

Code of Conduct

GNS Group

This is an English translation of a German text.
Only the German version is binding.

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Preamble

GNS¹ is aware of the role it plays in society and of its responsibility toward its customers and business partners as well as its employees². The company has therefore committed itself to clear principles which serve as the foundation for the actions GNS takes as a business and as a corporate citizen.

The actions taken by GNS and by its employees are founded on personal responsibility, honesty, loyalty and respect for others and for the environment. Managers bear particular responsibility in this regard.

GNS' key business goal is to develop GNS for its partners/customers into a centre of competence with regard to nuclear waste management. To this end GNS designs innovative concepts to meet its customers' precise needs. GNS carries out its tasks responsibly, reliably and efficiently, and aims for a continually improving performance in order to satisfy quality and service demands.

In order to do this GNS relies on

- the skills, strength and dedication of its employees
- a stable social, political and regulatory environment
- the opportunities offered by scientific and technological advances.

The Code of Conduct serves two main purposes:

First, it encourages every single employee to take responsibility for his or her actions, and it seeks to provide them with appropriate guidance. Second, it outlines the goals and principles which guide the business activities of GNS. These principles are also defined within the corporate guidelines.

¹ In this document the term "GNS" refers to all consolidated national and international companies.

² The term "employee" refers to both male and female members of staff.

Scope of Application and Principles

Scope of Application

The Code of Conduct applies uniformly throughout GNS. GNS subsidiaries outside Germany may adapt the measures taken to implement these guidelines to reflect national particularities if such adaptations do not contradict the Code's basic principles.

GNS works towards a further propagation of the principles stipulated in the Code of Conduct. If, in the course of such business relationships, the Code conflicts with another company's ethics policies, GNS will do its best to find a mutually acceptable solution.

The Code of Conduct forms the basis for other internal regulations which take into account aspects specific to the industry and country concerned. The Code covers company interests and all areas in which employees are viewed as representatives of the company.

Global Compact

The United Nations Global Compact initiative asks companies to recognise, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption and to comply with this set of core values in practice.

Human Rights³

1. Business activities should support and respect the protection of internationally proclaimed human rights and
2. make sure that they are not complicit in human rights' abuses.

Labour Standards

3. Business activities should uphold the freedom of association and the effective recognition of the right to collective bargaining as well as
4. the elimination of all forms of forced and compulsory labour
5. the effective abolition of child labour
6. the elimination of discrimination in respect of employment and occupation.

³ Taken from the official English version of the United Nations Regional Information Centre for Western Europe (UNRIC Brussels)

Environment

7. Business activities should support a precautionary approach to environmental challenges,
8. undertake initiatives to promote greater environmental responsibility, and
9. encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

10. Business activities should work against corruption in all its forms, including extortion and bribery.

GNS Corporate Guidelines

In line with these principles, the GNS specific corporate guidelines form the basis for the actions of all GNS employees and cultivate a shared corporate identity and culture across all the operating companies within GNS.

Compliance with Laws and Regulations

GNS is subject to laws, directives and other regulations that can be international and national as well as regional and local in scope.

These laws, directives, guidelines and regulations in particular set safety and environmental standards for the operation of facilities and equipment as well as other tasks performed by GNS, inter alia transport procedures and handling of radioactive material. Furthermore they require a high degree of personal reliability and requisite qualification of each person responsible for special tasks, describe requirements in terms of quality of products and services, regulate activities within various markets and prohibit certain behavioural patterns and practices.

Particularly important are laws, directives, guidelines and regulations concerning the Atomic Energy Act, Radiation Protection Ordinance, competition regulations as well as the cartel and foreign trade law.

GNS' foremost objective is to comply with all laws and regulations and to always operate within the bounds of these – frequently changing – legal and regulatory parameters.

The integrity of all actions is an essential prerequisite for sustained successful business performance. GNS expects individuals and subsidiaries to abide by the law. GNS strives to inform its employees of the regulations affecting them in how to comply with these regulations.

The environment in which GNS operates is shaped not only by national and international law, but also by many social and cultural rules and customs. GNS also factors these – oftentimes unwritten – rules and customs into its decision-making and evaluation processes and strives to act in accordance with them.

External Relations

General principles

GNS conducts its business activities in manner that is legally and ethically beyond reproach and expects the same of its employees. GNS urges its business partners, suppliers and customers to abide by this principle as well.

The private interests of GNS employees and the interests of the company are to remain strictly separated. A conflict of interest occurs when private interests collide with GNS' interests or even when there might be a perception of such a conflict.

Monetary benefits from third parties must therefore not be solicited or accepted by any employee nor must they be offered or given to third parties by any employee. This applies without exception, particularly to individuals holding public office including those in foreign countries or international organisations.

Other types of benefits from suppliers, customers or other business partners may not be solicited.

Token business gifts, business entertainment or other gifts may only be accepted within the bounds of customary business practices, as long as they do not influence corporate decision-making. These types of benefit may only be given within the bounds of normal customer relations practices, as long as they are not seen as an attempt to gain undue influence.

Conduct toward Customers

GNS offers its customers a wide range of products and services. These offers are guided by the company's commitment to provide appropriate and efficient solutions to meet customers' needs. This includes the ongoing re-evaluation of the company's portfolio and adjusting it in anticipation of new market requirements. A fair treatment of all customers is to be ensured.

Conduct toward Partners and Associates

GNS views the capital of its partners and associates as the prerequisite for and foundation of its business activities. Maintaining the capital and delivering fair market returns on it, are therefore GNS' primary goals.

Conduct toward Suppliers

In its relationship with suppliers, GNS makes sure to comply with the regulations in the Code of Conduct. GNS therefore does not have business relationships with suppliers who are publicly known

to be in violation of the principles underlying the Global Compact. GNS works to further enforce the Global Compact principles in its business relationships.

Conduct toward Consultants

GNS will only sign consultancy contacts with individuals or companies whose capabilities will contribute direct benefit to GNS. Such agreements must conform with the following principles:

Consultants will be chosen and employed on the basis of a documented profile of job requirements and specified tasks. The level of compensation must appropriately reflect the value of the services performed and the consultant's professional qualifications. Payment for consulting services is generally made only after such services have been provided. Cash payments are prohibited.

In the fields of corporate, strategic, market and organisational consulting, management coaching, and consultancy activities associated with the acquiring of new business, the management of the respective operating company must be involved in the decision-making process to appoint a particular individual or company observing the principle of dual control performed by two individuals.

Agreements with GNS must contain a clause in which agents working on behalf of the company state that the service they provide will not violate any laws, regulations or the GNS Code of Conduct.

For the engagement of consultants by the sales department, the guideline and the work instructions issued hereunto apply.

Conduct toward Authorities

GNS and its employees aim to maintain cooperative relationships dominated by openness with all responsible authorities and their experts. This applies especially to licensing and supervising authorities. The principles regulating behaviour among each other are also to be observed toward representatives of the authorities.

Conduct toward the Public

All communications of GNS are required to be full, fair, accurate, timely and understandable. GNS respects the professional independence of journalists and media. GNS therefore does not pay for editorial content.

Only authorised persons are allowed to disclose information concerning GNS or its subsidiaries to the public, the media or to other third parties.

Conduct toward the Political Establishment

In the light of its importance for the economy and society, GNS feels that dialogue with representatives of government bodies and political parties is indispensable. GNS has established the following principles to exclude even the impression that it exercises undue influence:

GNS is non-partisan and does not make contributions to political parties or to organisations and foundations that are closely associated with political parties.

GNS will not employ or undertake consultancy agreements, including “payment for services” agreements, with individuals whose main occupation involves holding a public office or parliamentary seat.

GNS recognises the shared responsibility of the company and its employees to the development of the common good. GNS therefore welcomes its employees’ commitment to civic, political and social activities outside of the workplace, particularly charitable and community-based activities. Employees who volunteer their services politically do so as private individuals and not as representatives of the company. GNS does not pursue its business interests through its employees’ activities in this area.

Sponsoring and Community Investment

Advancement of societal development especially on the regional or local level, but also in the domain of science, must not arouse the impression that those public or scientific institutions involved are led by the interests of the sponsor. This can only be avoided by utter transparency with regard to the extent and nature of promoting measures.

Internal Relations

Occupational Health and Safety

GNS works to continually improve the occupational safety and health conditions for its employees and the safety of its facilities.

Every employee is responsible for helping to keep his/her workplace safe and to protect the environment. Every employee must comply with all relevant laws and regulations. All managers are required to instruct and support their employees in fulfilling their responsibilities in this regard. In the event of violations or accidents, the responsible authorities must be notified without delay.

Equal Opportunities and Mutual Respect

GNS respects the dignity and individuality of each and every employee. Workplace interactions should be characterised by mutual respect, fairness, teamwork, professionalism, and openness. Managers are expected to be role models and competent points of contact, particularly when conflicts arise.

GNS promotes equal opportunity and diversity, which are indispensable to achieving commercial success and to maintaining an excellent reputation as a company.

No employee or job applicant will be discriminated against on the basis of his or her gender, marital status, race, nationality, age, religion, physical impairment, or sexual orientation. Decision regarding the selection, training, and development of employees are made according to strictly job-related criteria and must be relevant to the job.

High performance is important to achieve business success. GNS is therefore committed to developing individuals who have both the professional and interpersonal skills to help to maintain the sustainable success of the company. GNS offers opportunities for professional and personal development and encourages employees to take advantage of such offers. GNS endeavours to have its employees achieve a balance between work and private life. Special emphasis is put on reconciling the employees' family lives and careers.

Compliance with the Code of Conduct/Reporting

General principles

Each employee will receive a copy of the Code of Conduct. The Code must become a living part of the corporate culture and must be incorporated into the day-to-day work of all employees. Managers in particular are called upon to actively promote the Code's implementation. This involves ensuring that all of the employees assigned to them are familiar with the Code of Conduct so that they can comply with its regulations in their daily work.

To clarify any issues relating to the Code and Code compliance, employees should first consult their supervisor or the department within their company responsible for dealing with these issues. Such issues include the interpretation of specific sections of the Code and evaluating an employee's own behaviour against the Code's principles. If an employee has reason to believe the Code has been violated by himself/herself or another employee this too should first be clarified in the employee's own work area.

Compliance Officer

If this is not possible or seems inappropriate given the circumstances, employees can contact the GNS compliance officer. The compliance officer will be appointed by GNS.

The compliance officer will treat each question, comment and suggestion with the utmost confidentiality and deal with each concern individually as the situation demands. Upon request, employees will be informed of how their issue was handled and what measures were taken. No employee will face recrimination for contacting the compliance officer, though sanctions may be applied if the Code of Conduct has been violated.

As a rule the compliance officer will inform GNS management annually, on special occasions immediately, about the compliance with this guideline and bring forward suggestions for improvement.

Confirmation and Reporting

Every manager who has responsibility for employees will use a predefined template to report to the compliance officer once a year on the implementation of the Code of Conduct in his or her realm of responsibility; violations of the Code of Conduct must be reported regardless of clarifications within the respective work area.

Register

All grants with monetary value given to holders of public offices or parliamentary seats, public bodies or authorities, charitable organizations or institutions dealing with social concerns are to be recorded in a register. Payment for services occurs through bank transfer. Cash Payments are prohibited.

Each GNS subsidiary will keep a register, which is to be updated at the end of each year and passed on to the compliance officer. The register will be kept by the compliance officer and will be accessible at any time.

Inception and Implementation

The GNS Code of Conduct takes effect as of June 1st, 2021 and replaces the version dated January 1st, 2009.