



POSSEHL SPECIAL
CONSTRUCTION GROUP
CODE OF CONDUCT

Paving
Professionals



EDITORIAL

Dear Colleagues,

In front of you is the code of conduct of the Possehl Spezialbau Group. As a group of companies operating throughout Europe, we depend on the trust placed in us.

Our stakeholders such as employees, customers and clients, suppliers and subcontractors, shareholders and the public expect us to comply with applicable laws and guidelines, respect ethical principles and act sustainably at all times and everywhere.

For this reason, I strongly encourage you to familiarize yourself with the Code of Conduct. Misconduct can be detrimental to both the group and each individual, with significant consequences.

The Code of Conduct formulates our basic understanding of responsible, legally compliant behavior and thus forms the basis for a healthy corporate culture and long-term and sustainable corporate success.



Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Henschel'. The signature is fluid and cursive, written over a light grey background.

Jörg Henschel
Chairman of the Management Board

I. Preface

The trust of customers and other stakeholders in the companies of the Possehl Spezialbau Group and in their products and construction services is our greatest asset. It is therefore our common task to reassure this trust by behaving with integrity and sincerity on a daily basis. This includes that we all know the applicable internal rules and legal requirements – and comply with them.

When we realize that something is wrong, when we make mistakes or recognize mistakes, we need to address them and respond appropriately – even if it is uncomfortable. Looking away never was and is not the right way. When in doubt, we must seek competent advice and ask for support.

Regardless of their position in the company, each individual employee is responsible for the reputation and thus for the success of our group with their attitude and behavior.

Please familiarize yourself with this Code of Conduct.



II. Bases

A. Scope of validity

This Code of Conduct applies worldwide to all employees, senior staff and bodies of all companies belonging to the Possehl Spezialbau Group. The groups of people named here are hereinafter referred to as employees (for better legibility, "employees" is used as a neutral term for all genders).

B. Lawful Conduct

Compliance with laws and regulations is of paramount importance to anyone who works in or for our company. In the case of cross-border action, this applies both to the laws of our country and to the laws of the countries affected by this action. By laws are meant all legal rules that come into consideration for concrete action. Violations of the law must be strictly avoided. In the event of violations, every employee – regardless of their position in the company – must expect consistent detection, criminal consequences and, due to the violation of labor law obligations, corresponding consequences up to and including the termination of the employment relationship.

C. Values

This code of conduct regulates the behavior of employees in a variety of situations. This is based on the central values of the Possehl Spezialbau Group: safety, personal responsibility, future, and respect. The employees of the Possehl Spezialbau Group associate these values with the following:

SAFETY

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

PERSONAL RESPONSIBILITY

We promote, demand and reward personal responsible actions of our employees.

FUTURE

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

RESPECT

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

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

D. Special responsibility of managers

Every manager is responsible for the employees entrusted to them. Managers are role models. Employee recognition must be achieved through personal impeccable conduct, performance, integrity, and social skills. A manager sets clear goals. They promote the development of employees and are responsive to their problems and concerns. Managers support their employees in complying with this Code of Conduct.

E. Responsibility of each individual employee

The reputation of the Possehl Spezialbau Group and the perception of our companies in the public and among business partners are determined by the actions of each individual employee. Every employee must be aware of this responsibility at all times and must observe this – in particular in the context of the fulfilment of their contractual tasks.

F. Implementing and monitoring


All employees are informed in writing and through accompanying events about the content of this Code of Conduct and are continuously trained in its practical application.

An ombudsman office and the function of the compliance officer as well as an IT-based whistleblower system were set up for the Possehl Spezialbau Group.

The ombudsman and the compliance officer are responsible for the confidential processing of compliance-relevant incidents.

All employees are obliged to provide the Ombudsman with factual information (verbally and/or in writing).

Every employee has the right and the obligation to report any violations of this Code of Conduct that become known to them and to seek advice in case of doubt. We describe how to handle notices and reports in the whistleblower policy that applies to you individually. The provisions, procedures, and comments there are essentially the same for all companies of the Possehl Spezialbau Group and are therefore equally binding for all employees, executives, and bodies of the Possehl Spezialbau Group. You will not only find information on how and through which communication channels you report a violation, but also explanations on which information you may disclose to whom and under which conditions, which communication channels we provide you with for reports, which feedback you receive from us, how you are protected as a whistleblower and how we handle your report.



If you have any doubts about certain processes, you should always contact the (external) ombudsman or the compliance officer, especially if you have to answer one or more of the following questions in the negative:

Is the process legal?

Is it in line with this Code of Conduct?

Am I free of any concerns about this process?

III. Protection of employees, information, and real assets

A. Equality and fair treatment

Equal opportunities and equal treatment are important cornerstones for fair, unbiased, and open treatment. This is the only way to achieve the highest level of productivity, competitiveness and innovation, creativity, and efficiency.

We respect the rights and dignity of each and every one of our employees. Our appreciation is the same for all employees – regardless of nationality, culture, religion, ethnic origin, gender, disability, gender identity or age. Every employee is entitled to protection against discrimination, insult, and harassment as well as to respectful and equal treatment.

Check your conduct to make sure you are not intimidating, insulting, or belittling others.

Refrain from any conduct that could be misinterpreted as sexual harassment.

Respect religious beliefs. Do not misuse personal information. Do not spread rumours.



B. Personal data protection

Personal data may only be collected, processed, or used insofar as this is necessary for pre-determined, clear, and legitimate purposes. The storage of such data is only permitted for as long as it is necessary to fulfil the tasks and such storage is permitted by law. The required high standard is guaranteed in terms of data quality and technical protection against unauthorized access. The use of data must be always transparent for those concerned, their rights of access and correction and, where appropriate objection, blocking and deletion must be respected.

Access to personal data is limited to those employees who have appropriate authorization and who need to access this data solely for business purposes. Persons who have access to this data are obliged to maintain the strictest confidentiality.



You may pass on personal data to third parties only if you have explicit permission to do so in the specific case.

C. IT security

Information technology (IT) is an indispensable part of the everyday work of the Possehl Spezialbau Group, but it carries a large number of risks. The threat posed by cybercrime is constantly increasing at an alarming rate.

Strict compliance with all protective measures taken (e.g., rules for the allocation of passwords) must be strictly observed by all employees at all times.



Familiarize yourself with the applicable IT security regulations and adhere to the specifications therein.

Never open emails and their attachments that seem suspicious to you, for example because you have received them from an unknown person.

D. Occupational health and safety

The Possehl Spezialbau Group takes its responsibility for the safety and health of its employees very seriously. We ensure occupational health and safety within the framework of the applicable regulations on our construction sites, in our plants and our offices.

By constantly improving working conditions and through a variety of prevention and health promotion measures, we maintain and promote the health, performance, and job satisfaction of our employees. Regulations limiting working hours must be strictly adhered to at all times. The consumption of alcohol and other drugs at work is prohibited.

Comply with occupational health and safety regulations.

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

Within the limits of your authority, take all reasonable and legally required measures to ensure that your workplace always allows safe working.

E. Confidentiality

Information is a very valuable asset. An open, targeted, and effective transfer of information is crucial for the success of the company. However, it is also important that confidential information is only passed on to those employees and business partners who are authorized to receive it due to their tasks.


In the interest of the company, every employee must protect confidential company information, which is only intended for a limited group of people, from unauthorized access. In addition to many other issues, confidential information includes quotation calculations, new products and processes, contracts, business relationships, negotiation statuses, legal disputes, financial key figures.

Handle all your company's information with care and do not pass it on without authorization.

F. Quality of construction services and products

Ensuring the highest quality and its continuous optimization are the basis for the success of the Possehl Spezialbau Group. Our customers expect conscientious care in the performance of our tasks.

Unavoidable deviations from defined construction methods or product specifications will only take place after thorough examination by the responsible employees and will only be carried out with the express consent of the customer based on the applicable law.



Keep in mind that the elimination of a faulty construction often causes a multiple of the original costs and a significant loss of image for the client.

G. Company property

The tangible and intangible assets of the Possehl Spezialbau Group serve to support our employees in achieving the company's business objectives and may only be used within the framework of operational regulations.

Every employee is obliged to protect the property of Possehl Spezialbau companies against loss, theft, or misuse. Facilities or objects of Possehl Spezialbau companies may only be used for private purposes or removed from the company with the express consent of the supervisor or in the case of operational regulations.



Handle business assets (e.g., the vehicles or construction equipment entrusted to you) gently and carefully.

IV. Cooperation with business partners

A. Conflicts of interest

A potential conflict of interest exists if the private interests of an employee may conflict or conflicts with the interests of the Possehl Spezialbau Group. Such a conflict of interest may arise in particular from secondary activities or business interests of related parties. If an employee puts his personal interests above those of the company, this can damage the company.

Conflicts between private and business interests or even their appearance are to be avoided. Decisions may only be made based on factual criteria and may not be influenced by personal interests and relationships.

Avoid the mere appearance of a conflict of interest and disclose any apparent or actual conflict of interest to your supervisor, the compliance officer, or the external ombudsman.

B. Gifts and invitations

Grants in the form of gifts, hospitality and invitations are common for the maintenance of business relationships. In this context, it is particularly difficult to assess whether such grants are within an appropriate framework.


In general, no donations may be accepted or distributed that, even in appearance, influence or impair independent decision-making. Exceptions are occasional and promotional gifts as well as invitations that are related to a business purpose. The awarding and acceptance of cash and other monetary gifts is prohibited under all circumstances.

If in doubt, do not accept the gift.

C. Prohibition of corruption

Corruption (bribery or passive bribery) consists of giving or receiving things to which a value is to be attached in order to obtain or grant an advantage or influence that is contrary to the principles of honesty and integrity. Corruption is a serious problem in trade and commerce. It leads to decisions for improper reasons, prevents progress and innovation, distorts competition and harms society. Corruption is prohibited. It may result in fines for the companies and criminal penalties for affected employees.

Employees must never, directly, or indirectly, grant or accept a bribe in any form.




If you suspect corrupt behaviour, contact the external ombudsman or the compliance officer immediately.

Use the whistleblower system.

D. Dealing with authorities

Special legal conditions often apply when dealing with officials or elected officials as well as governments, authorities, and other public institutions – regardless of whether they are customers or state supervisory authorities. This also applies in particular to donations in the form of gifts, hospitality, and invitations. Even individual violations can have serious consequences and result in the permanent exclusion of companies of the Possehl Spezialbau Group from the award of public contracts.

Employees must take care not to expose themselves or the companies of the Possehl Spezialbau Group to unnecessary risks in such transactions. All information provided to a public authority must be truthful, free from error and effectively protect the interests of the company.



Completely refrain from giving gifts to public officials that go beyond a cup of coffee or a glass of water.

E. Fair and free competition

Fair and free competition is protected by applicable competition and antitrust laws. Compliance with these laws ensures that there are no distortions of competition in the market – for the benefit of all market participants. In particular, agreements and concerted practices between competitors that have the purpose or effect of preventing or restricting free competition are prohibited. It is also impermissible to abuse a dominant position. Anti-competitive behavior can not only significantly damage the good reputation of the Possehl Spezialbau Group, but can also result in sensitive fines, penalties, and claims for damages.

Only permissible means are used in competition and when observing it. Any action that is illegal or creates liability risks is inadmissible.

In any contact with competitors, make sure that no information is received or given that allows conclusions to be drawn about the current or future business conduct of the Discloser.

Avoid topics that are important for the competition in conversations or other contact with competitors. These include, but are not limited to, prices, pricing, business planning, development status or delivery deadlines.



V. Responsibility as a member of society

A. Social responsibility

The observance of human rights, respect, and appreciation of one's fellow human beings are prerequisites for the responsible interaction with one another. Each employee is responsible for ensuring that the fundamental social standards are observed and that these rights are not violated. They are indispensable for any human coexistence and therefore apply equally to dealing within the company as well as dealing with business partners.

B. Community commitment

Possehl Spezialbau fundamentally supports the involvement of its employees in public functions at the local or supra-regional level. Employees must ensure that their appearance in public does not damage the reputation of the company. In the case of private expression of opinion, an appeal to one's own role or activity in the company must be avoided.

C. Media Communication

In order to pass on information from Possehl Spezialbau companies such as financial data, information about accidents and crises, acquisitions, company sales or personnel changes in the management structure to the media, approval from the corporate communications department of L. Possehl & Co. mbH must be obtained. The same applies to company-related expressions of opinion by individual employees in public.

D. Proper accounting, export control

The financial statements must accurately reflect the financial situation of the Possehl companies. Business transactions are documented with the utmost care. All entries in books and documents must be timely, complete, accurate and correct. It is the job of every employee to ensure that all tax and customs obligations are met, that the identity of customers, business partners and other third parties with whom we want to do business is clarified, that all payment flows

are reported transparently and openly and that all regulations for the Import and export of goods, services and information are complied with. The procedures available for this purpose, such as signature regulations, filing systems and documentation, must be used as intended.

E. Donations and sponsoring

The sole owner of the Possehl Spezialbau Group is the non-profit Possehl Foundation. The Possehl Foundation is solely responsible for the granting of donations. If, in exceptional cases, a commitment as a sponsor for one of the group's companies appears to make sense, approval must be obtained from the management of Possehl Spezialbau GmbH.

F. Environmental responsibility

The base of our actions in the Possehl Spezialbau Group is the responsible treatment of the environment. One of our main tasks is to deal carefully with the ecological challenges and to protect the limited natural resources. The aim is to continuously minimize energy and raw material requirements and reduce any negative impact on the environment. Our companies undertake to comply with the applicable legal environmental regulations and company standards. The companies of the Possehl Spezialbau Group are actively involved in environmental protection by promoting the development and dissemination of environmentally friendly technologies.

G. Political representation

The companies of the Possehl Spezialbau Group are involved in various industry associations. Political representation of interests is carried out exclusively by these industry associations. For the assumption of functions in industry associations by employees, an approval of the management of Possehl Spezialbau GmbH must be obtained.

