

PohlCon Code of Conduct

- CODE OF CONDUCT -

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Introduction

Dear Colleagues,

PohlCon GmbH, together with its subsidiaries - (hereinafter collectively referred to as "PohlCon") would like to establish a common basic understanding of social responsibility and ethical corporate management with this Code of Conduct.

This Code of Conduct reflects not only our values, but also sets out the principles of our actions and decisions. We expect all employees, managers and senior management at all our locations around the world to live up to these principles. We believe that our long-term success is linked to the fact that responsible and commercial business success are not mutually exclusive, but mutually reinforcing.

It is only through our continued commitment to the following principles that we can secure the trust, acceptance and goodwill of our business partners, clients and contractual partners for the future. Compliance with the law is of the utmost importance to PohlCon. Breaches of the law present a high risk to us and our employees, as they can result in fines, penalties, damages and a tarnished reputation.

The principles in this Code of Conduct are minimum standards that are binding for each and every employee. By its nature, the Code of Conduct cannot cover all laws and standards. It is therefore never exhaustive. Compliance requirements for our suppliers and external partners are outlined in the Code of Conduct for Business Partners.

If you have any questions or comments, please contact your line manager, senior management, or the compliance officer.

A. Values

I. Our basic understanding

Treating each other with respect, honesty and tolerance forms the basis of our conduct and collaboration. We see ourselves as a team that draws on the strengths and experience of over 200 years in the construction industry, and makes mutual trust the foundation of its work.

Our business success is the result of the combined efforts and tireless dedication of all our employees. We are proud of the strong identification and long-standing loyalty of our employees, whose high level of expertise makes an important contribution to the success story of our group.

II. Our actions

Ensuring client satisfaction and continuously increasing client loyalty is one of our top priorities. *For* our clients also always means *with* our clients. Working together, we can find solutions to almost any challenge.

We win people over with our communication, reliability, quality and competent service. Creativity and a wealth of ideas drive our progress in developing products and services.

III. Our responsibility

As a growing family business, PohlCon is aware of its responsibility as an employer, a reliable business partner and a resource-efficient and sustainable company.

We are fully committed to complying with applicable laws, government regulations and internal company policies, which we believe are essential to the integrity and credibility with which our business is perceived.

B. Principles

I. Adherence to the law and compliance principles

PohlCon recognises its responsibility to ensure compliance with all applicable statutory regulations in its business operations. The principles contained herein reflect the key principles that guide our business conduct, and are binding for all employees.

The key compliance principles are:

1. Fair competition

We act in accordance with national and international competition and antitrust laws. PohlCon is committed to fair competition and the free development of all participants in the market. Agreements of any kind with competitors on prices, terms and conditions, market allocation and non-competition are prohibited. Our employees respect the principles of fair and open competition.

2. Prevention of corruption

We do not engage in corruption, bribery or any form of extortion. In order to maintain our integrity as a reliable and competitive business partner, PohlCon's business relationships are based on objective criteria. PohlCon does not influence or distort competition through corruption-related payments, nor does it make any such attempts. Employees are required to comply with internal anti-corruption policies.

Furthermore, business matters should never be influenced by personal interests or considerations. In particular, this includes any financial, business, family or close relationship with a competitor, client, supplier or business partner. Situations in which personal interests could come into conflict with the interests of PohlCon are to be avoided.

3. Prevention of money laundering

We also do not tolerate any activities related to money laundering. It is the responsibility of our employees to be vigilant and to prevent transactions that could potentially expose PohlCon to the suspicion of money laundering. We are committed to the detection and reporting of such suspicious transactions or activities.

4. Data privacy, confidentiality and protecting third-party rights

All personal data relating to employees, clients, business partners and other third parties are to be treated confidentially and processed in accordance with the national and international data protection laws applicable to PohlCon.

All employees are aware of their obligation to maintain the confidentiality of business and proprietary information as part of their employment with PohlCon. This includes, but is not limited to, trade secrets, business documents and business records. Information is to be stored properly and protected from unauthorised access by third parties.

All employees are required to respect the valid intellectual property rights of third parties (e.g. patents, copyrights and trademarks). No unauthorised use is to take place.

5. Financial integrity

All business records that PohlCon compiles, publishes and, in particular, makes available to the competent authorities, shareholders and creditors must be complete in accordance with the applicable accounting principles. All financial records must be prepared accurately and in a timely fashion by employees in accordance with their duties and areas of responsibility and in compliance with applicable laws and regulations.

6. Export controls

PohlCon attaches great importance to compliance with foreign trade regulations. We comply with applicable import and export regulations as well as regulations on sanctions and embargoes. To this end, we implement appropriate preventive measures.

II. Human rights, anti-discrimination, labour and health and safety rights

1. Human rights

At PohlCon, respect for internationally recognised human rights is the basis of every business relationship. We comply with ILO core labour standards. We respect the dignity, privacy and personal rights of every individual.

We do not tolerate behaviour, whether verbal or physical, that is disrespectful or humiliating to a person. PohlCon treats its employees fairly and without prejudice. We do not tolerate abuse, bullying or harassment of any kind.

We have no tolerance for any form of forced, compulsory, or child labour.

2. Anti-discrimination, equal opportunity and diversity

We reject all forms of discrimination and are expressly committed to equal opportunity. We treat all people equally, regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, ideology or other personal characteristics.

3. Occupational health and safety

PohlCon is committed to providing a healthy and safe working environment. For us, occupational health and safety is of the highest priority in the company. Our goal is to reduce workplace accidents to zero. We create the necessary conditions to ensure the safety of our employees and third parties and comply with applicable labour, accident prevention and health regulations.

III. Environmental protection, climate protection, and sustainability

PohlCon is constantly improving the sustainability of its products and services in order to fulfil its commitment to environmentally oriented management.

In addition, we have taken appropriate measures and act in accordance with applicable environmental legislation and international standards to minimise negative impacts on the environment.

We reject the use of conflict materials such as rare earths and ores from conflict zones.

IV. Selection of business partners

Reliable business partners are of great importance to us. That is why we choose ours with great care. We apply risk-based checks and expect our business partners to adhere to the same principles as we do. We ensure this through our Code of Conduct for our business partners.

C. Implementation and whistleblowing unit

All employees are required to comply with the provisions of this Code of Conduct. These principles are fleshed out in internal guidelines and directives. Regular training courses and e-learning programmes also take place.

Violations of the Code of Conduct will not be tolerated. They will be appropriately penalised and may result in consequences for the employment relationship and claims for damages.

We encourage our employees to use the whistleblowing channels provided by PohlCon to report information about breaches of the law or important internal guidelines and principles of conduct set out in this Code of Conduct.

We are also open to suggestions for improvement and comments on the implementation of this Code of Conduct. If you need help in applying or interpreting this Code of Conduct, the general principles on which it is based, or a specific legal requirement, or if you are in any doubt, please contact your line manager, senior management or the compliance officer.

A handwritten signature in purple ink, appearing to read "Oliver D. Gessert".

Oliver D. Gessert
Managing Director

A handwritten signature in purple ink, appearing to read "ppa. A. Wolter".

Andreas Wolter
Commercial Director

A handwritten signature in purple ink, appearing to read "Vera Pieper".

Vera Pieper
Head of Quality and the Integrated
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