

Code of Conduct

for HOCHTIEF subcontractors and suppliers

This Code of Conduct defines the requirements which HOCHTIEF makes of its subcontractors and suppliers regarding their responsibility towards people and the environment. HOCHTIEF insists that its subcontractors and suppliers observe these requirements. Furthermore, HOCHTIEF expects its subcontractors and suppliers to achieve and encourage adherence to these demands by their own subcontractors and suppliers.

HOCHTIEF makes the following requirements of its subcontractors and suppliers:

- **adherence to standards and stipulations**
 - the legal stipulations of the relevant legal system must be observed;
 - international standards on ethical conduct especially as specified by the European Convention on Human Rights¹ and the Declaration of the International Labor Organization on Fundamental Principles and Rights at Work² shall be observed;
 - active and effective action shall be taken against all forms of bribery and corruption, e.g. in keeping with the ICC Rules of Conduct and Recommendations for Combating Extortion and Bribery³ or the “Business Principles for Countering Bribery” published by Transparency International.
- **respect for the basic rights of employees**
 - to promote equality of opportunity for their employees regardless of color, race, nationality, social origin, any handicap, sexual orientation or political or religious convictions, gender or age;
 - to respect the personal dignity, the privacy and the rights of every individual;
 - not to employ anyone against his or her will or force anyone to work;
 - not to tolerate unacceptable treatment of employees, such as physical punishment, sexual or personal harassment or discrimination;
 - to ensure fair payment, to pay the same rate for the same work and to observe any national legal stipulation on minimum wages;
 - to observe the maximum working hours laid down in any country or, in cases where no such stipulation exists, to adhere to an average working week of 60 hours;

1. European Convention for the Protection of Human Rights and Fundamental Freedoms of 11.04.1950 in its revised version dated 11.1.1998, Federal Gazette 2002, Part II, p. 1054, <http://frei.bundesgesetzblatt.de>

2. http://www.ilo.org/public/german/region/eurpro/bonn/ilo_kernarbeitsnormen.htm

3. <http://www.icc-deutschland.de> and/or <http://www.iccwbo.com>

4. <http://www.transparency.org>

- to recognize, as far as legally permissible, the freedom of association of employees and neither to favor nor discriminate against members of employee organizations or labor unions.
- **ban on child labor**
 - the rights of children must be recognized and observed;
 - Conventions 138 and 182 of the International Labor Organization (ILO) forbidding child labor must be adhered to.
- **safety of employees**
 - to take all possible precautions to avoid accidents;
 - to train employees in health and safety and, in particular, in the handling of hazardous substances.
- **environmental protection**
 - to observe environmental protection within the framework of applicable legal standards;
 - to minimize adverse impact on the environment and to constantly improve environmental protection;
 - to put in place and/or apply an environmental management system in line with ISO 14001.

HOCHTIEF reserves the right to audit adherence to this Code of Conduct by its subcontractors and suppliers at any time and without prior notification or to have adherence audited by independent third parties whereby such inspections of the premises of subcontractors and suppliers as are necessary shall be in agreement with them and undertaken in accordance with prevailing legislation.

If any violation of applicable laws or of this Code of Conduct is established, HOCHTIEF must be informed immediately. In the event of any violation of applicable laws or this Code of Conduct by subcontractors or suppliers, HOCHTIEF reserves the right to terminate the business relationship.

If you have any questions regarding the Code of Conduct, please get in touch with a HOCHTIEF contact partner at +49 201 824-2714.

Information as to possible offences, non-compliance with legal or company requirements or other problems within the company can be passed on via the internal or external HOCHTIEF whistle-blowing hotline. This can be done on an anonymous/confidential basis if desired. When using the internal hotline, callers are put through to a HOCHTIEF compliance officer. On the external hotline, callers can speak with an independent lawyer specializing in criminal law.

Internal hotline

Telephone +49 201 824-2222

External hotline

Telephone 0800 8862525 (calls from Germany, free of charge)

Telephone +49 30 88625254 (calls from outside of Germany)