

HABA GROUP



CODE OF CONDUCT

1. Fundamentals and development of the HABAU Group's Code of Conduct

The mission statement, principles of conduct, compliance guidelines and a number of other documents of the HABAU Group form the basis for successful and sustainable corporate management. Responsibility towards employees, society and the environment has always been practised and implemented in various ways within the HABAU Group.

Employees from different business areas and group companies of HABAU Hoch- und Tiefbaugesellschaft m.b.H. laid the foundation for this Code of Conduct during a writing workshop in November 2014.

The code of conduct is derived from the existing documents and instruments of the HABAU Group and is accessible to all employees throughout the entire group.

2. Scope and area of application of the code of conduct

The Code of Conduct supplements and specifies the company's ethics, making them manageable for the daily activities of everyone in the company. In addition, the Code of Conduct sets out in writing the rules and values of cooperation that are practised in the company and are a matter of course for many. Through our actions, based on the Code of Conduct, we present our mission statement and our principles of action to clients and contractors as well as to the authorities. More than just a document for internal use, the Code of Conduct is the HABAU Group's "value business card" to the outside world.

The Code of Conduct applies to all group companies in Austria and abroad. In addition, we also require our business partners to comply with these principles when acting on behalf of or for the HABAU Group.

The Code of Conduct covers four areas:

- Law-abiding and responsible conduct
- Respectful and appreciative interaction with one another
- Prudent and sustainable conduct
- Implementation of principles and responsibilities

2.1 Law-abiding and responsible conduct

All business activities and decisions comply with the applicable laws, regulations, guidelines and standards of the countries in which the HABAU Group operates. No illegal or dishonest means are used to obtain information, business or orders. Offering, promising or granting undue advantages to a public official or business partner with the intention of influencing their activities is prohibited. The same applies to accepting 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 our top priority.

Acting in conformity with the law means:

- We ensure that all employees are informed to the appropriate extent about relevant laws, regulations, guidelines and standards in the countries in which we operate. This also includes making information about the legal framework conditions of all these countries available. Our actions in all countries must not only comply with the applicable legal standards, but also be consistent with our mission statement and our principles of conduct.
- The implementation of our mission statement and principles of conduct is particularly important to us when compliance with these principles appears challenging.
- Compliance with laws 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 a top priority with regard to workers employed by contractors or provided by personnel leasing agencies, as well as employees. In the event of violations of labour law, such as underpayment, as well as violations of equal treatment and non-discrimination, we will refrain from further cooperation.

- We implement our anti-corruption guidelines in our daily work. We reject any form of personal enrichment and will only accept invitations and gifts offered to the extent permitted.
- Maintaining fair competition is very important to us. We do not enter into any agreements or arrangements that restrict competition. Behaviour that restricts free competition and violates competition and antitrust laws is not compatible with our mission statement and our principles of conduct.
- Our employees are prohibited from entering into price or bid-rigging agreements, dividing up markets and customers, exchanging confidential business information (e.g. prices, price components, price calculation methods, general terms and conditions, bidding behaviour, award procedures) and submitting cover or sham bids.
- If there is any uncertainty in a situation as to whether conduct complies with the compliance guidelines, anti-corruption guidelines and other internal and legal standards, the relevant managers and compliance officers should be informed.

Acting responsibly means living up to our reputation as a fair and reliable partner on equal terms. For all of us, this means

- We implement projects in line with the expectations and wishes of our clients. We always treat them with honesty, trust and partnership in our consulting and cooperation.
- We work conscientiously, transparently and in accordance with contracts and deadlines in all our construction projects.
- It is important to us that our business partners can rely on us, and we therefore treat them openly, honestly and cooperatively. Joint project management from start to finish also means that we are always available to discuss difficult situations. We define realistic and achievable goals in order to avoid deviations later on. This includes assessing situations in the construction project in a practical manner and communicating necessary planning changes at an early stage.
- Discretion and the confidential handling of data and information in accordance with the GDPR are a matter of course for us.

- In general, we avoid any actions that could damage the public reputation of the HABAU Group. We ensure that alcohol is consumed in moderation at business dinners and company celebrations.

2.2 Respectful and appreciative interaction with one another

We encourage and challenge our employees. One of our guiding principles is to treat each other with respect at all levels. Respect and appreciation increase satisfaction within the company, promote identification with the company and contribute to maintaining above-average employee retention for the industry. There is great diversity within the HABAU Group, and equal opportunities within the company should be promoted. Managers lead by example in all their actions. Appreciative communication and respectful interaction with one another are central to us. Therefore, we pay particular attention to the following:

- We want to be open and honest in our conversations with each other. Everyone is responsible for ensuring that listening, allowing excuses and giving constructive feedback are not foreign concepts in the company.
- Any discomfort caused by inappropriate comments from colleagues should be openly addressed or discussed with managers or a trusted person.
- Work steps and processes as well as the assignment of responsibilities should be designed transparently, employees should be involved in decisions and informed accordingly. Managers also set a good example here.
- Mistakes happen! When they do, we want to learn from them and work together to develop constructive solutions to avoid them in the future.

Diversity within the HABAU Group is growing thanks to ongoing internationalisation and numerous transnational projects. Greater diversity within the company is a clear goal. However, diversity is also a challenge.

For us, diversity in the company means:

- We take into account our principle of not treating anyone differently without justification in our daily work. No one should be disadvantaged on the basis of age, health, gender, sexual orientation, physical or mental disability, origin, language, ancestry, skin colour, ethnicity or nationality, religious or political beliefs, or social affiliation. We actively respond to different needs (e.g. access to the company for people with disabilities).

- In the event of bullying or harassment, the occupational psychology service is available to everyone, with which a strategy can be developed to deal with the situation in a neutral manner and outside of one's own department.
- Part of our culture of diversity is ensuring that all religions and cultures are taken into account, for example at festive occasions, celebrations and in the general catering.
- Our corporate language is German. Due to the internationalisation of the HABAU Group, several languages are spoken within the company. We want to break down language barriers within the company, improve communication, be open to new languages and try to offer more services in multiple languages.
- Wherever we operate, we show appreciation for the culture and customs of the respective country. We respect religious holidays and plan for them in the course of our activities. We familiarise ourselves with the political and legal framework of a country before we start operating there.

2.3 Prudent and sustainable action

We see ourselves as co-creators of current and future society and take responsibility for this. Economic efficiency and sustainability are therefore among the basic principles of our corporate activities. As an integral part of our corporate philosophy and culture, sustainability means proactively assuming economic, ecological and social responsibility. Legal standards must be strictly adhered to as a basis, for example in the areas of occupational safety, health and environmental protection. However, we also go above and beyond with targeted corporate social responsibility (CSR) measures and projects. In doing so, we are guided by the expectations and needs of our stakeholders (internal and external groups of people affected by our business activities). In addition to our employees, our stakeholders include clients, shareholders, contractors, other business partners and society in general (i.e. local residents, authorities, legislators, research institutions, the media and the public).

Acting prudently means acting with foresight and integrity.

What we mean by this is:

- We always review the overall consequences of our decisions for the company, people and the environment in line with our ethical and moral standards. For us, this includes honesty, transparency, quality, reliability and fairness.

- We carefully assess situations in advance so that any adverse effects of our activities on us and our stakeholders can be avoided or minimised from the outset. This also applies to the use of new technologies, materials and techniques.

We do not raise unrealistic expectations in anyone, and we treat other people's issues with the same care as if they were our own.

For us, **sustainability** means maintaining a balance between economic, environmental and social commitment. In addition to the applicable laws, the HSEQ management policy and the compliance anti-corruption management policy of the group of companies, we do everything necessary to avoid or reduce potential harm to people and the environment and to exert a positive influence. To this end, we implement the following measures, among others:

- We follow our principle of efficient use of labour and economical use of resources. In this way, we protect the environment and ensure the long-term success of our company.
- We work with a view to the future and feel obliged to train our employees, especially apprentices, support them in their professional development and be more than just an attractive employer.
- Our comprehensive, sustainable strategy is also reflected in the healthy growth of the group of companies. Even in difficult economic times, we continue to pursue this approach. We invest in new facilities 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 on a construction site are not properly equipped or there are other safety concerns, we inform the relevant authorities (e.g. site management, executives). Compliance with work and safety standards by contractors is continuously monitored on site by management personnel.

2.4 Legally compliant and responsible conduct

The provisions of this Code of Conduct are an integral part of our corporate culture.

Employees base their conduct on these principles and are aware that failure to comply with them can have serious consequences for the group of companies and for themselves. We therefore all share responsibility for implementing the rules in our day-to-day business by taking the following points into account:

- If we notice actions that do not comply with our values, we inform our immediate managers. Employees who cannot or do not wish to contact their manager can contact the relevant management or compliance officer.
- Managers should communicate and exemplify the central importance of the Code of Conduct within their area of responsibility and provide information about who is responsible for answering questions about the Code of Conduct or for reporting violations. Reports will be treated as strictly confidential, unless legal reasons dictate otherwise. Under no circumstances will whistleblowers suffer any disadvantages as a result of such reports, unless they have knowingly made a false report.
- We ensure that personnel employed on construction sites work exclusively within the framework of legal regulations and in compliance with applicable labour and safety standards. This includes both the deployment of personnel by reliable personnel service providers and within the framework of subcontractor agreements.
- We pursue a corporate policy that is equally consistent and fair when selecting and employing contractors. The transfer of (partial) services by contractors already commissioned to other companies may only take place within the framework specified by contract and law.
- We reserve the right to refrain from further cooperation in the event of improper implementation of agreements or non-compliance with the principles of our Code of Conduct by external partners. In individual cases, contractual penalties may also be imposed.

To ensure compliance with the basic principles of this Code of Conduct, all enquiries and reports relating to compliance can be submitted to the Chief Compliance Officer or Compliance Officer of the respective Group company. Reports can also be submitted anonymously via the whistleblower platform on the website of the respective Group company.

THE CONSTRUCTION FAMILY