

CODE OF CONDUCT

PRINCIPLES

GOPA Infra's Code of Conduct is derived from the company's mission and common corporate values. In all of its activities, GOPA Infra upholds the principles of integrity, quality and social responsibility. GOPA Infra participates in tenders and implements private and donor-financed projects in keeping with the highest standards of corporate ethics and competitive practices. This requires high personal and professional standards for the management and staff, the observance of which GOPA Infra ensures by

- carefully selecting members of its head office management and personnel, external experts and cooperation partners;
- assuring compliance to the Code at GOPA Infra's headquarters and in project offices worldwide; and
- applying the Code when dealing with cooperation partners, donors and all stakeholders in projects that GOPA Infra implements.

APPLICATION

The Code of Conduct applies to all GOPA Infra's staff, i.e. management and other employees at the GOPA Infra head office and team leaders, team members, short- and long-term experts in the field as well as company representatives, and is part of GOPA Infra's employment contracts and contracts with representatives, partners and experts.

STANDARDS

Equal rights

GOPA Infra works 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 are observed in all of the company's activities. GOPA Infra dissociates itself from and does not tolerate bullying/mobbing, sexual harassment and racism, neither in its head office nor in project offices worldwide.

Legal compliance

GOPA Infra fulfils its contractual obligations. The company respects the laws in force in Germany and in the countries where the company is working. GOPA Infra complies with all applicable laws, statutes, regulations and codes relating to anti-corruption and antitrust.

Transparency

Through its management and accounting systems, rules and procedures GOPA Infra ensures that its actions and motives are clear and comprehensible.

Partnership

Partnership is characterised by mutual respect, trust and confidentiality. GOPA Infra strives for a partnership-based cooperation with associate firms, and freelance experts deployed in its projects. The same applies to its cooperation with donors, beneficiaries, target groups and authorities in the projects implemented.

Conflict of interest

By having the respective contractual arrangements and obligations in place GOPA Infra takes care to separate business and private spheres and to immediately reveal conflicts between personal interests and GOPA Infra's corporate interests in order to resolve them in a verifiable and understandable manner for all parties involved. Any paid or honorary activity of personnel related to GOPA Infra's field of activities and falling outside employment contracts with GOPA Infra has to be reported to and possibly approved by the management. The same applies to any connections of personal, familial, financial or of any other nature a staff member might have to GOPA Infra's clients, business partners, competitors or their employees, which could impinge on the objectivity of the staff member's work.

Bribery

GOPA Infra disassociates itself from active and passive bribery and neither encourages nor tolerates the direct or indirect acceptance of bribes or the offering of bribes.

Gifts

GOPA Infra personnel is not allowed to accept gifts from or to make gifts to business partners, except for small give-aways 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. GOPA Infra staff may accept occasional lunch or dinner invitations or may invite business partners to lunch/dinner, as these are informal work platforms between GOPA Infra and its partners.

VIOLATIONS

If GOPA Infra's management becomes aware of the fact that a partner or an employee has violated the Code of Conduct, whether explicitly or by implication, it will act in each individual case by carefully evaluating the degree and the seriousness of the contempt and undertake the necessary action.

Where a staff member, a business or project partner or any other person considers that the principles of this Code are not being upheld, he/she shall address the compliance officer designated for the purpose of reviewing compliance with this Code of Conduct (compliance@gopa-group.org) who acts independently and autonomously. Any information provided will be handled with strict confidentiality.

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