

BASIC PRINCIPLES OF THE COMPLIANCE SYSTEM

**CODE OF CONDUCT – REQUIREMENTS FOR
SUBCONTRACTORS, SUPPLIERS AND OTHER
BUSINESS PARTNERS**



POLICY STATEMENT

As LEONHARD WEISS-Group we are aware of the importance of foresighted and careful action and know that the success of our company goes hand in hand with a responsible treatment of humanity and nature. As a company, but also as a community of people, we take this responsibility for our economic activity and for its influence on the global chains of economic value added.

Since 1989 the principle defined in our mission statement «Experience the joy of building with LEONHARD WEISS, by paying attention to social values and responsibly treating humanity, family and environment in connection with our activity“ has been guiding us.

It is our objective to bestow the joy of building on all people. For this reason, the adherence to human rights is the basis of our interaction – within the company, as well as outside the limits of the company. LEONHARD WEISS avows itself to the internationally acknowledged human rights and obliges itself to support them and prevent breaches.

As a company active in the construction sector, characterised by bodily labour, we pay special attention to good working conditions. That means for us securing and supporting admissible working relationships, health and safety at work, further training and qualification, recreation, fair compensation, equality of opportunity and protection from discrimination.

In addition to that, the construction sector is especially energy and resource-intensive. As LEONHARD WEISS we avow to the protection of the environment. Part of this is the effort to minimise the environmental effects, to guarantee a conscious treatment of resources, as well as an efficient and economic use of raw materials including the support of recycling.

LEONHARD WEISS stands for consistent action. That means that breaches are not tolerated but persecuted. The company will implement whistle-blower possibilities, which will be available to third parties, as well as to employees.

LEONHARD WEISS regularly checks its own supply chain in connection with a risk analysis. We put the focus onto evaluating our own business activities and those of our immediate suppliers. The objective is to identify risks for the adherence to human rights and the protection of the environment early on, in order to be able to take the respective countermeasures. In accordance with the requirements of the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz), our risk analysis has particularly highlighted the risks of insufficient occupational health and safety as well as the withholding of fair wages. These risks are given special attention and are addressed through targeted actions and preventive measures.

LEONHARD WEISS expects all employees and partners to adhere to the applicable laws. In addition to the acknowledged human rights, the code of conduct of LEONHARD WEISS-Group, as well as the code of conduct with requirements for subcontractors, suppliers and other business partners define our own framework of action, as well as our expectations.

We consider our activities of due diligence a continuous process to keep improving all the time. For this reason, we will check the measures taken time and again, evaluate them, develop them further and give a summary of them in connection with our reporting.

Your LEONHARD WEISS company management

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

PREAMBLE

Within our own company and in our contacts to others LEONHARD WEISS Group pays attention to law-abiding behaviour and to the adherence to social, ethical, and ecological minimum standards. We expect our subcontractors, suppliers, and business partners to also commit themselves to these basic principles. LEONHARD WEISS Group is committed to continuously optimise our entrepreneurial decisions and services according to our social, ethical, and ecological principles.

This code of conduct gives a summary of the aspects LEONHARD WEISS considers as basic principles of every kind of cooperation with subcontractors and other business partners. Other business partners in the sense of this code of conduct are any other renderers of service LEONHARD WEISS employs for fulfilling our own obligations, especially towards our customers.

Business partners of LEONHARD WEISS exercise their business activities with integrity and adhering to the respectively applicable prescriptions. They pay attention to ethical standards like integrity and fairness, as well as a sense of responsibility towards society. They make an effort to make their employees adhere to these principles.

I. SOCIAL MATTERS

1.1. Respect of human rights

With our membership in UN Global Compact LEONHARD WEISS avows to the respect of internationally acknowledged human rights. These fundamental rights are the precondition and the basis of every kind of cooperation for LEONHARD WEISS. We therefore summon our partners to also adhere to the internationally acknowledged human rights and actively support the compliance with these rights.

1.2. No discrimination and protection of human dignity

The rights and dignity of every individual are to be protected. A respectful and loyal interaction with each other is a matter of course. LEONHARD WEISS expects its business partners to respect these basic principles for their interaction with LEONHARD WEISS and its employees, for their contacts within their company and in their interactions with customers and other business partners. This includes that any kind of discrimination due to origin, gender, sexual identity, religion, philosophy of life, age, or handicap is omitted.

1.3. Occupational safety and health protection

The health and safety of employees and third persons must always be guaranteed. Legal prescriptions and the prescriptions of the workers' compensation board concerning safety at work and health protection, as well as potential contractual prescriptions which may exceed the aforesaid prescriptions and regulate safety at work and health protection must be adhered to. Business partners of LEONHARD WEISS make sure to take suitable measures to eliminate or reduce dangers for employees and third persons.

1.4. Labour and social legislation

Business partners of LEONHARD WEISS must adhere to all labour and social legislation which is applicable to them including the applicable agreements with social partners.

Child labour, as well as any kind of forced labour, are unacceptable. Employees of business partners of LEONHARD WEISS may not be treated inhumanly or in a humiliating manner.

With view to remuneration and working hours the applicable industry standards must be adhered to in addition to the legal prescriptions. Illegal employment relationships and black labour must be omitted, as well as breaches of regulations - for example concerning minimum wages or working hours. In this field, business partners of LEONHARD WEISS use regular employment relationships as far as possible. the freedom of collective bargaining, the freedom of coalition, as well as the right to workers' representation must always be guaranteed.

II. ECONOMY

2.1. Prevention of business crime

LEONHARD WEISS does not tolerate any criminal business practices, especially no form of corruption. LEONHARD WEISS expects its business partners to make sure that their employees do not offer, grant, demand or accept any personal benefits, in order to influence business decisions. Illegal advantages to office bearers, no matter if they are of material or immaterial nature, are not granted or tolerated by our business partners either. This is also applicable for illegal benefits for other representatives of public institutions, political parties, their representatives, as well as elected members and candidates for political offices.

LEONHARD WEISS expects business partners to have suitable rules for invitations and presents, as well as donations and sponsoring excluding any influence on economic decisions and that our business partners abide by these rules. Such improper influence may not be exerted by using consultants, lobbyists, agents, intermediaries and other third parties.

Business partners of LEONHARD WEISS also prevent other conflicts of interest which may lead to corruption risks or other improper combinations of business and private interests.

2.2. Fight against money laundering and the financing of terrorism

LEONHARD WEISS expects its business partners to take suitable measures to prevent money laundering and the financing of terrorism in their company.

2.3. Behaviour in national and international competition

LEONHARD WEISS expects its business partners to behave as fair, responsible, and law-abiding market participants. The adherence to the applicable law on competition and cartel law is part of this behaviour. Especially formal or informal agreements may not be entered into which may distort or limit competition. Sensitive information in connection with competition may not be exchanged in a forbidden manner either.

As far as the business activities of the business partner are not limited to Germany, but concern international business transactions, LEONHARD WEISS also expects the adherence to applicable rules of other countries, as well as to the prescriptions for the import and export of goods, services, and information.

2.4. Data protection

LEONHARD WEISS expects its business partners to be aware of the special sensitivity of personal data and to adhere to the applicable prescriptions concerning the protection of personal data (for ex. of employees, business partners and customers).

III. ENVIRONMENT AND SUSTAINABILITY

3.1. Environmental protection

LEONHARD WEISS is aware of the ecologic effects of construction activities and of the responsibility for the protection of natural resources of future generations and summons its business partners to also take responsibility for the protection of the environment and integrate this protection into their organisation in a suitable manner. In addition to that, LEONHARD WEISS expects its business partners to make an effort to act sustainably and resource-friendly and use natural resources in a responsible manner to preserve biodiversity. For the protection of air, water, and soil the effects on the environment must be reduced to the technically and organisationally unavoidable measure. In addition to that, especially the consumption of water must be minimised.

3.2. Climate protection

Business partners of LEONHARD WEISS are requested to minimise their consumption of energy, to support the use of low-emission technologies and to reduce the production of emissions to a minimum.

3.3. Use of chemicals and hazardous substances

Principally, the use of chemicals and hazardous substances must be reduced to a minimum. The business partners of LEONHARD WEISS assure a law-abiding handling of chemicals and hazardous substances. This includes all steps from handling, storage, transport up until the disposal. In addition to that, the business partners must guarantee the required corresponding instructions and make available the required protective equipment.

3.4. Resource efficiency & economic cycle

Furthermore, LEONHARD WEISS expects a responsible handling of resources. Part of this is to reduce the consumption of materials and in the sense of recycling prevent or reduce waste. Business partners of LEONHARD WEISS support the reuse and recycling of waste and assure proper disposal, which, especially in case of hazardous waste, corresponds to the Basel Convention.

IV. COMMITMENT

4.1. Responsibility in the supply chain

Business partners of LEONHARD WEISS make sure that the principles included in this code of conduct are adhered to by themselves and their employees. They choose their suppliers and business partners according to these principles and make sure that they are bound by comparable principles.

4.2. Verification of the adherence to the principles

If there is a concrete suspicion that the basic principles described in this code of conduct are not adhered to or if there are special risks for the adherence to these principles, LEONHARD WEISS has the right to carry out inspections at the business partner's premises, carried out with prior notice, by our own employees or by independent third parties. Special risks can particularly arise from sector, country, or supply chain specific, negative effects of the business partner's activity on the environment, working conditions and human rights. If the business partner is a supplier or subcontractor of LEONHARD WEISS and is thus also indirectly active for customers of LEONHARD WEISS, inspections at the business partner's premises can also be carried out by the customer or by third parties assigned by the customer. The business partner concludes the corresponding agreements with his subcontractors and suppliers, so that LEONHARD WEISS or customers of LEONHARD WEISS can also carry out inspections at the premises of these subcontractors or suppliers in the cases defined above. Inspections are carried out in coordination with the business partner or with his subcontractors and suppliers according to the applicable legislation and taking into account the confidentiality interests of the company concerned. The costs of an inspection are borne by the business partner, if a breach of the cited principles is detected during the inspection. The results of the inspection are made known to the business partner.

4.3. Handling of breaches & reports of breaches

LEONHARD WEISS expects its business partners to immediately eliminate potential breaches of these principles. In case of serious breaches LEONHARD WEISS reserves the right to take legal steps up to the immediate termination of the business relationship.

Business partners of LEONHARD WEISS make sure that their employees who report breaches of the principles in this code of conduct don't need to fear any disadvantages due to such a report.

LEONHARD WEISS encourages its own employees, but also its business partners, their employees or other third parties, who have knowledge of shortcomings or concrete reports concerning breaches of this code of conduct, to report them. Whistle-blowers don't need to fear any disadvantages due to their report and can rely on a confidential handling of the matter.

CONTACT FOR SUBMITTING REPORTS

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HUMAN RIGHTS / ENVIRONMENT

Notification in connection with a threat to or violation of human rights or the environment in accordance with the Supply Chain Due Diligence Act.

