

Code of Conduct
for Business Partners
of Swietelsky AG
and Its Affiliated
Undertakings
04/25

The Swietelsky logo is a white diamond shape with a horizontal bar across the middle. The word "SWIETELSKY" is written in bold, dark blue, uppercase letters across the bar.

SWIETELSKY

EN

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**We work for people.
We shape the future.
We are part of the solution.
Building ever better.**

IMPRINT

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Foreword

Swietelsky AG and its affiliated undertakings (“SWIETELSKY”) are a leading construction group in Central and Eastern Europe, whose development since its founding has been strongly shaped by the principle of sustainability. This Business Partner Code of Conduct sets out, across the Group and in writing, the principles of social and environmental responsibility that have long been central to SWIETELSKY’s operations and its approach to cooperation throughout the value chain.

The construction sector is, by its nature, an energy- and resource-intensive industry. All the more reason for SWIETELSKY to make every effort to reduce the negative impacts of its business activities on society and the environment, while actively promoting the positive impacts.

SWIETELSKY is committed to the principles of the UN Global Compact and to contributing to the achievement of the Sustainable Development Goals (SDGs). SWIETELSKY observes national laws and international conventions, in particular the United Nations Universal Declaration of Human Rights, the European Convention for the Protection of Human Rights and Fundamental Freedoms and the standards of the International Labour Organization (ILO).

SWIETELSKY expects this same commitment from its business partners and expects them, in turn, to require the same of their own partners.

This Business Partner Code of Conduct have been translated from German into English. In the event of contradictions, the German version will take precedence.

Scope of Application

Collaboration with suppliers, subcontractors, and service providers (“business partners”) is based on this Business Partner Code of Conduct. The requirements set out herein are binding for all business partners. No rights are granted to third parties under this code. SWIETELSKY reserves the right to conduct spot checks.

This Business Partner Code of Conduct applies to all existing business relationships as well as future partnerships. It complements the principles set out in SWIETELSKY’s Compliance Management Code of Conduct, which remains in force. Where an affiliated undertaking is required by national law to adopt additional rules of conduct for business partners, such rules take precedence over this Business Partner Code of Conduct. In the event of contradictions, the stricter requirement shall apply.

SWIETELSKY expects its business partners to make all reasonable efforts to ensure compliance with this code throughout their entire supply chain. Business partners are expected to pass on these standards throughout the value chain or to define and implement equivalent standards.

This Business Partner Code of Conduct may be amended in response to changes in legislation or risk exposure. Business partners will be promptly informed of the latest version.

Principles

I Compliance

Adherence to Legal Requirements

Business partners of SWIETELSKY must comply with all applicable national and international legal requirements.

Taxes and Financial Responsibility

Business partners must recognise that a functioning tax system is a fundamental prerequisite for fulfilling the economic and social responsibilities of the state. As such, they must contribute to the functioning of the tax system and comply with the tax and fiscal regulations of their respective countries.

Business partners shall take financial responsibility and maintain their business records in accordance with applicable law and generally accepted accounting principles.

Anti-Corruption, Anti-Money Laundering, and Conflicts of Interest

Corruption and bribery are not tolerated. Business partners must ensure that no payments or benefits of any kind are offered, provided, or accepted with the intention of influencing decisions. This includes, in particular, any payments to public officials or other business partners, as well as the offering or acceptance of gifts. Conflicts of interest of any kind must be avoided and immediately disclosed to SWIETELSKY.

Donations and sponsorship activities may only be carried out in compliance with applicable legislation. These activities must not be used to circumvent anti-corruption or anti-bribery regulations.

Compliance with laws, the prohibition of money laundering, and the prohibition of financing illegal activities are binding obligations for all business partners. They must ensure that they only engage with other business partners for whom these principles are equally self-evident.

Fair Competition and Antitrust Law

For SWIETELSKY, treating clients, subcontractors, suppliers, service providers, and competitors with honesty and respect is second nature. SWIETELSKY expects its business partners to uphold the same standard in all business

interactions. In every transaction and decision, they must observe the applicable laws, standards, and customs of the countries in which they operate.

An essential component of this is the safeguarding of fair competition. Strictly prohibited are price-fixing arrangements, the allocation of markets or regions, the division of customer groups or business areas, and the coordination of bidding or product strategies. Business partners must refrain from deceptive practices such as misleading customers regarding product quality, sustainability, or availability, making disparaging remarks about competitors, or engaging in similar conduct.

Protection of Assets and Intellectual Property and Prevention of Plagiarism

Business partners must protect SWIETELSKY's assets. They must handle all operating resources entrusted to them with care and in accordance with their intended purpose. Use is permitted only for agreed business purposes. Business partners must protect assets against theft, waste, and excessive wear and tear.

Intellectual property, such as inventions, designs, trademarks, names, and images, must be respected by business partners, and applicable intellectual property rights must be observed. Business partners are expected to implement effective procedures for detecting plagiarism and counterfeit materials.

Confidentiality of Business Documents and Information

Business partners must safeguard trade and business secrets. All such information and documentation received by business partners must be treated as confidential, stored securely, and protected from inspection or access by third parties. Data must only be processed in accordance with legal and contractual provisions and solely for the purpose of fulfilling contractual obligations.

Data Protection and Data Security

Business partners must protect company-related and personal data against unauthorised access, misuse, loss, and premature destruction. To this end, they must implement all technically and organisationally appropriate measures at their disposal.

Economic Sanctions and Export Controls

Economic sanctions and export control regulations may restrict or prohibit business activities with certain countries, regions, entities, organisations or individuals. Violations can result in severe penalties. The same applies to the import or export of certain goods, services, or technologies.

SWIETELSKY expects its business partners to fully comply with all applicable export control regulations and economic sanctions, and to have appropriate organisational structures and internal policies in place to ensure compliance.

II Respect for Human Rights and Social Responsibility

Human Rights

In line with the European Convention for the Protection of Human Rights and Fundamental Freedoms, SWIETELSKY requires its business partners to respect the dignity, privacy, and individuality of all people.

Prohibition of Child Labour, Forced Labour, and Modern Slavery

SWIETELSKY does not tolerate child labour or any other form of exploitation of children or young workers. Business partners must ensure that such practices are likewise prohibited within their own operations and supply chains. They are expected to comply with the standards of the International Labour Organization (ILO) concerning underage workers.

All forms of human trafficking, modern slavery, forced labour, and compulsory labour are strictly prohibited.

Occupational Health and Safety

Occupational safety and the prevention of hazards to employees must be a top priority for business partners. All applicable occupational health and safety regulations must be strictly observed.

Working conditions that safeguard the physical integrity and health of employees must be a matter of course for business partners. This includes ongoing monitoring of how hazardous situations are handled and the continual improvement of workplace safety protocols. Regular training of employees is essential to strengthen the preventive impact of occupational safety measures.

Working Hours

High labour and social standards must be not only a legal obligation but also a genuine concern for business partners. Applicable regulations on maximum working hours, rest and break periods, and the performance and remuneration of overtime must be observed. National legal entitlements to paid leave must also be respected.

Fair Remuneration

Business partners' human resources policies must be based on fair working conditions and the principle of "equal pay for equal work", supported by freedom of association and the right of employees to collective bargaining. Business partners must ensure performance-related remuneration, in particular by paying adequate wages and social benefits that secure a living income appropriate to local living conditions for their employees. Recruitment processes must be conducted with integrity, transparency, and impartiality ("ethical recruitment").

Anti-Discrimination and Anti-Harassment

Business partners must not tolerate any form of discrimination or harassment based on, in particular, national or ethnic origin, gender, sexual orientation, religion, age, or disability.

Diversity

Inclusion, equality, and diversity are opportunities to bring together a wide range of perspectives to address the challenges of a rapidly changing world. SWIETELSKY considers the promotion of women in operational processes and leadership roles, the employment of older workers in line with their needs, and the training of young people to be urgent operational priorities. SWIETELSKY expects its business partners to take social responsibility in these areas as well.

Land Rights and Protection of Local Ecosystems

The livelihoods of all people must be protected. Business partners must not engage in activities - such as those involving harmful soil degradation, water and air pollution, harmful noise emissions, or excessive water consumption - that lead to the destruction of these livelihoods or the loss of biodiversity. Particular attention must be paid to the requirements of Regulation (EU) 2023/1115 ("EU Deforestation Regulation"). Unlawful evictions or the illegal seizure of land, forests, or water bodies are strictly prohibited. The rights of minorities and indigenous peoples must be respected.

Site Security

Where private or public security personnel are deployed, such as for the protection of construction projects, business partners must take appropriate organisational measures to ensure that human rights, as well as the labour and civil liberties of third parties, are respected and protected. Security staff must, for example, be appropriately trained, regularly monitored, and subject to contractual sanctions where necessary.

Responsible Procurement

Business partners must procure raw materials, goods, and products in compliance with applicable laws. Particular attention must be paid to the requirements of the German Supply Chain Due Diligence Act (LkSG) and to national legislation implementing Directive (EU) 2024/1760 ("EU Supply Chain Directive"). These regulations relate to the social and environmental requirements of responsible procurement.

Reporting on Social Aspects

SWIETELSKY continuously adapts its business practices to meet evolving due diligence requirements for a sustainable value chain.

Business partners must, upon request, provide SWIETELSKY with data relating to the social aspects of their products and services.

III Environmental Protection

Responsible Environmental Management

SWIETELSKY expects its business partners to conduct their operations in an ecologically sustainable and resource-efficient manner. Key aspects include the efficient use of natural resources, the promotion of a circular economy, waste prevention, and the reduction or avoidance of greenhouse gas emissions. The handling, transport, storage, reuse, or recycling of wastewater and solid waste must comply with all applicable laws and regulations.

Business partners must view it as a management responsibility to continuously raise awareness surrounding quality and environmental issues. Ideally, the environmental management system in place should be certified in accordance with recognised standards such as ISO 14001.

Throughout all project phases, business partners must ensure the use of environmentally sound methods and equipment. The transition from fossil fuels to renewable energy sources is encouraged as a contribution to climate protection.

Business partners must also ensure the careful use of water resources and the preservation of water quality. The same applies to the conservation of soil quality. Land and forests must be managed responsibly. Waste caused by excessive land use and deforestation must be avoided.

Hazardous substances of any kind must be stored, transported, and used in a manner that ensures human safety and protects natural habitats. They must also be recycled or disposed of in an environmentally friendly manner, in accordance with applicable national laws and international conventions.

Biodiversity

Business partners must pay particular attention to species protection and the promotion of biodiversity, so that species diversity and the habitat of plants and animals are protected and can be preserved.

Reporting on Greenhouse Gas Emissions

SWIETELSKY continuously adjusts its business practices in response to new requirements relating to climate protection and climate change adaptation.

As part of its commitment to a sustainable future, SWIETELSKY supports the goals of the Paris Climate Agreement and applies the Greenhouse Gas Protocol to its greenhouse gas accounting.

SWIETELSKY expects its business partners to regularly monitor and continuously reduce their greenhouse gas emissions.

Upon request, business partners must provide SWIETELSKY with environmental data, including emissions-related information relating to their products and services.

IV Compliance with the Business Partner Code of Conduct

Prevention and Reporting of Violations

Business partners of SWIETELSKY clearly and unconditionally commit to complying with all applicable laws and the principles set out in this Business Partner Code of Conduct. They strive to identify and investigate any potential violations within their own operations and throughout their supply chains as early as possible, and to implement appropriate corrective actions.

For reporting misconduct to SWIETELSKY, business partners have access to a whistleblowing procedure established in accordance with the requirements of Directive (EU) 2019/1937 ("EU Whistleblowing Directive").

Reports can be submitted via the accessible whistleblowing platform at <https://swietelsky.integrityline.com>, by email to: compliance@swietelsky.com, or by post to the following address:

Swietelsky AG
Compliance und Datenschutz
Edlbacherstrasse 10
A-4020 Linz

The anonymity of whistleblowers and the protection of personal data are fully guaranteed. Reports may also be submitted non-anonymously upon request.

SWIETELSKY does not tolerate any retaliation, coercion, or pressure against whistleblowers who report actual or suspected misconduct in good faith. SWIETELSKY expects the same commitment from its business partners.

Consequences of Violations

Business partners unconditionally commit to compliance with the requirements set out in this Business Partner Code of Conduct and implement the necessary organisational measures to ensure adherence. This includes cooperation, transparency, and the disclosure of information for supply chain evaluation processes.

Business partners are also expected to ensure compliance with this Business Partner Code of Conduct throughout their up- and downstream value chain.

Violations of this Business Partner Code of Conduct may result in the immediate termination of the business relationship.

**Swietelsky AG
and Its Affiliated Undertakings**



SWIETELSKY