

# CODE OF CONDUCT



## DEAR EMPLOYEES, DEAR INTERESTED PARTIES

We plan for people, not only for customers, and have been contributing to an environment worth living in for 160 years. Personal contacts are important to us, we use our technical know-how and interdisciplinary cooperation every day to continuously evolve in step with our customers. Transparency, personal responsibility, respect and other values, as well as legal regulations, play an essential role in ensuring Gruner's long-term success and protecting the excellent reputation of the Gruner brand.

Our Code of Conduct defines the principles of how we as employees work with each other and, on behalf of Gruner, with our stakeholders such as customers, shareholders, regulatory authorities, and other partners. This important document outlines the standards that define us as a company. As a guideline, they are intended to make it easier for us to make decisions in our everyday work. If we are confronted with a difficult situation, the Code of Conduct should help us to take a steady course.

We are personally committed to ensuring that we embody the ethical principles set out in this document. It is crucial for Gruner that we all understand the Code of Conduct and follow applicable laws, regardless of our role in the company. By acting with integrity, we help to reduce or avoid risks for Gruner. In this way, together we contribute to the long-term success of our company – all according to plan.

If you observe any unfair behavior against our Code of Conduct, please report this to our Head of Legal, Insurance – even in cases of doubt.

We thank you for your efforts to integrate the standards for ethical and lawful conduct in your daily work.



Thomas Ernst  
Chairman of the Board



Olivier Aebi  
CEO

Approved by the Board of Directors: September 22, 2020 (this updated version)

The Code of Conduct of Gruner is based on the following fundamental principles:

- > PROFESSIONAL INTEGRITY AND QUALITY OF SERVICES
- > LEGAL COMPLIANCE
- > SUSTAINABLE DEVELOPMENT

Gruner's mission is to provide high-level engineering services. As an engineering and planning firm, Gruner has a technical responsibility, but also a commitment towards sustainable development, which is based on economic, social and environmental responsibility. In this respect, Gruner's staff is committed to fully enforce the following standards:



**We adhere to the applicable laws.**

Gruner complies with applicable laws and regulations in the jurisdictions in which the company operates. Common, but illegal local practices do not relieve Gruner of its duty to comply with these laws.



**We do not discriminate.**

Gruner will not discriminate against any individual on the basis of race, colour, sex, national origin, age, religion, marital status, sexual orientation, physical abilities or any factors prohibited by applicable law.



**We offer a safe working environment.**

Gruner is committed to provide a safe and healthy working environment. The company complies with all applicable safety and health standards and regulations. Protecting and promoting the health and well-being of its employees is important to Gruner. Risks and hazards to health should be identified, minimized or eliminated as quickly as possible.



**We protect the environment.**

Gruner applies the precautionary principle and seeks to minimize the environmental impact of its activities. The company promotes environmental responsibilities, among other things with volunteer work for ecological and social projects as well as virtual collaboration whenever possible.



**We are in fair competition.**

Gruner competes fairly and vigorously in its competitive markets. The company respects anti-trust and competition laws throughout the world.



**We communicate our standards.**

Gruner makes its standards and policies publicly available. Consultants, representatives, independent contractors, external temporary workers and suppliers are expected to observe the same standards as Gruner's employees when doing business with or on behalf of Gruner.



### **We are constantly developing.**

Gruner purposefully promotes a culture that honors courage, values experimentation and enables constructive feedback. Gruner employees work in an attractive working environment that supports innovative thinking, personal development and continuous learning.



### **We do not finance political groups.**

Gruner makes no contributions or payments to political candidates or movements. Nevertheless, the company may engage in public debate on issues, which are of legitimate concern to the company. Gruner acknowledges the right of its employees to run for public office and to be politically active.



### **We do not accept or offer gifts.**

Gruner's employees do not accept nor offer gifts, gratuities, entertainment or favors unless they are normal and customary in the business circumstances. Invitations to business events which have a duration of more than one day must be approved by the supervisor. Payments of money cannot be accepted under any circumstances.



### **We know no corruption.**

Making bribes or other improper payments to government officials, civil servants or anyone else in order to influence them is strictly prohibited. The fact that bribery may be an accepted local practice in a country does not relieve Gruner of the duty to comply with this policy.



### **We avoid conflicts of interest.**

Gruner's employees have the right to engage in business, financial and other activities outside their jobs at Gruner. In case of possible conflicts of interest with their professional activities, these activities need to be approved prior to commencement by the management. Activities in boards of directors or foundations are in any case subject to the duty to inform.



### **We are subject to the confidentiality obligation.**

Gruner's employees will not disclose confidential data such as strategic plans, financial details, information about negotiations, agreements or dealings between Gruner and others, employee-related information, trade secrets and similar information from partners or others.



### **We do not engage in insider trading.**

In the course of their work for Gruner, employees may receive information about other companies, which is not available for the public. The use of non-public information by employees for their own financial benefit or that of a spouse, relative or friend is against the Gruner policy and a breach of the law.



### **We do not tolerate violations.**

All regulations of this Code of Conduct are binding for all employees, regardless of their hierarchy. Breaches of the Code of Conduct are fundamental violations of the regulations of Gruner and can have consequences. Breach or possible breach of the Code of Conducts must be reported to the Head of Legal, Insurances department. Reports are treated confidentially.

## CLOSE TO THE CUSTOMERS: OUR SITES

### GRUNER IN SWITZERLAND

Aarau, Appenzell, Basel, Berneck, Brugg, Degersheim, Flawil, Freiburg, Köniz, Lucerne, Martigny, Oberwil BL, Renens VD, Rodersdorf, Roggwil TG, Solothurn, Stein AG, St. Gallen, Teufen, Wil SG, Zollikofen, Zug, Zurich

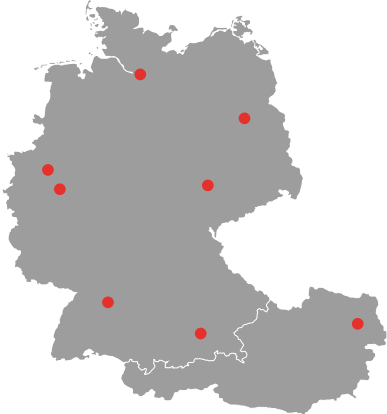
**gruner.ch**



### GRUNER IN GERMANY AND AUSTRIA

Berlin, Dernbach, Hamburg, Cologne, Leipzig, Munich, Stuttgart, Vienna

**gruner-brandschutz.de**  
**gruner-bauphysik.de**  
**gruner-leipzig.de**



### GRUNER INTERNATIONAL

Ankara (Turkey), Belgrade (Serbia), Tbilisi (Georgia)

**gruner.ch**



**CONTACT**

Gruner Ltd  
St. Jakobs-Strasse 199  
CH-4020 Basel  
T +41 61 317 61 61  
[www.gruner.ch](http://www.gruner.ch)