

# BCG

Business Conduct Guidelines



## SubCtech GmbH

- Responsibility
- Fairness
- Trust



Subsea Technologies for the Marine Environment



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## Our basic principles

**Integrity shapes our dealings with our business partners, employees and the public. This fundamental statement from our company's mission statement is the basis of the Business Conduct Guidelines.**

We must always base our strategic considerations as well as our day-to-day business on high ethical and legal standards. The appearance of our company in public is essentially shaped by the appearance, actions and behavior of each and every one of us, and above all by our respectful interaction with one another in every respect. Each of us is jointly responsible for ensuring that we as a company live up to our social responsibility worldwide. The Business Conduct Guidelines are binding rules that apply to every employee. They are intended to help you cope with ethical and legal challenges in daily work. Every employee can turn to his / her manager or to another designated body with questions and advice.



Your management

Our guidelines apply equally to all business decisions as well as to our entire behavior as employees of SubCtech GmbH.

- We comply with applicable law, ensure compliance with processes and their controls.
- We respect the personal dignity, privacy and personal rights of every employee.
- We work together regardless of age, disability, skin color, gender, sexual orientation, ethnic origin, culture, religion and worldview.
- We create trust by being open and honest with our colleagues and when dealing with third parties.



## Responsibility

We protect our fundamental rights as employees, our health, our personal security, and occupational safety at our workplace and when we are on business travel. In doing so, we maintain fair cooperation between management and employees.

- **No discrimination**

The principles of equal opportunity and equal treatment are guaranteed without regard to skin color, ethnic or social origin, religion, age, disability, sexual identity, worldview, or gender. Discrimination based on these characteristics, sexual harassment, or other inappropriate behavior toward individuals or groups will not be tolerated. Incidents are reported directly to the management.

- **Free choice of employment**

No one should be employed or forced to work against their will. All forms of forced labor are prohibited. Recruitments are always made in consultation with the team and management.

- **Prohibition of child labor**

Child labor is strictly prohibited. We offer training and internships in cooperation with schools and parents on the basis of legal regulations.

- **Adequate compensation**

SubCtech pays for wages for labor and adheres to all applicable wage and compensation laws. SubCtech observes „equal pay“ principles and does not discriminate on the basis of gender. The entire payroll is kept by a tax office and monitored by the managing Director.

- **Working hours**

SubCtech adheres to all applicable working-hours regulations.





## Fairness

The SubCtech GmbH always acts fairly and reliably. We stand for fair competition in which only market-economy criteria are decisive.

- **Conduct with integrity**

We reject all forms of corruption and bribery. It is important to us that the ban on corruption is systematically enforced in the company and among our partners. We report violations of the ban on corruption to the competent authority in the country. We only keep accounts or cash registers for lawful purposes. We only make payments to third parties within the framework of the applicable legal regulations and provided that there is a legitimate claim to this or other legitimate reasons justify this. Payments are only made against proof of payment. The whole payment system is monitored by a tax office and controlled by the responsible authorities.

- **Competitor**

We only speak to competitors when we have a compelling business reason and there are no legal or contractual concerns. We also protect free competition in relation to customers, distribution partners and suppliers. We handle confidential information from SubCtech GmbH and from third parties, such as competitors, customers, distribution partners and suppliers, with care. A non-disclosure agreement is concluded for sensitive data.

- **Trade and export control regulations**

For us as an international company, it is essential to comply with the regulations applicable to national and international trade in the area of export controls and customs. We take care to ensure that the applicable customs and foreign trade regulations, including the regulations on security in the supply chain, are checked, implemented and complimented with when trading or transporting goods, providing services or otherwise transferring technical know-how or software. Our employees are trained for this purpose. If there are any indications of possible violations or improper use of our products, we refrain from doing business and involve the responsible export control unit.

## Trust

We create trust and protect what makes the SubCtech brand valuable. We are innovative and constantly working on further developments and new business ideas. However, we never make our decisions in favor of a certain business alone, but always with the SubCtech brand in mind. Our motto: „Tradition is an essential good, but not a limit“

- **Conflicts of interest**

We make business decisions in the best interests of our company and not based on personal interests. We proactively avoid situations in which the appearance of a conflict of interest may arise. We inform the management of any personal interest that might exist in connection with the performance of our official duties.

- **Money laundering and the funding of terrorism not with us!**

SubCtech strives to maintain business relationships only with reputable customers, partners, and companies whose business activities comply with legal requirements and whose financial resources are of legitimate origin.

We check the identity of customers, business partners and other third parties, their economic background and the origin of payments based on risk to ensure that they come from legitimate sources. Restrictions due to sanctions or requirements for imports and exports are complied with.

- **Financial integrity**

SubCtech is committed to accurate and truthful reporting to employees, customers, business partners as well as to the public and all government agencies. Accordingly, we follow the respective laws, regulations, standards and practices.

We keep our books and records complete, accurate and truthful. They are made on time and in accordance with the applicable rules and standards. They are regularly checked by our tax office and the responsible authorities.

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- Corporate assets

Our corporate assets are essential to our business success. For this reason, we ensure that these assets are handled responsibly and fully protected. As employees, we play a decisive role in achieving this goal. It is very important to us that sensitive company information cannot fall into the hands of unauthorized persons or third parties. This is how we create the trust that is required for global cooperation with customers and partners.

- Data protection

The protection of personal data plays an important role in our digitized world. We handle it carefully and responsibly and respect everyone's privacy. It is very important to us that sensitive company information cannot fall into the hands of unauthorized persons or third parties. This is how we create the trust that is required for global cooperation with customers and partners.

- Our partners

Business relationships with our customers, suppliers, and other business partners are fundamental to SubCtech. We maintain business relationships only with reputable partners who comply with the law. We protect the interests of our customers through the careful selection of suppliers and other business partners and through the standards we set for our own actions. That is why we cooperate with excellent partners worldwide.



### Further information and contacts

Our corporate culture expects us to report possible violations of the Business Conduct Guidelines. In this way, we help clarify and eliminate misconduct and grievances and protect ourselves and the company against risks or damage that may result from this.

We can report circumstances that indicate a violation of the Business Conduct Guidelines to the following persons or offices:

- Executive,
- Management,
- By mail to [compliance@subctech.com](mailto:compliance@subctech.com)

Indications of possible violations of the Business Conduct Guidelines can, if necessary, be submitted confidentially and anonymously. We process all reports and take appropriate measures if they are necessary. We do not tolerate any retaliation against complainants or whistleblowers. Violations of this prohibition are punished as compliance violations.

All incoming indications of possible violations of the Business Conduct Guidelines are dealt with in a company-wide binding process. This takes into account the presumption of innocence in favor of the accused as well as the rights of participation of employees or their representatives. We will take appropriate disciplinary action or legal action in the event of verifiable violations.

Third parties can also report possible violations of the Business Conduct Guidelines to us. We handle such complaints and information from third parties according to the same principles as the complaints and information from employees, insofar as this is legally possible and permissible.



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### Revision History

Revision	Date	Person	Note	Released
0.1	04.03.2018	SJ	Dokument erstellt	--
0.2	04.11.2018	SM	Minor corrections	--
0.3	04.11.2020	LW	Review	--
1.0	04.11.2020	SM	Final review, released	X