



Code of Conduct
of the ORS Group

ors

4	1 INTRODUCTION
4	2 OBJECTIVE
4	3 SCOPE OF APPLICATION
4	4 BASIC RULES
5	5 HANDLING INFORMATION AND DATA
6	6 COLLABORATION
7	7 PROFESSIONALITY
8	8 VIOLATIONS OF THE CODE OF CONDUCT

Dear Colleagues,

Our company's integrity and reputation give us a decisive competitive edge in our market environment. As a group of companies that operates internationally, ORS is committed to compliance with local laws and regulations in every respect – and we expect the same from our employees at all times.

This Code of Conduct is one of the most important sets of guidelines for our company. As well as requiring compliance with laws and regulations as a bare minimum, it defines the fundamental ethical and moral values on which all employees are expected to base their behaviour. In terms of importance, there is no difference between the way in which we work and the actual work itself. Each of us is responsible for understanding and practising the fundamental ethical values described in the Code of Conduct, such as respect, transparency, honesty, decency and trust.

The rules serve as a guide, promotes correct behaviour and supports us with specific rules on how to conduct ourselves in our daily work. The rules and behavioural guidelines in the Code of Conduct are not exhaustive. They do not release us from our obligation to base our daily behaviour on the general principles of decency, morality and common sense, and to address problems openly and in a cooperative manner.

The Code of Conduct is binding for all employees of the ORS Group and so ensures that everyone – i.e. our employees, the people in our care, our clients and the public – benefits from it in their daily work.



A handwritten signature in black ink, appearing to read 'J. Rötheli', written over a vertical line that serves as a signature separator.

Jürg Rötheli
CEO ORS Group

1 INTRODUCTION

We are a competent and reliable partner for our clients in the public and private sector. Our work focuses on meeting the needs of the people in our care and serving the interests of our clients, employees, suppliers and other business partners. Our employees in particular are crucial to our company's success. Whether in operational and strategic areas, they commit themselves daily to meeting our organisation's objectives with professionalism, expertise and passion. They give their best each day and are aware of their responsibilities as an employee of the ORS Group. For this reason, it is important that the Code of Conduct establishes guidelines and principles relating to moral, ethical and legally compliant conduct in daily work, and thus provides a clear basis for decision making.

2 OBJECTIVE

Our Code of Conduct lays down the rules that apply when dealing with moral, ethical and legal issues that may arise in the conduct of our operational tasks, strategic considerations and decision-making processes. The Code of Conduct forms an essential part of our corporate culture and is embodied by employees and managers alike.

3 SCOPE OF APPLICATION

The Code of Conduct applies to all employees of the ORS Group, regardless of their position or location. It is therefore an integral part of each individual employment contract.

4 BASIC RULES

Compliance with legislation and regulations

We comply with all applicable laws and regulations as a matter of course. Violations may have serious legal consequences for ORS or individual employees and/or result in major financial losses.

Protection of company assets and fraud

We attach importance to responsible use of the company's property. The company's assets must always be used for the intended business-related purposes. Any other use – in particular for inappropriate personal, illegal or other unauthorised purposes – is prohibited. Fraud and resulting damage to the company's assets or the assets of third parties will not be tolerated in any shape or form.

Political and religious neutrality

Our organisation is religiously and politically neutral. The personal political and religious beliefs of employees are a private matter and must under no circumstances interfere with execution of their work.

Protection against corruption and bribery

We condemn all forms of bribery and corruption, which have no place in our company. In addition, we oppose any behaviour associated with exploitation of a position of power for personal gain in violation of standards of proper conduct.

Dealings with political institutions and authorities

When dealing with political institutions and authorities, we always act in an honest and transparent way and in accordance with the applicable laws.

Health and safety

Health and safety is important to us. We are committed to protection of the health and safety of all our employees, while taking into account their individual needs and differences. Rules and regulations relating to health and safety at work must be observed at all times. Through the provision of and participation in regular training and information, we foster a healthy and safe working environment for our employees.

Read more: Corporate Social Responsibility Statute of the ORS Group

5 HANDLING INFORMATION AND DATA

Data protection and confidentiality

Confidential information of any kind to which our employees are exposed while carrying out their duties for the company (even if not directly related to their area of work) may not be used to pursue the employee's own interests or made available to serve the interests of third parties. The data protection provisions must be adhered to at all times.

We therefore protect company data against access by unauthorised persons. Confidential documents and information must be identified as such. We treat sensitive data of employees, clients, business partners and other third parties with care and in strict confidence, and comply with the applicable laws and regulations.

Read more: Data protection and IT policy



Confidentiality and opinions

We are aware of our responsibilities and duties as a service provider. As a politically and religiously neutral partner of public clients, we do not share our opinions on immigration and asylum policy. We protect confidential information against unauthorised disclosure and mis-use. We forward requests from the media and other external contacts to our internal media relations department.

6 COLLABORATION

Equal opportunities and trust

We regard human rights as fundamental values that are to be respected and considered by all employees.

This guiding principle applies to the treatment of people in our care, as well as to the collaboration between all employees and our dealings with external partners. Our corporate culture appreciates and welcomes the fact that each individual is unique and valuable, and should be respected for their individual abilities.

We believe in equal opportunity and do not tolerate any form of discrimination on the grounds of ethnic origin, nationality, gender, pregnancy or parenthood, marital status, age, disability, religion or beliefs, sexual orientation or any other unjustified reason. Our work is shaped by trust, tolerance, appreciation and mutual respect.

Communication

We maintain open, regular, timely and professional dialogue with our employees, the people in our care, our clients, our business partners and third parties. We always communicate in a transparent and respectful way, and we pass on important information immediately.

Freedom of speech

We attach great importance to an open climate in which our employees feel they can go to their supervisor or management without hesitation. Management encourages open discussion and is there to assist in a trustworthy and impartial manner. In structured appraisal interviews, employees and managers provide each other with mutual feedback on work performance, the working relationship and general progress, thus helping to further improve our corporate culture.

Fairness and respect

We treat each other, our clients, our business partners and third parties with fairness and respect at all times. As a responsible employer, we do not engage in salary dumping or offer unequal pay for men and women. The principles of remuneration are defined at Group level. We comply with the relevant national rules and regulations governing pay, and we monitor compliance regularly with the principle of equal pay for equal work.

Harassment, sexual harassment, bullying and violence

Harassment, sexual harassment, bullying, violence and intimidation in any form have no place in our company and are punished accordingly. We have an internal reporting system to protect our employees, clients and external partners.

Read more: Management principles of ORS and in our general terms of employment.

7 PROFESSIONALITY

Professionality

In our support work with asylum seekers, we do not advise them on the asylum procedure or take sides, but instead refer them to the relevant authorities or advisory bodies. Professional care can be provided only if we maintain this distance and our behaviour is completely neutral.

Read more: Support guide

We behave appropriately and professionally in our business relationships with others. Our business partners (e.g. clients, suppliers, authorities, etc.) can expect ORS, as a business partner, to act in accordance with the law. This also requires us to be familiar with our contractual obligations to our business partners.

Gifts and invitations

Acceptance of gifts, gratuities or invitations from clients, suppliers or business partners is not generally permitted. However, this does not apply to small gifts or invitations to business lunches or business-related events. The context and appropriateness of the gift or invitation should be considered within the scope of local norms. In case of doubt, the employee must inform their manager in advance and obtain their approval.

These rules and principles apply equally to invitations or gifts from ORS Group employees to clients, suppliers or other third parties.

Employees may not accept gifts or money of a private nature from clients as part of the performance of the support work. Exceptions include small tokens of appreciation, such as drawings by children or a homemade cake, if agreed in advance between the employee and their manager. Similarly, gifts from employees to clients are not permitted. Employees are also not allowed to accept personal invitations from clients. The significance of gifts and invitations, and whether it is acceptable to give or receive them, will vary from culture to culture. We try to avoid misunderstandings and disappointment by highlighting the cultural differences between our country and the country of origin during the induction meeting.

Assumption of responsibility, reflection and improvement

We take responsibility for our work and our actions. We also reflect on and improve our work and behaviour on an ongoing basis.

Use of resources

We use the many resources available to us in order to carry out our work with conviction and fulfil our responsibilities. At the same time, we use the available resources economically and carefully.

Violations of personal boundaries

We do not tolerate violations of personal boundaries, sexual exploitation or abuse. We are committed to taking appropriate measures to protect the people in our care. We foster a culture of vigilance. Our employees are obliged to report any incidents they see or of which they become aware. They are responsible for recognising, preventing and stopping attacks through attentiveness and alertness.

Violations of personal boundaries may result in dismissal. Persons affected by any such attacks can seek advice or file a complaint without fear that they or anyone else involved will be disadvantaged in any way.

Read more: Violations of personal boundaries in the care relationship

8 VIOLATIONS OF THE CODE OF CONDUCT

Procedure if a violation is identified or suspected

We operate a zero tolerance policy: ORS employees who become aware of a violation of the Code of Conduct (or any signs of such) have a duty to report it. In case of doubt, looking the other way is tantamount to complicity. If there are any indications that the Code of Conduct has been violated, the employee must inform their supervisor, the HR department or a manager.

Procedure in the event of violations of personal boundaries and the Code of Conduct

The ORS Group has set up a reporting office where violations of personal boundaries and the Code of Conduct can be reported:

ORS Reporting Office:
compliance@ors-group.eu

The following generally applies

- ▶ Take your observations and feelings seriously.
- ▶ Stay calm and do not rush into anything.
- ▶ Make notes of anything you observe, as well as information from third parties and comments from the accused person or suspected victim.
- ▶ Inform the Reporting Office in every case.

The Reporting Office is a neutral body to which incidents can be reported. It acts as a competence centre for all matters relating to violations of personal boundaries and the Code of Conduct. It records all notified incidents and will follow up on any suspicions using the same procedure. The supervisor/manager and/or other relevant bodies will be notified only after the employee's manager/supervisor has been consulted.

Disciplinary action

Employees who violate a provision of the Code of Conduct can expect disciplinary action. Depending on the severity of the violation, this may range from a verbal warning to termination of the employment contract through to instant dismissal. If the violation also constitutes a criminal offence (e.g. sexual exploitation in a position of authority, threat, bribery, etc.), criminal proceedings may also be initiated. Unsubstantiated complaints, i.e. those for which a violation could not be sufficiently proven on the basis of the available evidence, will have no consequences for the complainant if it was made in good faith. On the other hand, if an innocent person is knowingly accused, the accuser may be subject to disciplinary or legal action.

An accused person who feels innocent or was not aware that they were doing anything wrong may contact their immediate supervisor or the national HR department and the Compliance Officer to request a review of the circumstances and corrective action if applicable.

Zurich, april 2022



ors



neutral, flexible, mindful.

ORS Group AG
Röschibachstrasse 22
CH-8037 Zürich



www.ors-group.org