

# CODE OF CONDUCT INTERNATIONAL



**Deutsche WindGuard**  
Oldenburger Straße 65 A  
26316 Varel | Germany

[windguard.de](http://windguard.de)

## DEUTSCHE WINDGUARD'S CODE OF CONDUCT – RESPONSIBLE INTERACTION WITH EACH OTHER

Ever since Deutsche WindGuard Group was founded in 2000, we have been offering comprehensive services and consulting along the entire value chain of a wind energy project. This is our contribution to a successful energy transition. We are convinced that only renewable energies can provide a sustainable, responsible, reliable and cost-effective energy supply in the long term. This implies honest and ethically correct behaviour by all Deutsche WindGuard employees. That is the only way we can ensure a holistically positive contribution to the future development of renewable energies and, as a company group, be successful in the long term.

SUSTAINABILITY  
PART OF OUR IDENTITY

A trustful and honest cooperation with our customers, suppliers, service providers, cooperation partners and, of course, our employees is our recipe for success in providing safe and high-quality services at Deutsche WindGuard. Equal treatment for all, the protection of life, health and environment, as well as the safeguarding of company values and data are essential principles for any co-operation. This Code of Conduct outlines Deutsche WindGuard's fundamental values, which are the minimum requirement in all our divisions and activities.

“



**Leif Rehfeldt**  
Managing Director  
Deutsche WindGuard GmbH

”

## OUR RESPONSIBILITY AS A MEMBER OF SOCIETY

**We acknowledge our social responsibility as a company group and are particularly aware of the economic, social and ecological impacts of our actions. This responsibility implies that we ensure legal compliance in all our business decisions.**

The United Nations' "Universal Declaration of Human Rights" and the "European Convention for the Protection of Human Rights and Fundamental Freedoms" set out the international community's requirements and expectations with regard to respect for and observance of human rights. All Deutsche WindGuard companies respect these globally recognised regulations for the protection of human and children's rights as fundamental and universally applicable requirements. We reject all forms of child and forced labour as well as any use of modern slavery and human trafficking. This applies not only to our work within the company group, of course, but we also expect the same from our business partners.

Equal opportunities and treatment are important principles for fair, unprejudiced and open interaction. We promote a respectful cooperation, diversity and tolerance. This is the only way to maximize competitiveness, innovation, creativity and efficiency.

We do not tolerate discrimination, for example, because of ethnic or national origin, gender, religion, ideology, age, disability, sexual orientation, skin colour, political views or social background.

The selection, recruitment and promotion of our employees are based on their qualifications, skills and expertise above all.



### RESPECT FOR HUMAN RIGHTS

### EQUAL OPPORTUNITIES AND TREATMENT

## FOR THE SAKE OF THE ENVIRONMENT – AWARE OF OUR RESPONSIBILITY

**As a service provider in the field of renewable energies, we stand for an energy supply using sustainable and climate-friendly resources. The protection of our environment is our intrinsic drive. We are committed to dealing responsibly with natural resources and promote the use of environmentally friendly technologies.**

We are however aware that our processes can also have a negative impact on the environment. Keeping this impact as low as possible is our endeavour. We continuously review our processes for their carbon footprint and implement alternative and more resource-efficient approaches.

For example, we have always opted for 100% green electricity, practise recycling and organise CO<sub>2</sub> compensation for unavoidable business trips. By operating our own wind energy and photovoltaic systems, we produce more electricity than we need to provide our services.

We select all equipment and hardware according to the principle of longevity, without compromising on the state of the art. We replace environmentally hazardous substances and resources with less harmful substances. We fully offset the CO<sub>2</sub> emissions of our vehicle fleet and are continuously and sustainably replacing our vehicles with electric cars whenever possible.

We ask all employees and managers of Deutsche WindGuard to commit themselves to environmental protection and nature conservation and to actively support our endeavours. To achieve this, we are committed to providing our employees with space for creative ideas and sustainable research projects.



**ACTIVE REDUCTION OF  
ENVIRONMENTAL IMPACTS**

**CLIMATE PROTECTION  
THINK TANK**

## OUR RESPONSIBILITY AS A BUSINESS PARTNER– FAIR AND FREE COMPETITION

**Integrity and fairness are essential for creating trust and credibility. Deutsche WindGuard Group is particularly committed to clearly communicating and consistently complying with both legal requirements and internal company policies. We advocate free competition and condemn unfair competition and restraints on competition.**

A potential conflict of interest exists when an employee's private interests collide or may collide with the interests of the company. We respect our employees' personal interests but are committed to avoiding conflicts between private and business interests or even the appearance of such conflicts. Deutsche WindGuard's employees are obliged to report potential conflicts of interest and to make decisions based solely on objective criteria.

The quality of our services is the key to our global success. We do not tolerate any corrupt behaviour and monitor compliance with the relevant legislation.

Gratuities such as gifts, hospitality and invitations are common in business relationships. Our employees and our management only accept such benefits if they are within reasonable limits and do not conflict with internal or legal regulations. Inducements that raise suspicion of attempted influence or bribery must be rejected by our employees, managers and executives and reported internally without any delay.



**OPEN  
COMMUNICATION OF  
CONFLICTS OF INTEREST**

**A CLEAR NO TO  
CORRUPTION!**

## OUR RESPONSIBILITY AS AN EMPLOYER- PROTECTION OF OUR EMPLOYEES

**Our employees are the strong foundation of the Deutsche WindGuard Group. Maintaining and promoting all employees' health is therefore the core of our corporate activities. With this in mind, "Safety First - always and without exception!" is our primary principle.**

Health and safety at work are an integral part of all operational processes. We include them in technical, economic and social considerations right from the start.

Risk-aware thinking at all company levels forms the basis for a safe workplace. Without exception, we favour preventative measures over aftercare.

Every employee has the right to stop working if situations or events occur that impede safe working or pose a risk to the environment. Our managers support employees in these situations and are always available for dialogue.

Deutsche WindGuard Group pays all employees fairly and in accordance with applicable legislation. We accept and support further employee rights according to applicable law.

Preventive health protection for our employees is very important to us. In addition to providing ergonomic office equipment, we for example also support the Hansefit company fitness programme and organise other health-promoting offers in cooperation with health insurance companies.



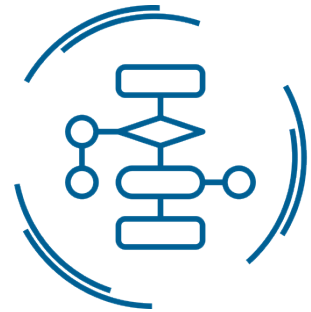
**SAFETY AS  
TOP PRIORITY**

**CREATING GOOD WORKING  
CONDITIONS**

## **SAME RULES FOR EVERYONE- SUPPLIERS, SUBCONTRACTORS AND VISITORS**

**Offering Deutsche WindGuard's comprehensive service portfolio requires a particularly diverse range of expertise. While we are proud to be capable of delivering the majority of our services through our own employees, we still require assistance from suppliers, subcontractors and other contractual partners and greatly value partnership-based cooperation.**

Compliance with our principles by these contractual partners must be ensured internationally. We therefore strive to place the same demands on our suppliers and subcontractors in particular as we do on ourselves. They commit themselves to complying with Deutsche Windguard's basic requirements as part of the contract. Adherence to the applicable laws and regulations is the foundation of our cooperation. Consequently, we have the right to conduct checks randomly.



**OBLIGATION OF OUR  
PARTNER NETWORK**

## **INFORMATION SECURITY – PROTECTION OF DATA, KNOWLEDGE AND PROPERTY**

**At Deutsche WindGuard Group, we stand for partnerships and business relationships based on trust. Securing this trust in the long term and keeping it alive is our endeavour. That is why we handle our business partners' data and property with care and responsibility.**

We recognise the value of a company's intellectual property. The loss of such knowledge or intellectual property can cause considerable damage to a company. Thus, we not only safeguard our own knowledge, but also that of our business partners. This applies, among other things, to general information, technical details, patents, company and business secrets. All information-processing procedures are based on the principle that confidentiality, integrity and availability of sensitive information must be guaranteed and unauthorised use must be prevented.

In business relationships, dealing with personal data and information is unavoidable. Handling personal data is subject to special legal regulations. Collection, storage, processing and other use of personal data require the consent of the person concerned, a contractual provision or other legal exception. We comply with these legal regulations internationally.



**RESPECTFUL HANDLING  
OF COMPANY DATA**

**PROTECTION OF  
PERSONAL DATA**



## DECLARATION OF LIABILITY

**As Managing Directors of the individual companies in the Deutsche WindGuard Group, we declare these principles to be binding and commit ourselves and our employees to complying with them.**

(Release takes place by publishing the version in the BITqms system. No signature required.)

**Gerhard Gerdes**

Deutsche WindGuard GmbH  
Deutsche WindGuard Consulting GmbH

**Dr. Knud Rehfeldt**

Deutsche WindGuard GmbH  
Deutsche WindGuard Wind Tunnel Services GmbH  
Deutsche WindGuard Engineering GmbH  
Deutsche WindGuard Offshore GmbH

**Dr. Dennis Kruse**

Deutsche WindGuard GmbH

**Leif Rehfeldt**

Deutsche WindGuard GmbH

**Nicholas Balaesque**

Deutsche WindGuard Wind Tunnel Services GmbH  
Deutsche WindGuard Engineering GmbH

**Axel Albers**

Deutsche WindGuard Consulting GmbH

**Jan Wallasch**

Deutsche WindGuard Inspection GmbH

**Lars Weigel**

WindGuard Certification GmbH  
Deutsche WindGuard Inspection GmbH

**Sven Bicker**

Deutsche WindGuard Offshore GmbH

**Niels Erdmann**

Deutsche WindGuard Offshore GmbH

**Dr. Stephanie Wehkamp**

KEACON GmbH

**Deutsche WindGuard**  
Oldenburger Straße 65 A  
26316 Varel | Germany

[windguard.com](http://windguard.com)