

HABAUGROUP



CODE OF CONDUCT

HABAUGROUP.COM

1. Basic principles and development of the Code of Conduct of the HABAU GROUP

The mission statement, principles of action, compliance guidelines and a series of other documents of the HABAU GROUP form the basis for successful and sustainable corporate management. The responsibility towards employees, society and the environment has always been embodied and implemented in the HABAU GROUP in a variety of different ways.

As part of a writing workshop in November 2014, employees from various business units and Group companies of HABAU Hoch- und Tiefbaugesellschaft m.b.H. laid the foundations for this Code of Conduct.

The Code of Conduct is derived from the available documents and instruments of the HABAU GROUP and is accessible to all employees in the entire corporate group.

2. Scope and area of application of the Code of Conduct

The Code of Conduct supplements and substantiates the corporate ethics of the HABAU GROUP, thus making it practicable for the daily actions of all within the company. In addition, the Code of Conduct puts into writing rules and values of cooperation that are embraced in the company and that for many are a matter of course. Through our actions, based on the Code of Conduct, we present our mission statement and our principles of action to the clients and contractors as well as to the authorities. More than just a document for internal use, therefore, the Code of Conduct is the HABAU GROUP's "calling card of values" to the outside world.

The Code of Conduct of the HABAU GROUP applies to all Group companies in Austria and abroad. What is more, we also demand that our business partners observe these principles whenever they act on behalf of or for the HABAU GROUP.

The Code of Conduct comprises four subject areas:

- 2.1 The HABAU GROUP acts in conformity with the law and in a responsible manner.
- 2.2 The employees of the HABAU GROUP treat one another with respect and appreciation.
- 2.3 The HABAU GROUP acts prudently and sustainably.
- 2.4 The HABAU GROUP actively implements its principles and responsibilities.

2.1 The HABAU GROUP acts in conformity with the law and in a responsible manner

The applicable laws, regulations, guidelines and standards of the countries in which the HABAU GROUP operates are adhered to in all business activities and decisions. In the HABAU GROUP, no unlawful or dishonest means are used in order to gain access to information, transactions or orders. Offering, promising or granting undue advantages to public officials or business partners with the intention of thus influencing the activity of this person is prohibited. Logically, this also applies to the acceptance of undue advantages.

In its relationships with business partners, the HABAU GROUP is characterised by quality and reliability. The highest quality of our construction work is always the top priority.

For us as the HABAU GROUP, acting in conformity with the law means:

- We ensure that all employees of the HABAU GROUP are informed to the appropriate extent of relevant laws, regulations, guidelines and standards of the countries in which the HABAU GROUP operates. This also means that information on the legal framework conditions of all of these countries is available. Not only must our actions comply with the applicable legal standards in all countries, they must also be in line with our mission statement and our principles of action.
- The implementation of our mission statement and our principles of action is especially important when the observance of these principles seems challenging.
- Compliance with laws means, among other things, that illegal employment practices such as all kinds of forced labour or child labour are rejected.

- Fair working conditions are also of the highest priority with regard to the workers and employees deployed by contractors or provided by staff leasing agencies. In the event of labour law violations, such as underpayment, as well as in the event of breaches of equal treatment and non-discrimination, the HABAU GROUP refrains from further cooperation.
- We implement our anti-corruption guidelines in our daily work. We reject all forms of personal gain and will only accept invitations and offered gifts up to the extent permitted.
- 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.
- Our employees are prohibited from making price or tender agreements, entering into market or customer allocations, exchanging confidential business information (e.g. prices, price components, pricing methods, general terms and conditions, bidding behaviour, award procedures) and submitting cover offers or fictitious offers.
- If there is a situation in which it is unclear whether a behaviour complies with the compliance guidelines, the anti-corruption guidelines and other internal and legal standards, then the corresponding superiors and respective Compliance Officers should be informed.

For the HABAU GROUP, acting responsibly means that we do justice to our reputation as a fair and reliable partner that acts at eye level. This includes, for all of us:

- We execute projects entirely in line with the expectations and desires of our clients. We always conduct our consultation and cooperation with them in an honest, trusting and partnership-based manner.
- We work conscientiously, transparently and in fulfilment of our contract and schedule in all our construction projects.
- It is important to us for our business partners to be able to rely on us, therefore we interact openly, honestly and cooperatively with them. Collaborative handling of a

project from start to end of the project also means that we can always be approached even in difficult situations. We define realistic and achievable goals so as to avoid deviations further down the line. This includes assessing situations in the construction project on a real-life basis and communicating necessary planning changes early on.

- Data and personal information is handled with the utmost discretion and confidentiality within the context of the GDPR as a matter of principle.
- In general, we avoid all actions that could be likely to damage the reputation of the HABAU GROUP in the public eye. We pay attention to a moderate use of alcohol at business meals or company celebrations.

2.2 The employees of the HABAU GROUP treat one another with respect and appreciation.

The HABAU GROUP supports and challenges employees. One main principle of action here is the appreciative way of interacting with one another at all levels. Respect and appreciation increase the satisfaction in the company, promote identification with the company and contribute towards achieving employee loyalty that continues to be above average for the industry. The diversity in the HABAU GROUP is large, and the aim is to encourage equal opportunities in the company. Managers act by setting good examples in all their actions. Appreciative communication and respectful interactions with one another are crucial for the HABAU GROUP. This is why we consider the following in particular:

- We want to be open and honest in conversations with one another. Everyone is responsible for ensuring that listening, allowing others to speak and constructive feedback are familiar concepts in the company.
- Feelings of unease or inappropriate remarks by colleagues should be openly addressed or discussed with superiors or a person of confidence.
- The HABAU GROUP aims to make work steps and processes as well as the assignment of responsibilities transparent, to include employees in decisions and to inform them thereof accordingly. Here, too, managers act by setting good examples.
- Mistakes happen! When they happen, we want to learn from them and work together to develop constructive solutions to avoid such mistakes in future.

The **diversity** in the HABAU GROUP is growing thanks to ongoing internationalisation and many transnational projects. More diversity in the company is a clear goal of the HABAU GROUP. But diversity is also a challenge.

For us, diversity in the company means:

- In our daily work, we bear in mind our principle of action of not treating anybody differently without justified cause. Nobody in the HABAU GROUP should be discriminated based on their age, health, gender, sexual orientation, physical or mental disability, origin, language, descent, skin colour, ethnicity or nationality, religious or political beliefs or social class. We actively address different needs (e.g. access to the company for people with disabilities).
- In the event of bullying or harassment, everyone has access to the occupational psychological service, with which a strategy for remedying this situation can be developed in a neutral manner outside of the employee's own department.
- Embodying a culture of diversity also means that as part of festive occasions, celebrations and our general catering offer, among other things, all religions and cultures are taken into account.
- Our Group language is German. The internationalisation of the HABAU GROUP means that several languages are spoken within the company. We want to break down language barriers in the company, improve the communication between the individual parts of the HABAU GROUP, approach new languages with openness and strive to offer more multilingual services.
- Wherever the HABAU GROUP operates, we show appreciation for the culture and the customs of the respective country. We respect religious holidays and plan these into the workflow of our activities. We examine the political and legal framework conditions of a country before commencing operations there.

2.3 The HABAU GROUP acts prudently and sustainably

The HABAU GROUP sees itself as a co-creator of the current and future society and assumes responsibility accordingly. Thus economic efficiency and sustainability are part of the basic principles of the company's activities. As an integral part of the corporate philosophy and culture, sustainability for the HABAU GROUP means being proactively aware of economic, ecological and social responsibility. As a basis, legal standards are to

be strictly observed, i.e. in the areas of occupational safety, health and environmental protection. But beyond this, the HABAU GROUP also commits itself to this cause with targeted Corporate Social Responsibility (CSR) measures and projects. In doing so, it aligns with the expectations and needs of its stakeholders (internal and external groups of persons that are affected by the business activity). Alongside employees, we define our stakeholders to include clients, shareholders, contractors, other business partners as well as society in general (i.e. residents, authorities, legislators, research institutes, media and the public).

Acting prudently means acting in a forward-looking and honest manner.

What we mean by this is:

- We always examine the overall consequences of our decisions for the company, people and the environment in the sense of the ethic and moral standards embodied within the HABAU GROUP. For us, these include the indispensable values of honesty, transparency, quality, reliability and fairness.
- We carefully evaluate situations in advance so that any adverse effects of our activities for us and our stakeholders can be avoided or kept to a minimum right from the start. This also applies to the use of new technologies, materials and techniques.

We never create unrealistic expectations for anybody and we approach the issues of others with as much care as if they were our own.

For the HABAU GROUP, **sustainability** means preserving the balance between economic, ecological and social commitment. As an extension of the respective applicable laws as well as the HSEQ management policy and the compliance anti-corruption management policy of the HABAU GROUP, we do everything necessary to avoid or reduce potential adverse effects on people and the environment and to ensure our influence has a positive impact. To this end, we implement the following measures, among others:

- We apply our principle of action regarding the efficient employment of labour and an economical use of resources. By doing so, we protect the environment and ensure our corporate success in the long term.

- We work with a view to the future and feel obliged to train our employees and in particular our apprentices, to support them in their professional development and to be more than an attractive employer to them.
- Our comprehensive, sustainable strategy is also evident in the healthy growth of the corporate group. Even in economically difficult phases, we continuously pursue this approach. We invest in new production sites and refrain from outsourcing work wherever possible.
- We care about more than just the well-being of our own employees. If, for example, colleagues from another company at a construction site are not properly equipped or if other safety concerns exist, we inform the competent authorities (e.g. site manager, superiors). The observance of labour and safety standards by contractors is continuously monitored on site at the construction sites by the management staff.

2.4 The HABAU GROUP actively implements its principles and responsibilities.

The provisions of this Code of Conduct are a fixed component of the corporate culture of the HABAU GROUP.

The employees orient their behaviour by this and are aware that failure to observe these principles can have serious consequences for the HABAU GROUP as well as for the employees themselves. Therefore, we all assume joint responsibility for the implementation of the rules in everyday business by taking the following points into account:

- When we notice actions that do not align with our values, our immediate superiors are informed. Employees who cannot or do not wish to turn to superiors may make contact with the respective management or the respective Compliance Officer.
- Within their area of responsibility, managers should communicate and set an example of the crucial importance of the Code of Conduct as well as provide information on who is responsible as a point of contact for questions regarding topics related to the Code of Conduct or indications of transgressions. Indications are treated with strict confidentiality, unless legal grounds dictate a different approach. Under no circumstances, however, shall such a disclosure result in disadvantages for the informant.

- We ensure that the personnel deployed at the construction sites operates exclusively within the framework of the statutory provisions and in compliance with applicable labour and safety standards. This encompasses both the deployment of personnel by reliable personnel service providers as well as within the scope of subcontracts.
- When selecting and employing contractors, we pursue an equally consistent corporate policy that strives for fairness at all times. The transfer of (partial) services by already commissioned contractors to other companies may only take place within the contractually and legally stipulated scope.
- In the event of improper implementation of agreements concluded or failure to observe the principles of our Code of Conduct by external partners, we reserve the right to refrain from further cooperation. In individual cases, contractual penalties may also be provided for.

In order to ensure the observance of the basic principles of this Code of Conduct, all enquiries and reports related to compliance in the HABAU GROUP may be reported to the respective Compliance Officer. Reports may also be made anonymously via the whistleblower platform on the website of the respective Group company.

THE CONSTRUCTION FAMILY