

Declaration of Self-Commitment for Corporate Members of Transparency International Deutschland e.V.

– Companies –

(March 2009)

We are joining Transparency International Deutschland e.V. as a corporate member because we reject and condemn corruption in all its manifestations.

We are determined to attain high ethical standards in our business activities. We do not tolerate corrupt practices on the part of employees, managers, appointed representatives, representatives acting on our behalf or our business partners.

Correspondingly, our company has issued binding rules (Code of Conduct) as well as other guidelines and demands strict compliance with these internal rules and generally law-abiding conduct from all those employed by us or working for us at all times.

To ensure compliance with these rules, our company has introduced an implementation program for the active prevention of corruption, with the following elements:

- A clear and visible commitment to the company's Anti-Corruption policy by the company's management and all governing bodies as well as exemplary conduct by managers in dealing with situations that involve conflict of interest or dilemmas.
- Minimizing the risk of corruption in all business units through preventive organizational measures governing responsibilities, powers, reporting duties as well as the selection of employees, managers and business partners.
- Systematic and comprehensive controls of all business units, especially of business processes that are prone to corruption.
- Comprehensive education and training of employees, managers and business partners (awareness) as well as targeted support for uncovering and avoiding violations through the use of whistleblower systems.
- Consistent intervention in situations of suspicion and sanctioning of violations through legal and disciplinary measures.

In our shared interest groups (associations), we are committed to identify industry-specific problem areas and to take suitable counter-measures.

If a suspicion of corruption in the company becomes public knowledge, we will keep Transparency International Deutschland e.V. constantly informed about the process, as far as the consideration of a criminal investigation allows.

We hereby agree to confirm the compliance, adaption and implementation of this declaration of self-commitment every three years, and to respond to all questions that Transparency International Deutschland e.V. considers necessary in this context.

Ahrensburg, 25.06.2018

Bluester GmbH

Place, Date

Company Name



bluester
SAIL SAFE THE SMART WAY

Stamp and legally binding signature of Executive Board member/managing director