BEGECA Code of Conduct

(as of 1 October 2025)

§1 Scope

BEGECA Beratung – Beschaffung – Logistik gGmbH obliges itself as an institution, all its employees (both paid and voluntary) as well as all its board members, partner organisations, business and project partners to observe/ comply with the following attitudes and behaviours:

§2 Conception of humanity and interaction with one another

(1) At the core of the Christian conception of humanity is the unconditional attribution of personal dignity to every human being. Unconditional means that human dignity arises from the mere fact of being human, i.e. it is independent of contingent characteristics and attributes such as age, state of health, social status or mental or physical abilities.
(2) Our conception of humanity prohibits us from discriminating against other people on the basis of biological or social gender, ethnic/social/religious/political affiliation, age, deviations from a supposed norm, physical/mental/emotional impairment or individual performance.
(3) Our interactions with one another are characterised by respect, recognition and appreciation of the other person.
(4) We treat each other fairly – i.e. we make every effort to treat each other in a way that does justice to the individual as a whole. Fair does not explicitly mean that we treat everyone the same – but we treat everyone equally fairly.
(5) We work with our business partners, project partners, target groups and colleagues in a fair manner based on mutual trust.
(6) Criticism and, where applicable, sanctions relate exclusively to specifically observable behaviour or non-behaviour, but never to the person as a whole.

§3 Principles

(1) We fulfil our contractual obligations. We respect the applicable laws in Germany and in our partner countries.
(2) BEGECA's working methods and motives must be transparent, understandable and comprehensible.
(3) We treat all business information as confidential if the nature and scope of the information require discretion or if discretion is expressly requested.

§4 Dealing with (sexualised) violence

(1) All actions that endanger the dignity and well-being of individuals or even lead to (sexualised) violence are prohibited. Sexualised violence and exploitation take many forms and also include boundary violations in the form of unwanted comments, compliments and suggestive remarks.
(2) We pay attention to communication and interaction so that hurtful or sexualised language and boundary violations have no place.
(3) Discriminatory, racist, violent or sexist actions and statements must be addressed. This can be done either directly to the person exhibiting the misconduct or by reporting it to a supervisor.
(4) It is prohibited to offer goods or services and other favours in exchange for sexual services, money, employment or promotion; this also includes sexual favours or other forms of humiliating, degrading or exploitative behaviour.
(5) Sexualised violence and exploitation constitute serious misconduct and will be met with criminal consequences if necessary.

§5 Use of resources

(1) In its activities, BEGECA directly or indirectly uses financial resources, natural resources, the trust of its partners, working time/human lifetime, individual skills/initiative/creativity/energy to fulfil its corporate purposes.
(2) In the spirit of "good and faithful stewardship" (understood as "good and faithful/conscientious administration" and "good and faithful/conscientious leadership"), we use the resources entrusted to us responsibly, carefully and sparingly/in a resource-efficient manner.
(3) As far as it is within our power, we ensure that no human or natural rights are violated in the extraction of the aforementioned resources.
(4) In particular, we pay attention to compliance with general human rights and the UN Convention on the Rights of the Child in our work – including that of our partners.

§6 Dealing with conflicts of interest

(1) The business and private spheres are separate.
(2) Potential conflicts of interest arising from family, financial or other ties must be reported immediately to superiors. They must be resolved in a manner that is objectively verifiable and understandable to all parties involved.
(3) The acceptance and granting of bribes, dispatch money, gifts or other personal advantages from/to BEGECA business partners, project partners and target groups is prohibited, with the exception of gifts of low value. These are small gifts or vouchers or other advantages that do not exceed a value of EUR 50,00 per giver, calendar year and employee. If gifts are given in expectation of a consideration, they must be refused regardless of their value.
(4) Invitations to meals by business partners are considered low-value gifts, even if they exceed EUR 50,00, provided they take place within an appropriate business context. For reasons of transparency, employees should inform their superiors if they receive

regular invitations to meals or if BEGECA frequently covers the costs of such business meals.

(5) Business trips to subcontractors or companies with which BEGECA has business relations are paid for by BEGECA. The subcontractor is not permitted to cover any travel costs.

§7 Procedure in the event of suspected violations of the Code of Conduct

(1) It is the responsibility of all BEGECA employees to ensure compliance with the Code of Conduct within its scope.

(2) Persons with management responsibility and/or decision-making authority/ authority to issue instructions have a particular duty in this regard.

(3) If a violation of the Code of Conduct is suspected, there is an obligation to report it. The report can also be made anonymously. Failure to comply with this obligation may result in a warning or, in the case of a serious violation or if a warning has already been issued, termination without notice.

(4) Suspected violations of the Code of Conduct can be reported to:
   a. The person who has potentially violated the Code of Conduct AND
   b. The immediate superior
   c. A member of the management
   d. A member of the Board of Directors
   e. The ombudsperson
   f. begeca@begeca.de

(5) The informed person is obliged to follow up on the report and to communicate the result of the investigation to the reporting person, if known.

(6) All reports (anonymous or named) will be investigated with equal diligence. All information will be carefully examined and, if desired, kept confidential. The principles of presumption of innocence and whistleblower protection apply. In all cases, it must be verified whether the allegations are justified and verifiable.

(7) Only a limited group of people has access to the documented information. The GDPR must be complied with.

(8) Protect those involved: It is examined whether the person concerned and/or the whistleblower needs protection (e.g. from physical threats, blame, verbal abuse). The accused must also be granted protection until the accusation has been clarified.

(9) Sexualised violence or exploitation is always a serious allegation. In the case of a criminally relevant allegation of sexualised violence, the accused is suspended from duty until the facts have been clarified and the victim is provided with medical, psychological and legal support.

(10) To clarify the facts of the case, discussions are held with the victim and the accused and recorded as verbatim as possible. These discussions are attended by the ombudsperson, a BEGECA internal representative and an external expert. Further guidance is provided in the guide "What to do in the event of sexual harassment in the workplace" published by the Federal Anti-Discrimination Agency https://www.antidiskriminierungsstelle.de/SharedDocs/downloads/DE/publikati

onen/Leitfaeden/leitfaden_was_tun_bei_sexueller_belaestigung.html). After the discussions, the persons involved will make a recommendation to the chair of the Administrative Board.

(11) Proven misconduct will be met with appropriate sanctions, including contractual and, if necessary, criminal consequences.