

PRINCIPLES OF THE COMPLIANCE- SYSTEM

CODE OF CONDUCT OF THE
LEONHARD WEISS-GROUP



Experience the joy of construction with LEONHARD WEISS

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I. BASIC RULES OF CONDUCT

The adherence to applicable laws is an essential precondition of our business activities. In acting on behalf of the company all employees¹⁾ must thus respect legal regulations and other obligatory rules of the states we are active in. In addition to this, intern rules and guidelines of LEONHARD WEISS Group must be adhered to, as well as integrity and fairness when dealing with our fellow human beings and responsibility concerning the society we live in.

All employees must make an effort, in order to avoid breaches of laws in the company. In case of doubt or in case of evidence confirming unlawful behaviour they are to seek communication and demand clarification of the matter.

The obligations of this code of conduct are binding for all employees of LEONHARD WEISS Group, including all associated companies in Germany and abroad. Suppliers, service providers and subcontractors working for us are bound to respect our principles by contractual agreements.

II. IMPORTANT AREAS FOR LEONHARD WEISS

1. Safety at work and health protection

The health and safety of our employees and third parties must always be guaranteed. In order to do this, we adhere to the regulations prescribed by law and by professional associations concerning safety at work and health protection, as well as our own prescriptions and safety instructions and work towards the respective qualification of our employees.

Every employee is responsible for the establishment of a safe work area for himself or herself, for his or her colleagues and our business partners and for pointing out dangers early and explicitly. It is our common aim to continuously improve the safety of everybody taking part in construction.

2. Avoidance of business crime

We do not tolerate any illegal business practices, especially no form of corruption.

The management and all employees of LEONHARD WEISS Group set the highest standards for the avoidance of and the fight against corruption. We make all our decisions exclusively based on economic considerations and we require the same principles from our business partners. We will by no means influence the decisions of our business partners by granting them, their employees, public officers or third parties any benefits. Neither do we accept the attempt of others to improperly influence our activities in this way and we do not demand any illegal personal benefits or accept these. Personal benefits which may be illegal are payments of money,

The word "employee" in this statement is used for male and female employees respectively (General Equality Act)

valuable presents, improper invitations, other non-cash benefits, as well as immaterial benefits.

We already want to avoid the impression, that the independence of the recipient might be questionable due to a benefit. The prohibition of improper influence may not be skirted by the engagement of third parties (for ex. consultants, lobbyists, agents or other intermediaries).

3. Gifts and gratuities

Employees of LEONHARD WEISS are not allowed to accept any gifts or gratuities or to grant them, if they influence the independent decision making - even if they only appear to influence or compromise it. Exceptions are for ex. promotional gifts of low value, as well as invitations to meals, which in their content and value adhere to the rules of hospitality in normal business relationships.

Our employees show special sensitivity in their behaviour towards public officers and other representatives of official institutions. They may principally not be granted or offered any gifts or other benefits related to their official activities.

Illegal contributions to political parties, their representatives, as well as members of parliament and candidates for political offices must be refrained from.

4. Donations and sponsoring

We principally regard donations and sponsoring as a means of expressing our responsibility for society and to support eligible social, cultural and sportive events and projects. Donations and sponsoring are thus not used as a means to achieve improper or unlawful advantages.

Donations are always made transparently, without any expectation of reward and according to our mission statement. Sponsoring is documented in writing by means of a sponsoring agreement.

5. Avoidance of conflicts of interest

LEONHARD WEISS is aiming for a professional relationship with all our business partners. We avoid all situations, in which personal or financial interests might come into conflict with the interests of LEONHARD WEISS.

The participation in companies of current or potential customers, suppliers or competitors is only allowed subject to prior agreement of the company management. The same applies for taking up a secondary employment or lecturing activities in companies standing in a business relationship with LEONHARD WEISS.

Employees of LEONHARD WEISS may not have any private business relationships with customers, competitors or other business partners, if it is to be expected that these could influence the business behaviour or other decisions in their activities for LEONHARD WEISS. We award contracts according to economic considerations only. Family or friendly relationships may not play any role in the process of awarding contracts.

6. Environmental protection and sustainability

LEONHARD WEISS is aware of ecologic consequences of construction activities and of the responsibility for the conservation of nature for future generations. In our activities we adhere to the valid rules of environmental protection. Furthermore, we make an effort to use our resources in a sustainable and environmentally friendly

way. It is our aim to reduce the influence on the environment to the technically and organisationally inevitable measure.

We attach great importance to the fact that our suppliers, subcontractors and other third parties also adhere to all regulations in the field of environmental protection while acting for LEONHARD WEISS.

7. Standards of labour legislation and social security legislation

In our work we respect any labour legislation as well as all social agreements. We consider it very important that our subcontractors and suppliers also respect these regulations. We especially reject any kind of illegal employment and black labour.

We offer fair working conditions and adhere to the respective laws and industrial standards for working hours and compensation. As far as possible, work is performed on the basis of regular employment relationships. In addition to laws, the applicable standards of the industry are adhered to. The freedom of association of employees, including the right to elect employee representatives, is guaranteed. We take care in order to protect the privacy of our employees. Child labour is strictly rejected. Furthermore, LEONHARD WEISS strongly opposes any kind of forced labour.

8. Adherence to the rules for the protection of free competition

We feel obliged to support free and fair competition, which in the end protects competitive companies like LEONHARD WEISS. Especially breaches of antitrust laws are also punished with high fines.

In our business activities we adhere to all valid laws of competition and antitrust laws and do especially not participate in formal or informal deals creating unfair competition or limiting competition. This applies to deals with competitors or other business partners influencing our prices or their prices offered to third parties, concerning a distribution of customers or areas or in which independent offers in public tenders are coordinated. Neither are we prepared to illegally exchange sensitive information which may lead to uneven competition.

9. Export and Import

We do not only carry out our business in Germany, but in many countries. Due to this international standing of our activities we adhere to the valid national and international rules of export and import of goods, services and information.

10. Abatement of money laundering and financing of terrorism

LEONHARD WEISS opposes any kind of money laundering and financing of terrorism and takes any measures necessary, in order to prevent this kind of activities. We pay special attention to the clear identification of our business partners, as well as to the traceability of channels of payment and the identity of the paying party.

11. Documentation of business transactions

All relevant business transactions must be documented completely, traceably and promptly according to the valid regulations. Created reports, documentation and data must clearly picture the respective business transactions and events.

LEONHARD WEISS pays special attention to a transparent keeping of accounts and the adherence to the principles of correct and proper bookkeeping.

12. Handling of company property

All employees must handle company property of LEONHARD WEISS economically and with care. In addition to company property, this is also applicable for other rights LEONHARD WEISS is entitled to. The improper use of company property for purposes outside the field of activity of LEONHARD WEISS, especially for private purposes, is not allowed without the explicit approval of the competent authority. The same rule applies to the property of business partners, as well as to the use of services of LEONHARD WEISS.

13. Confidentiality

Company secrets and trade secrets must be treated confidentially. This also includes information, the confidentiality of which does not only concern LEONHARD WEISS, but also our customers, suppliers and other business partners. Such information may principally not be divulged to third parties without the approval of company management. The confidentiality obligation stays valid after the termination of an employment contract with an employee.

14. No discrimination and protection of human rights

We respect the rights and dignity of every single individual and treat each other respectfully and loyally. Social and cultural diversity enrich our work and considerably contribute to productive working conditions. All employees shall have the same opportunities at the beginning of their employment, as well as for their further professional development. No employee may be discriminated due to his or her origin, gender, sexual orientation, religion, age or due to a handicap.

15. Data protection

We respect the privacy of our employees and business partners and are aware of the special sensitivity of personal data.

We adhere to the valid legislation concerning the protection of data of employees, customers, suppliers, contractors and other business partners. When collecting, recording, transferring and treating personal data, the necessary care must always be applied in the framework of the assignment that is to be carried out. Personal data may only be used for clearly defined purposes and while respecting the standards of data protection.

16. Reporting of malpractice

All employees are asked to report indications of breaches of valid legislation, of the code of conduct or of intern rules of LEONHARD WEISS. The information received will be treated confidentially and checked carefully. No employee needs to fear any disadvantages because of a report he or she made to protect the company, as far as he or she has not done wrong.

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