

**HABAU
GROUP**



**COMPLIANCE ANTI-CORRUPTION
MANAGEMENT POLICY**

HABAUGROUP.COM

DECLARATION OF COMMITMENT BY THE MANAGEMENT TO THE COMPLIANCE AND ANTI-CORRUPTION MANAGEMENT POLICY

The HABAU GROUP conducts its business on the basis of the applicable legal framework conditions as well as the fundamental ethical principles of our society. We actively practise a culture of compliance, appreciation, respect and impeccable conduct in every regard, which serves as the foundation of all our actions. It is the responsibility of all those who represent this company - regardless of position and hierarchy - to preserve these principles.

Our behaviour in all interactions, with clients and with contractors must reflect integrity and must leave no room for doubt in terms of the legal and moral appearance. Alongside our promise to customers, suppliers and business partners, we also owe uncompromising compliance with the regulations to the company and ourselves, in order to avoid penalties, loss of reputation, a lack of recognition and mistrust.

With this responsibility in mind, the HABAU GROUP has decided to present its established rules in a management system for the fight against corruption pursuant to ISO 37001 and in a compliance management system pursuant to ISO 37301 i.e. to integrate these into the existing management systems. The management strives for the constant improvement and advancement of the system, with the executives as well as all employees.

We therefore formulate the following cornerstones for our ethical, moral and legal responsibility:

LEGAL CONFORMITY AND COMPLIANCE IN ALL AREAS

The knowledge and observance of all legislation and all internal company requirements regarding commercial business requires time, the desire for ongoing training and legally compliant behaviour on the part of those involved in the implementation of the goals. These requirements are supported, promoted and developed by the company by way of specific, explanatory training courses.

Reporting of compliance incidents involving illegal and immoral practices via the whistleblower platforms set up for this purpose on the respective websites and/or the respective independent Compliance Officer is desired.

The company management ensures that the competent Compliance Officer is able to carry out the permanent evaluation and observance of the compliance culture unhindered and free from all external pressure.

In the event that doubts are expressed, retaliatory measures or negative consequences need not be feared. The prerequisite is a substantiated presumption and/or a report in good faith. Failure to observe statutory provisions and the company's own regulations is not tolerated and compliance infringements are associated with criminal, civil and disciplinary consequences.

NO PLACE FOR CORRUPTION, BRIBERY OR UNFAIR COMPETITION

No employee within our areas of responsibility, regardless of whether they are operative or administrative, helps contact persons to receive undue advantages or benefits, so that business practices cannot be manipulated. Even the slightest impression of such actions may not be created and must be avoided altogether.

Any kind of influence causing such behaviour is absolutely forbidden and will be sanctioned with personal consequences in the form of formal warnings or criminal and civil consequences.

Any kind of gift, invitation, commission or remuneration that presents the slightest doubt with regard to the transparency, equivalence and legality of performance and consideration is forbidden and will be sanctioned accordingly. This applies equally to business relations that are based on close personal relationships.

We fulfil the requirements of the legal regulations against unfair competition and the (in addition to EU law, also region-specific) provisions on cartels. Any kind, whether in writing or verbal, of frowned-upon behaviour such as agreements or arrangements within the competition is strictly prohibited.

Anti-trust issues are usually very complex and are associated with heavy fines. This is why the corresponding awareness-raising and careful observance of the anti-trust rules is an essential obligation of both management and executives.

HUMAN DIGNITY

Even with our steady growth, we strive to preserve the core and the aura of a family business and consider it a maxim in internal and external cooperation to respect and consider the dignity and individuality of all people. We therefore reject any kind of discrimination or violation of privacy as well as offensive behaviour such as workplace harassment and the like, with zero tolerance.

Daily interactions must be characterised by acknowledgement, respect shown via appreciation and collegial esteem, regardless of levels or hierarchies.

PROTECTION & SAFETY

Trust requires safety, and safety requires protection. We handle all information from business transactions with care and the strictest confidentiality. We take the utmost safety precautions against any kind of misuse of documents and against all inappropriate use of company and personal data, and we use suitable means and tools to avoid these kinds of inconsistencies.

We categorically reject non-compliant and immoral behavior, any kind of dishonest, unfair, unfree competition as well as bribery and corruption.

For the continued development of this fundamental philosophy, the management systems for compliance and combating corruption have been implemented in agreement with all management boards, executives and employees.

The management itself is a role model and responsible part of these systems.

THE CONSTRUCTION FAMILY