

The HABAU corporate group and its employees commit to observe the statutory provisions and ethically correct conduct (for more on this, see also the HABAU corporate group's code of conduct at [Verhaltenskodex HABAU GROUP](#)). Further important principles of conduct are sustainability and responsible actions, which are based on the principles of the UN Global Compact.

The HABAU corporate group expects the same of its business partners, who with this code of conduct are obliged to observe the minimum standards set out below.

### **Combating bribery and corruption**

Active and strict counteractive measures against any punishable or unethical exertion of influence on business decisions of the HABAU corporate group and its employees or of other companies, authorities and institutions and strict action against bribery and corruption within the company itself.

No invitations, gifts or other items of value are handed over with the aim of exerting influence on employees of the HABAU corporate group.

### **Combating prohibited agreements and cartels**

Preservation of fair competition and thus no involvement in anticompetitive agreements (e.g. price agreements, bid rigging, customer or market-sharing agreements) or prohibited cartels.

### **Sanctions and export controls**

Compliance with the effective embargoes/economic sanctions and export control laws and regulations and prevention of the violation of sanctions, laws and regulations.

### **Combating money laundering**

Neither alone nor in collaboration with third parties are measures taken that violate money laundering regulations. Money laundering is understood to mean in particular the introduction (e.g. by conversion or transfer) into the legal financial and economic cycle of money or other assets originating from a criminal offence.

### **Combating illegal employment, undeclared work and wage dumping**

Compliance with relevant statutory regulations on the employment of employees and effective action against illegal employment and undeclared work. Employment and remuneration of employees takes place based on fair and legally compliant contracts, observing in particular the respective applicable pay scale/collective agreement and statutory minimum wage legislation.

### **Respect for human rights and basic rights of employees**

Respect for human rights as fundamental inviolable values and prevention of participation in the violation of said rights.

Compliance with the health and safety regulations and the personal rights of the employees and a guarantee of respectful, fair, non-discriminatory and equal opportunity treatment.

Zero tolerance towards bullying and sexual harassment at the workplace.

### **Combating child, forced and compulsory labour, human trafficking and slavery**

Rejection of all forms of child labour and, beyond this, assurance that the employment of younger employees does not put their health, safety or development at risk.

Strict advocacy against forced and compulsory labour, human trafficking and modern slavery. Forced and compulsory labour refers in particular to all work or services that are not performed voluntarily or that are extracted from people under the threat of punishment and also includes the withholding of identity documents and passports, restrictions on movement and debt bondage.

### **Occupational safety and occupational hygiene**

The health and safety of employees is the utmost priority.

A safe workplace, sanitary and social facilities as well as personal protective equipment must be made available to employees in accordance with the international standards and the local legislation. Equipment and tools must be in good condition and appropriate for the respective work processes.

Employees must be informed and trained regarding the health and safety at their workplace. This includes information on the risks to which they are exposed as well as the relevant control measures. Furthermore, measures for safe evacuation from the construction site and workplaces, the safe handling and labelling of chemicals and the correct use of machines and tools must be taken.

### **Consideration of the environment**

Identification and minimisation of environmental risks based on the significant environmental aspects, observing the relevant statutory regulations. Through the consistent use of environmentally friendly technologies, the environmental impacts and harmful influences on the climate are kept as low as possible. In particular, the statutory requirements and provisions regarding energy efficiency and sustainability are also observed and, upon request by the contracting company of the HABAU corporate group, evidence thereof is also provided.

### **Data protection and information security**

Responsible handling of personal data, intellectual property and business information, under observation of the respective valid statutory provisions.

### **Transfer to subcontractors and suppliers**

Our business partners commit to also enforce compliance with the principles of the Global Compact initiative and the minimum standards of this code of conduct for business partners among their subcontractors and suppliers. In particular, the business partners will take suitable measures to identify risks to the observance of human rights among their subcontractors and suppliers and to eliminate or minimise these as necessary.

### **Reporting obligation**

If the contracting company of the HABAU corporate group with its affiliated companies or its customers and business partners are subject to a statutory or contractual reporting obligation, for example in connection with a supply chain, sustainability, energy efficiency and so on, the business partners of the contracting company of the HABAU corporate group will submit the required information and/or documents concerning them immediately upon request.

**Reporting misconduct and violations**

Business partners of the HABAU corporate group are required to report their own violations and suspected violations of the code of conduct, insofar as these affect the business relationship with the HABAU corporate group, as well as misconduct by employees of the HABAU corporate group directly to the compliance officer or via the whistleblower platform, to actively participate in clarifying these incidents and to cooperate with the HABAU corporate group without reservation.

The whistleblower platform on the websites of the respective companies of the HABAU corporate group is also available to the subcontractors and suppliers for the reporting of misconduct and wrongdoing against the valid statutory provisions and compliance regulations, including anonymously.

**Violations and consequences**

In the event of reasonable suspicion of a violation by a business partner against the code of conduct or if the duty of disclosure is not fulfilled, the contracting company of the HABAU corporate group may terminate the business relationship with the business partner concerned with immediate effect based on the existing contractual or statutory rights. The right to further legal actions, in particular claims for damages, is reserved.

The business partner commits, in addition to other contractual obligations with the contracting company of the HABAU corporate group, to observe this code of conduct. The HABAU corporate group reserves the right to request additional self-declarations as well as to conduct a supplier audit incl. a compliance discussion.

Name of business partner .....

Name of signatory .....

Position of signatory .....

.....  
Place, date

.....  
Corporate/legally valid signature