

ground.net code of conduct

For the integrity of our alliance and the protection of our members

Our Code of Conduct defines the ethical principles that underpin our business practices. It is through these principles that we want to act and be perceived as a responsible association in a challenging environment. They serve our members as a basis on which to provide a sustainable and trustworthy performance. The Code of Conduct is an important mainstay of our alliance development and encourages correct and appropriate behavior in every business situation. Following the Code of Conduct safeguards the sustainable success of our association. Respect for the dignity of each individual and for our environment is prerequisite for acting and operating with economic far-sightedness.

Our objective

Throughout the business and personal relations with customers, suppliers, contract partners, competitors, authorities, colleagues, employees and investors, the ground.net delegates of all the companies of the association shall embrace high ethical standards.

Our principles

1. *We comply with the laws and the regulations.*
2. *We do not accept or pass on unlawful advantages.*
3. *We respect the rights and the dignity of third parties.*
4. *We always treat sensitive information as confidential.*
5. *We inform each other of unusual business practices of contract partners or competitors.*
6. *We give our association our full commitment and loyalty.*
7. *We prepare business documents conscientiously; we take due and proper care of them and treat them confidentially.*
8. *We all contribute actively to ensuring compliance with our Code of Conduct.*

We expect all members to embrace these principles in a spirit of personal responsibility and count on their active involvement in ensuring compliance. The following explanatory notes shall facilitate compliance with the Code of Conduct.

Principle 1 – We comply with the laws and the regulations.

Compliance with laws and regulations is a fundamental principle of the business philosophy of the ground.net association. Laws differ from country to country and are subject to change. The principles defined here shall nevertheless remain valid and applicable. Particular attention shall be paid to this aspect:

Competition: The ground.net association upholds the principles of free enterprise and competition. Competition law differs from country to country. Regardless of such differences, we will not enter into agreements regarding costs and sales prices, the sharing of production quotas, markets and customers. We will not coordinate our bids with those of the competitors. Moreover, we will not accept bribes or other advantages from, or offer bribes or other advantages to, third parties or employees of existing or potential customers.

Principle 2 – We do not accept or pass on unlawful advantages.

The high ethical standards embraced by the ground.net association demand that our members do not accept unlawful advantages, neither for themselves nor for others. When offered invitations and gifts from suppliers, competitors or customers we must therefore ensure that acceptance will not inhibit our independence or our freedom of action, and that acceptance will not be at odds with the principles of fairness. If that should be the case, we must refuse such invitations or gifts, amicably yet firmly. One-off gifts or gifts of souvenir nature or symbolic value may be accepted, as may Christmas presents that do not exceed the customary scope. In these situations we count on the common sense of our members. We do not grant advantages to customers or other third parties if such advantages exceed the scope customary in business.

Principle 3 – We respect the rights and the dignity of third parties.

Respect for the rights and dignity of others – whether customers, colleagues, suppliers, competitors or authorities – is one of our basic ethical values. The customs and practices in other countries shall be respected, as shall the social mores of foreign business partners and customers.

Principle 4 – We always treat sensitive data and information as confidential.

We consider any kind of person-related data, business and operating secrets (whether ours or those of third parties), financial data and information that is of confidential nature as sensitive information. We shall only disclose such information to third parties when authorized in advance to do so and only if the recipient is equally bound to maintain confidentiality. We are cooperative and transparent when dealing with the authorities. Collaboration with the media is the exclusive responsibility of the members of the board of each partner.

Principle 5 – We inform the line manager of unusual business practices of contract partners or competitors.

If in the course of our business activities we are confronted with unusual practices of competitors, contract partners, authorities or co-workers, we shall inform our line manager, Legal Services and/or the managing director of the member company concerned.

Principle 6 – We give our association our full commitment and loyalty.

As ground.net members, we fulfill our legal duty of loyalty towards the association. We do not participate actively in any business that competes directly and/or indirectly with any other ground.net member company.

Principle 7 – We prepare business documents conscientiously; we take due and proper care of them and treat them confidentially.

As a general rule in this context, we store business documents as required by the legal regulations and in accordance with customary business practices. We do not prepare documents carelessly, and we make sure they are unambiguous. Deliberate falsification of documents is prohibited. All commercial, financial and technical documents including electronically stored data are business secrets. We treat them confidentially. Such information may only be communicated to third parties if indispensably required for the business at hand.

Principle 8 – We all contribute actively to ensuring compliance with this Code of Conduct.

Every member delegate receives a copy of this Code of Conduct. All delegates are required to instruct their staff, who directly deal with the ground.net group. If members should become aware of infringements of the Code of Conduct they shall report them a board member or to info@ground.net. Members reporting such infringements shall not be disadvantaged in any way as a consequence of such reporting. We are convinced that the relationship between alliance partners must be built on trust. If we should nevertheless become aware of infringements of the Code of Conduct, the responsible parties will suffer the appropriate penalties.