

Compliance and Code of Conduct

The basis for the cooperation between GSE and the client (hereinafter collectively referred to as 'the parties') is set out in the following principles, which both GSE and the client shall adhere to. Breaches of these principles may result in significant financial and, where applicable, criminal consequences, as well as damage to reputation. Should the client be uncertain regarding the applicability or compliance with the principles, or should they discover any breaches, they shall contact GSE without delay in order to find an appropriate solution.

1. In their cooperation and the performance of the contracts, the Parties shall, as a matter of course, comply with all applicable laws, regulations and rules both domestically and abroad.
2. The Parties shall respect internationally recognised human rights as well as the core labour standards of the International Labour Organisation (ILO) and its labour and social standards. The responsibility to respect human rights, labour and social standards applies throughout the entire value chain, with particular attention being paid to the rights of especially vulnerable individuals and groups, such as women, children, people with disabilities, migrant workers and indigenous peoples. Particular emphasis is placed on the responsibility to comply with the prohibition on participating in or condoning any form of forced labour, slavery and human trafficking, the prohibition on child labour and the prohibition on any form of discrimination, as well as to respect freedom of association and the right to collective bargaining, and to ensure a safe and healthy working environment.
3. GSE and the client operate in various countries with different cultures. People of different ethnic origins, religions, beliefs, ages, disabilities, genders or sexual identities enrich both parties. No one may be directly or indirectly discriminated against, sexually harassed or personally disparaged on the basis of any of these characteristics. The parties shall treat every person with respect, fairness and an appreciation of diversity. They shall ensure respectful and fair interaction and shall not harass or discriminate against anyone. When communicating with customers and local contacts, the parties shall respect other opinions and exercise restraint when making political statements.
4. The parties shall comply with the legal and technical requirements and standards relating to occupational health and safety.
5. Compliance with the applicable environmental protection laws, regulations and standards is a matter of course for the parties. Through our actions today and the sustainability of our current economic and lifestyle choices, we respect and protect the living conditions of future generations.
6. The parties shall avoid conflicts of interest, as independence, integrity and trust in GSE's services form the basis of our credibility. A conflict of interest may arise in various circumstances, for example where a teacher's private interests (may) conflict with those of GSE. The parties shall also take care to avoid even the appearance of a conflict of interest.
7. A) Corruption and the acceptance of undue advantages are prohibited by law in almost all countries worldwide. GSE also prohibits its employees and contractual partners, in connection with any business activity, from demanding or accepting personal advantages for themselves or their associates, or from offering or granting personal advantages to third parties or business partners and their associates.
Such benefits may take the form of, for example, a gift, an invitation or any other favour, and may benefit the person acting or a third party, such as a family member.

B) Any form of corruption is prohibited, including the granting of a benefit in return for an action or omission, such as so-called 'facilitation payments'. 'Expedition payments' are payments made to a public official intended to initiate or expedite a routine official act to which there is a legal entitlement. GSE thus deliberately sets stricter standards in some countries than those required by law.

C) Payments in the form of cash or cash equivalents are prohibited. However, regional internal regulations may permit exceptions, which must be expressly authorised by the responsible managing director.

D) In practice, gifts and invitations offered to employees, business partners or public officials represent the most common form of benefit. The giving or acceptance of such benefits is only permitted provided that the benefits are reasonable. In particular, the acceptance of a reasonable benefit must neither influence the recipient's decision-making nor give the impression that it influences decision-making. Reasonableness is determined primarily by the financial value of the benefit, the recipient's role and position, the timing in relation to negotiation and decision-making processes, and the business customs of the country in question. Gifts or the acceptance of gifts with a value exceeding €100.00 require the approval of GSE's management in all cases.

E) Particularly strict legal restrictions apply to gifts made to public officials. The term 'public officials' encompasses not only all persons who hold a public office or perform a public function, such as representatives of public authorities, the police and border officials. University professors and representatives of state-owned enterprises may also be regarded as public officials. Gifts to public officials are therefore generally not permitted and are subject to the approval of GSE's management.

8. The parties shall help to ensure that assets of illegal origin are not introduced into the economic cycle. The parties shall therefore comply with the applicable national and international laws on combating money laundering and the financing of terrorism.

9. The parties shall comply with the applicable export control and embargo restrictions. Export control laws regulate the export and re-export of goods and services that can be used for both military and commercial purposes, as well as their movement within the country. These laws serve national security and other interests, or are intended to influence the behaviour of a particular country, company or individual.