

Code of Conduct

Possehl Construction Group

1. Foreword

The trust that customers and other stakeholders place in the companies of the Possehl Construction Group – and in our products and construction services – is our greatest asset. We are all jointly responsible for re-establishing this trust on a daily basis by conducting ourselves in an honest and sincere manner. This means that we all have to be familiar with the applicable company regulations and legal requirements – and we also have to comply with them.

If we notice that something is wrong, if we make mistakes or recognise other people's mistakes, we have to address them and react accordingly – even if it is sometimes uncomfortable. It is never acceptable to turn a blind eye. In case of doubt, we must seek expert advice and ask for help.

Each and every employee is responsible for our group's reputation and success, regardless of their position in the company.



PLEASE FAMILIARISE YOURSELF WITH THIS CODE OF CONDUCT.

2. Basic principles

2.1 Scope of application

This Code of Conduct applies to all employees, executives and bodies of all companies in the Possehl Construction Group around the world. The groups of persons specified here are referred to below as “employees” (in the interest of making this document easier to read, masculine pronouns may be used as neutral terms for all genders).

2.2 Lawful conduct

It is absolutely essential that everyone who works in or for our company complies with the law. In the case of cross-border trading, this applies to both the laws of our own country and to the laws of the countries in which we conduct our business. The term “laws” refers to all legal rules that may be relevant to the business in question. Any breaches of the law must be strictly avoided. If any employee breaches the law, regardless of their position in the company, they should always expect to be exposed and face criminal charges and disciplinary measures, including the termination of their contract due to the violation of their obligations under employment law.

2.3 Values

This document establishes how our employees are required to conduct themselves in a variety of situations. This is based on the core values of the Possehl Construction Group: security, personal responsibility, future and respect.

The employees of the Possehl Construction Group associate these values with the following:

SECURITY

We strive for economic success to secure our company and jobs in the long term.

PERSONAL RESPONSIBILITY

We encourage and ask our employees to take responsibility for their actions and reward them for doing so.

FUTURE

We invest in the development of our employees, products and processes.

RESPECT

We treat our employees, customers, subcontractors and suppliers with respect because we want to be treated the same way.

These values will also offer guidance in situations that are not explicitly mentioned in this Code of Conduct.

2.4 Special responsibility of managers

Every manager is responsible for the employees entrusted to them. Our managers act as role models. The recognition of employees must be achieved through impeccable conduct, performance, integrity and social skills. Our managers set clear goals. They promote the development of our employees, who can approach them with any problems and concerns they may have. Our managers support employees in complying with this Code of Conduct.

2.5 Responsibility of each individual employee

The actions of each and every employee shape the reputation of the Possehl Construction Group and the way our companies are perceived by our business partners and the general public. Every employee must be aware of their responsibility and must act accordingly at all times, especially when performing their contractual duties.

2.6 Implementation and monitoring

We will inform all employees about the content of this Code of Conduct in writing and at related events. All employees will also be continuously trained in the practical application of this Code of Conduct.

An ombudsman's office, compliance officer and IT-based whistleblower system have been set up for the Possehl Construction Group. The ombudsman's office and the compliance officer are responsible for handling any compliance incidents in a confidential manner.

All employees are obliged to provide the ombudsman's office with factual information (verbally and/or in writing).

Every employee is entitled and obliged to report any breaches of this Code of Conduct and to seek advice in case of doubt. We explain how to deal with tips and reports in our whistleblower policies. The provisions, procedures and notes contained in those policies are essentially the same for all companies in the Possehl Construction Group and are therefore equally binding for all employees, executives and bodies of the Possehl Construction Group. There you will not only find information on how to report a breach via various communication channels, but also explanations as to which types of information you may disclose to certain individuals and under which circumstances, which communication channels we provide for reporting incidents, what feedback you will receive from us, how you will be protected as a whistleblower and how we will deal with your report.

 If you have any doubts about certain transactions, you should always contact the (external) ombudsman's office or the compliance officer, especially if the answer to any of the following questions is "no":

Is the transaction legal?

Does the transaction comply with this Code of Conduct?

Am I comfortable with the transaction?

3. Protection of employees, information and property

3.1 Equality and fair treatment

Equal opportunities and equal treatment are essential aspects of fair, unprejudiced and open interactions. This is the only way to maximise our productivity, competitiveness, innovation, creativity and efficiency.

We respect the rights and dignity of each individual employee. We appreciate all employees in equal measure – regardless of their nationality, culture, religion, ethnicity, gender, disability, sexual identity or age. Every employee has the right to be protected against discrimination, abuse and harassment, as well as the right to be treated equally and with respect.

 Make sure that your behaviour does not intimidate, offend or belittle others.

Avoid any behaviour that could be mistaken for sexual harassment.

Respect religious beliefs.

Don't misuse personal information.

Don't spread rumours.

3.2 Protection of personal data

Personal data may only be collected, processed or used to the extent necessary for specified, clear and legitimate purposes. Any such data may only be stored for as long as legally permissible and necessary to perform the tasks in question. All personal data must be kept in the necessary high quality and protected against unauthorised access. The use of data must always be transparent for data subjects, who must be granted the right to information, the right to request the rectification of any incorrect personal data and, where appropriate, the right to object to data processing and the right to have their data blocked or erased.

Access to personal data is restricted to employees who have the appropriate authorisation and who need to access that information exclusively for business purposes. Anyone who has access to such data is obliged to maintain strict confidentiality.

 Only pass on personal data to third parties if you are authorised to do so in each case.

3.3 IT security

Information technology (IT) has become an integral part of the Possehl Construction Group's daily business, but it also poses a large number of risks. The threat of cybercrime is increasing at an alarming rate.

All employees must strictly observe the relevant safeguards (e.g. password rules) at all times.

 Familiarise yourself with the applicable IT security regulations and comply with the relevant specifications.

Never open any emails or attachments that you find suspicious (e.g. because you have received them from an unknown sender).

3.4 Occupational health and safety

The Possehl Construction Group takes its responsibility for the health and safety of employees very seriously. We ensure occupational health and safety on our building sites, in our factories and in our offices in line with the applicable regulations.

We maintain and promote the health, performance and job satisfaction of our employees by constantly improving our working conditions and taking a variety of measures intended to prevent risks and promote health. The regulations on maximum working hours must be strictly observed at all times. Our employees are prohibited from consuming alcohol and other drugs at work.

 Adhere to the occupational health and safety regulations.

Never compromise the health and safety of your colleagues or business partners.

Take all reasonable and legally required measures within your authority to ensure that your workplace is always safe.

3.5 Confidentiality

Information is a highly valuable asset. The open, targeted and effective transfer of information is crucial for our company's success. However, it is just as important that confidential information is only passed on to employees and business partners who are authorised to receive it as part of their job description.

In the interest of the company, every employee must prevent unauthorised third-party access to confidential company information that is only intended for a limited number of

persons. A large number of facts may be classified as confidential information, including quotations, new products and processes, contracts, business relationships, the status of negotiations, legal disputes and financial indicators.

 **Treat all of your company's information with care and do not pass it on to unauthorised persons.**

3.6 Quality of construction services and products

The success of the Possehl Construction Group is founded upon our desire to ensure the highest quality and strive for continuous improvement. Our customers expect us to work carefully and conscientiously.

Any unavoidable deviations from defined construction methods or product specifications must be explicitly approved by the customer and may only be made after a thorough examination has been carried out by the responsible employees on the basis of applicable law.

 **Keep in mind that it is often much more expensive to get rid of a faulty construction. This also damages our reputation with the customer.**

3.7 Company property

The tangible and intangible assets of the Possehl Construction Group are used to support our employees in achieving the company's business goals. They may only be used according to the company regulations.

Every employee is obliged to protect the property of the companies in the Possehl Construction Group from loss, theft and misuse. Any items or equipment belonging to the companies in the Possehl Construction Group may only be used for private purposes or removed from the premises with the express authorisation of the relevant supervisor or in accordance with the relevant company regulations.

 **Handle company property (e.g. the vehicles and construction equipment provided for your work) with due care.**

4. Cooperation with business partners

4.1 Conflicts of interest

When an employee's private interests (potentially) clash with the interests of the Possehl Construction Group, this is referred to as a "conflict of interest". An employee may be

affected by a conflict of interest, in particular, if they undertake any form of secondary employment or if their friends and relatives have certain business interests. If an employee puts their own interests before those of the company, this can harm the company.

Therefore, employees must avoid any clashes between their private and commercial interests – or even the mere appearance thereof. All decisions must be based on objective criteria and must not be influenced by personal interests or relationships.

 **Avoid even the mere appearance of a conflict of interest and disclose any apparent or actual conflicts of interest to your supervisor, the compliance officer or the external ombudsman's office.**

4.2 Gifts and invitations

When it comes to maintaining business relationships, it is common practice to exchange gifts, provide hospitality and send invitations. In this context, it can often be difficult to assess whether such gifts and invitations are appropriate.

As a general rule, a gift or invitation should not be offered or accepted if it could influence or interfere with an independent decision-making process – even if the influence or interference is only apparent. The only exceptions are gifts given to someone on a specific occasion, promotional gifts and invitations related to a specific business purpose. Under no circumstances are employees allowed to give or accept cash or other monetary gifts.

 **If you have any doubts about a gift, don't accept it.**

4.3 Prohibition of corruption

Corruption (or bribery) involves giving or accepting anything of value to gain an advantage or exert some form of influence – or to give others such an advantage or influence – in a manner that conflicts with the principles of honesty and integrity. Corruption is a serious problem in commercial transactions. It sways decision-making, hinders progress and innovation, drives unfair competition and harms society. Corruption is prohibited. It can result in fines for companies and criminal sanctions for the employees concerned.

Employees must never offer or accept any form of bribe, either directly or indirectly.

 **If you suspect any corrupt behaviour, contact the external ombudsman's office or the compliance officer immediately.**

Use the whistleblower system.

4.4 Dealing with authorities

When dealing with public officials, elected officials, governments, authorities and other public institutions, regardless of whether they are our customers or state supervisory authorities, we often have to observe special legal conditions. This applies in particular to gifts, hospitality and invitations. Even individual violations can have serious consequences, leading to companies in the Possehl Construction Group from being permanently excluded from public tenders.

When engaging in such transactions, employees must take care not to expose either themselves or the companies in the Possehl Construction Group to unnecessary risks. Any information provided to a public authority must be truthful and accurate while effectively protecting the company's interests.

 **Refrain from offering public officials anything more than a cup of coffee or a glass of water.**

4.5 Fair and free competition

Fair and free competition is safeguarded by the applicable competition and antitrust laws, which ensure that there is no unfair competition on the market – for the benefit of all market participants. In particular, competitors are prohibited from entering into agreements or coordinating their business in such a way that free competition is prevented or restricted. It is also inadmissible for companies to abuse a dominant market position. Anti-competitive practices can not only significantly tarnish the Possehl Construction Group's good reputation, but also result in severe fines, penalties and claims for damages.

We only ever use permissible means to compete with other companies and monitor the market situation. Any practices that are illegal or carry a liability risk are prohibited.

 **Whenever you contact our competitors, make sure that no information is received or provided that reveals the current or future business plans of the person providing the information.**

Whenever you talk to our competitors or interact with them in other ways, avoid any topics that are important for our competition. These include prices, pricing, business plans, stages of development and delivery times.

5. Responsibility as a member of society

5.1 Social responsibility

If we want to deal with one another responsibly, we have to respect human rights and appreciate our fellow human beings. Every employee is responsible for ensuring that fundamental social standards are observed and that human rights are not violated. This is essential for all human interactions and therefore applies not only to dealings within the company, but also to dealings with our business partners.

5.2 Community involvement

Possehl Construction generally allows its employees to take on public roles at local or national level. However, those employees must ensure that their public appearances do not damage the company's reputation. When expressing their personal opinions, they must refrain from making reference to their role or position within the company.

5.3 -Communication with the media

Whenever the media is provided with information about companies in the Possehl Construction Group (e.g. financial data, information about accidents and crises, acquisitions, company sales or management changes), approval is required from the Corporate Communications department of L. Possehl & Co. mbH. The same applies when individual employees express any opinions related to the company in public.

5.4 Proper accounting and export controls

Our accounting must accurately reflect the financial situation of the companies in the Possehl Construction Group. We take the greatest care in documenting our business transactions. All entries in books and records must be timely, complete, precise and correct. Every employee is responsible for ensuring that all tax and customs obligations are met, that the identity of all customers, business partners and other third parties with whom we wish to do business is verified, that all cash flows are reported transparently and openly, and that all regulations for the import and export of goods, services and information are observed. The procedures provided for such purposes, such as signature rules, filing systems and documentation processes, must be used as intended.

5.5 Donations and sponsorship

The sole owner of the Possehl Construction Group is the non-profit Possehl Foundation, which is solely responsible for granting donations. If a sponsorship role makes sense for any of the group companies in exceptional cases, approval must be obtained from the management of Possehl Construction GmbH.

5.6 Environmental responsibility

In the Possehl Construction Group, our actions are based on environmental responsibility. One of our main responsibilities is to deal carefully with environmental challenges and to conserve our limited natural resources. Our aim is to continuously minimise our energy and raw material demands and to reduce any negative impact on the environment. The companies in our group undertake to comply with the applicable environmental regulations and company standards. The companies in the Possehl Construction Group actively contribute to environmental protection by promoting the development and widespread use of green technologies.

5.7 Political lobbying

The companies in the Possehl Construction Group are involved in various trade associations. Any political lobbying is carried out exclusively through those trade associations. If any employees wish to take on functions within trade associations, they must obtain approval from the management of Possehl Construction GmbH.