

Group Directive

Occupational Safety, Health, Environmental and Climate Protection

02/2016

Issued by	OSHEP Center / Corporate Responsibility
Contact person	Head of OSHEP Center / Head of Corporate Responsibility
Purpose	This Directive establishes the requirements for Occupational Safety and Health Protection as well as Environmental and Climate Protection in the divisions.
Type of directive	Management Directive
Scope of application / Target group	HOCHTIEF Group worldwide with exception of CIMIC companies/ Relevant members of staff and management
Effective from	05/01/2016
Valid until / Update	Open/ 05/01/2021
Distribution list	HOCHTIEF Aktiengesellschaft - Executive Board Corporate Departments - Heads All operating and holding companies of the following divisions <ul style="list-style-type: none">- Division HOCHTIEF Europe- Division HOCHTIEF Americas- Division HOCHTIEF Asia Pacific with exception of CIMIC companies
Supervision	OSHEP Center/Corporate Responsibility
Archive	Indoor: Directives/Directives within the Group
Appendix	Occupational Safety, Health and Environmental Protection Policy, Climate Protection Policy

This Directive was approved by the Executive Board of HOCHTIEF Aktiengesellschaft on 02/15/2016.

History of Versions / Changes

Version	Date	Author	Changes
1.0	06/26/2012	Dr. Oliver Polanz / Dr. Ute Bardelmeier	Drafting of the Directive
1.1	02/15/2015	Mr. Dirk Grosche / Mr. Michael Kölzer	Adaptation to the current organizational structures and revision of the OSHEP and Climate Protection Policy
1.2	07/29/2019	Mr. Klaus Schmidt / Mr. Michael Kölzer	Editorial adaptations to the Directive (OSHEP&C Reports, OSHEP Policy, change of reporting intervals and change of update date)

1. Content and purpose

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The Directive establishes the responsibilities and requirements for Occupational Safety and Health Protection as well as for Environmental and Climate Protection (OSHEP&C) for HOCHTIEF Aktiengesellschaft.

The objective is the lasting guarantee of health protection for HOCHTIEF employees and third-party personnel and the preservation of the natural environment as well as the efficient use of resources and the protection of the climate. In addition, damage to the company's reputation and property, which may result from these issues, is also to be avoided.

For this purpose, HOCHTIEF Aktiengesellschaft operates an active OSHEP&C Policy. Its contents are laid down in Annexes 2 and 3.

2. Tasks, competencies, responsibilities

The overall responsibility for occupational safety, health, and environmental protection as well as for Climate Protection (OSHEP&C) lies with the Executive Board of HOCHTIEF Aktiengesellschaft.

The divisions are responsible for the legally compliant implementation of OSHEP&C in the divisions (in accordance with regionally applicable laws). The Executive Board members/the Managing Directors of the divisions or the subsidiaries (hereinafter only referred to as Divisions) are responsible for compliance with the Directive.

The OSHEP Center is the central department for occupational safety, health and environmental protection within HOCHTIEF Solutions AG. Furthermore to HOCHTIEF Solutions AG, the OSHEP Center also advises and supports the Executive Board of HOCHTIEF Aktiengesellschaft in all OSHEP matters as OSHEP service provider. Beyond that, the OSHEP Center regularly gathers information in the divisions regarding OSHEP structures and procedures, in order to report to the Executive Board.

The Corporate Responsibility (CR) management function advises and reports in the area of Climate Protection. Together with the CR Committee of HOCHTIEF Aktiengesellschaft and the CR bodies of the HOCHTIEF divisions, objectives and measures are developed, which handle the topic of Climate Protection for the benefit of HOCHTIEF and the environment.

The Group Directive CR defines the CR organization with the competent bodies, as well as the responsibilities regarding CR in the divisions. The operational implementation and responsibility are assumed by the CR Managers of the HOCHTIEF divisions. There is a fundamental duty to provide information to Corporate Communications.

3. Occupational Safety, Health, Environmental and Climate Protection requirements

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3.1 OSHEP&C requirements in general

German law requires from the Executive Board "to take suitable measures to install, in particular, a monitoring system so that developments endangering the company's continued existence are recognized at an early stage."

Additional requirements arise from legal obligations, from memberships such as UN Global Compact, and ILO, as well as from criteria for the Dow Jones Sustainability Index (DJSI), Climate Disclosure Project (CDP) and Sustainability Reporting (GRI).

3.2 OSHEP&C corporate objectives

In the CR program of the Group Report of HOCHTIEF Aktiengesellschaft, OSHEP&C goals are specified by the Executive Board.

The divisions then define derived OSHEP&C objectives to achieve the overall objectives and take concrete measures for their implementation.

They develop appropriate procedures in order to regularly evaluate the achievement of objectives and to adapt objectives and measures in the sense of a continuous improvement process (CIP).

The divisions report information and data on set OSHEP&C objectives and on the degrees of target achievement to the OSHEP Center and to CR by the reporting date of December 31.

3.3 Organization of OSHEP&C in the divisions

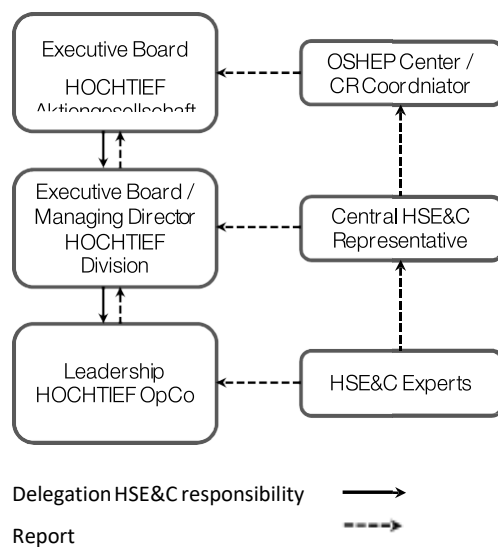
The divisions ensure an organization of Occupational Safety and Health Protection as well as Environmental and Climate Protection that satisfies the local legal requirements.

In addition,

- The divisions define the overall responsibility for Occupational Safety and Health Protection as well as for Environmental and Climate Protection in their scope of responsibility
- They appoint a central representative for Occupational Safety and Health Protection as well as for Environmental and Climate Protection (this can be the same person). This person is to be designated to the OSHEP Center/CR and as central contact reports consolidated and validated information of the division according to the requirements under item 4 of this Directive

- They deploy experts, who are required to ensure Occupational Safety and Health Protection organization as well as Environmental and Climate Protection organization

Where the divisions have no management company (i. e. Americas), the subsidiaries are directly responsible for the obligations.



3.4 OSHEP&C management system and internal regulations

Occupational Safety and Health Protection as well as Environmental and Climate Protection are to be integrated into the work routines of the divisions. To this end, the divisions maintain management systems, which are based on international standards (ISO 14001, ISO 50001, and ISO 45001/ BS OHSAS 18001).

In particular, the management systems govern:

- Tasks and responsibilities of the line hierarchy as well as the staff functions with regard to Occupational Safety and Health Protection as well as Environmental and Climate Protection
- Compliance with all relevant legal, regulatory, and normative requirements
- Compliance with internal HOCHTIEF requirements (i. e. Code of Conduct and this Group Directive)
- Assurance of compliance with the management system through appropriate measures such as inspections or audits, and
- The determination and monitoring of the required corrective measures

The divisions inform OSHEP Center/CR each year by the reporting date of December 31 on internal regulations and certificates in their area, as well as of the number of employees working under a certified management system.

3.5 Risk evaluation and preventive measures

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Each manager with HR responsibility identifies and evaluates the Occupational Safety and Health Protection hazards as well as the Environmental and Climate Protection risks that are associated with his/her activities, products and services, and regional conditions. The dangers and risks are documented, measures are taken to prevent and mitigate them, and their effectiveness is reviewed.

3.6 Information and qualification

The divisions ensure that employees/contractual partners are notified of/instructed about the risks determined in the risk evaluation and the measures for their avoidance.

In addition, the divisions ensure that the employees and contractual partners are qualified in accordance with their activities and the legal, regulatory, and normative requirements as well as internal HOCHTIEF requirements and receive the required training.

3.7 Incidents/Events causing damage

The divisions ensure through appropriate measures that accidents and incidents with potential effects (near misses) on the health of employees/third parties or on the environment/climate are compiled and evaluated.

In doing so, the following objectives are pursued:

- Determination of the causes as well as development and implementation of measures for avoiding the events in the future
- Mitigation of accidents
- Prevention of financial damage
- Prevention of damage to reputation

Using their internal reporting system, the divisions ensure that the respective Managing Directors are promptly informed about all events causing damage as well as significant events with

- Transregional public relevance and/or
- Irreversible damage and/or
- An expected damage sum of over five million euros
- Expected criminal relevance

are immediately reported to the OSHEP Center. The Group Directive on the Crisis Information system and their regulations remain unaffected. Additional information, which is to be reported regularly by the divisions to the OSHEP Center/ CR is specified under item 4 of this Directive.

3.8 Emergency preparedness and response

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Emergencies result from things such as fire, explosion, radiation, environmental damage, and external threats, for example. The divisions ensure that suitable precautionary measures have been taken in case of emergency in order to limit the extent of the emergency. Therefore emergency plans are to be drafted in the divisions indicating the necessary personnel resources (safety experts, fire protection assistants, first-aid workers, physicians and environmental experts) and material mechanisms necessary for managing an emergency. The emergency action plans are to be made known and practiced at regular intervals in the respective divisions. The Group Directive on the Crisis Information System also applies.

4. Reporting

HOCHTIEF informs the public on OSHEP&C topics mainly in the HOCHTIEF Group Report.

The publications are based on the legal requirements to be met by the HOCHTIEF Group's reporting, and on the reporting standards chosen by the Group.

The non-exhaustive list of Annex 1 specifies the key Occupational Safety, Health, Environmental and Climate Protection data to be reported. The information is to be reported by the central OSHEP&C Representatives for the divisions in consolidated form.

5. Supervision

The Executive Board of HOCHTIEF Aktiengesellschaft checks the implementation of and compliance with this Directive in the divisions. It entrusts the OSHEP Center/CR with the gathering of relevant information and grants the appropriate powers in order to approve the implementation. The OSHEP Center/CR reports in regular intervals, at a minimum, however, once a year, on the status of the implementation to the Executive Board.

The divisions and all senior managers with responsibility for Occupational Safety and Health Protection as well as Environmental and Climate Protection regularly check the effective implementation of

- Regional legal requirements
- This Directive as well as
- Own OSHEP&C regulations

in their area of responsibility.

They are supported by the OSHEP&C Representative and additional OSHEP&C experts of the division. These report in professional terms also to the OSHEP Center/CR.

OSHEP&C Reports

Report	By	To	Interval
<p>The following data are to be collected separately broken down by own employees and employees of subcontractors, where HOCHTIEF is legally responsible for these. The data are to be reported via the SoFi database.</p>			
<p>Number of industrial accidents, which led to a loss of working hours of more than one shift (excluding the accident day)</p>	<p>OSHEP&C Representatives of Divisions</p>	<p>OSHEP Center</p>	<p>quarterly</p>
<p>Number of fatal accidents Note: In addition to the direct notification to the crisis hotline.</p>	<p>OSHEP&C Representatives of Divisions</p>	<p>OSHEP Center</p>	<p>quarterly</p>
<p>Number of hours worked (excluding vacation and illness hours or other non-productive hours)</p>	<p>OSHEP&C Representatives of Divisions</p>	<p>OSHEP Center</p>	<p>quarterly</p>
<p>Number of loss hours caused by occupational accidents</p>	<p>OSHEP&C Representatives of Divisions</p>	<p>OSHEP Center</p>	<p>quarterly</p>
<p>Information on causes of accident</p>	<p>OSHEP&C Representatives of Divisions</p>	<p>OSHEP Center</p>	<p>quarterly</p>
<p>Information on injured body parts</p>	<p>OSHEP&C Representatives of Divisions</p>	<p>OSHEP Center</p>	<p>quarterly</p>
<p>Number of occupational illnesses</p>	<p>OSHEP&C Representatives of Divisions</p>	<p>OSHEP Center</p>	<p>annually, Reporting date 12/31</p>
<p>The following information is to be collected exclusively for the own organization and to be reported via the SoFi database:</p>			

Annex 1

Report	By	To	Interval
Pending legal proceedings, convictions or penalties in connection with offenses against OSHEP regulations	OSHEP&C Representatives of Divisions	OSHEP Center	annually, reporting date 12/31
Number of environmental damage events (category 1 - 2) Note: In addition to direct notification to the crisis hotline.	OSHEP&C Representatives of Divisions	OSHEP Center	annually, reporting date 12/31
Organizational structure of Occupational Safety and Health, Environmental and Climate Protection	OSHEP&C Representatives of Divisions	OSHEP Center	annually, reporting date 12/31
Process organization of Occupational Safety and Health, Environmental and Climate Protection	OSHEP&C Representatives of Divisions	OSHEP Center	annually, reporting date 12/31
Energy consumption	OSHEP&C Representatives of Divisions	CR	annually, reporting date 12/31
Water consumption by source used	OSHEP&C Representatives of Divisions	CR	annually, reporting date 12/31
Material use	OSHEP&C Representatives of Divisions	CR	annually, reporting date 12/31
Business travel (flights, rental cars and train trips)	OSHEP&C Representatives of Divisions	CR	annually, reporting date 12/31
Quantity of greenhouse gas emissions (Scope 1, Scope 2 and Scope 3)	OSHEP&C Representatives of Divisions	CR	annually, reporting date 12/31
Quantities of waste by type and disposal method	OSHEP&C Representatives of Divisions	CR	annually, reporting date 12/31

Occupational Safety, Health and Environmental Policy (OSHEP)

The topic of Occupational Safety, Health and Environmental Protection has a high priority throughout the entire HOCHTIEF Group. Therefore, HOCHTIEF promotes efforts to protect employees, partner companies, and subcontractors, to ensure their quality of life, and not to endanger the environment.

In order to actively support this statement, HOCHTIEF will

- Comply with applicable laws, regulations and standards as well as corporate OSHEP requirements, principles and procedures
- Introduce and implement an OSHEP management system allowing for a structured and systematic approach to implement OSHEP and continuous improvement
- Provide personnel and financial resources in order to ensure the effectiveness and sustainability of OSHEP management
- Promote a safety culture by training, instructions, information and supervision, encouraging everyone to proactively implement OSHEP
- Determine, evaluate, and avoid or minimize risks in connection with the corporate activities
- Offer training in order to ensure that employees are qualified and safely perform their work
- Review and report on events, in order to determine causes and to introduce proactive and corrective measures
- Draft, maintain and rehearse an emergency and crisis management plan
- Select partners and subcontractors also with a view to OSHEP aspects
- Determine and monitor key OSHEP indicators
- Review this policy regularly, in order to ensure its suitability

HOCHTIEF requests from all employees and from everyone working on behalf of the company to actively promote this OSHEP Policy.

Climate Protection Policy

HOCHTIEF is aware that the construction industry has effects on the natural environment—on soil, water, air, climate and biological variety. In order to ensure quality of life of today's and future generations in the best possible way and to protect the climate at the same time, HOCHTIEF will

- Comply with all legal, official and corporate requirements concerning climate protection
- Propose or provide solutions for climate protection requirements during project processes
- Increase the energy efficiency of our products and services
- Determine energy savings potentials in building processes
- Increasingly use renewable energies
- Raise consciousness for matters of climate protection
- Compile solutions together with the contractual partners, in order to reduce climate-damaging emissions
- Specify and determine key indicators on climate protection
- Integrate climate protection in prequalification processes for partners and subcontractors

All HOCHTIEF employees and everyone working on behalf of the company actively contribute to implement and to promote this climate Protection Policy.