actions are based on **integrity**, economic, social and ecological responsibility and ethics, employee orientation, sustainability, innovation and excellence.
- We comply with laws, guidelines and rules. We do not tolerate corruption and bribery.
- **Integrity and acting with integrity** are deeply rooted in our self-image and corporate culture. This applies to our day-to-day communications within the firm as well as with our clients, business and project partners.
- **Managerial staff** act as role models and, therefore, have a decisive impact on the importance awarded to the compliance system and strict adherence to it.
- Only the **employees** can ensure that GFA will meet all requirements of the compliance system. This requires competence, commitment and motivation of everyone.

1.2 OUR CORPORATE VALUES – WHY AND FOR WHOM?

A common understanding of corporate values is the basis for successful work and sustainable development of the company.

GFA's corporate values provide orientation for the company's development and define our corporate identity. A common understanding among all employees of GFA of our corporate values is the basis for successful work and the sustainable long-term development of the company. Our commitment to these values assures that we take responsibility for clients, business partners, employees and for the protection of our environment.

GFA's value system focuses on

- **clients and partners** as drivers of development in partner countries,
- **employees** as our most crucial asset in service delivery.

The basis for implementing and living the corporate values is

- a management philosophy and mission statement **in line with the respective values**,
- clear, targeted communication both in-house and in public; and
- an appropriate staff policy.

1.3 GUIDING PRINCIPLES

In line with GFA's corporate values and in order to safeguard GFA's business integrity, GFA is committed to and accountable for upholding the highest ethical standards to avoid any involvement in fraud, corruption, coercion, money laundering, human trafficking or terrorism, as well as any behaviour, which aims at unfair competition or gives rise to respective suspicions. GFA is equally committed to and accountable for the prevention of any form of violation of human rights, sexual exploitation, abuse, and harassment, racism, as well as any other ethical breaches.

1.3.1 ETHICAL STANDARDS

GFA provides management services to private and donor-financed projects under terms and condition that comply with the internationally accepted ethical standards of corporate governance and competitive practices, such as the FIDIC Code of Ethics and the United Nations' Global Compact Principles.

1.3.2 EQUAL RIGHTS

GFA does not tolerate discrimination or stigmatization on any grounds; including gender, skin colour, and religion, nationality, and HIV status. Instead, GFA engages with its clients, partners and beneficiaries based on mutual respect, and insists upon equal rights and equal treatment in all corporate activities.

1.3.3 LEGAL COMPLIANCE

GFA respects and conforms to the rule of law in all of its activities and meets its contractual obligations both in Germany and in any country in which it provides services.

1.3.4 TRANSPARENCY

GFA makes sure that its actions and motives are clear and comprehensible and engages in fair and transparent partnerships with its business partners, experts, beneficiaries and other stakeholders.

1.3.5 COOPERATION IN PARTNERSHIP

GFA works together with our business partners, project partners and target groups in a fair and reliable manner based on mutual trust. This also applies to our behaviour towards our colleagues based on mutual respect and the rejection of bullying. Constructive conflict management is an important part of our work.

1.3.6 ACTIVE AND PASSIVE CORRUPTION

GFA does not offer or accept remuneration of any kind that seeks to unduly influence tender, procurement, employment, management, or other decision making processes in our consulting services. Furthermore, GFA is a corporate member of [Transparency International](#) Deutsches Chapter e.V. and supports the fight of Transparency International against corruption.

1.3.7 CONFIDENTIALITY

GFA treats all information related to business activities and the review of compliance with this Code of Conduct with strict confidentiality. This obligation also applies after termination of a contract of employment. It does not apply to information that is in the public domain or which in terms of significance does not require secrecy.

1.4 WHO IS COVERED BY THE CODE OF CONDUCT

Compliance is an essential task that each one of us is called to answer. **GFA relies on all employees, management, and business partners working with GFA to play key roles in ensuring GFA's integrity.** We have to act with integrity and in accordance with this Code of Conduct, and fully understand the ethics of serving clients.

Only a business that is based on a set of values, as outlined above, has the preconditions for sustained growth and for solutions to the challenges arising in a world of change. A commitment to these values means assuming responsibility; for clients, business partners, employees and for the protection of the environment. GFA is committed to ethical, legally correct and socially responsible business management. We also expect this standard of conduct from everyone, working with us and with whom we do business.

We expect you to share this commitment and to make reasonable efforts to promote the compliance of your colleagues at home and abroad as well as business partners with the principles of this Code.

Adopting a zero tolerance policy against all forms of bribery and corruption, GFA feels a responsibility to work with business partners that share our ethical approach and adhere to these or similar standards. The business partner screening is part of our risk management and we therefore ask our business partners to complete [GFA's business partner questionnaire](#).

1.5 GFA'S BUSINESS MODEL AND AREAS AT RISK

We are all judged by our behaviour - whether or not we abide by the law and how we live integrity. We all like to believe that we are honest, responsible, respectful, trustworthy, reliable and loyal. However, our integrity may be tested in unexpected ways, especially in an international business environment.

When it comes to compliance within GFA's business model, the main areas at risk are:

- different national customs and legal systems;
- public contracts;
- intense competition;
- temporary project teams made up of external experts; and
- large financial volumes.

To avoid and minimise the risk of non-compliance we are all required to:

- be aware of relevant laws and regulations;
- comply with all **GFA policies, directives and procedures**; and promptly;
- report all suspicions or violations of the law, of our Code of Conduct and Integrity, policies, directives and procedures.

1.6 OUR CORE PROCESSES AND INTEGRITY

In our daily work, in acquisition and in our projects abroad, we work in complex environments with governments, government-controlled bodies and public international institutions as well as private companies, employees and experts. Integrity is the core of our values, and this attitude is embedded in our policies, directives and in our procedures for acquisition and project management.

Therefore, it is essential to

- **understand and comply with** our procedures for acquisition and project management and with laws, rules and regulations pertaining to anti-corruption, public procurement, data protection and disclosure;
- **ensure that we comply with** tax regulations in Germany and abroad, that we comply with business law in countries of assignment (registration, legal formalities, and contract law) and with national banking laws.
- **apply a mindful attitude** when we handle personal data of employees and freelance consultants, whereas in our Headquarters, in cooperation with our business partners and in our projects.
- **know and apply** our policies, directives and procedures, which have been designed to guide you and help us comply.

1.6.1 DUTY OF CARE FOR EMPLOYEES AND FREELANCE CONSULTANTS

GFA takes security seriously and treats all related issues with high priority. The security of our employees and freelance consultants when travelling, in our projects and on missions abroad is of particular importance in our business. Therefore, we conduct **project-specific risk assessments** and set-up **security and emergency** plans for our projects.

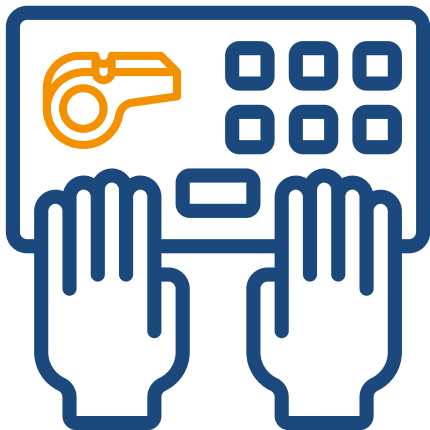
Furthermore, employees and freelance consultants travelling abroad receive a **travel guide** and a **security card** that contains emergency telephone numbers and insurance information. Additionally GFA developed the electronic platform **'Who is where abroad'** (WiWa). Employees and freelance consultants must provide security-related information for a case of emergency or crisis (**security profiles**) and submit their travel data. Sensitive personal data is only accessible for the Management Team. In the event of an emergency or crisis, WiWa at first sight allows to see whether anyone is on site and to initiate assistance.

1.6.2 CONFLICTS OF INTEREST AND BUSINESS COURTESIES

To act fairly and with integrity, when dealing with our clients and business partners is not only our duty but also deeply rooted in GFA's self-conception and the essential spirit of our corporate culture. However, notwithstanding all attentiveness, it may happen at any time - whether intentionally or unintentionally - that our integrity is undermined.

Please refer to our directives 'for the avoidance of conflict of interest and the protection of company assets' and 'on accepting and granting of gifts' for further guidance.

- [Directive for the avoidance of conflict of interest and the protection of company assets](#)
- [Directive on accepting and granting of gifts](#)



1.7 REPORTING MATTERS

At GFA, we live a culture of transparent communication between colleagues and within the hierarchical structure. That does not only hold true for technical and leadership issues but also for compliance matters. However, as this may not be possible at all times, GFA maintains a whistleblowing function within GFA and externally.

When using the **whistleblowing portal on GINA** or the [whistleblowing function on GFA's website](#), you are asked to choose between the following complaint areas: compliance, data protection, human rights and sexual harassment. The division assures confidentiality. After you have submitted your report, either openly or anonymously, you can request your identity to stay confidential while still keeping a line of communication open.

Externally you may report your concern to:

A. With regard to **Sexual Harassment** to the Fürstenberg Institute.

You can contact the Institute:

Phone: 0800 387 78 36

Website: www.fuerstenberg-institut.de

B. With regard to **Compliance and Human Rights** our Ombudsperson Dr Malte Passarge. Dr Malte Passarge is the head of Pro Honore ("Vertrauensstelle der Hamburger Wirtschaft").

You can contact him:

Phone: +49 40 41 52 51 72

E-mail: passarge@pro-honore.de

Website: www.pro-honore.de

The ombudsperson, the compliance officer, the data protection officer and the contact persons for human rights and sexual harassment shall respect your wish for confidentiality.

You find more information here:

- [GFA's human rights directive](#)
- [GFA's Ombuds office](#)
- [Whistleblowing GFA's Policy for the handling of compliance indications](#)