



Common Policies Applying to the General Business Conduct of the CIWI GmbH



1.1. Environmental Affairs Policy

CIWI GmbH is committed to environmental affairs leadership in all of its business activities. CIWI GmbH has begun implementing basic policy guidelines in 2010 when applying for the Global Compact Active Level in the areas of providing a safe and healthful work place, protecting the environment, and conserving energy and natural resources. These principles provide the foundation for the following corporate policy objectives:

- Be an environmentally responsible neighbour in the communities where we operate, and act promptly and responsibly to correct incidents or conditions that endanger health, safety, or the environment. Report them to authorities promptly and inform affected parties as appropriate.
- Conserve natural resources by reusing and recycling materials, purchasing recycled materials, and using recyclable packaging.
- Develop, manufacture, and market products that are safe for their intended use, efficient in their use of energy, protective of the environment, and that can be reused, recycled or disposed of safely.
- Use development and manufacturing processes that do not adversely affect the environment, including developing and improving operations and technologies to minimize waste, prevent air, water, and other pollution, minimize health risks, and dispose of waste safely and responsibly.
- Ensure the responsible use of energy throughout CIWI's business, including conserving energy, improving energy efficiency, and giving preference to renewable over non-renewable energy sources when feasible.
- Participate in efforts to improve environmental protection and understanding around the world and share appropriate pollution prevention technology, knowledge and methods.
- Utilize CIWI GmbH products, services and expertise around the world to assist in the development of solutions to environmental problems.
- Meet or exceed all applicable government requirements and voluntary requirements to which CIWI GmbH subscribes. Set and adhere to stringent requirements of its own.
- Periodically issue progress reports to the general public.
- Conduct audits and self-assessments of CIWI GmbH's compliance with this policy, and report periodically to Executive Management.

Every employee and every contractor on CIWI GmbH premises is expected to follow this policy and to report any environmental, health, or safety concern to CIWI GmbH management. Managers are expected to take prompt action.

1.2. Labour Policy

CIWI GmbH and its affiliates recognize its responsibility to respect and protect the rights of its employees. As such, CIWI GmbH has adopted the following guidelines as part of its goal to respect the fundamental rights of its employees.

CIWI GmbH:

- Shall obey and comply with local labour practices and maintain good working relationships with its employees.
- Shall not employ or support the use of any form of child labour, or forced or coerced labour.
- Shall seek to provide a safe and healthy work environment.
- Shall not engage in nor support the use of corporal punishment, mental or physical coercion, or verbal abuse.
- Shall respect its employees' right to associate and engage in the collective bargaining process pursuant to local labour practices.
- Prohibits discrimination of employees based upon sex, race, national origin, political beliefs, or religion and maintains a discrimination-free work environment.
- Prohibits, and complies with laws prohibiting acts of sexual harassment or threats in the workplace.
- Shall comply with applicable industry standards relating to work hours and payment of wages.

1.3. Human Rights Policy

CIWI GmbH's policy on global human rights applies to the company's operations worldwide and is part of its commitment to ethical and socially responsible behaviour.

- CIWI GmbH has a zero tolerance policy and is committed to maintaining an inclusive workplace free of harassment and discrimination based on a person's status such as race, colour, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status or other characteristics protected by applicable law. Any associate who knows of discrimination or harassment, or feels that he or she has been subjected to or falsely accused of discrimination or harassment should report it immediately to the person with immediate authority over the workplace, to his or her human resources representative, or to the other resources identified in the zero tolerance policy. All reports will receive an appropriate investigation or review.
- Each associate's presence must be voluntary. This specifically prohibits all forms of prison labour, indentured labour, slave labour, or other forms of compulsory labour or human trafficking.
- CIWI GmbH does not engage in or condone the unlawful employment or exploitation of children in the workplace (In the absence of any national or local law, CIWI GmbH will define "child" as someone less than 15 years of age. If local minimum age law is set below 15 years of age, but is in accordance with developing country exceptions under the International Labour Organization (ILO) Convention 138, the lower age will apply).
- CIWI GmbH respects associates' rights and freedom to join organizations of their own choosing or to refrain from doing so. Associates who have chosen unions in accordance with applicable laws and regulations are entitled to bargain collectively through representatives of their own choosing. The Company shall facilitate open communication and direct engagement between associates and management in those situations in which the right to freedom of association and collective bargaining are restricted under law. No associate shall be subject to dismissal, discrimination, harassment, intimidation, or retaliation due to his/her membership in a lawful workers' association or union.
- CIWI GmbH is committed to complying with all applicable laws and regulations dealing with the wages we pay CIWI's associates and the hours they work.
- CIWI GmbH seeks to do business with suppliers that observe similar standards in their relations with their employees and their own supply chains.

1.4. Anti-Corruption Policy

CIWI GmbH recognizes that due to the nature of its business, it is directly affected and affected by people and organisations working to fight corruption globally. It therefore strives to recognize its particular responsibility by employing a clear policy and by supporting its employees to make decisions in line with this position.

CIWI's corporate conduct is based on its commitment to acting professionally, fairly and with integrity. CIWI GmbH does not tolerate any form of bribery or corruption. In developing this policy CIWI GmbH has made reference to the 'Business Principles for Countering Bribery' published by Transparency International.

- This policy applies to Centrica employees (staff, contract and temporary) and extends to all its business dealings and transactions in all countries in which it or its associates operate.
- CIWI GmbH operates responsibly wherever it works and engages with its stakeholders to manage the social, environmental and ethical impact of its activities.
- CIWI GmbH does not engage in bribery or any form of unethical inducement or payment including facilitation payments and 'kickbacks.' All employees are required to avoid any activities that might lead to, or suggest, a conflict of interest with the business of CIWI GmbH. Employees must declare and keep a record of hospitality or gifts accepted or offered, which will be subject to managerial review.
- CIWI GmbH will uphold laws relevant to countering bribery and corruption in all the jurisdictions in which it operates, particularly laws that are directly relevant to specific business practices. The following national and international laws and conventions underpin this policy:
 - OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (1997)
 - UN Global Compact – Principle 10 (Anti-Corruption)
- If any instance of bribery or corruption is identified, executive management is responsible to take remedial steps immediately.
- CIWI GmbH communicates this policy to its employees, through its established internal communication channels. It will also communicate this policy to its suppliers, contractors and business partners and wider stakeholders.
- Employees are encouraged to raise concerns about any instance of malpractice at the earliest possible stage.
- CIWI's sustainability staff will review the implementation of this policy and make improvements as appropriate. It will periodically report the results of this process to executive management.

1.5. Public Policy and Lobbying

- CIWI GmbH does not make direct or indirect contributions to political parties.
- CIWI GmbH does not engage in public policy or lobbying of any kind.
- CIWI's sustainability staff will review the implementation of this policy and make improvements as appropriate. It will periodically report the results of this process to executive management.