



# Code of Conduct

FOR TGE'S BUSINESS PARTNERS

## FOREWORD OF THE MANAGING DIRECTOR OF TGE GAS ENGINEERING

TGE's business is founded on its core competencies of project management, engineering, procurement and construction excellence and strong partner integration, all infused by TGE's fundamental company values. It is this combination not only of skills, but also ethical principles that enables TGE to sustain successful, longterm relationships with business partners based on trust and reliability.

TGE's management is dedicated to promoting a culture of compliance at the company. The cornerstone of the compliance system is TGE's Code of Conduct, the implementation of which is carefully guided and overviewed by its Compliance Officer. TGE requires ethically and legally correct behaviour from its employees and encourages fair and respectful collaboration both within the company and between TGE and its partners.

I believe our dedication to our corporate values will drive growth and prosperity not only for TGE and its shareholders, but also for TGE's customers, partners and suppliers.

Hongli Sun



### **What TGE expects of its Business Partners**

TGE Gas Engineering GmbH and its associated companies ("TGE") recognise their business partners as important contributors to TGE's worldwide success. Our goal is to develop relationships with business partners who share our corporate values of precision, high quality, accountability, teamwork and trust and who conduct business in an ethical manner in compliance with relevant laws. We expect our business partners to observe the principles laid down in this code of conduct and reserve the right to follow-up potential issues in the event of doubt or to discontinue the business relationships.



### An Example of Action

You are purchasing goods from several suppliers. Through your implemented monitoring system of new and already existing business relationships you find out that a supplier lets his employees work under inhumane conditions (e.g. no required safety measures; exceeding the permissible working hours) or uses children in the work processes. You have to take immediately the necessary actions and inform all responsible persons and business units to evaluate the specific case. If necessary you have to break off the business relationship.

## HUMAN RIGHTS AND LABOR PRACTICES

TGE expects from its business partners to respect and protect international proclaimed human rights and to refrain from child or forced labour. Employees shall be treated fairly and equally with dignity and respect.

### Essential Actions

- Prevention of all kinds of discrimination
- Prevention of child labour. Do not employ workers under 15 years of age according to conventions of the International Labor organization. There is an exception for developing countries according to ILO Convention 138, in these countries, the minimum age for employment is 14 years old. For hazardous work you don't have to employ workers under the age of 18 according to ILO Convention 182.
- Enable the right of freedom of association and collective bargaining.
- Providing a safe and healthy work place.
- Observing health and safety requirements at the working place.
- No excess of national regulated maximum working hours.
- Implement an effective monitoring system in your supply chain.

## ENVIRONMENTAL PROTECTION

TGE seeks to continuously reduce the environmental impact arising from its activities. Our business partners are encouraged to share and actively support this objective. TGE's environmental management system complies with ISO 14001 and therefore encourages its business partners to consider environmental aspects.

### Essential Actions

- Act in line with applicable national and international statutory standards and laws concerning environmental protection.
- You consider all measures for product related environmental protection. This could be related to material, product design, recycling or hazardous substances.
- Use resources and energy economically and efficiently. Make sure your activities have the smallest possible environmental impact.
- Conducting regular training for responsible persons.
- Implementing an environmental management system.



### An Example of Action

You notice that due to a fault in the construction chemicals are seeping into the ground. Due to the definition of roles and responsibilities in your environmental management system, the incident will be reported to the responsible department in your company. As reaction, required measures are taken to eliminate the error. Furthermore, the cause will be analysed to avoid such error in the future.



## HEALTH & SAFETY OF EMPLOYEES

In order to protect the health and well-being of its employees, TGE has organized its management system to meet the requirements of ISO 9001, ISO 14001 and ISO 45001 (Occupational Health and Safety Management Systems). Business partners are encouraged to develop and implement equally effective quality, safety, health protection policies, trainings and management systems. For TGE, compliance with applicable national and international statutory standards and laws is substantial.

### Essential Actions

- Control hazards and take precautionary measures against accidents and diseases. This means: Analyze the risks of your activities, products and services at an early stage and implement required measures to eliminate or minimize the risks as far as possible. .
- Provide an occupational health and safety management system, which includes among others: Risk analysis, risk minimization measures, risk monitoring and precisely defined workflows.
- Ensure that your supplies are also implementing these standards. If the supplier does not comply with these standards you have to break off the business relationship.
- Ensure security aspects in countries with an increased risk potential.
- Ensure health and safety trainings on a regular basis.

### An Example of Action

A lack in the tank is reported to you. Take immediate actions to fix the lack. In the next step analyze the risks and causes of the lack and monitor the implemented measures. Do not rely on somebody else reporting the lack.

## FAIR COMPETITION

TGE strictly prohibits anti-competitive agreements. We require our business partners to be committed to free and fair competition and to observe applicable laws, in particular competition and anti-trust legislation.

### Essential Actions

- No practices with competitors to distort the market e.g. price fixing, bid rigging, segregation of markets and customers.
- Never give any confidential information about TGE to its competitors



### An Example of Action

You are in contract negotiations with TGE, so you have confidential information about the terms of the contract. You have to keep these information confidential and do not publish it neither to your nor to our competitors.



## EXPORT CONTROL

TGE expects its business partners to comply with applicable export control legislation and to share with TGE any relevant information without undue delay. TGE will not make any business with partners, who are subject to international sanction lists.

### Essential Actions

- Have procedures in place describing the export control process in the company.
- Conduct a comprehensive export control screening of all relevant business partners and countries.

### An Example of Action

As an international supplier you get an order to deliver certain goods from one country to another. Before execute a cross-border shipment you have always to conduct a product related export control check and ensure the required due diligence to not make business with sanctioned countries, companies, organizations or persons. If the screening shows suspicious results clarify the matter with your relevant department and take all required measures to not violate export restrictions.

## CORRUPTION

TGE conducts its business with integrity and will not accept its partners to condone or actively participate in corruption. Business partners are expected to ensure the same with regard to their employees, subcontractors, representatives and other involved parties. Directly or indirectly offering, granting, promising of benefits (e.g. gifts, money, hospitalities and invitations), which are not appropriate and likely to influence decisions illegitimately or to gain an improper advantage, are not acceptable. TGE expects its business partners to have own procedures in place regulating the dealing with benefits.



### An Example of Action

A supplier is offering you a benefit. In the first step you should take a look into your internal guideline to get an overview about the specific requirements of your company related to the dealing with benefits. In the second step you have to evaluate the crucial criteria like value limit, time or frequency for the specific case and ask yourself if the benefit is able to influence your business decision or is it only made out of politeness. When you are in doubt relating the value limit and possibility of influencing make the case transparent by contacting your compliance department and handing the benefit over. The compliance department will take an own specific evaluation and document the whole case for your personal protection.

### Essential Actions

- You have binding corporate guidelines in connection with the correct dealing of benefits from and for third parties.
- You have implemented regular corruption prevention measures e.g. trainings and workshops.
- Never offer, provide, demand or accept benefits with the expectation of any type of advantage.
- You have contractual alignments with business partners to act in line with anti-corruption laws and corresponding regulations.

PLEASE UNDERSTAND THAT IF A TGE EMPLOYEE REJECTS YOUR GIFT OR DOES NOT GIVE YOU ONE, IT IS NOT OUT OF DISRESPECT, BUT BECAUSE OF OUR COMPANY GUIDELINES.

## DATA PROTECTION

Data protection pursues the goal of giving every person self-determination and control over their personal data. Personal data means any information relating to an identified or identifiable natural person. TGE always process personal data under the high European level of protection according to the General Data Protection Regulation (GDPR). We expect our business partners to respect personal rights and to maintain an equally high level of protection when processing personal data.

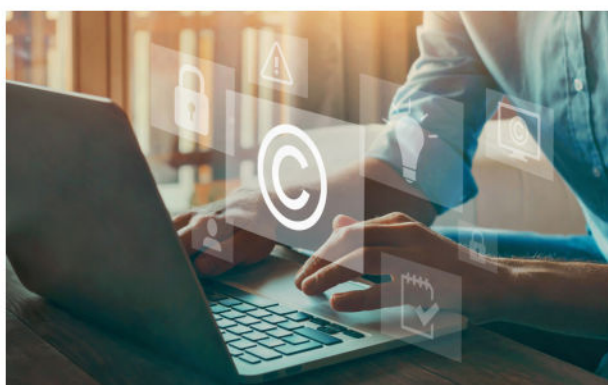
### Essential Actions

- Before you are processing personal data you have to ensure that there is a legal basis like a consent of the data subject, a contractual relationship or legitimate interests.
- You have to implement required technical and organisational measures for ensuring the security and confidentiality of the processing.
- In addition to the legal basis, the following principles must continue to be observed in order to be in compliance with the law: lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; integrity and confidentiality.
- You have a data protection management system with defined roles and processes.
- Notify immediately TGE if you become aware of a personal data breach involving one of our employees.



### An Example of Action

You want to publish internal (e.g. in you intranet) or external (e.g. in social media) the team of a new project including picture and short description. This is a processing of personal data for which you need a legal basis. In such a case, the consent of the data subject will in most circumstances constitute the legal basis. Also make sure to follow the data protection principles such as purpose limitation and storage limitation. You should have a point of contact where employees can obtain an assessment for all data protection matters.



### Essential Actions

- You have to comply with all relevant laws, regulations and contractual obligations to protect the intellectual property rights of TGE.
- You have to establish processes and workflows to ensure the protection of intellectual property rights.

## INTELLECTUAL PROPERTY

TGE respects the intellectual property rights of others and expects the same of its business partners.

This means not to infringe another party's intellectual property rights, use copyrighted materials or third-party trademarks without permission of the copyright or trademark owners.

### An Example of Action

A major construction project has been completed. You are at the construction site and proudly want to take a picture of the finished tank to publish on the intranet and Internet. Please consider that you can violate intellectual property rights with this action. So to be in line with all relevant laws, regulations and contractual obligations please follow your internal company guideline and contact the relevant department to check the case.

## IT SECURITY

Information Technology (IT) is an integral part of our working life and helps us to work efficiently. At the same time numerous security risks arise from the technology and the electronic data processing. Risks are, for example, data loss due to program errors, data theft due to cyber-attacks or unauthorized access to data due to a missing authorization concept. TGE operates a knowledge business for which it is crucial to keep our information secure and protect our expertise. We expect from our business partners the implementation of all required IT-Security measures which are required to protect the shared information from TGE.

### Essential Actions

- Conduct a regular IT-Security awareness training due to the fact that several incidents arise because of a lack
- of awareness.
- You must have a specific IT-Security-System with required measures in place.
- You have to use data processing systems which are state of the art.
- Beware of suspicious emails and phone calls, which ask you to perform an action, especially from someone you don't know.



### An Example of Action

Some of your employees receive an e-mail with a known sender address. In the e-mail a link is attached and it is asked for follow-up and data entry. Some employees comply with the request and realize that it is a scam email. Unfortunately too late. The criminals hacked into your company's system and have now access to several data.

Actions to take:

1. Immediate measures to minimize the damage
2. Identification of the source of the fraud
3. Implement preventive measures for the future
4. Conduct a specific IT-Security awareness training
5. Document the case and measures taken



### An Example of Action

You want to post a picture from the construction site on social media. When posting pictures it's very important to obtain written permission due to the fact that you can violate several laws within one picture. For example: If there are persons on the picture you can violate against data protection law and if you don't have the required rights for the specific construction on the picture you can violate against copyright law, as well.

## SOCIAL MEDIA

Social Media is a powerful tool and can have a big impact on a company. The impact can be both positive and negative. Every post which is related to TGE can have impact to our reputation. In addition, careless use of social media can cause several violations of law. That is the reason why for us it is important to use social media responsibly and as a medium of self-expression.

### Essential Actions

- Always keep non-public information confidential and never make it public.
- Before you post anything, make sure that you do not violate any laws, such as privacy laws or copyright laws.
- Always obtain written permission before posting anything TGE related.
- In various situations, it is important to make it clear that your opinion is your own and not that of the company. Be transparent when discussing topics related to TGE and speak for yourself.

## PHYSICAL PROPERTY

TGE expects that all kinds of materials used by business partners will be used with care, in an economical manner and only for legal purposes.

### Essential Actions

- Products of TGE are stored, prepared, loaded and transported safely and with reasonable care.
- Physical property of TGE is protected against unauthorized access.



### An Example of Action

On the construction site there are numerous physical property of TGE. To protect this from theft you have to establish a safety concept. Furthermore you have to ensure that in the event of theft, it is reported immediately and countermeasures are taken.



## SUPPLY CHAIN OF THE BUSINESS PARTNER

In most cases, value creation occurs in the supply chain. Close cooperation with suppliers is therefore essential. For this reason it is crucial to us that you as our business partner take care to communicate and implement the standards and requirements from our Code of Conduct or your own equivalent Code of Conduct in your supply chain.

### Essential Actions

- You regularly ensure that your suppliers meet the minimum requirements of our or your own equivalent Code of Conduct. Suitable measures could be: Self-Assessments, management talks or on-site visits.
- You actively support your suppliers in implementing these standards. If an implementation is not possible you have to break off the business relationship.
- You monitor your suppliers for compliance with the minimum requirements and further development of these.

### An Example of Action

For a new project you need new suppliers and publish an invitation to tender. For each potential supplier you make a background check to ensure compliance with the standards and requirements of our code of conduct. If there are any concerns ask for a self-assessment and evaluate the case afterwards.

## Contact

Any concerns related to the conduct of TGE's employees or business partners should be reported immediately to TGE's Compliance Officer via [Compliance@tge-gas.com](mailto:Compliance@tge-gas.com).

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