

Dorsch Gruppe. A Group of Companies.



Code of Conduct Dorsch Gruppe

Our foundation of acting with integrity.

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Company list

AHT GROUP GmbH, Essen, Germany

AMBERO Consulting Gesellschaft mbH, Kronberg im Taunus, Germany

Dorsch Holding GmbH – Abu Dhabi, Abu Dhabi, UAE

Dorsch Consult Asia Co., Ltd., Bangkok, Thailand

Dorsch Consult Egypt LLC, Cairo, Egypt

DC India Private Ltd., Mumbai, India

Dorsch GmbH, Wien, Austria

Dorsch Holding GmbH, Frankfurt am Main, Germany

Dorsch Holding GmbH – KSA LLC, Riad, Kingdom of Saudi Arabia

Dorsch International Consultants GmbH, Munich, Germany

Dorsch Qatar LLC, Doha, Qatar

GRE German Rail Engineering GmbH, Frankfurt am Main, Germany

spiekermann ingenieure GmbH, Düsseldorf, Germany

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Dear employees,

Social responsibility and economic success are two objectives of our company that cannot be separated from each other. Responsible and ethical conduct towards employees, business partners, society and the environment are integral to our principles and the basis for successful cooperation.

We want to continue to grow profitably in the future, but not at any price. There is no business so important that it justifies the violation of applicable rules and laws in the process. Compliance with rules and laws in our business activities is therefore a matter of fact. Violations are incompatible with our values and will not be tolerated, and in addition they also damage our reputation and can lead to legal consequences. Persons who contravene the law for their own benefits do so at the expense of the company and harm all parties: the shareholders, the management and the employees themselves. Such behaviour impairs the economic success, investment and growth capacity of the company and can jeopardise jobs.

For this reason, we must comply with the rules and laws and make this an integral part of our corporate culture. Our Code of Conduct serves as a moral compass of values for our decisions and actions. It is intended to make you more sensitive to legal risks and pitfalls. All of us - employees, executives and the management - are equally obliged to comply with the principles set out here.

The success of our company depends above all on our commitment to social responsibility and our reputation as trustworthy business partners. We all want to contribute to leading the Dorsch Gruppe into a sustainably successful future. Therefore, please carefully read the Code of Conduct and make it the binding foundation for your actions.

Our fundamental thesis is "Honourability means success - now and into the future!"



Olaf Hoffmann
CEO

Andreas Schweinar
CFO



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Our Dorsch corporate values...

integrity

respect and recognition

reliability

transparency

responsibility

... provide guidance, are an integral part of our management culture and the foundation of our business success.

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1. Interaction with customers and business partners

We are committed to treating our business partners and third parties with integrity, transparency and fairness.

1.1 Inadmissibility of corruption

Quality is the key to our success in order to be able to compete on our own merits. We therefore maintain transparency in our relations with customers, suppliers and authorities. We strictly reject any form of corrupt behaviour and avoid even the mere impression of undue influence. As an employee of the Dorsch Gruppe, you may not offer, promise or grant any unjustified advantages directly or indirectly to business partners, public officials or third parties. We also strictly reject any such behaviour by third parties (e.g. consultants, freelancers and sponsors) acting in the name of or on behalf of the Dorsch Gruppe.

1.2 Fair competition

We are committed to the rules and principles of the free market economy and fair and free competition in all business relations. Agreements (e.g. on prices) and other prohibited or coordinated market practices (e.g. the allocation of products, markets or customers) are prohibited. The exchange of such information with competitors is also prohibited. Dorsch behaves in a fair manner towards customers, suppliers and traders and does not misuse any opportunities to take advantage of the situation. Further information is provided in our global anti-trust policy.

1.3 Prevention of money laundering

We do not participate in money laundering activities and are committed to the prevention of money laundering. Money laundering defines the circumstance of transferring the income from criminal offences and illegal transactions into the legal money cycle. To minimize our exposure to the risk of money laundering transactions, all Dorsch employees are required to verify unusual transactions.

1.4 Compliance with foreign trade law

We observe all regulations of foreign trade law, which arise according to national and international regulations that apply to us. As a globally operating planning and consulting group, free trade in compliance with applicable regulations is our highest priority. For dealings involving cross-border transactions, we have defined reviews within the framework of export controls.

1.5 Compliance with tax obligations

We comply with our tax obligations and observe all legal and internal tax regulations in the countries in which we operate as well as the common rules and guidelines of international taxation. Violations of tax obligations can lead to additional payments, penalties and personal consequences which have a negative impact on the reputation of the Dorsch Gruppe.

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2. Protection of company assets

We protect the corporate assets of the Dorsch Gruppe through an independent and responsible approach.

2.1 Conflicts of interest

We act objectively, without bias and free from personal or financial interests in business decision-making processes. In order to protect ourselves and the Dorsch Gruppe, we expect the immediate disclosure of possible conflicts of interest (e.g. financial interests of employees or related parties in business partners, sideline activities, acceptance or offering of gifts).

2.2 Handling company property

We have a duty to handle company property responsibly and appropriately. This includes, for example, office equipment, licenses and the know-how of the Dorsch Gruppe. The use of the assets is only allowed for business purposes, unless private use has been explicitly agreed upon.

2.3 Recording and reporting

We ensure proper reporting to our stakeholders through complete and accurate documentation and recording of all business transactions - in compliance with applicable standards and laws.

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3. Handling of information and data

The protection of information and data is an essential part of our successful business model.

3.1 Data security

We have taken appropriate and reasonable measures to protect company, customer, business partner and employee data from unauthorized access, unauthorized or improper use, loss and deletion. For this purpose we observe the legal framework.

3.2 Data protection

We are aware of the importance of and the increased demands on data protection. Accordingly, we as the Dorsch Gruppe handle personal data sparingly, carefully and responsibly. The Dorsch Gruppe ensures that the legal requirements for processing personal data (e.g. of customers or other third parties, business partners or employees) are complied with.

3.3 Protection of confidential information

We observe the obligations of confidentiality with regard to internal information not publicly known or external information made available by third parties (company and business secrets). Secret information must be treated as strictly confidential, protected appropriately, and may not be passed on or used for our own benefit.

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4. Acting responsibly

The commitment to social responsibility is an important part of our compass of values within the Dorsch Gruppe.

4.1 Rejection of child and forced labour

We are committed to respecting human rights in all our business activities. We reject any form of exploitation of children and young people and ensure that all employees of the Dorsch Gruppe have reached at least the local legal minimum age. We guarantee that every Dorsch employee complies with national legal labour standards. The use of forced and compulsory labour is prohibited.

4.2 Equal opportunities and prohibition of discrimination

The diversity of our employees is the most valuable asset of the Dorsch Gruppe that needs to be protected. Within the Dorsch Gruppe, mutual recognition and a constructive work environment are encouraged and appreciated.

We do not tolerate any discrimination, bullying, harassment or intimidation based on social or ethnic origin, age, gender, disability, religion, political opinion, sexual orientation or nationality.

4.3 Environmental protection, occupational health and safety

We are aware of the environmental impact of our business activities and are committed to the responsible and sustainable use of natural resources. Environmental pollution is to be reduced to a necessary minimum and environmental protection is to be continuously expanded.

Dorsch provides a safe working environment for its employees by complying with the relevant legal requirements and regulations regarding occupational safety and proactive health protection. Every Dorsch employee contributes to the protection of people and the environment with his or her own responsible measures (e.g. by keeping the workplace tidy or by wearing protective clothing when visiting construction sites).

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5. Key aspects of acting with integrity

The following guiding questions will assist you find out whether you act with integrity in accordance with the corporate values of the Dorsch Code of Conduct.

If you can answer the questions in the affirmative, you are acting with integrity.

Is my behaviour in accordance with this code?

Is my behavior in line with the Dorsch corporate values?

Do I behave in the interest of the company?

Do I support the reputation of Dorsch in a positive way through my behaviour?

Does my behaviour stand up to external review?

Can I reconcile my behaviour with my conscience?

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6. Reporting of notices and contact details

If you have any questions, comments or concerns, please refer to the applicable rules and regulations or contact your supervisor or the compliance function. The compliance function provides preventive advice and counseling.

How to contact the compliance department:

Tel: +49 (0) 69 1302 5712

E-Mail: compliance@dorsch.de

Whistleblowing system

Notifications of violations of applicable law, the Code of Conduct or our internal guidelines can also be submitted at any time via the whistleblowing system <https://dorsch.integrityline.org/>. The system is available in several languages and allows secure and confidential communication with our compliance function. Dorsch pursues every report of violations and assesses which consequences are necessary and appropriate.

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