*Your performance partner
for a better tomorrow*

Dear Readers,

What is "right" and what is "wrong"?

What factors should determine our actions – internally and externally?

How can we create – or even further develop – a corporate culture in which we synchronise the systemic and the real world within our organisation so that no integrity gaps can arise?

The GOPA Group has been working successfully in international development cooperation for 50 years now. We are proud of this, and convinced that we have created a corporate culture that harmonises perfectly with the norms of society. This includes continually reflecting on principal assumptions and the standards and values associated with them.

In recent years, the public's expectations in terms of companies' ethical behaviour have risen significantly. This trend can also be observed in the requirements of our clients. Long gone are the times when it was enough to keep one's own house in order. Our customers, who often indirectly reward our services with taxpayers' money, expect us to assume responsibility for the freelancers, suppliers and subcontractors working for us – in short: our entire value chain.

With our Code of Ethics, the Practical Guide to the Code of Ethics derived from it, and the Code of Conduct for Business Partners, we want to give all GOPA Group's employees and our business partners a clear orientation in our values and principles. By signing the Practical Guide to the Code of Ethics, our senior management annually confirms its personal commitment to complying with the Code.

The Code is both a promise and an obligation: a promise to the public, and a commitment by each individual employee to the company.

Being aware that – in the area of international cooperation, in particular – we encounter a wide variety of conditions, institutions and systems, we pledge to uphold a "zero tolerance" policy with regard to corruption, fraud, money laundering and the financing of terrorism.

To ensure that the Code of Ethics remains an integral part of our work, we established a binding, Group-wide, compliance and integrity management system. The core elements are: comprehensive training of our employees; the position of an independent Compliance and Integrity Officer for the whole GOPA Group; regular internal audits to ensure compliance with the Codes; and safeguarding of confidentiality for informants.

The implementation of the Code of Ethics is therefore a daily priority for all of us.

We are convinced that, in addition to high professionalism and operational reliability, our success is based on our values and principles of fairness, loyalty, honesty and integrity.

Dr. Martin Güldner
CEO GOPA Consulting Group

CODE OF ETHICS

Integrity and compliance are fundamental values of GOPA Consulting Group - all group companies share these values and follow the same key principles.

GOPA Group acts in a sense of corporate social responsibility, transparency and mutual respect. In all of its activities it upholds the principles of quality, respect and equal rights, legal compliance and anti-corruption, transparency and honesty, partnership and fairness, responsibility and sustainability.

Integrity is understood as the conformity of these corporate and individual values with day-to-day actions. **Compliance** means the observance of laws and regulations including those required by the company itself. Both fundamental values are the core of how all group companies interact with their clients, partners, employees and contractors across the globe.

The management board and senior executives play a key role. In their daily work they set good examples, they motivate and support employees in the practical implementation of this Code of Ethics.

GOPA Group companies participate in tenders and implement private and donor-financed projects in keeping with the highest standards of corporate ethics and competitive practices. This requires high personal and professional standards for management and staff, the adherence to which is ensured by

- carefully selecting head office management and personnel, external experts and cooperation partners;

- being compliant to this Code of Ethics, the Practical Guide to the Code of Ethics and related policies at home and abroad; as well as

- applying this Code of Ethics and the Practical Guide to the Code of Ethics and related policies when dealing with cooperation partners, donors and stakeholders in all projects implemented by group companies.

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OUR KEY PRINCIPLES

QUALITY

GOPA Group makes sure that resources mobilized for its clients meet the respective contractual obligations of each project. By doing so it uses the appropriate skills and the best tools available while respecting profitability objectives.

GOPA Group employs and works with people without making any differentiation in respect of gender, age, nationality, ethnic origin, religion, culture, education, social status, disabilities, or sexual orientation. Equal rights principles are met in all its activities. It dissociates itself from and does not tolerate bullying/mobbing, sexual harassment, child abuse and racism, neither in its head offices nor in project offices worldwide.

RESPECT AND EQUAL RIGHTS

Respect is a key principle of GOPA Group to show a high regard for all resources entrusted to it. These resources may include people, money, reputation, the safety of others as well as nature and environment. A surrounding of respect generates trust, confidence and performance excellence by fostering mutual cooperation - diverse perspectives and views are encouraged and valued.

LEGAL COMPLIANCE AND ANTI-CORRUPTION

GOPA Group complies with all applicable laws, statutes, regulations and codes relating to anti-corruption, bribery, anti-trust, competition and procurement. Group companies fulfill their contractual obligations and respect the laws in force in their home countries and in the countries where they are working.

TRANSPARENCY AND HONESTY

Through its management and accounting systems, rules and procedures, group companies ensure that all their decisions, actions and motives are clear and comprehensible.

Honesty is a crucial principle to GOPA Group committed to understand the truth and act in a truthful manner both in its communication and in its conduct.

Violations of this Code of Ethics, the Practical Guide to the Code of Ethics and the Code of Conduct for Business Partners are brought to the attention of its Compliance and Integrity Officer for resolution. This might lead to disciplinary and/or legal action against individuals or business partners who retaliate upon a person raising ethical concerns.

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PARTNERSHIP AND FAIRNESS

GOPA Group strives for a partnership-based cooperation with associate firms and freelance experts deployed in its projects. Partnership characterized by mutual respect, trust and confidentiality, also applies to cooperation with clients, donors, beneficiaries, target groups and authorities in all countries where projects are implemented.

Fairness is key to making decisions and act impartially and objectively. All interactions within GOPA Group and with the outside world are conducted following the sense of fairness. Its conduct is free from competing self-interest, prejudice, and favoritism.

RESPONSIBILITY AND SUSTAINABILITY

GOPA Group companies take responsibility: they take ownership for the decisions they make or fail to make, the actions they take or fail to take, and the consequences that result. Accountability is accepted for any issues resulting from errors or omissions and any resulting consequences. Corrections are made promptly. Errors or omissions caused by others are communicated to the appropriate body as soon they are discovered.

The three pillars of sustainable development are central to GOPA Group's work. It adheres to the UN Millennium Development Goals adopted in 2000 and to the UN Sustainable Development Goals formulated for post 2015 development.

In all their operations group companies follow the principles of Corporate Social Responsibility. Based on the precautionary principle, risks related to human rights, environment, social standards, occupational safety and health are assessed, managed and minimized.

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