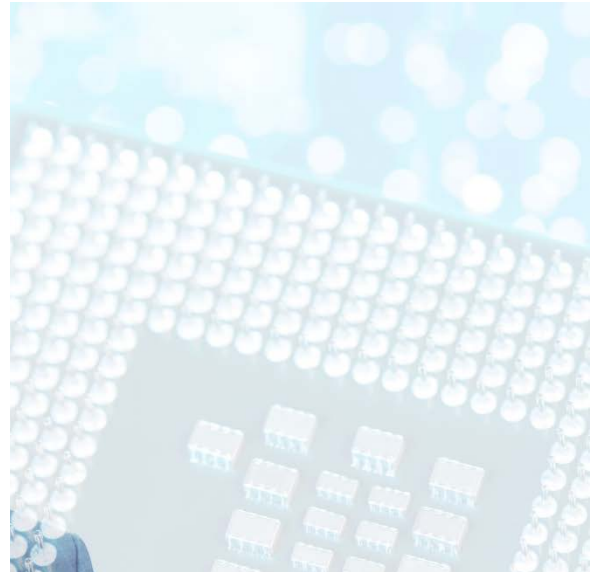


FICHTNER



Fichtner GmbH & Co. KG | Sarweystrasse 3 | 70191 Stuttgart | Germany

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Code of Conduct

We seek to implement our Corporate Philosophy in our day-to-day work and to imbue it with life. Our core principles to ensure good and sustainable business relations with our partners are honesty, responsibility and integrity. To this end, certain standards of conduct have to be maintained. We aim to conduct ourselves professionally and with human decency in our relations with clients, contractors, financiers, Business Partners, competitors and the general public as well as in our day-to-day dealings within the company.

We, the Board of Directors, take this Code of Conduct very seriously and wish to see it applied wholeheartedly by all our members of staff. Our objective is to uphold and safeguard the excellent reputation all of us have helped to achieve among clients, contractors, financiers, Business Partners, competitors and the general public through our outstanding and impeccable work. For us, our reputation and integrity, with which we have earned the trust of our partners over a period of decades, are a valuable asset that we intend to protect and preserve. They are one of the foundations of our success and the basis for the future development of our company.

As a core principle, we execute our services with professionalism, integrity, fairness and decency. We obey relevant national laws and respect other cultures. We do not engage in any form of misconduct. We do not tolerate such behavior from our staff or Business Partners.

Competition, Quality of Consultancy Services, and Independence

In providing our services, we focus on what is the best solution for the client. We strive for customized, sustainable and innovative solutions. We attach great importance to quality and efficiency. We do therefore not engage in projects which could compromise quality.

We are focused on performance and committed to the competition rules governing the marketplace. We support fair selection decisions based on quality and demonstrated ability. We refrain from colluding with competitors or any other third party in order to restrict competition or impede competitors' reputation. In assessing the work of others, we proceed with the requisite professionalism, independence, objectivity and fairness. We respect human rights, laws and regulations as well as the ILO core conventions.

We accept contracts only in those sectors in which we have expertise and experience, and in which we are able to meet our clients' requirements expertly and efficiently.

When providing our services, we set ourselves high standards in terms of expertise, professionalism and quality, and strive for continuous improvement. We secure the quality of our proposals and our contract execution by adhering to designated procedures, applying quality management systems such as ISO 9001 and undergoing meticulous checks.

When handling projects, we observe relevant export regulations as well as tariffs and customs legislation. We observe the required embargo regulations and check whether embargoes are in force against relevant persons.

We do not tolerate conflicts of interest between employees and the company or third parties such as clients, contractors and Business Partners. We inform our clients in advance of any potential conflicts that exist or might arise in the course of a contract. We accept contracts only on terms and conditions that do not compromise our independence, integrity or impartiality. We respect confidentiality and treat any relevant information and reports with utmost care.

Social Responsibility and Sustainability

We accept responsibility when providing consultancy services to our clients and vis-à-vis the general public. When meeting our social responsibilities on an international level, we are guided by the principles of the UN Global Compact and observe its underlying principles. In providing our services, we give priority to solutions that support the concept of sustainability. We execute our contracts in a professional manner, act with integrity and pay regard to the justified public interest.

We observe the customs and practices of our profession and conduct ourselves in a manner consistent with decency and integrity.

Tolerance and Humanity

We are tolerant and do not discriminate against anyone on the grounds of their origin, gender, sexual orientation, age, disability, religious beliefs or ideology.

While we will always act within the law and the CMS if possible we familiarize ourselves with the local situation and act with cultural sensitivity regarding the social environment. Fairness, openness and respect in relations with clients, contractors, Business Partners and work colleagues are our key concerns. We act with tolerance and humanity in internal company dealings. We support equality of opportunity and prohibit bullying and harassment. We are focused on performance, promote team spirit and seek an open working atmosphere that offers freedom for creativity and innovation. Our decision-making processes and our communication processes are transparent.

Health and Safety

Compliance with national health & safety regulations and labor laws in the respective countries is mandatory. We ensure observance of necessary and statutory standards for a healthy and safe working environment as well as socially responsible working practices.

For work in crisis regions, our risk assessment is based initially on the directives of the German government and other relevant information. On the basis of the available information, initially the Board of Directors of Fichtner GmbH & Co. KG decides whether such deployment is justifiable. Furthermore, all members of staff are themselves responsible for deciding whether or not to accept or continue with their field assignments. Such assignments are always voluntary.

Ethics, Integrity and Misconduct

We are committed to compliance with the laws, national regulations and ordinances both in Germany and in project countries. In addition, we expect not only our staff members but also our business partners to act with honesty, decency and high standards of ethics and integrity.

We have a zero-tolerance policy for any illegal activities or violation of our CMS. This particularly applies to any form of misconduct such as fraud, corruption, collusion, coercion or obstruction. Those actions are illegal and not consistent with our corporate culture. We take robust measures to counter any of the above and to prevent them from occurring. We do not engage in projects with compliance risks that we deem too high.

Donations to charities and other institutions in need are made transparently and without expectation of return. Sponsoring forms part of our publicity related activities and is not done in pursuit of other objectives. Both are approved by the company management.

To preserve our independence, we refrain from political activities in host countries and also make no political or financial contributions to their political systems. We act with neutrality.

Compliance Organization, Implementation, Whistleblowers

In applying these principles, we strengthen our credibility, integrity and standards of ethical conduct. We expect the same from our Business Partners. Only if these principles are put into practice, will it be possible to strengthen our reputation and protect future viability.

All staff members are obliged to inform us about actual or suspected misconduct, whether to a supervisor, a company director, the Chief Compliance Officer for the Fichtner Group or the External Compliance Officer for the Fichtner Group. Reporting any misconduct will not lead to any reprisals against the reporting person. Fichtner will not tolerate retaliatory acts by staff or third parties against the reporting person. We also encourage all third parties to report any possible, suspected or actual misconduct to the CCO and the ECOG.

**Chief Compliance Officer for the
Fichtner Group (CCO)**

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