



COMPLIANCE MANAGEMENT

CODE OF CONDUCT

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CODE OF CONDUCT

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FOREWORD

Dear Sir or Madam:

Swietelsky is a leading construction company in Central and Eastern Europe. With the driving force of around 12,000 employees, more than 3.1 billion euros in sales, and a decentralized organizational structure, we are an international player, a national winner, and a local champion. For more than 80 years, our development has been characterised by economic sustainability and sound prosperity, so that the Group today offers its entire range of construction services with the highest quality, flexibility and adherence to schedules.

The positive development of the company is the result of the willingness of the employees to continuously grow and accept challenges with a view to the future. In the same way, we also face up to new legal frameworks and ethical standards in order to maintain our good reputation as a reliable, competent and law-abiding partner. Fairness, respect, and integrity within the company as well as towards clients and competitors set us apart.

As a guideline for this legally, ethically and morally impeccable conduct, we have drawn up a Code of Conduct, a central element of our certified compliance management system (certified following ISO standards 37301 and 37001). Compliance with the principles set out therein applies to all employees at Swietelsky, regardless of their position. Undoubtedly, our conduct in our daily professional life is one of the most important factors influencing the company's reputation. Each individual is therefore required, in his or her own interest, to take the following principles into account, thereby ensuring joint economic success.

The board of directors



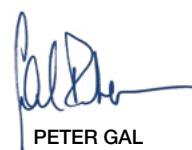
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DIVERSITY STATEMENT

IDEAS ARE BUILT ON DIVERSITY

Swietelsky AG recognises the ever-increasing diversity of the society in which we live and work. We build on the diversity of ideas and know that different perspectives can help us to master the challenges of a rapidly changing world.

The prerequisite for this is that our employees, regardless of their gender, religion, sexual orientation, age, ethnicity, or disability, are comprehensively supported and developed and are able to fully realise both their personal and professional potential.

We stand for a clear rejection of any form of discrimination and bullying and are committed to a culture of togetherness that is inclusive and appreciative of one other. We

regard committed diversity management as a strategic instrument to increase the long-term efficiency of our construction activities.

We therefore encourage our employees to see diversity as an opportunity to gain a competitive edge, to cultivate an empathetic working climate and to create framework conditions that meet the goals of inclusion.

We see the advancement of women in construction-related work processes and management structures in particular, but also the tailored employment of older employees and the training of young people as urgent operational requirements and, not least, a significant social responsibility,

Board of Directors, Swietelsky AG, November 2022



CODE OF CONDUCT

OF SWIETELSKY AG

The term employee in the following text refers collectively to both male and female employees.

Any other gender-specific designations should otherwise also be understood as referring to both sexes.

Scope of application

This Code of Conduct applies to all employees of the Swietelsky Group without any exception. Every new employee will also be familiarised with this Code of Conduct and be obliged to observe it in accordance with his or her employment contract.

It also applies to any companies in which Swietelsky AG has a direct or indirect holding of at least 50%.

Effective implementation of the Code of Conduct shall also be insisted upon in the case of other Swietelsky interests where no control is exercised owing to other long-term investees and investors and where no policy corresponding to the Code of Conduct to hand already exists.

Our Code of Conduct applies not only to Swietelsky but also to our subcontractors, suppliers and service providers. In doing so, we want to ensure compliance throughout the entire supply chain.

I. We are law-abiding

We act according to ethical principles and adhere to prevailing statutory regulations and policies. The applicable laws, standards and practices of all countries in which Swietelsky operates shall be strictly observed and respected in relation to all business processes and decisions. All employees are obliged to acquaint themselves with and observe the legal

provisions applicable within their sphere of responsibility. Legal advice must be sought in writing for clarification purposes in case of doubt.

Swietelsky currently has operations in many European countries as well as in Australia. Its activity in these countries is subject to the widest variety of legal and political systems as well as cultural and social variants. Infringements of prevailing legal systems can lead to the most serious consequences, beyond calculation at the time of the infringement. Considerable penalties and compensation for damage resulting from an unlawful action may not only affect a company in material terms but may also be accompanied by reputational damage, which can have further negative economic consequences.

A violation of provisions under criminal law, in particular, represents one of the most serious interventions in a prevailing legal system and regularly leads to the most lasting damage to entrepreneurial activity.

Illicit behaviour therefore has no place in business and not in our corporate culture.

Responsible business conduct does not end with the limits of criminal law, but rather much earlier than this. Common sense is often sufficient to determine whether conduct is lawful. Your superiors are always on hand to provide assistance in case of doubt or uncertainty. Moreover, the expertise of the respective contacts within commercial management as well as various staff units can also be called upon. External consultants can also be involved should this prove necessary.

Your Local Compliance Officer (LCO) or the Chief Compliance Officer (CCO) responsible for the Group as a whole is furthermore available to you.

Please consider during your business activities and dealings that (illicit) unlawful behaviour can also seriously damage your personal integrity, your reputation and career as well as your personal and family circumstances.

The consequences of infringing internal policies and legal provisions, but also moral and ethical standards, therefore not only damage the company, but also you in a very personal way.

Disciplinary measures are, in any case, taken in such instances. The spectrum for this ranges from a warning to dismissal. Moreover, criminal convictions such as fines and imprisonment are also possible. Insofar as (illicit) unlawful behaviour causes damage to the company, you must furthermore consider that you will also be prosecuted for this.

Make sure you are aware of the consequences of such behaviour, and do not allow yourself to be swayed by short-term success and benefits. The basis for the success of our company was, is and will always be reliability, a sense of responsibility, and lawful conduct in accordance with the prevailing laws of your respective country.

II. We see taxes as a social responsibility

A functioning tax system is a basic prerequisite for managing social, economic, and societal challenges in a country. We are committed to our obligation to make our contribution and therefore adhere without exception to the tax and fiscal laws and regulations.

Just like any other taxable entity, our company is also subject to continuous (financial) regulatory inspection. For this reason alone, the risk of irregularities emerging under tax and subsidy law in the course of such inspections is especially high.

The options for scrutiny open to financial and investigatory authorities are already far-reaching and comprehensive owing to the technical resources available and excellent training of their employees. Suspicions on the part of customers and subcontractors, suppliers and other business partners can also lead to cross-checks being carried out in our company. Tax and subsidy fraud are neither trivial offences nor a competitive advantage. The evasion of taxes by companies and private individuals causes annual losses in the billions and contributes to countries not being able to fulfil their duties at all or only inadequately. Companies like ours experience this first hand as members of a key sector like construction through a continuous decline in the awarding of public contracts. Tax evasion therefore not only threatens the existence of companies that rely on the awarding of public contracts through the threat of heavy penalties, but also their employees.

We naturally also make no contribution to or assist tax evasion in any way:

Any service we are to provide or have provided is performed properly under tax law and we offer nobody the possibility of gaining an illegal tax advantage through improper practices.

Examples:

- Orders that we would only receive from a third party if an incomplete or incorrect or no invoice at all is issued are naturally not accepted.
- Services rendered are charged on to the customer as the invoice recipient in accordance with the order and not to the recipient's company so that the sales tax can be illegally claimed here as input tax.

III. We accept neither corruption nor bribery

No employee or representative of the company may provide improper advantages or privileges either directly or indirectly to business partners or demand such advantages or privileges in the course of business if this could result in business transactions being or appearing to be influenced in an improper manner. This can be assumed especially to be the case if the type and scope of the advantages are such that the actions and decisions of the recipient are influenced. In countries where gifts are customary and a sign of politeness, the legal provisions of the respective country must be observed as a minimum standard and the effects of such behaviour on our company's image considered. The approval of the superior in question must be obtained in case of doubt.

Payments made to a consultant or agent for actual services provided must in any case be proportionate to the services being provided and these services must be documented transparently and verifiably.

Improper commissions must neither be agreed nor paid, let alone be accepted.

Corruption and bribery involve the offering of money or non-cash benefits for the purpose of influencing decisions. We do not participate in such practices, because we know them to be among the worst enemies of fair and free competition. We win over clients through the quality of our service and through adherence to contracts and deadlines, through genuine and competitive pricing, and through the reliability and excellent qualification of our employees.

We use these means accordingly to compete fairly and strictly reject bribery and corruption that could distort this competition in an improper manner.

Every employee is therefore prohibited, both directly and indirectly, from offering or awarding advantages to third parties in any form whatsoever if this could even so much as create the impression that a business decision is to be improperly influenced or is being done precisely for this purpose.

This of course also applies in cases where a decision maker is offered a contribution so as not to perform the duty incumbent upon him properly or is to be rewarded for improper performance.

Conversely, this naturally also applies similarly where employees of our company are offered an advantage to bring about a certain behaviour. The active or passive donation of money or non-cash benefits by or to employees of companies but also in the case of public office holders and officials is a particularly reprehensible offence and has no place in an orderly economy and as such is therefore strictly prohibited.

The following is therefore prohibited in particular in this sense:

- Any payments to officials, public servants or public office holders in order to accelerate their services or in some way fix or precipitate such services. The donation of money or personal non-cash benefits to responsible persons of a potential customer or business partner in order to influence the awarding of a contract is also subject to this ban.
- Neither gifts, nor hospitality, nor invitations to events may be granted or accepted, which are unreasonably generous and/or do not correspond to general practice according to local regulations and customs. Gifts moreover have a certain rarity value over the longer term and remain the exception.
- Under no circumstances is it permitted to give or accept cash or gifts that could even just create the impression of "optimising" decision-making processes.
- The granting or acceptance of discounts for private use, insofar as such discounts have not also been offered to other employees of the company, or for example invitations to travel or events, where the "feel-good factor" exceeds the business purpose, are also not permitted.

Be guided by common sense when giving or receiving gifts. Consider if it would be unpleasant for you or your opposite number if third parties were to gain knowledge of this. If you are in doubt or if the value of the gift exceeds an amount of EUR 100, you have to obtain the approval of your direct superior.

Contributions from other third parties, such as agents or consultants, for the purpose of influencing decisions must neither be offered nor accepted. The services of consultants or brokers must be proportionate to the services to be provided by them and their services must be documented seamlessly in regular reports.

Donations and sponsorship:

Swietelsky is aware that cultural, social or humanitarian projects are difficult to implement without donations or sponsoring contributions. Support for selected events, aid organisations and charitable institutions is a societal concern for the company.

Contributions in the form of donations are expressly intended as a means of assistance to support such organisations or institutions in their work or to allow such events to take place. No service in return is either demanded or expected.

When making donations, refer to the website of the Federal Ministry of Finance where the beneficiary institutions are recorded or which are listed explicitly as beneficiaries in the Income Tax Act (EStG) in accordance with Sec. 4a(1). These are broadly in line with the fundraising organisations and principles that Swietelsky regards as worthy of support. Donations to such or similar institutions must therefore always be guided by the principles outlined above and their amount considered from the point of view of proportionality and customary practice.

Donations made directly or indirectly to events organised by parties, party political front organisations or individual politicians are not permitted.

In contrast to donations, sponsoring is defined as donations from Swietelsky to an organiser of sporting, cultural, charitable or other events based on advertising or image cultivation. In return, there is an advertising service for Swietelsky. Therefore, sponsoring is generally one of the permitted benefits. However, if benefits received within the scope of sponsoring agreements (e.g. tickets for a football match) are passed on by Swietelsky to a public official in connection with an official transaction or if the sponsoring benefit is made dependent on a certain behaviour of the public official, this may qualify as an act of corruption under certain circumstances.

Sponsoring activities by Swietelsky are always carried out in return for marketing and are always in line with fair competition. Sponsoring activities serve neither the individual nor the personal interests of individual office holders or employees.

IV. We behave fairly towards our business partners

Honesty and respect when dealing with customers, subcontractors, suppliers and competitors are a given for us.

To ensure fair competition, it is essential to refrain from certain business practices, such as misleading customers in relation to quality or availability, disparaging comments about the competition and such like.

In particular, it is not permitted to arrange prices or engage in other illicit practices, which have as their object or effect the restriction, distortion, or alteration of fair competition. We require our subcontractors and suppliers to also meet these standards.

The regulations governing assurance of transparent, free and fair competition are manifold:

Provisions in this regard are contained in a series of laws, such as laws against unfair competition, antitrust law but also country-specific procurement law.

Violation of such legal provisions can—in addition to personal consequences under criminal law—lead to penalties that could threaten the existence of a company but also to its exclusion from participating in the awarding of public contracts. Our company never has and never will tolerate such violations. The following is accordingly prohibited:

- Arranging prices, price-fixing factors, terms and conditions, and discounts.
- Partitioning of municipalities, territories and regions or markets.
- Partitioning of customers and business areas.
- Arranging bids with competitors, regardless of the nature.
- Coordinating bid and product strategies.
- Any behaviour that could influence the result of a competition such that a different result would have been achieved were it not for this behaviour.

It should be understood that the examples above not only relate to explicit written and verbal arrangements or agreements, but also to corresponding behaviours. It is also not acceptable to even exchange information with competitors outside of the current competition if this information could act as a basis for concerted practices.

Our prices, cost structures, our customer group, our product and business strategies as well as similar business-related information must be strictly withheld from the competition. This information is regarded as a trade secret that must be strictly preserved; violations in any form shall be prosecuted in the interests of the company.

V. We avoid conflicts of interest

Situations can arise in everyday professional life in which the interests of the company conflict with personal interests. All employees are called upon to avoid such situations. Should a potential or actual conflict of interest nevertheless arise, the employees in question must inform their superiors in advance and without delay. Every employee is aware that secondary employments that conflict with the interests of Swietelsky (e.g. run counter to competition) must be refrained from, unless explicitly approved by management.

Your business decisions must never be influenced by any personal interests that could arise from a business transaction.

The decision against or in favour of a business transaction must be documented clearly and verifiably. The best decision is the most transparent decision that is made in the interests of Swietelsky. Take great care therefore that you never convey the impression that your decisions are taken in your own personal interest.

Actual or apparent conflicts of interest can arise, for example, if business relationships are considered with individuals who come from your closer or wider family circle or close group of friends. Such a conflict also occurs if the individuals mentioned hold a responsible authoritative role or a share in a company. This naturally also happens if you are involved in such a company yourself or profit in any form from this company (see III). To avoid such situations where your personal and/or financial interests conflict with those of Swietelsky, it is forbidden to participate in companies of competitors, contractors or suppliers or also customers.

Insofar as such or similar conflicts of interest arise or have already arisen, they must be immediately reported to the respective superior in the form of a disclosure. If you already hold interests in the above or similar companies when you join our company or profit in any way from such a company or if friends and family relations could suggest a conflict of interest, you are obliged to inform your supervisor of any such conflict of interest at that time, but at the latest as soon as it occurs.

Secondary employments that do not relate to one of the companies mentioned above must also be disclosed on joining our company or prior to commencement of the secondary activity and appropriate approval must be sought. Such approval can only be granted if it is ensured that your working time is used exclusively in the company's interest and none of our company's resources are used as part of your secondary employment.

The following is therefore prohibited:

- Commissioning of companies at especially favourable terms and conditions in the private domain, if this is obviously intended to influence your decision-making in business transactions in favour of this company. Inform your superiors prior to commissioning!



- Situations in which you feel obligated to a business partner to make a business decision in his favour. Seek agreement with your superior in this regard.

VI. We protect the assets of the company

We treat the resources entrusted to us with care and in accordance with their intended purpose. We have to protect the company's assets from theft, carelessness, waste and wear and tear beyond the usual extent. All resources must essentially only be used for professional purposes, while private use beyond any necessary extent must be approved by the respective superior.

Regardless of the area of the company in which you perform your duties: Resources are entrusted to you to fulfil your duties, which are often of considerable value. Respect the property of the company and make sure to use it as carefully as you would if it actually belonged to you.

It is expressly forbidden to use business assets and services of the company improperly for private purposes. Use of resources above and beyond this must be approved explicitly by the respective superior.

The following is prohibited in particular:

- Unapproved surrender of resources to third parties in a paid or unpaid manner;
- Use of resources for private purposes above and beyond the absolutely necessary extent, also outside of normal working hours;
- Use of company resources as assistance for generating income ("cheating" – refer to V. "Secondary activities");

- Any non-company-related use of resources without the required approval of your superior.

Offences against property and assets, such as theft, are not tolerated in any form. This leads to an immediate loss of trust and these or similar offences result in dismissal.

VII. We respect human rights and assume social responsibility

Based on the European Convention for the Protection of Human Rights and Fundamental Freedoms, we observe the personal dignity, privacy and personality rights of every individual. We do not tolerate discrimination on grounds of national or ethnic origin, gender, sexual orientation, religion, age or disability. Degrading treatment of employees such as through sexual harassment or bullying and such like is not tolerated. Furthermore, we prohibit all forms of human trafficking and modern slavery as well as child and forced labour.

Our employees are important to us. We know that a healthy work/life balance is essential for personal success and job satisfaction. A trusting relationship and loyalty form the basis for cooperation and are thus fundamental to the successful enhanced development of our company.

Our human resources policy is based on fair and performance-related pay, secure jobs, freedom of association, and employees' right to collective bargaining.

High standards in employment and social-security law are therefore not just compulsory legal regulations



for us but a genuine concern. We therefore require our subcontractors and suppliers to also meet these standards. Our employees are thus obliged to verify compliance with all regulations under employment and social-security law in the legally required form and in a reasonable manner. Violations of the Law on the Employment of Foreign Nationals in particular or benefit fraud are not tolerated.

Advanced and modern companies and organisations are not only characterised by their active understanding of diversity, regardless of the nature. Quite the opposite – they use this diversity and see it as a building block for achieving common objectives. In the knowledge that diversity is to be embraced for the greater good, we treat each other with respect, appreciation and goodwill, regardless of hierarchical levels. Criticism is always permitted—but not in association with denigration or disrespect; the individual's reputation must remain intact. Denigration and offensiveness have no place in our dealings with one another.

Regulations under employment and social-security law are not a bureaucratic impediment but an obligation. Conformity with regulations is accordingly practised in our company and is an essential part of our corporate culture.

When commissioning subcontractors and suppliers, we consider and examine if they also comply with such regulations. Necessary checks against the provisions of the Law on the Employment of Foreign Nationals and the Wage and Social Dumping Control Law are performed seamlessly with a view also to preventing relevant sanctions, which if serious enough could lead to exclusion from participation in the process for awarding public contracts. Refer to the intranet for more detailed regulations and instructions, which are evaluated on an ongoing basis, concerning the provisions mentioned as well as further-reaching statutory provisions.

VIII. We ensure a safe working environment and respect the environment

Avoidance of risks for people and the environment is very important to us. The regulations governing accident avoidance must be strictly observed. Ongoing controls concerning handling dangerous situations play a significant role in this respect. Continual training for employees strengthens the preventative effect of the accident prevention measures.

The construction industry is an energy and resource-intensive sector with a considerable impact on nature and the environment. The sustainable and resource-efficient use of our environment forms an integral part of our corporate strategy. We strive to ensure the use of environmentally-friendly processes and equipment in all project phases. By using renewable energy sources and thus saving fossil energy sources, we want to contribute to improving air quality effectively. Likewise, we pay attention to the careful use of water and preservation of water quality.

Special attention is also paid to biodiversity so that the biodiversity and habitat of plants and animal species are protected and preserved. The management considers it their responsibility to continuously improve the quality and environmental awareness of all personnel.

Information on legal requirements and other internal regulations concerning occupational safety and health and environmental protection is available to every employee at any time through the integrated management system (IMS). To fulfil the legal requirements arising in relation to industrial safety and health protection, programmes were elaborated with the involvement of occupational physicians,

safety experts, health and safety officers in cooperation with the responsible representatives as well as managers and executive management.

All employees must take care to ensure that their working environment is safe and healthy. Employee protection and safety regulations must therefore be strictly observed.

No employee is obliged to perform services for which safety-related regulations exist but which are not respected or observed at the time the service is performed. Performance or arrangement of services without adequate protective equipment is therefore expressly prohibited. The use of protective equipment must be verified by the superior, who must arrange immediate measures if necessary to ensure compliance with the safety regulations.

To ensure a high standard of occupational health and safety, an internationally recognised occupational health and safety management system following ISO standard 45001 has been implemented in the group. This is anchored in the integrated management system. Compliance with measures for the industrial safety and health protection of our employees is monitored on an ongoing basis by the safety experts, health and safety officers and occupational physicians. Furthermore, the environmental management regulations are actively implemented in accordance with the requirements of ISO 14001. They apply both to building sites and the production and re-use of recyclable materials.

Consistently determining environmental aspects in connection with our activities on construction sites and factories makes it possible to identify potentials for continuous improvement of environmental protection measures. Targeted environmental protection projects are implemented by project management in the branches, subsidiaries and factories.

IX. We treat business documents and information confidentially

All corporate information is held in safe-keeping and protected against inspection or access by third parties. Corporate information includes all financial data, strategy documents, contracts, plans, correspondence and such like, regardless of the form and medium in which it is used or saved. If such information is identified as “confidential”, it is treated with particular care and therefore not stored at the workplace where it can be freely accessed. Confidential information of any type, which is requested in the framework of professional duty, must neither be used for pursuing own interests nor made accessible to unauthorised persons. The obligation of confidentiality exists for the duration of the business relationship but also upon termination of the business relationship.

X. We observe IT security and data protection standards

IT equipment must always be kept safe in an appropriate manner and protected by means of passwords within the scope of what is technically feasible. Personal passwords must not be passed on either to employees or to third parties. We use all suitable and appropriate technical and organisational means to protect corporate data in the same way as personal data of business partners and employees from unauthorised access, misuse, loss and premature destruction.

XI. We continue to develop

Developing and providing innovative solutions and technologies for our customers is part of what we do every day. The experience we have gained in implementing countless construction projects is incorporated in new projects and leads to continuous improvements and adaptations in relation to machinery used and optimisations both in terms of internal processes and also in contact with our customers. In addition to these technical and organisational developments, we also encourage the personal and functional development of our employees. We therefore focus on ongoing training and education—be it as part of internal training events or external training in order to provide the best possible support for all employees in fulfilling their duties now and in the future.

Applying the Code of Conduct

This Code of Conduct is binding for all employees of Swietelsky. It can be accessed on the intranet by all employees. If employees detect violations or should questions arise in certain circumstances, please contact your superior in confidence or if necessary the Compliance Officer (LCO or CCO). All reports and queries will be dealt with in the strictest of confidence and examined carefully.

The Code of Conduct to hand is an internal document that is also suitable however for conveying our corporate principles and rules of conduct to our business partners and other interested parties. Claims by third parties cannot be derived on this basis, however.

This Code of Conduct is also the basis for other internal regulations in the Group and its companies, branches, and factories.

Further policies or internal regulations should therefore substantiate, comment on or extend this Code of Conduct. Superiors at all levels are called upon to inform themselves and their employees of the content of this Code of Conduct and the other internal policies and to ensure compliance herewith.

It may happen that special regulations are required to take account of country-specific characteristics. Should supplementary regulations therefore be required in the respective country, these must in no way be contrary to the principles

of this Code of Conduct.

Reporting rule violations

In the event of violations of this Code of Conduct, internal regulations or (national) legal provisions by group employees, you can - as promptly as possible - choose to contact the following contact persons/institution:

- Direct superior
- Executive management or branch management of the respective Group company or branch
- Board
- Local Compliance Officer (LCO)
- Chief Compliance Officer (CCO)
- Reporting system

In addition to reporting to a contact person, all employees have the option of making a report via the web-based reporting system. This is accessible 24/7 from any location at <https://swietelsky.integrityline.com>.

Your reports and information about rule violations will be carefully examined. It will be necessary in most cases to identify the individual who makes the report in order to ensure thorough investigation. Depending on the case in question, anonymous reports have the disadvantage that questions cannot be asked or supplementary information obtained.

Should you wish this explicitly or should it appear necessary for follow-on investigations, the confidentiality of the individual shall naturally be preserved. You can also be assured that no negative consequences shall arise for you following your reporting of the case since in so doing you are assisting us in ensuring conformity with this Code of Conduct, the prevailing legal provisions and other internal regulations. Individuals who contribute to the clarification of rule violations by providing information in the framework of investigating rule violations shall also enjoy this protection of legitimate expectation insofar as they request such protection.

However, it is expressly pointed out that disciplinary measures can be taken should reports emerge that contain false accusations due to intent or gross negligence.

Contact information:**Mag. Gernot Reiter**

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- Germany
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- Croatia
- Luxembourg
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- Norway
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DECLARATION OF CONSENT

I, _____, hereby expressly acknowledge that I have read and accepted the Code of Conduct of Swietelsky AG and its Group companies. Compliance with the guidelines and principles of the Swietelsky Group companies as outlined herein are as much a natural obligation for me as the observance of national laws and regulations. I therefore consider myself bound to this Code of Conduct without any restrictions and confirm this by my signature.

Place, Date _____

Signature _____





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