

Bauwerk Boen Group Code of Conduct

PURPOSE OF THE CODE OF CONDUCT

The Code of Conduct lays out the guidelines for worldwide activities of all employees of Bauwerk Boen Group and its group companies (hereinafter referred to as "BBG").

PRINCIPLE

BBG is aware of its economic, environmental and social responsibility to its investors, employees, customers, business partners, the local authorities, the company and the environment. BBG believes that ethical conduct is vital for a business to be successful in the long term and in all of its business operations.

Engagement, responsibility, reliability, respect, trust and cooperation are values all employees are committed to and is part of the "BBG way". In daily contact with internal and external partners, the application and implementation of these values, attitudes and related behaviors, is a part of the corporate culture practiced at BBG, based on mutual respect.

BUSINESS INTEGRITY

Compliance with laws

Compliance with applicable laws in all countries where BBG operates, as well as the relevant international standards.

Corporate governance

Effective corporate governance is vital for a sustainable and successful business. BBG ensures that corporate governance practices are up to date, reviewed regularly and adapted, when required.

Cooperation with business partners based on trust

BBG maintains a continuous partnership with its customers and suppliers based on openness and mutual trust. BBG expects sustainability, social responsibility and compliance with laws and standards from its suppliers.

Fair competition

BBG is committed to fair competition based on performance. BBG, neither engages in anti-competitive practices, nor does it participate in arrangements that violate antitrust law.

Bribery and accepting an advantage

BBG tolerates neither active nor passive bribery. BBG does not give any unjustified advantages to members of the government or government authorities or to employees of private companies in order to influence their decisions, nor does BBG accept them from third parties either. No one that works for BBG may give, request or accept unjustified advantages, such as excessive gifts or benefits, i.e. ones that exceed a customary value. Giving gifts or benefits is in particular prohibited, when business decisions are influenced in an illegal manner, as a result or only left with the impression that such is the case. All donations made by BBG must be transparent. Further details described in the BBG "anti-corruption guidelines".

Conflicts of interest

BBG strives to prevent conflicts of interest of the management and of the employees wherever possible. All employees are expected to act in the best interests of BBG and to put aside personal interests or benefit. All employees are obliged to disclose fully their personal or financial interests in conflict with BBG's interests.

Confidentiality and data protection

BBG protects its confidential information and personal data and prevents inappropriate or their unauthorized disclosure. BBG employees may neither internally, nor externally, pass on or utilize BBG's trade secrets and industrial secrets during or after their employment. In cooperation with external partners, a suitable non-disclosure agreement to be entered in advance.

Intellectual property

BBG protects its intellectual property and respects the applicable intellectual property rights of third parties. BBG expects its employees to enforce the intellectual property rights of BBG, ensure their protection and use them in a responsible manner.

Product safety

BBG is committed to the quality and safety of its products. BBG assures the conditions for customers faith in BBG's products in regards to reliability, quality and performance. All BBG products comply with national and international statutory standards, as well as internal quality assurance guidelines.

RESPONSIBILITY TO INVESTORS

Suitable return on investment

BBG is aware of its responsibility towards private and institutional investors. BBG is committed to paying its investors suitable dividend on their investment and adequate compensation for their risk. However, BBG refrains from using the prospects of short-term profits as the basis for its decisions. Instead, it uses the long-term and sustainable well-being of the company.

RESPONSIBILITY TO EMPLOYEES

Respectful cooperation

The commitment of its employees and the ability to develop their skills are vital for the success of BBG. Therefore, BBG is particularly careful to ensure that employees in all countries work with respect, fairness, politeness, honesty and trust.

Employee development

Creating an attractive working environment is very important to BBG. This includes the provision of modern workplaces, subject-specific training, as well as individual development and career planning.

Discrimination prohibition

Equal opportunity is a key value for BBG and evaluates employees on their performance, skills and conduct. BBG does not tolerate discrimination or harassment on gender, race, religion, national origin, age, disability, sexual orientation, marital status or other characteristics protected by law, following the “Human Rights Rules of BBG”.

Health and occupational safety

BBG promotes the physical and mental well-being of all its employees and sees the employees as the most valuable capital. Therefore, BBG conducts needed actions to prevent their health and ensure their personal safety.

Social partnership

BBG respects the promotion of dialogue between BBG and its employees and is committed to a functioning social partnership with employees and their representatives.

Compensation

BBG provides fair compensation and benefits to employees, in compliance with applicable local laws.

RESPONSIBILITY TO SOCIETY

Dialogue with society

BBG recognizes the importance of cooperation with government authorities and associations to make its business ethics a reality. BBG strives to maintain an ongoing dialogue with representatives of government authorities and associations.

Human rights and child labor

BBG assumes the responsibility being a global business entails with regard to respecting human rights and in particular, the challenges associated with child labor, as set in the “BBG Human Rights Rules”.

RESPONSIBILITY TO THE ENVIRONMENT

BBG is aware of the environmental impacts of its business operations. BBG complies with local and international environmental standards and is committed to continually improve its environmental performance. BBG focuses on environmental responsible and sustainable behavior in favor of natural resources within its direct and indirect business context.

Sparing use of resources

BBG orients all of its activities – from procurement to production and disposal – toward maximum conservation of resources and minimization of emissions. With its products and solutions, BBG is committed to deal with the environment in a responsible economic and environmental manner.

RESPONSIBILITY AND IMPLEMENTATION

This Code of Conduct is mandatory for all employees in BBG. Each employee is individually responsible for compliance with and implementation of the Code of Conduct. Superiors are role models and set an example of the Code of Conduct, ensuring it is communicated to all employees and is internalized and implemented by the employees. BBG has specified further details of this Code of Conduct in internal directives. BBG oversees compliance with the Code of Conduct and the directives and adapts them as needed. All employees of BBG are called upon to report breaches of the Code of Conduct. When assessing whether a specific practice could constitute a breach of the Code of Conduct, employees shall apply reasonable ethical and moral criteria, use common sense and apply country-specific customs and conventions. In the event of violation of the law, it exists no margin of discretion.

Three internal reporting offices (HR departments of BBLT, BBCH and BBHR) and the Chief Human Resources Officer of BBG are available for assistance.

Employees that report breaches in good faith enjoy the full support and discretion of BBG and need not to fear any negative consequences. Abusive reports will not be pursued, and may result in disciplinary action. In the event of a breach of this Code of Conduct, disciplinary consequences to be expected. In addition, violations of the law may also result in civil law consequences, such as recourse claims and claims for damages.

ASSISTANCE AND CONTACT PERSONS

If employees are unsure about the application of the Code of Conduct or its directives, BBG encourages all employees to seek advice from their superior, managing director or the Head of Legal & Compliance.

St. Margrethen, March 13, 2019

Bauwerk Boen Group



Klaus Brammertz
CEO



Michael Kummer
CHRO

Bauwerk Boen Group (BBG) Global Human Rights Rules

(as part of BBG Code of Conduct)

WE ALL IN BBG WILL ACT in accordance with the Guiding Principles of United Nations on Business and Human Rights (resolution 17/4 of June 16, 2011) and in accordance to our values and specifically will:

- Seek to avoid causing or contributing to adverse human rights impacts through our own activities, and address such impacts if they do occur in a timely and appropriate manner.
- Seek to prevent or mitigate adverse human rights impacts that are directly related to our operations, products and services through our business relationships.
- If we identify that we have caused or contributed to adverse human rights impacts, provide for or cooperate in their remediation through legitimate processes.
- Continue to look for ways to support the promotion of human rights within our operations and our sphere of influence.

REGULATIONS AND STANDARDS

Wherever we operate, we will comply with local laws and regulations, and cooperate with the relevant authorities in respecting and promoting internationally declared human rights.

- Where local legislation is more stringent than our Policy, local requirements will apply in addition to the Policy.
- Where local legislation may conflict with the commitments contained in our Policy, we will comply with the law and seek to raise awareness of human rights within our spheres of influence and provide an example of good practice through our own business conduct.
- Where local legislation is less stringent than our Policy, we will adhere to the commitments set out in our Policy.

With regard to our key stakeholder groups, we specifically commit to the following:

Our People and local communities(*):

- Invest in our people by providing development opportunities and encouraging continual learning.
- Promote a culture that fosters workplace flexibility and work/life balance.
- Ensure safe working places and building up permanent awareness for safety at work
- Not tolerate harassment or discrimination in our working environment.(*)
- Provide fair wages and benefits. (*)
- Protect the health and safety of our people at work, and promote their well-being. (*)
- Provide a secure working environment. (*)
- Not tolerate forced, bonded or involuntary labor (*)
- Not tolerate any instances of child labor. (*)
- Where we have concerns that other community members are directly linked to human rights violations, we will use our Policy as a basis to communicate our expectations to the relevant party/authorities.

Our Suppliers:

- Where we have concerns that the products or services supplied to us are directly linked to human rights violations, we will use our Policy as a basis to communicate our expectations to the relevant suppliers (existing suppliers or potential suppliers at the point of selection) and work with them to mitigate these impacts, as appropriate. A corresponding risk assessment will be part of our Supplier Relationship Management and auditing system.

Our Customers:

- If we have concerns that our work will be directly linked to human rights violations by a client, discuss our concerns with relevant parties, seek to mitigate the impacts and only proceed if we are comfortable that our work will not contribute to human rights violations.
- Be prepared to walk away from clients and engagements where our integrity could be called into question if we continue

GRIEVANCE AND REMEDIATION

We encourage all stakeholders to report and express their concerns relating to our activities and suspected violations of our policies, including this Statement. We maintain reporting mechanisms at both a Global level and in each country to allow stakeholders to report these issues. Further information on our grievance mechanisms is available in our Code of Conduct. Point of contact in regard to suspected violations are all Human Resource Managers, and/or all MT members.

In the event that our business activities are suspected of causing or contributing to human rights violations, we will investigate, address and respond to the concerns raised and take appropriate corrective actions in response to any violation.

GOVERNANCE

All BBG staff is required to adhere to this Statement. The Management Team is responsible for reviewing this Statement periodically to reflect our ongoing engagement with stakeholders, as well as emerging requirements and good practices.

We will actively communicate this Statement to our People and will use it as a basis to engage internal and external stakeholders (including suppliers and customers) on human rights issues, as appropriate.

CEO and MT Team of BBG

January 15, 2019