

# HABAUGROUP



## Code of Conduct

[HABAUGROUP.COM](http://HABAUGROUP.COM)

## **1 FUNDAMENTS AND DEVELOPMENT OF THE CODE OF CONDUCT OF THE HABAU GROUP**

The vision, mission statement, compliance guideline and a series of other documents of the HABAU GROUP form the basis for sustainable corporate governance. A sense of responsibility towards the environment, staff and society has been lived out and implemented in the HABAU GROUP from its inception in a variety of ways.

Within the parameters of a writing work-shop held in November 2014, staff from various business divisions and subsidiaries of HABAU Hoch- und Tiefbaugesellschaft m.b.H. laid the foundations for this Code of Conduct.

The Code of Conduct is derived from the existing instruments of the HABAU GROUP. All these documents, as well as the Code of Conduct, are accessible to all staff members across the entire Group of companies via the HABAU GROUP organisation system (HAKOS).

## **2 SCOPE AND FIELD OF APPLICATION OF THE CODE OF CONDUCT**

The Code of Conduct supplements and concretises the corporate ethics of the HABAU GROUP, thus making these workable for the daily activities of all in the organisation.

Furthermore, the Code of Conduct documents in writing regulations and values specific to cooperation that are lived out within the organisation and that are a matter of course for many. By way of our actions, which are based upon the Code of Conduct, we present our mission statement and our operational principles to customers, suppliers and regulatory authorities. More than just a document for internal use, the Code of Conduct is, thus, the „values visiting card“ of the HABAU GROUP in the external environment.

The Code of Conduct of the HABAU GROUP applies to the entire Group of companies, including the subsidiaries in Austria and foreign countries. Additionally, we also promote external partners' compliance with these principles when they act on behalf of the HABAU GROUP, such partners including subcontractors or suppliers.

## **The Code of Conduct encompasses four thematic areas:**

- 2.1 The HABAU GROUP acts responsibly and in compliance with the law.
- 2.2 The staff of the HABAU GROUP interact with one another with respect and appreciation.
- 2.3 The HABAU GROUP acts prudently and sustainably.
- 2.4 The HABAU GROUP concretely implements its principles and responsibilities.

## **2.1 The HABAU GROUP acts responsibly and in compliance with the law**

All business actions and decisions are effected in compliance with the valid laws, regulations, guidelines and standards of each country in which the HABAU GROUP operates. In the HABAU GROUP, no unlawful or dishonest resources are used to procure information, business, public sector contracts or information on business secrets of staff. Offering and accepting benefits such as gifts is prohibited if a specific act is purported thereby or if such an impression might be garnered. In relation to business partners, the HABAU GROUP stands apart by virtue of its quality and reliability. Priority is consistently accorded to ensuring the premium quality of our construction services.

### **For us, the HABAU GROUP'S focus on acting in compliance with the law means:**

- We ensure that all staff members within the HABAU GROUP are appropriately informed of the relevant laws, regulations, guidelines and standards of those countries in which the HABAU GROUP operates. This also extends to ensuring that information on statutory framework conditions of all these countries is available. Our actions must not just correspond to the valid legal standards in all countries but must also be compatible with our mission statement and our operational principles.
- The implementation of our mission statement and operational principles is particularly important to us if compliance with these principles appears challenging.
- Compliance with legislation means, among other things, that illegal employment practices, such as all forms of forced labour or child labour, are rejected.
- Fair working conditions are also accorded top priority in relation to the workers provided by subcontractors or staff-leasing agencies. In the instance of infringement of employment law, such as underpayment, as well as in the event of violations of the principles of equality of treatment and non-discrimination, the HABAU GROUP will refrain from further cooperation.

- We implement our anticorruption guidelines in our daily work. We reject any form of personal gain and will accept invitations and gifts that are offered only to the permitted extent.
- It is very important to us that we help maintain fair competition. We do not enter into any agreements or arrangements that serve to restrict competition. Conduct which restricts free competition and violates competition and antitrust laws is not in line with our mission statement and principles. In addition to potential damages to good reputation, prohibited agreements can also result in high fines and contract award bans.
- Our employees are prohibited from entering into price and tender agreements or market and customer allocations, exchanging confidential business information (e.g. prices, price components, pricing methods, general terms and conditions, bidding behaviour, award procedures, etc.) and submitting cover offers or fictitious offers.
- If there is lack of clarity in any given situation in respect of whether specific conduct corresponds to anticorruption guidelines and other internal and statutory standards, or if assessment of the situation is difficult in isolation, the relevant superiors and the department responsible are to be informed.

**For the HABAU GROUP, acting responsibly means that we live up to our reputation as a fair and reliable partner on an equal footing. To this end, the following are important for us all:**

- We implement projects in complete alignment with the expectations and specifications of our customers. Our interactions with them during consultancy and cooperation are consistently characterised by honesty, trust and a spirit of partnership.
- We work conscientiously, transparently and in compliance with contractual parameters, and endeavour to observe punctuality in all our construction projects.
- It is important to us that our business partners are able to rely upon us, and therefore we interact with them in a spirit of openness, honesty and cooperation. Collaborative project processing from the beginning to the conclusion of a project also means that we are accessible at any time in difficult situations. We define realistic and achievable objectives in order to avoid subsequent deviations. This includes realistically assessing situations specific to a construction project and communicating necessary planning changes in a timely manner.
- Data and personal information is to be handled with the utmost discretion and confidentiality within the context of GDPR as a matter of principle.

- In general, we avoid actions that might serve to damage the public standing of the HABAU GROUP. We ensure that alcohol consumption during business meals or corporate events is moderate.

## **2.2 The staff of the HABAU GROUP interact with one another with respect and appreciation.**

The HABAU GROUP promotes and challenges staff. One of the operational principles thereby is appreciative interaction with one another at all levels. Respect and appreciation increase satisfaction within the organisation, promote identification with the corporate brand and contribute to keeping staff attrition within the HABAU GROUP below the industry average. There is great diversity within the HABAU GROUP, and equal opportunities are to be promoted in the organisation. Executives set a good example in all their actions.

**Appreciative communication and respectful interaction with one another are pivotal for the HABAU GROUP. For this reason, we pay particular attention to the following:**

- We aim to be open and honest in our discussions with one another. Everyone is responsible for ensuring that listening, allowing others to express themselves fully and constructive feedback are not terms that are alien to the corporate vocabulary.
- Discomfort with inappropriate remarks made by colleagues should be frankly broached or should be discussed with superiors or with a person in a position of trust.
- The HABAU GROUP aims to configure operational steps and processes, as well as the allocation of responsibilities, in a transparent manner, involve staff members in decision-making and provide them with information on this accordingly. Here, too, executives set a good example.
- Mistakes happen! If they do happen, we aim to learn from them and, together, develop constructive solutions to address them.

The **diversity** in the HABAU GROUP is enhanced by way of continuous internationalisation and numerous transnational projects. Greater diversity in the organisation is a clear objective of the HABAU GROUP. But diversity is also a challenge.

## **For us, diversity in the organisation means:**

- We observe our operational principle of refraining from according differential treatment to anyone without justification. No one in the HABAU GROUP is to be disadvantaged because of age, health, gender, sexual orientation, physical or mental impairment, origin, language, ancestry, skin colour, ethnicity or nationality, religious or political views and social affiliation. We actively address a variety of needs (e.g. access to the company for people with disabilities).
- Occupational psychological services are available to all in the instance of mobbing or harassment, offering a strategy developed outside one's own department to address the situation.
- A structure of diversity that is lived out also extends to ensuring that all religion or cultures are respected on festive occasions, during celebrations and in the general range of meals offered.
- The language in which our Group communicates is German. By virtue of the internationalisation of the HABAU GROUP, a great many more languages are spoken in the organisation. We aim to remove language barriers in the organisation, improve communication between the individual units of the HABAU GROUP, embrace new languages with an open mind and endeavour to offer more services in multiple languages.
- Wherever the HABAU GROUP becomes operational, we openly express our appreciation of the culture and the customs of the respective country. We respect religious holidays and allow for these when planning our activity itinerary. We address the political and social framework conditions of a country before becoming operational there.

## **2.3 The HABAU GROUP acts prudently and sustainably**

The HABAU GROUP considers itself to be a contributor to the shaping of present and future society and assumes responsibility on that front. Economic efficiency and sustainability thus rank among the fundamental principles of the organisation's activities. An integral component of the corporate philosophy and culture, sustainability, for the HABAU GROUP, means proactively apprehending economic, ecological and social responsibility. Statutory standards constitute the basis, for instance in the areas of occupational safety, health and environmental protection, and are to be strictly observed. But over and above this, the HABAU GROUP is also engaged in targeted CSR initiatives and

projects. In this process, it aligns itself with the expectations and needs of its stakeholders. In addition to staff members and customers, we consider our stakeholders to be shareholders, supplier companies, sub-contractors, other business partners and society in general (i.e. local communities, regulatory authorities, legislators, research institutions, media and the public).

**Acting with caution means acting in a foresighted and upright manner. What we mean is:**

- We consistently review the overall consequences of our decisions for the organisation, people and environment in the spirit of the ethical and moral standards lived out within the HABAU GROUP. For us, this incorporates, under all circumstances, honesty, transparency, quality, reliability and fairness.
- We evaluate situations carefully ahead of time so that disadvantageous ramifications of our activities can be avoided or minimised for us and our stakeholders from the very outset. This also applies when deploying new technologies, materials and techniques.

We do not raise unrealistic expectations in others, and we treat others' issues with the same care as we would our own.

For the HABAU GROUP, **sustainability** means preserving the balance between economic, ecological and social engagement. In addition to the respectively effective laws and the safety, health and environment policy of the HABAU GROUP, we do everything that is needed to prevent, or reduce, potential adverse effects from impacting humanity and the environment and to exert our influence in a positive way. To do this, we also implement the following measures:

- We follow our operational principle in respect of efficient inputs while working and in respect of the efficient handling of resources. In so doing, we protect the environment and sustainably ensure the success of our organisation.
- We work in a forward-looking manner and consider ourselves obligated to train our staff and – in particular – our trainees, to support them in their professional development and to be more than an attractive employer to them.
- Our comprehensive, sustainable strategy is also evinced in the healthy growth of the Group of companies. Even during economically difficult phases, we continuously pursue this approach; we invest in new operating facilities and, wherever possible, refrain from outsourcing.

- Wherever it is necessary to commission third parties to carry out work, we select local partners, preferring those companies that, like us, commit to the issue of CSR. Any commissioning of sub-services by sub-contractors already commissioned is mandatorily subject to our consent.
- We are concerned with more than just the wellbeing of our own staff. If at a construction site, for instance, colleagues within another company are not properly equipped or if other safety issues are in evidence, we inform the responsible authorities (construction management, superiors, etc.). Compliance with the occupational and safety standards on the part of commissioned sub-contractors is continuously monitored in situ on the construction sites.

## **2.4 The HABAU GROUP concretely implements its principles and responsibilities.**

The provisions of this Code of Conduct are an integral component of the corporate culture of the HABAU GROUP. The staff members align their conduct with this and are aware that non-compliance with these principles can entail serious consequences for the HABAU GROUP as well as for themselves.

Thus, all of us assume shared responsibility for the implementation of the regulations in everyday working life by taking the following steps:

- If we notice actions that do not correspond to our values, or in the instance of questions specific to the Code of Conduct, we inform our immediate superior. Staff members who cannot or do not wish to approach superiors may establish contact with the Advisory Board, with a person in a position of trust who is familiar with a specific topic, with the compliance officer or with the Legal department.
- Executives are to communicate and exemplify the key significance of the Code of Conduct within their area of responsibility, and to provide information on the person responsible, as a point of contact, for questions specific to the Code of Conduct or for information on transgressions. Information is treated in strict confidence unless legal reasons demand a different procedure. Under no circumstances, however, do disadvantages accrue from such intimation to the person providing information.
- By way of our management and organisation system, we ensure that only reliable personnel providers audited by the in-house legal department are engaged on the construction sites. Those commissioned with responsibility in situ are, thus, released

from the organisational responsibility of researching the reliability of the recruiters and sub-contractors to be engaged. However, this does not release managerial staff from their leadership responsibility in situ, for instance, specific to compliance with occupational and safety standards.

- While selecting and engaging sub-contractors, we pursue a similarly consistent corporate policy that strives for fairness. Any commissioning of (sub-)services to other companies by sub-contractors already commissioned may only be effected within contractual and statutorily prescribed parameters and is subject to the consent of the local site management of the HABAU GROUP.
- In the event of failure to appropriately implement the agreements concluded or of non-compliance on the part of external partners with the principles of our Code of Conduct, we expressly reserve the right to refrain from further cooperation. In individual instances, provisions may also be made for contractual penalties.

To ensure compliance with the principles of this Code of Conduct, all requests and announcements in connection with compliance at the HABAU GROUP can be sent to the compliance-officers of the companies.

# **the construction family**