



GRASPOINTNER  
Sustainable innovation.

# Code of Conduct

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# Introduction

## Why do we have a Code of Conduct?

For us to grow successfully, the BG-Graspointner Group relies on the trust placed in it by its own workers and employees and its customers.

With numerous subsidiaries across the globe, we are proud of our international workforce. This Code of Conduct represents our joint and individual commitment to integrity. It helps all of us to make the right decisions, act with integrity and serves to guide us in all our daily actions and activities. This holds true for our dealings with our colleagues, business partners and customers as well as with our resources, data and products.

The Code of Conduct applies to everyone employed at the BG-Graspointner Group.



# Corporate values

## at BG-Graspointner

### Appreciation

We accept one another, with all our strengths and weaknesses, and are strong as a team. We communicate as equals and listen to each other so that we can better understand our concerns. Our managerial staff consciously delegates responsibility to our employees, provides them with specific coaching, and trusts in their ability to find solutions to the matters assigned to them. In our personal dealings with our customers and suppliers, we are friendly, consistent and professional.

### Agility

We respond swiftly to market changes, coordinate the decisions that we make and take a structured approach when implementing measures and actions. We are adaptable, proactively scrutinise routine practices and working methods, and are not afraid to adapt these as needed. We embody a culture of constructive feedback with our employees, customers, suppliers and partners by openly addressing even unpleasant matters and learning from mistakes.

### Solution orientation

We develop solution and decision-making templates independently. We actively compromise, seek to understand the views and perspectives of others and strive to find sustainable solutions together. Working with our suppliers and customers, we proactively resolve issues constructively and collectively and, where economically viable, are also willing to go that "extra mile" to fulfil customer requests.



## Dependability

We abide by decisions and agreements and can depend on those responsible for completing tasks to do so reliably, expertly and punctually. This is also what we expect from our business partners. We strive to build lasting and successful partnerships with our customers and suppliers.

## Enthusiasm

We exude dedication and motivation in our work and empower each other in difficult times. Successes are celebrated collectively with our colleagues. The enjoyment of working as a team is expressly desired. We enthuse and inspire our customers with our products and services.



# Teamwork

## Human rights

Human rights are an important asset when it comes to safeguarding individuals against over-powering organisations and institutions. We respect and abide by the principles of the Universal Declaration of Human Rights adopted by the United Nations, the UK's Modern Slavery Act and comparable laws and principles. We require our suppliers, contractors and business partners to uphold these and similar standards at all levels.

## Equal opportunities

We promote diversity and tolerance so as to achieve the highest attainable levels of productivity, creativity and efficacy. The benchmark for assessing our workforce is their skills and abilities, their performance and their ethical conduct. We never discriminate by gender, race, religion, age, impairment, sexual orientation, ethnicity or any other legally protected characteristics, and have a zero-tolerance policy towards any such discrimination.

## Dealings with each other

Relations between managing directors, managerial staff and employees across all levels, in all divisions and at all locations are guided by mutual respect, openness, honesty and a common understanding of trust-based teamwork. Every employee is called upon to play their part in fostering a spirit of respectful coexistence.



## Fair working conditions – Fair employment

We never employ children or youths in contravention of the law and equally do not tolerate such actions from our business partners. Our wages and salaries, and the granted welfare benefits, comply with or exceed the relevant minimum national standards.

## Workplace safety

We are committed to creating a healthy work environment for our employees. With this in mind, we attach great value to following our health and safety policies. We endeavour to foster the physical and mental well-being of our employees. Our goal is to have low sickness absence rates and zero work-related accidents.

## Protection of company assets

We are responsible in our handling of company assets (work materials and equipment, IT equipment, company vehicles, etc.), because these belong to our company and we want to cherish and protect these assets.



# IT and communication

## Privacy Policy

The BG-Graspointner Group values the protection of its customers, its employees and the environment. For this reason, safeguarding individuals against any abuse or misuse of personal data is a matter of particular importance and the reason why the BG-Graspointner Group is highly committed to complying with the data protection laws and regulations.

## Information and IT security

Information and IT security are not simply a means to an end but the underlying premise for our market competitiveness and not only safeguard our relations with our customers and business partners but also the jobs of our employees. IT security encompasses those areas of information security that deal with all processed data and information that are transmitted electronically. Information security guards data and information against unauthorised access, destruction and disclosure and enables the traceability of data and information flows. It ensures that our own data and information resources as well as those entrusted to us remain confidential, available and integral.

To this end, BG-Graspointner employs every available, appropriate and reasonable technical and organisational means to safeguard corporate data and all customer, business partner and employee data against unauthorised access, misuse, unauthorised use or loss and any premature destruction. To ensure this, all BG-Graspointner Group workers and employees commit to observing the policies and guidelines and refreshing their knowledge of such measures at regular intervals.





## Conduct & use of IT resources at the company

The company has an IT infrastructure in place which is made available to its workers and employees as a work resource, as their work responsibilities require. The IT infrastructure is essential to the BG-Graspointner Group achieving its business goals. All Group workers and employees are therefore expected to abide by the IT end user rules and regulations.



## Secrecy and confidentiality

Company and trade secrets are to be kept confidential; this equally applies to other information where BG-Graspointner, its contracting partners and customers have or could have an interest in these remaining confidential. Such information may not be disclosed to unauthorised parties without prior consent and must also be safeguarded, through appropriate means, against any access by third parties or employees without a need to know. Any sharing of company or trade secrets must be preceded by the signing of a corresponding agreement (confidentiality/non-disclosure agreement) and the information to be shared to be correctly designated (declassification) where required.

## Social media & digital communication channels

Social media create new channels for communication with customers, suppliers, colleagues and a broader audience. We are aware of our responsibility to uphold the reputation of our company when using such social media. We respect the privacy of our colleagues and our business partners when dealing with social media and never disclose any confidential information.

Abidance by and compliance with copyrights, non-competition clauses, trademarks and personal rights as well as licensing terms are to be observed. No websites suspected of containing content that might pose a security risk may be actively accessed, let alone forwarded or communicated.





# Dealings with partners and contacts

## Fair competition

The BG-Graspointner Group affirms its unreserved commitment to competing through fair means and to strictly observing the anti-trust laws. Every infringement of competition or anti-trust laws is incompatible with our corporate philosophy and culture.

## Anti-corruption

In all our actions and dealings, we observe the United Nations Convention Against Corruption. We reject any and all forms of corruption; no bribes are ever offered or accepted. We respect the codes of ethics in business and expect each and every employee to show integrity.

Gratuities in the form of invitations or gifts are permissible within certain bounds, provided that these relate to advertising activities or serve to foster business relations or present products or services. The gratuity must never be of an inappropriate value nor may it disproportionately exceed the value of what is customary in business practice or the normal standard of living of the individual potentially receiving such a gratuity.



## Donations and sponsoring

We see ourselves as an active member of society and therefore engage in a variety of ways. When performing donation activities and/or making sponsorship payments, these must not be designed to promote concealed decisions that serve our own interests. The recipients of our donations and the use of such donations by the recipient are transparent.



# Environment and nature

## Environment

We operate an efficient internal environmental management system, are guided by the precautionary principle and have an effective contingency plan in place in the event of any damaging environmental consequences. We strive to continuously improve our environmental performance and adopt a precautionary approach towards environmental risks. The introduction, certification and continuous improvement of environmental management systems is a vital cornerstone of our sustainable corporate success.

## Ecological safety

Sustainability is an integral part of our sustainability strategy. Our commitment extends to researching and developing environmentally-friendly products and technologies. We value the use of renewable energies and consistently growing our energy efficiency. Sustainable buildings and infrastructures, energy conservation and a circular economy to reduce our waste management are aspirations and activities that we naturally embrace. In our endeavour to achieve sustainable procurement, the process of selecting our business partners on the basis of ecological criteria and ecological commitment is gaining in importance. Their relevance as a procurement criterion continues to increase.





# Final provisions

Every employee is able to access the provisions contained in this Code of Conduct. Any questions concerning the Code of Conduct can be directed to the relevant manager.

All managing directors, managerial staff, employees and leased employees are obliged to abide by this Code of Conduct. They are familiar with the Code and the Code rules are applied in their daily work routines.

Our managerial staff bear responsibility and a duty for ensuring that every employee within their remit is familiar with and abides by the Code of Conduct and the company's internal policies.

On commencing their service at the company, every employee will be made aware of the Code of Conduct.

## Dealing with compliance infringements

All reports or complaints concerning potential infringements of laws or this Code of Conduct can be submitted via the following link:  
[say.bg/whistleblowing\\_uk](https://say.bg/whistleblowing_uk)

The reporting individual's anonymity as well as confidentiality in the matter are guaranteed without exception. The whistleblower enjoys full protection from any reprisals.









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