

# **Code of Conduct**

## **(Verhaltenskodex)**



### **Cteam Group**

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## **1 Principles and development of the Cteam Group Code of Conduct**

Vision, corporate policy, principles of action and our anti-corruption policy form the basis for our successful and sustainable approach to corporate governance. All executive directors, managers and employees of the Cteam Group shall be obligated to comply with the Code of Conduct and the references therein within the scope of their own responsibility, and to act in accordance therewith.

## **2 Scope and application**

The Code of Conduct complements (and specifies) the corporate policy and vision of the Cteam Group, thereby ensuring their application in the day-to-day actions of everyone in the company. In addition, the Code of Conduct sets out the rules and values of our spirit of cooperation that have long been lived in the company and are, therefore, taken for granted by many. Through our actions based on this Code of Conduct, we present our mission statement and our principles of action not only within the company, but also – and above all – vis-a-vis our customers, suppliers, authorities and stakeholders. More than just a document for internal use, the Code of Conduct is thus the Cteam Group's "values business card" to the outside world. The Code of Conduct applies to the entire Cteam Group, both at home and abroad. In addition thereto, we also require compliance with these principles from external partners – such as subcontractors and suppliers when they act on behalf of or for the Cteam Group.

The Code of Conduct covers four key topics:

1. The employees of the Cteam Group always act in a legally compliant and responsible manner
2. The employees of the Cteam Group treat each other with respect and appreciation
3. The Cteam Group acts in accordance with the principles of economy, prudence and sustainability at all times
4. The Cteam Group implements its principles and responsibilities in concrete terms
5. The Cteam Group respects confidentiality and data protection

### **2.1 The Cteam Group acts in a legally compliant and responsible manner**

All business actions and decisions will comply with all applicable laws, regulations, policies and standards of all countries in which the Cteam Group operates. The Cteam Group shall not use any unlawful or dishonest means to obtain information, business, public contracts or trade secrets of its employees, customers and suppliers. Offering and accepting benefits – such as gifts – is prohibited if it is intended to cause a particular action, or could even create such an impression. You will find the precise regulations on this in the Anti-Corruption Policy. In its relationship with business partners, the Cteam Group is characterised by the utmost quality and reliability. Ensuring the highest level of quality in our construction and planning services is always our top priority.

#### **Acting in accordance with the law by the Cteam Group**

Legal compliance, social responsibility, respect for human rights and the protection of our environment form the basis of all our business relationships. We also expect our business partners to act in accordance with the law, to assume the appropriate degree of responsibility and not to commit or participate in human rights violations. For us, this means, in particular:

- The “worst forms of child labour” according to ILO 182 are prohibited. Persons under the age of 18 are classified as particularly vulnerable. Activities with a negative impact on their health, safety or morals are not acceptable to us. The minimum age for employees is 15 years. Vocational training shall at least comply with the applicable statutory regulations. We reject the use of child labour.
- We do not approve of any form of forced labour – such as modern slavery, compulsory labour, servitude, human trafficking or work carried out under duress (punishment or coercion). Any form of work must be voluntary.
- We respect freedom of association and the right to collective bargaining in accordance with the law. Workers and workers’ representatives must not be discriminated against or subjected to reprisals when it comes to adjusting or changing working conditions. They must be able to exercise their rights freely and without hindrance.

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- The employees of the Cteam Group have the possibility to report complaints and grievances internally or externally. Our business partners also have the possibility to use our reporting system. Those who are reporting must not be discriminated against or subjected to reprisals. In order to ensure the confidentiality and protection of these individuals, we have appointed external ombudsmen. They are subject to a lawyer's duty of confidentiality, and will maintain the reporting person's anonymity vis-à-vis us upon request.
- We shall ensure that all employees of the Cteam Group are informed about relevant laws, regulations, policies and standards of all countries in which the Cteam Group operates to the appropriate extent. This shall also include the availability of information on the legal frameworks of all these countries. Our actions in all countries must not only comply with the applicable legal standards, but must also be compatible with our mission statement and principles of action.
- The implementation of our mission statement and our principles of action is important to us, especially when compliance with these principles appears challenging.
- Fair working conditions remain a top priority for us, as well as in relation to employees provided by subcontractors or personnel service providers. In the event of labour law violations – such as underpayment and violations of the principles of equal treatment and non-discrimination – the Cteam Group will refrain from any further cooperation. We implement our anti-corruption policy in our day-to-day work. We reject any form of (personal) enrichment, and will only accept and extend invitations and offers of gifts within the usual scope of our work and to the pertinent degree defined by the Cteam Group.
- Should there be any uncertainty in a situation as to whether conduct complies with the Anti-Corruption Policy and other internal and legal standards, or if it is difficult to assess the situation on one's own, then the supervisor or a person entrusted with ensuring compliance should be informed and the further course of action determined.

**For the Cteam Group, acting responsibly means living up to our reputation as a fair and reliable partner operating on an equal footing with all other stakeholders. This is what counts for all of us:**

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- We realise projects entirely in line with the expectations and wishes of our customers. We always meet them honestly, in trust and in a spirit of partnership in our consultation and cooperation efforts.
- We work conscientiously, transparently and in accordance with the underlying contracts, and we strive for punctuality in all our construction and engineering projects.
- It is important to us that our business partners can rely on us, and we, therefore, deal with them in an open, honest and cooperative manner. Collaborative project management from the beginning to the end of a project also means that we are always approachable in difficult situations. We define realistic and achievable goals to avoid deviations at a later stage. This includes assessing situations in the construction project in a practical manner and communicating necessary planning changes at an early stage.
- Discretion and the confidential handling of information are a matter of course for us.
- Cteam only commissions such private or public security forces that act in accordance with national law. Any form of cruel, inhuman or degrading treatment, or injury to life or limb will not be tolerated by us.
- In general, we avoid any action that could be likely to damage the reputation of the Cteam Group in public or even create a negative impression.
- We prefer business partners who, like us, act in a legally compliant and responsible manner.

### 2.2 The employees of the Cteam Group treat each other with respect and appreciation

The Cteam Group encourages and challenges its employees. One principle of action is to treat each other with respect at all levels. Respect and appreciation increase the level of satisfaction within the company, they promote a sense of identification with the company and contribute to keeping staff turnover below the industry average. Diversity in the Cteam Group is high, and equal opportunities in the company are to be encouraged. Leaders set a good example in all their actions. **Appreciative communication** and respectful interaction are central to the Cteam Group. We, therefore, take particular account of the following:

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- In conversations with each other, we want to be open and honest. Everyone is responsible for ensuring that listening, letting people talk and providing constructive feedback are not alien concepts in our company.
- Any sense of discomfort regarding inappropriate remarks by colleagues should be addressed openly or discussed with superiors or a trusted person.
- The Cteam Group wants to make work steps and processes, as well as the allocation of responsibilities, transparent, involve employees in decisions and inform them accordingly. Leaders also set a good example here.
- Mistakes happen! And when they happen, we want to learn from them and work out constructive solutions together.

The **diversity** in the Cteam Group is growing. Greater diversity within the company is a clear goal of the Cteam Group. But diversity is also a challenge.

### **Diversity in the company means for us:**

- We take into account our principle of action in our day-to-day work not to treat anyone differently without justification. No one in the Cteam Group shall be discriminated against on the basis of age, health, gender, sexual orientation, physical or mental disability, origin, language, ancestry, colour or nationality, religious or political beliefs or social affiliation. The equal treatment of all employees is one of our core values. The selection of employees is based on their qualifications and other skills.
- A culture of diversity also includes making sure that all religions and cultures are taken into account, for example, during festive occasions, celebrations and general meals.
- Our Group language is German. Due to the internationalisation of the Cteam Group, more languages are now used throughout the company. We want to break down language barriers in the company, improve communication between the different parts of the Cteam Group, be open to other languages and try to offer more services in multiple languages.

## **2.3 The Cteam Group acts prudently and sustainably**

Economic efficiency and sustainability are among the basic principles of the company's activities. As an integral part of the company's philosophy and culture, sustainability for

the Cteam Group means proactively assuming economic, ecological and social responsibility. Legal standards form the basis, for example, in the areas of occupational safety, health and environmental protection, and are, therefore, uncompromising and strictly adhered to. The Cteam Group is also involved in various other projects with the help of targeted Corporate Social Responsibility (CSR) measures. In doing so, its actions are guided by the expectations and needs of its stakeholders. In addition to employees and customers, our stakeholders also include shareholders, suppliers, subcontractors, banks, other business partners and wider society in general (i.e. local residents, authorities, legislators, the media and the public).

### **To act prudently means to act with foresight and honesty.**

#### **What we mean by this is as follows:**

- We always review the holistic consequences of our decisions for the company, people and the environment in terms of the ethical and moral standards that are embraced within the Cteam Group. For us, this includes honesty, transparency, quality, reliability and fairness.
- We carefully assess situations in advance so that any adverse impact from our activities on us and our stakeholders can be avoided or minimised from the outset. This also applies to the use of new technologies, materials and techniques.
- We do not allow for unrealistic expectations vis-a-vis anyone, and we treat the issues of others with the same care as if they were our own.

For Cteam Group, **sustainability** means striking a balance between economic, environmental and social commitment. In extension of all applicable laws and the safety, health and environmental policy of the Cteam Group, we do everything necessary to avoid (or reduce) possible harm to people and the environment, and to exert our influence in a positive way. To this end, we are implementing the following measures, among others:

- We adhere to our operating principle of efficient use of labour and economical use of resources. In this way, we protect the environment and ensure the sustainable success of our company.
- We comply with all applicable environmental regulations and binding international agreements on environmental standards. Cteam has an environmental management system according to ISO 14001. Our daily actions are geared towards avoiding hazards for people and the environment. Natural habitats are



protected. Unlawful evictions or the unlawful acquisition of land, forests or waters are excluded.

- The available natural resources are used carefully and sparingly, and are not withheld from anyone. Materials are reused wherever possible. Otherwise, they are disposed of properly and in accordance with national regulations.
- We work in a future-oriented way and feel obligated to train our employees (especially apprentices), to support them in their professional development and to be more than an attractive employer for them.
- Our comprehensive, sustainable strategy is also reflected in the healthy growth of the Group of companies. Even in difficult economic times, we continue to pursue this approach; we invest in new facilities and refrain from outsourcing work where possible.
- Where the subcontracting of work to third parties is necessary, we choose partners and preferably such companies that have a long-standing business relationship with us in partnership, and have proven themselves to be guarantors of our mission statement. The subcontracting of partial services by subcontractors already commissioned shall require our unconditional consent.
- We care about more than just the welfare of our own employees. Occupational safety and health protection have the highest priority at Cteam. We comply with national standards to ensure a safe and hygienic working environment. We take appropriate measures to ensure health and safety in the workplace, thereby making sure the our team members enjoy the best working conditions. To this end, we have set up an occupational health and safety management system in accordance with ISO 45001. If colleagues from another company are not properly equipped on a construction site or if there are other safety concerns, we inform the responsible bodies (site management, supervisors, etc.). Compliance with labour and safety standards by contracted subcontractors is continuously monitored on site by management personnel.

### **2.4 The Cteam Group implements its principles and responsibilities in concrete terms**

The provisions of this Code of Conduct shall form an integral part of the corporate culture of the Cteam Group. The employees shall conduct themselves in accordance with these principles, and are aware that any failure to comply with these principles may have serious

consequences for the Cteam Group, as well as for themselves. We all, therefore, take shared responsibility for the implementation of the rules in everyday business life by taking the following steps:

- If we notice actions that are not in line with our values, or if we have questions about the Code of Conduct, we inform our immediate supervisor. Employees who cannot (or do not wish to) approach superiors may contact a person in charge of compliance.
- Managers should communicate and exemplify the central importance of the Code of Conduct in their area of responsibility and provide information on who is responsible as a point of contact for questions on Code of Conduct topics or for tips on violations. Information will be treated in strict confidence, unless legal reasons dictate otherwise. Under no circumstances, however, will the whistleblower suffer any disadvantages from such a report.
- Our personnel service providers and subcontractors are informed about our Code of Conduct for Business Partners before they are commissioned. However, this does not relieve management staff of their on-site management responsibilities – such as compliance with labour and safety standards.
- When selecting and employing subcontractors, we pursue an equally consistent corporate policy that strives for fairness. The transfer of (partial) services by subcontractors who have already been commissioned to other companies may only take place within the contractually and legally stipulated framework, if necessary with the required consent.
- We hereby expressly reserve the right to terminate any further cooperation in the event of the improper implementation of agreements made, or instances of non-compliance with the principles of our Code of Conduct by external partners. In individual cases, contractual penalties may also be provided for.

### **2.5 Cteam Group respects confidentiality and data protection**

Data **security** is of paramount importance to the Cteam Group. Information security affects business success and public reputation. Therefore, the Cteam Group protects company data – such as customer, business partner and employee data – against unauthorised access, unauthorised and improper use, loss and premature destruction with all available suitable and appropriate technical and organisational means. This is done in compliance



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with the respective legal framework and national laws, as well as internal guidelines and regulations.

The Cteam Group is aware of the hugely sensitive nature of the personal **data** entrusted to it by its business partners and employees, and protects this data by handling it carefully and responsibly. The Cteam Group takes a variety of technical and organisational measures aimed at ensuring the availability, integrity and confidentiality of data. Each individual is responsible, within the scope of his or her duties, for ensuring a high level of protection within the Cteam Group. The employees of the Cteam Group consistently comply with data protection regulations and respect and observe, in particular, the comprehensive rights of the data subject whose data they collect, store, process and use.

Every employee of the Cteam Group is obligated to protect the company's interests. Information pertaining to the Cteam Group and beyond will, therefore, only be communicated to authorised recipients. This applies to internal and external recipients. The Cteam Group also respects the **confidentiality** of information and protects business documents from being viewed by unauthorised persons.

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