



ACTING RESPONSIBLY

HOCHTIEF Code of Conduct for Business Partners

We are building the world of tomorrow.



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When sailing, the team stands together to achieve the common goal. Team spirit and the right tools help to achieve this. This Code of Conduct for Business Partners forms the basis for HOCHTIEF's everyday project work, serving as our logbook.

Dear Business Partners,

We are pleased to present you with the HOCHTIEF Code of Conduct for Business Partners for your information and use. In this document, we have defined the guidelines for our cooperation. We look forward to a good working relationship!

HOCHTIEF Europe GmbH

About this document

Combining entrepreneurial activity with ethical principles is a key factor for HOCHTIEF's long-term success and is a well-established tradition. We are convinced that ethical and economic values are mutually dependent and that business needs to be done in a spirit of fairness within the framework of existing rules.

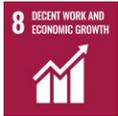
In line with our expectations towards our own employees, we require from our partners that they bear a particular responsibility towards their own company, towards customers and their business partners, towards the environment and towards society, too.

The ethical principles spelled out in this Code of Conduct for Business Partners are grounded in the [United Nations' Universal Declaration of Human Rights](#), the [UN Guiding Principles on Business and Human Rights](#), the [OECD Guidelines for Multinational Companies](#), the [ILO Conventions](#), the [UN Convention on the Rights of the Child](#), the [Basic Principles of the UN Global Compact](#), as well as the [UN Sustainable Development Goals](#).

This Code of Conduct constitutes minimum standards, which we require our subcontractors, suppliers and further contractual parties ("partners") to comply with. The standards shall apply to any type of worker. This includes but is not limited to:

- Complying with the respective applicable law
- Avoiding conflicts of interests
- Actively and effectively fighting against every kind of corruption and bribery
- Prohibition of forced and child labor
- Respecting human dignity
- Fair working conditions
- Taking responsibility for health and security of the employees
- Environmental protection
- Confidentiality

HOCHTIEF reserves the right to change the requirements for partners and expects the partner to accept the respective changes. The partner expressly declares to observe the principles of the Global Compact and that in its management practices it seeks to ensure that they are upheld. Acceptance of this Code of Conduct or its content is a general prerequisite for all contractual agreements between HOCHTIEF and its partners.



Labor and Human Rights



At HOCHTIEF, we are committed to labor and human rights standards, working together with our employees and partners. By means of our [Human Rights Statement of Principles](#), HOCHTIEF commits to make reasonable efforts to avoid causing or contributing to any form of adverse impact on the human rights of the people involved in our global operations, as well as to formalize due diligence processes for identifying, preventing, mitigating, and remediating such impacts, should they occur.

HOCHTIEF requires partners to respect the [United Nations' Universal Declaration of Human Rights](#) for all employees, and to treat them with respect and dignity.

HOCHTIEF will engage in dialog with partners and will provide corresponding principles and documents to ensure that partners fully understand what is expected of them with respect to the human rights standards of HOCHTIEF. HOCHTIEF will foster a culture of cooperation and partnership, and we will treat our partners fairly and with respect.

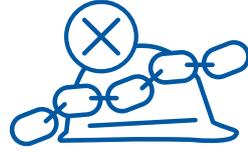
HOCHTIEF will negotiate its contracts whilst respecting and promoting human rights. Where there is a risk of a human rights violation or where a human rights violation has occurred in connection with the contract(s), HOCHTIEF will participate in remediation adequately and will take effort to use or build (in collaboration with other stakeholders) its leverage with its partners to prevent any future harm.



In our contracts with employees and partners we are committed to labor and human rights standards.

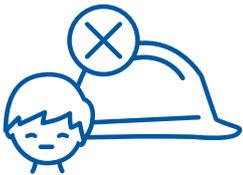
Rejection of Forced Labor

Partners are required to reject every form of forced labor. No employee may be obliged to work by the direct or indirect use of force and/or intimidation. Only people who voluntarily make themselves available for work may be employed. HOCHTIEF does not tolerate any kind of slavery, human trafficking, debt bondage or involuntary prison labor in the supply chain. Employees have to be allowed to leave their workplace and terminate their employment relationship (within the requirements of the applicable law).



Partners shall assure that labor conditions are transparent and agreed upon in contracts, prior to commencing work. They must avoid placement fees, excessive accommodation costs, withholding of identity documents and unfair payment as these practices can lead to situations of forced labor and debt bondage. Partners must prevent employees from becoming undocumented by ensuring proper payment of all hiring costs, including the renewal of work visas.

Rejection of Child Labor



Children have the right to develop their potential and maintain their dignity, without doing any task that is harmful to their physical and mental development. Partners commit to complying with the [ILO Worst Forms of Child Labour Convention \(No. 182\)](#), and accordingly to avoid any kind of hazardous work for children within their direct business and in their supply chain. This refers, for instance, to work which exposes children to physical, psychological or sexual abuse; work underground or in confined spaces; work with dangerous machinery, equipment and tools or carrying heavy loads; exposure to hazardous substances; work for long hours, night work, and confinement to the premises of the employer.

Partners are furthermore obliged to avoid work which interferes with children's schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely or requiring them to attempt to combine school attendance with excessively long and heavy work.

In addition, partners commit to complying with the ILO Minimum Age Convention (No. 138), stating that the minimum age for employment must not be below the age at which compulsory schooling ends, and in no case may it be below the age of 15 (or within the age range where ILO makes an exception for specific cases) or below any higher minimum age specified by local law.

If a national regulation concerning child labor provides for stricter measures, these shall have precedence.

Fair Working Conditions and Remuneration



Partners shall ensure that wages and benefits of their employees and subcontractors are fair and comply with applicable national and local laws as well as with contractual agreements. They will furthermore ensure that the maximum working hours laid down in the respective country are adhered to.

Partners shall confirm that their employees have the right to social security, decent working conditions, rest, leisure and holidays, an adequate standard of living, and professional training.

If the partner is based in a country that has regulations in place which do not correspond to our standards, we and our partners jointly develop concepts that take into account the regional framework conditions.

Humane Treatment and Prohibition of Discrimination



HOCHTIEF requires all partners not to tolerate unacceptable treatment of employees, such as physical punishment or torture, sexual harassment or abuse, mental or physical coercion or verbal abuse, or the threat of any such treatment. Partners must not exploit anyone. They must not engage in business with any company, person or organization that disregards the standards and principles of human rights that this Code of Conduct is based on.

Partners are required to commit, within the scope of prevailing laws and statutes, to opposing all forms of discrimination, mobbing or harassment. They shall provide equal treatment and opportunities for employees, job applicants and business partners. Furthermore, partners are called on to create an atmosphere of respectful mutual relations and to rigorously oppose any discrimination, directly or indirectly, on various grounds, including race, ethnicity, religion, language, gender, sexual identity or orientation, national or social origin, ideology, political opinion, union membership, age, health status, disability and personal or social circumstances.

Right of Association and Right of Collective Bargaining



Partners are required to maintain an open and constructive communication with their employees and employee representatives. In accordance with applicable local laws, partners shall respect their employees' right to freely assemble and associate, nominate employee representatives, join trade unions, engage in collective bargaining and form works councils. Furthermore they shall respect, in line with the local legal framework, the right to strike of employees, regardless of whether they belong to an association or trade union. It must be ensured that all employees are able to openly communicate with the management regarding

working conditions. If partners operate in a context in which freedom of association is not legally recognized, they are expected to put their best effort to proactively protect vulnerable groups, e. g. by means of alternative communication channels, without violating local law. HOCHTIEF will support and engage in this process.

Privacy



Partners are to respect their employees' right to the protection of their personal data. Additionally, partners must ensure that all uses of personal data – such as collection, registration, storage and deletion – take place in accordance with applicable laws and regulations.

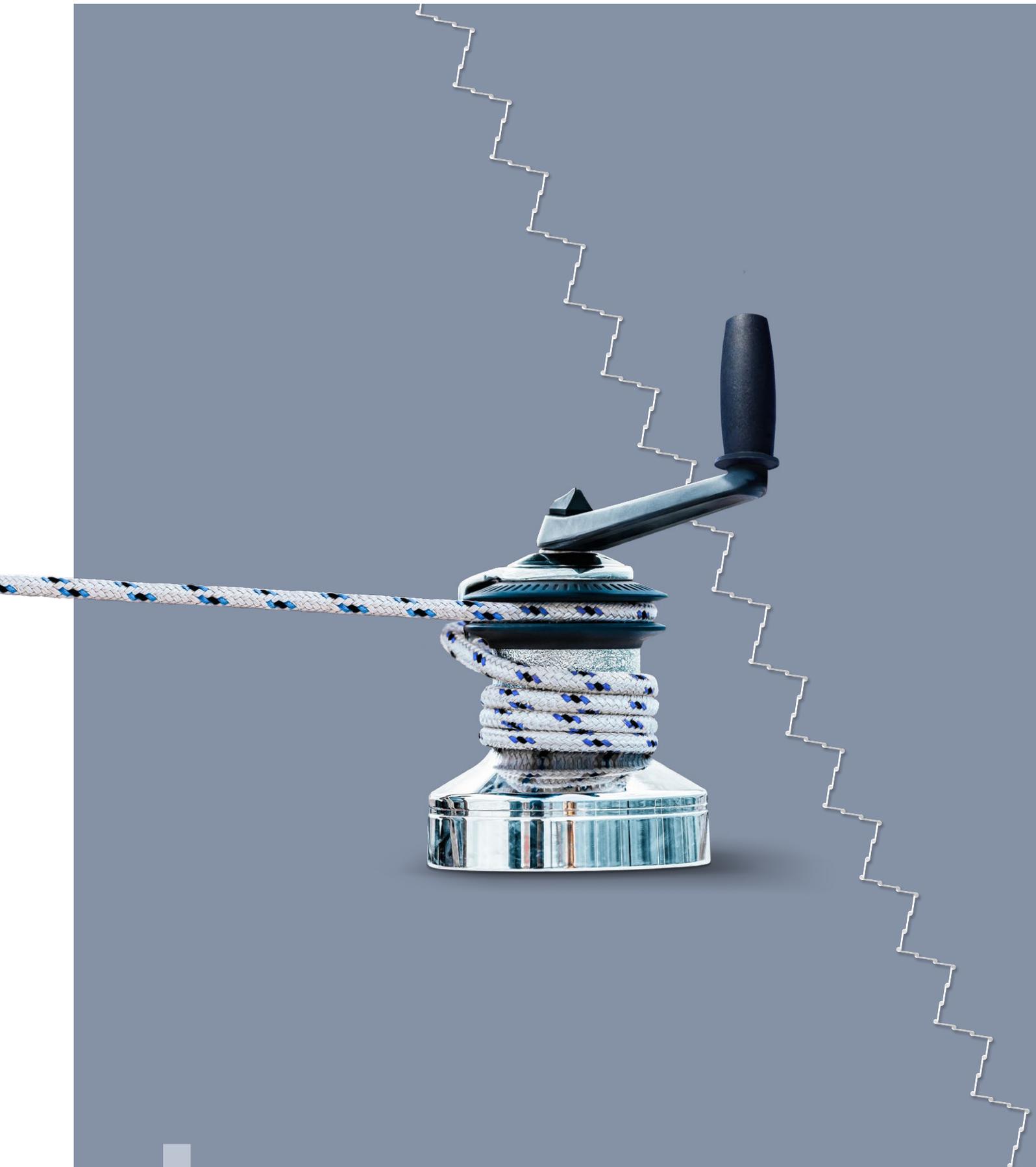
Protection of Living Spaces

At HOCHTIEF, our aim is to save natural resources as a prerequisite for life. We contribute to the conservation and protection of natural resources and habitats and the rights of all living beings to a clean and healthy environment and a reasonable standard of living.



Our construction and project activities can change the environment and influence landscapes. HOCHTIEF therefore has a clear obligation to protect, preserve or restore ecosystems and biodiversity by using natural resources efficiently. Our aim is to prevent negative and harmful impacts on the environment and offering solutions for sustainable and resilient infrastructure, expecting the same from our partners who have to adhere to the same standards (see also chapter “Environmental Protection”).

In accordance with applicable local laws, partners shall promote the conservation and sustainable use of finite local basic resources and the prevention and mitigation of any negative impact on living spaces.



We and our partners have a commitment to honesty, fairness and social responsibility.

Business Integrity



Partners shall commit to respecting the laws in effect and any other applicable provisions in the countries where they are active and to fulfilling their obligations reliably. Furthermore, partners are expected to demonstrate honesty and fairness in all aspects of their business activities and to commit to fulfilling their social responsibility with respect to all of their business activities.



Conflicts of Interest and Anti-Corruption



In dealing with partners and state institutions, the interests of the company and the private interests of employees on both sides are to be kept strictly separate. Actions and decisions are to proceed independent of considerations that do not concern the business at hand and that involve personal interests. The criminal law on corruption applicable in each case has to be complied with. In relation to their size, turnover and risk exposure, partners are required to have in place organizational and management models – to an appropriate extent – aligned with international standards designed to comply with the principles in this Code of Conduct, e. g. with standard ISO 37001 Anti-Bribery Management Systems. Among other things, the following is to be observed:

Criminal Acts in Dealings with Public Officials

Offering, promising, authorizing or granting personal advantages (in particular benefits in kind such as payments and loans, including the repeated giving of smaller gifts over a longer period of time) by partners and their employees to public officials (such as civil servants, public employees, or political party officials) in the context of an official action, not being clearly determined yet, for partners or oneself or for third parties, is not permitted.



Criminal Acts in Business Dealings

Personal benefits in kind in exchange for a favored position in business dealings may not be offered, promised, granted or authorized. Nor may personal benefits be demanded in dealings with partners. Partners must require from their employees that they will not allow any such benefits to be promised to them and that they will not accept such benefits.



No employee should accept anything – especially in the form of a personal gift or a benefit arising from a HOCHTIEF business relationship – that could reasonably be assumed to have a potential impact on business decisions or transactions. Because of that, the management and employees of partners are not allowed to grant, promise or offer anything of value to an employee of HOCHTIEF. Neither the management nor employees of partners are allowed to accept such kind of value from an employee of HOCHTIEF. Invitations must be within the bounds of normal business hospitality.

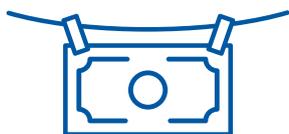
Fair Competition

Standards of fair business and competition are to be upheld. Partners shall not act in a way that is or could be interpreted as unfair, anti-competitive, or abusive. All activities must be in line with current laws that uphold and promote competition, in particular prevailing antitrust laws as well as laws that regulate competition. In dealing with competitors, these provisions in particular prohibit



collusion and other activities aimed at influencing prices or conditions, dividing up sales territories or customers or using prohibitive means to inhibit free and open competition. Furthermore, these provisions prohibit agreements by which customers are to be enjoined in their freedom to autonomously determine their pricing and miscellaneous conditions when reselling.

Anti-Money Laundering



Partners ensure to comply with all laws that prohibit money laundering or financing for illegal or illegitimate purposes. Partners ensure to engage in business exclusively with reputable business partners involved in legitimate business activities, with funds derived from legitimate sources.

Treatment of Company Property and Assets

Partners must respect confidential information relating to HOCHTIEF and HOCHTIEF stakeholders. It must not be disclosed to any person who does not have a right to that information.

Partners shall commit their employees to safeguarding trade and company secrets. Confidential information as well as confidential documents must not be disclosed to third parties without proper authorization, nor may any other form of access to them be provided, unless proper authorization has been granted or the information has to do with publicly available information.



In fulfilling this duty, partners will be responsible for complying with national and international laws protecting industrial and intellectual property rights and trade secrets and personal data protection laws and regulations.

Partners must have in place organizational and management models aligned with international best practice and standards designed to comply with the principles of this Code of Conduct, e.g. with standard ISO 27001 Information Security Management Systems. They must ensure that suitable security and cybersecurity measures to protect confidential information have been implemented and that all their employees fulfill this duty in their relations with HOCHTIEF.

Partners are required to respect the assets of HOCHTIEF and of HOCHTIEF stakeholders. The partners' employees only use assets belonging to HOCHTIEF and others when appropriately authorized. Partners must not tolerate theft of assets. Property and equipment of HOCHTIEF is not to be misused, damaged, or lost.



HOCHTIEF requires partners to ensure safe working processes, appropriate controls, and preventive measures in order to minimize any health and safety risks at the workplace.



Health and Safety

Partners must have in place organizational and management models aligned with international best practice and standards designed to comply with the principles of this Code of Conduct, e.g. with standard ISO 45001 Occupational Health and Safety Management Systems.



Occupational Health and Safety



HOCHTIEF requires all partners to provide their employees with a safe and healthy environment. They are obliged to have procedures in place to identify and evaluate health and safety risks in the context of their activities and to prevent, detect, and mitigate those risks. They are responsible for strictly complying with the HOCHTIEF health and safety standards and the applicable legislation on this subject. Furthermore, all employees have the right and the obligation to immediately stop unsafe work.

Prior to the start of work, all employees must have received adequate training and are provided with the proper equipment to safely carry out their work.

Prevention and Emergency Preparedness



HOCHTIEF requires partners to ensure safe working processes, appropriate controls, and preventive measures in order to minimize all kinds of health and safety risks at the workplace. In doing so, partners are expected to implement suitable trainings and evaluate production processes and machinery for health and safety hazards. The impact of identified hazards shall be minimized by implementing emergency procedures. Partners must immediately report all health and safety incidents related to HOCHTIEF projects, workplaces or construction sites directly to HOCHTIEF.



Environmental Protection

We strive to achieve the reduction of greenhouse gas emissions, an efficient and responsible usage of natural resources and energy, pollution prevention, sustainable management of water and waste and a clear commitment to protection of biodiversity, non-deforestation and land conservation. These goals are formalized in the [HOCHTIEF Sustainability Plan](#).



HOCHTIEF expects partners to support these goals and to commit to ensuring the utmost respect for the environment in the performance of their activities. Partners must comply with applicable environmental laws and regulations and have in place organizational and management models aligned with international best practice and standards, designed to comply with the principles in this Code of Conduct, e.g. with standard ISO 14001 Environmental Management Systems.

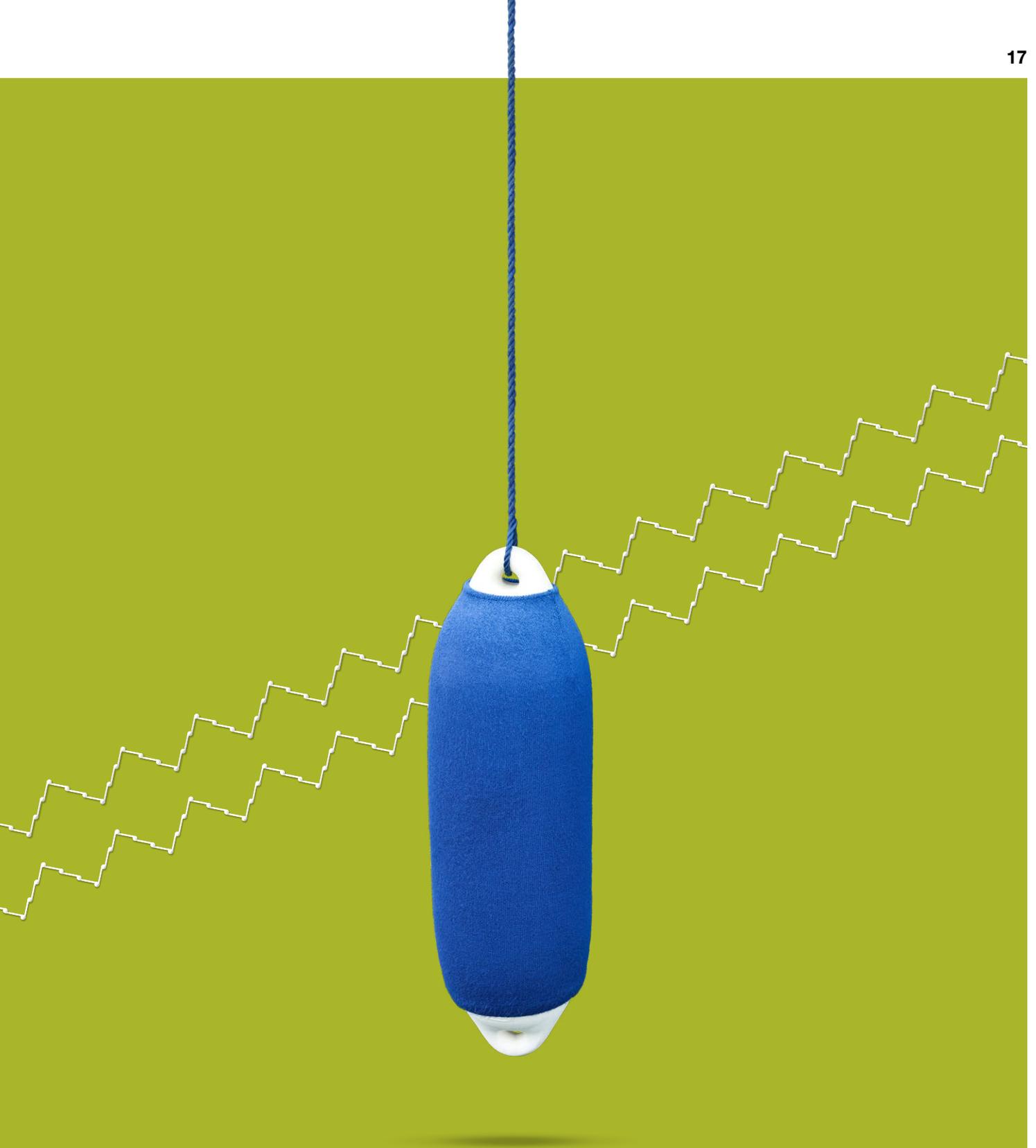
All required official permits, licenses and registrations need to be present and maintained. Partners shall identify environmental risks and impacts associated with their activities and set up appropriate prevention, mitigation and remediation measures.

Resource Efficiency

HOCHTIEF puts high effort in evaluating organizational or technological modification in designing of products and processes that allow a more efficient and responsible usage of energy, raw materials or water resources.

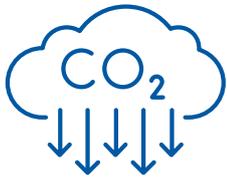


Partners are expected to save natural resources and improve resource efficiency in their operations and products throughout the life cycle. By reusing and recycling materials, adjusting production processes, as well as using material substitutes, negative impacts on the climate and the environment shall be minimized or avoided.



HOCHTIEF expects partners to support our goals and to commit to ensuring the utmost respect for the environment in the performance of their activities.

Greenhouse Gas Emissions and Energy Efficiency



HOCHTIEF supports the goals of the Paris Climate Agreement and applies the Greenhouse Gas (GHG) Protocol. We are committed to reduce greenhouse gas emissions and achieve climate neutrality “net zero” by 2045. On that behalf, we promote the purchase and use of energy from renewable sources and the efficient use of energy.

Partners are expected to keep mechanisms in place to ensure their effective commitment to fighting climate change and avoiding or minimizing energy consumption and greenhouse gas emissions generated by their activities. Partners are furthermore expected to engage in the development and application of climate-friendly products and working methods to support the reduction of greenhouse gas emissions. We proactively offer sustainable solutions to our clients and involve our partners in the supply chain in developing and executing these solutions.

Pollution Prevention and Waste Management

Our aim is to prevent pollution of air, water and soil to avoid negative and harmful impacts on the environment and offering solutions for sustainable and resilient infrastructure, expecting the same from our partners. Partners must keep mechanisms in place to foster a circular economy in their business activities. They shall ensure the safe handling, transport, storage, reuse or recycling of wastewater and solid waste. They are furthermore expected to reduce or avoid waste of all types, for instance by modifications of production processes, maintenance, and the use of recycled, reused or substitute materials. Partners shall monitor and evaluate all kinds of wastewater and solid waste generated from works prior to discharge or disposal and treat the substances as required.



Partners must furthermore ensure safe handling of hazardous materials. Biological or chemical materials or any other materials that have the potential to cause harm to humans, animals, or the environment, either by themselves or by interacting with other materials are to be identified and managed to ensure their safe handling. This applies to storing, moving, using, recycling and disposing of the materials. All information relevant to safety needs to be disclosed to HOCHTIEF.

Biodiversity, Non-Deforestation and Land Conservation



Biodiversity forms the basis for functioning and stable ecosystems. Rich biodiversity is essential for providing all living beings with food, fresh water and clean air. HOCHTIEF has a clear responsibility to protect, preserve or restore ecosystems and biodiversity while using natural resources efficiently. In our operations, HOCHTIEF aims to strike a balance between development and conservation of biodiversity and natural capital, as well as a commitment to non-deforestation.

HOCHTIEF requires partners to support these goals and to operate sustainably and use natural resources with care. Partners are expected to take responsibility to protect, preserve or restore biodiversity. If partners operate in areas in close proximity to critical biodiversity, they are requested to maximize their effort to apply appropriate mitigation measures such as avoiding, minimizing and restoring negative effects on biodiversity. All legal and official requirements in this regard must be strictly adhered to. Any environmental damage caused that is related to our projects must be reported immediately to HOCHTIEF.

HOCHTIEF strives to avoid deforestation arising from the activity itself, as well as from partners and partners of the partners whose contracted activity is critical to avoid deforestation, through actions focused on compensation, restoration and reforestation, as well as the promotion of the use of certified (e. g. FSC, PEFC, SFI etc.) and recycled wood.

Partners must strive to ensure that supply chains are free of deforestation in accordance with applicable law and international biodiversity regulations. HOCHTIEF furthermore requires partners to strive to ensure that products sold in and exported from the EU have not led to deforestation and forestation degradation. HOCHTIEF also focuses on land conservation and requires partners to protect, restore and promote sustainable use of land to avoid loss of nutrients, erosion and harmful soil contamination.



Partners are required to ensure that goods and materials are not sourced in a dubious or illegal way.

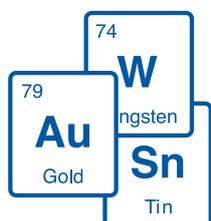


Responsible Sourcing

Business partners must have measures in place, such as a sustainable procurement policy or equivalent appropriate measures for their supply chain as well as associated standards of conduct similar to those specified in this Code of Conduct.



Conflict Minerals



Partners are required to ensure that goods and materials are not sourced in a dubious or illegal way. They are obliged to implement measures for the responsible procurement of goods and materials to ensure compliance with laws and regulations and to counter the financing of terrorism. The purchase and trade with regulated conflict minerals (in particular tantalum, tin, tungsten, gold or their derivatives considered as conflictive) is not permitted. Business partners must ensure that no items are delivered to HOCHTIEF containing metals based on minerals originated from a conflict region where the purchase directly or indirectly supports or finances armed groups.

Contractual Partners of the Partner

HOCHTIEF requires partners and their employees to act responsibly and to commit to the principles set out in this Code of Conduct. Partners are obliged to communicate the principles of this Code of Conduct to their direct contractual partners and to oblige them to follow these principles as well. Partners are further requested to recommend to their contractual partners to pass on the principles of this Code of Conduct accordingly.



Quality in Management

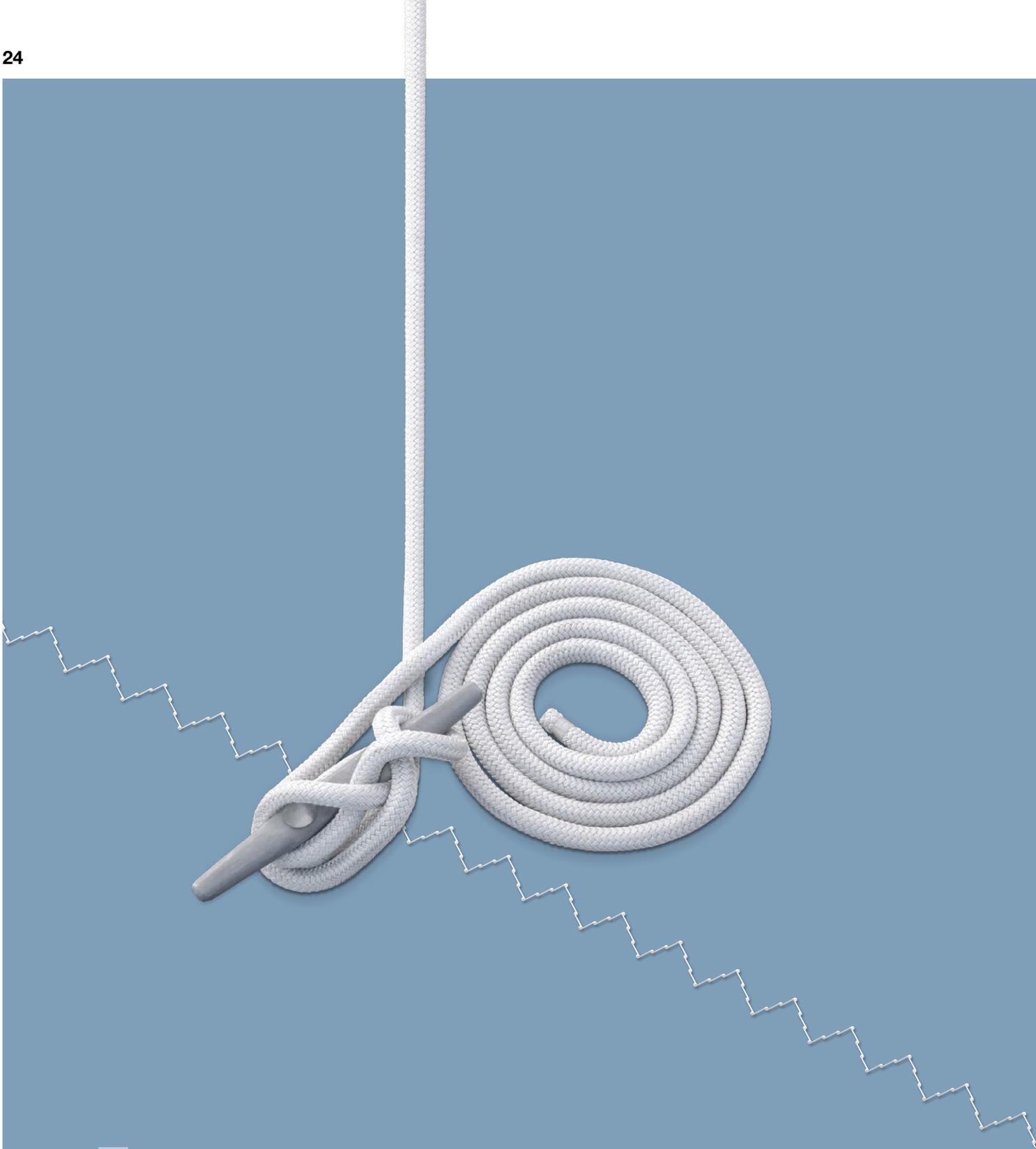
Partners are required to ensure that the regulations and content of this Code of Conduct are applied in their company. They must have in place organizational and management models aligned with international best practice and standards designed to comply with the principles in this Code of Conduct, e. g. with standard ISO 9001 Quality Management Systems.



Partners are at liberty to introduce – for themselves and their employees – codes of conduct that must not, however, restrict the standards defined in this Code of Conduct. They commit to informing their employees of the provisions governed by the HOCHTIEF Code of Conduct for Business Partners and the obligations that result from it.



Our partners have to comply with the principles spelled out in this Code of Conduct.



Our partners have to respect the ESG standards formalized in this Code of Conduct and to collaborate and support HOCHTIEF in order to fulfill our due diligence obligations.

Collaboration within Due Diligence Processes



Partners are expected to communicate any identified risks and/or violations with respect to the ESG standards formalized in this Code of Conduct and to collaborate and support HOCHTIEF in order to fulfill our due diligence obligations. That includes the provision of requested information for prequalification and evaluation processes. In the event of identified risks and/or violations, HOCHTIEF will engage to collaborate with our partners to find appropriate solutions and to define according measures where applicable. Partners are expected to collaborate within such grievance procedures.

In particular cases, where there is a (suspected) severe risk or violation and thus a legitimate interest, HOCHTIEF reserves the right to inspect the partner's compliance with the aforementioned requirements

- on site
- during business hours
- by a neutral auditor
- after prior timely notice
- in the presence of representatives of the partner
- and in accordance with the applicable law, in particular in compliance with data protection laws.

The auditor's final report may only deal with the issue of compliance with the aforementioned requirements and may not contain any business secrets or competition-relevant information concerning the partner.

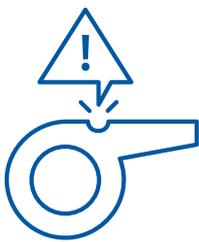
In the event of severe violations, HOCHTIEF reserves the right to terminate the contractual relationship.

Should there be differences or a conflict between the Code of Conduct and local regulations applicable to our partners, the more restrictive rule will prevail.



Whistleblowing System

HOCHTIEF provides several ways of reporting violations or incidents or non-compliance with statutory or company regulations. Our digital whistleblowing system allows for potential and/or actual human rights violations or incidents to be reported anonymously, without discrimination of any kind, under the provisions of the HOCHTIEF Code of Conduct and Code of Conduct for Business Partners.



In any case, grievance channels are governed by principles of confidentiality, respect and substantiated grounds. HOCHTIEF aspires to fully comply with the law in its business transactions. HOCHTIEF takes a very serious stance on compliance with applicable laws and internal requirements – also and particularly from this Code of Conduct. We therefore would like to encourage our partners, employees of the partners and the supply chain to report to HOCHTIEF suspected or known misconduct, information as to possible offenses, non-compliance with legal or company requirements, human rights violations, environmental, social or safety issues or other possible abuses. This is how you notify us regarding an incident:

Web-based system: hochtief.integrityline.com/frontpage

Chief Human Rights Officer (compliance@hochtief.de)

Ombudsman: 0800 88 62 52 5 (calls from Germany free of charge)

Ombudsman: +49 30 88 62 52 54 (calls from abroad)

There is no need to worry or have any fears with regard to this. A cornerstone of our notification system is the principle of a fair process. HOCHTIEF does not tolerate any type of pressure, coercion or reprisals against whistleblowers, who contribute towards promoting behavior in compliance with regulations at HOCHTIEF. Each person who does not provide false information deliberately or through gross negligence enjoys protection against negative consequences resulting from such notifications – even against any possible indirect consequences. Similarly, our partners must not retaliate or tolerate retaliation against anyone who, in good faith, reports suspected or known misconduct.



Our digital whistleblowing system allows for potential and/or actual human rights violations or incidents to be reported anonymously, without discrimination of any kind.



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Fax: +49 201 824-2777
info@hochtief.de, www.hochtief.com

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Any questions? Don't hesitate to ask.

