# INFRA GROUP GENERAL CODE OF CONDUCT

Within the framework of INFRA Group's general management, every INFRA Group company must, first and foremost, comply with the specific rules, regulations and guidelines imposed on a project or activity by the government or a private client and by the local authorities involved in that project or activity in a particular country or region.

INFRA Group further aligns its self-regulation in the field of Sustainability & ESG with the globally applied standards of the Global Reporting Initiative (GRI). In this way, the Group strives to develop a robust Sustainability & ESG policy in accordance with the seven Sustainability & ESG disciplines traditionally referred to, namely accountability, transparency, ethical conduct, respect for the interests of stakeholders, respect for the law, respect for international standards of conduct and respect for human rights.

This Code of Conduct groups the Sustainability & ESG policy requirements set out below under the headings of Corporate Governance, human rights, business conduct and human resources.

The Code of Conduct provides a framework that can subsequently be further developed by each business unit and company within the INFRA Group. In doing so, account must be taken of the standards and impact analysis applicable to the specific activities and the country in which the business unit or company operates.

Compliance with the Code of Conduct is monitored at INFRA Group level and applies to every company within the INFRA Group. The only exceptions permitted to the formal publication by INFRA Group may relate to specific characteristics of the country or business sector concerned, on the understanding that the company is always required to apply higher standards than those customary in that geographical or business segment.

The INFRA Group values of excellence, co-creation, respect, passion and unity are applied in conjunction with the underlying principle of respect. Performance in this area must be continuously monitored and assessed in order to effectively achieve the highest standards of sustainability and responsibility.

Furthermore, INFRA Group aims to contribute to the ongoing alignment of the Code of Conduct with the Universal Declaration of Human Rights, the Ten Principles of the United Nations Global Compact, the 17 Sustainable Development Goals (SDGs), the International Labour Standards, the ISO 9001, 14001 and 45001 standards, and VCA** standards.

Within its sphere of influence, INFRA Group does everything in its power to ensure that its suppliers, subcontractors, agents, joint ventures and other partners adhere to the principles set out in the Group's Code of Conduct.

INFRA Group thus fulfils its responsibility towards the communities and environments in which the Group operates, and towards its employees, business partners and society at large.

INFRA Group may at any time monitor the implementation of and compliance with this Code of Conduct, which forms an integral part of INFRA Group's Sustainability & ESG objectives and action plans.

**Compliance with laws, rules and regulations**
Directors, senior management, consultants and employees must comply with the laws, rules and regulations applicable to each company or entity within INFRA Group. INFRA Group complies with the legal requirements applicable in the countries where the Group operates.

**Conflict of interest**
Directors, senior management, consultants and employees must avoid situations in which their own personal or financial interests conflict with those of INFRA Group. Any situation that leads to a conflict of interest with INFRA Group, or where such a conflict can reasonably be expected, must be immediately communicated and disclosed to the reporting line of the relevant executive or employee before a conflict of interest actually arises. In case of doubt, the INFRA Group Sustainability & ESG Officer can assist with this.

**Accounting practices**
All business transactions with clients must be recorded fully and accurately in the books and records of each company, in accordance with the relevant procedures. Falsifications or misleading entries, unrecorded funds or assets, or payments without proper supporting documentation and approval are strictly prohibited. Project accounts must be complete, accurate and transparent. Invoices must be drawn up in accordance with legal requirements and commercial practices. Cash payments or discounts on payments must not be accepted under any circumstances, unless the payment is made in accordance with generally accepted auditing principles.

**Personal data and privacy**
INFRA Group regards employees' personal data, such as information on remuneration, performance and development, home address and telephone number, as confidential and highly sensitive information.
Unauthorised access to, and the use or dissemination of, such information constitutes a breach of company policy and may contravene legal requirements. INFRA Group strives to strike a balance between business needs and personal rights, including the safety and privacy of employees.

**Company Assets**
Directors, senior management, consultants and employees have a responsibility to protect the property and resources of every INFRA Group company and to ensure their efficient use. Operations involve the use of information, , plant and equipment, tools, material stocks and office supplies, etc. These company assets may only be used in connection with the activities of INFRA Group.
Any other use is prohibited. The same applies to confidential and proprietary information and/or rights. Employees must ensure that such information or rights are handled securely and used with due care.

**Confidential information**
Directors, senior management, consultants and employees must ensure the confidentiality of information entrusted to them by the company or its clients, partners or contractors, in accordance with the GDPR (General Data Protection Regulation), except where disclosure is permitted or legally required. If in doubt as to whether disclosure is legally required or permitted, the immediate manager of the relevant INFRA company must be consulted.

**Email, network, social media, internet access and software**
Unless expressly permitted within an INFRA Group company or entity, internal information systems, means of communication and systems (including email and voicemail), networks and databases are made available solely for the purpose of carrying out the activities of the INFRA Group. Anyone with access to INFRA Group's email, network, social media and internet systems is expected to use them responsibly and in compliance with company policy and professional and personal standards of conduct and courtesy. The ICT (information and communication technology) department of the relevant company or entity within INFRA Group must approve all software used by employees to carry out business activities. The creation or use of unauthorised copies of any software for business purposes, whether in the office, at home or whilst on business travel, is strictly prohibited unless expressly permitted.

**Handling internal knowledge**
All employees must ensure the rapid and smooth exchange of information within the company. Except in cases where other interests take precedence (e.g. confidentiality), information must be passed on correctly and in full where necessary. Information must be correctly recorded and reported to the INFRA Group company or entity.

**Commitment to international standards**
INFRA Group is committed to complying with the United Nations Universal Declaration of Human Rights, the International Fair Labour Practices Agreement and the guidelines of the Organisation for Economic Co-operation and Development (OECD). Furthermore, the Group acknowledges its responsibility to comply with the rights and regulations applicable to INFRA Group's operations in relation to INFRA Group employees and the communities in which the Group operates or from which it recruits staff.

INFRA Group strives to comply with the principles of the Organisation for Economic Co-operation and Development (OECD) Global Compact.

**Social dialogue**
INFRA Group promotes social dialogue and communication with workers and employees in every country where the Group operates, in accordance with the agreed and applicable communication and negotiation channels and working methods in that country.

**Discrimination and harassment**
INFRA Group strives to provide a working and employment environment for employees that is free from discrimination and prohibits all forms of harassment by employees. Discrimination, harassment, slander or jokes based on race, skin colour, belief, religion, country of origin, nationality, age, gender, sexual orientation, marital status or physical disability, or on other individual characteristics or statuses that may be protected by law, will not be tolerated. Physical, verbal or sexual harassment will not be tolerated. Employees must report complaints in this regard to the designated officers.

As part of its ongoing commitment to promoting respect, INFRA Group has established a network of confidential advisors.

Consultants, independent contractors and other service providers
Relationships with third parties must always be conducted correctly, lawfully and in a documented manner. Remuneration and fees must always be set out in a written agreement and reflect the value of the service provided.
Procurement
INFRA Group expects its suppliers, subcontractors, joint venture partners and service providers not to betray the trust placed in them by INFRA Group. All agreements must be strictly adhered to. Business partners are entitled to expect the same from INFRA Group.

INFRA Group encourages and requires that purchasers, suppliers, subcontractors and service providers adhere to INFRA Group's code of conduct for a sustainable and responsible procurement policy.

**Bribery and corruption**
Directors, senior management, consultants and employees are not permitted to offer or give, directly or indirectly, any undue payment or other consideration to any person or entity for the sole purpose of inducing that person or entity to act to secure, retain or award a contract, or to secure any other improper advantage for a company or entity of INFRA Group.

**Conducting business fairly**
Directors, senior management, consultants and employees must strive to deal fairly with customers, suppliers, competitors and employees of INFRA Group. No one may exploit others through manipulation, secrecy, insider trading, the misrepresentation of facts or any other unfair practice.

**Free and fair competition**
Directors, senior management, consultants and employees undertake to comply with global and/or European and/or applicable national competition laws, which are designed to encourage and protect free and fair competition.

**Gifts**
Directors, senior management, consultants and employees are prohibited from requesting or accepting any undue payment or other remuneration given for the sole purpose of inducing a breach of their obligations. Small business gifts are permitted solely as a token of appreciation, provided that the recipient is under no obligation by accepting such gifts. In case of doubt, the INFRA Group Sustainability & ESG Officer must be consulted.

**Local requirements**
INFRA Group operates globally in many countries, each with its own laws. Therefore, INFRA Group may and will apply this Code of Conduct in the manner most appropriate to the region concerned. Nothing in this Code of Conduct is intended to justify conduct that is inconsistent with local laws.

**Political contributions**
INFRA Group encourages employees to exercise their civil rights and responsibilities. However, employees' political ambitions and holding a position outside the company, whether public or private, must not conflict with the law. INFRA Group's funds or assets must not be used for political donations, campaigns or political events.

**Safety**
Directors, senior management, consultants and employees must comply with INFRA Group's health and safety rules and practices and, in accordance with legal requirements, report accidents, injuries and unsafe equipment, practices or conditions, and exercise due care in all their work activities. All INFRA Group companies and employees are responsible for maintaining a safe and healthy working environment. Violence and threatening behaviour are not permitted and will result in disciplinary action.

**Environment**
INFRA Group is committed to contributing to the responsible development of the built environment in accordance with legal requirements. A sound environmental management policy forms an integral part of day-to-day operations. INFRA Group aims to continuously improve the environmental performance of its projects, products and services by actively seeking ways to reduce negative environmental impact throughout the entire life cycle. Employees are expected not to take any action that runs counter to this objective.

**Business opportunities**
Directors, senior management, consultants and employees are prohibited from (a) exploiting opportunities for their own benefit arising from the use of company property or information or from a company position, which do not serve the interests of INFRA Group, (b) usingcompany property or information or a company position to gain personal advantage, and © competing with a company or entity of INFRA Group.

**Illegal 'controlled substances'**
It is prohibited to possess, pass on, buy, sell or use illegal 'controlled substances' at work or during events sponsored by the company. For the use of non-illegal 'controlled substances' such as alcohol, please refer to local company policies.

**External employment**
Directors, senior management, consultants and employees may not work outside INFRA Group, including as self-employed persons, unless management has given prior approval. External employment must not interfere with their performance or responsibilities towards INFRA Group, and the use of INFRA Group staff or property for such purposes is prohibited.

**Credit cards**
Directors, senior management, consultants and employees who are issued with a company credit card are responsible for all activity relating to these credit cards, including purchases, payments, late payment charges and fines. Unless specifically provided otherwise in local policy, credit cards may only be used for business expenses.

**Reporting of illegal conduct or breaches of the Code of Conduct**
Directors, senior management, consultants and employees must promote ethical conduct and encourage employees or staff to consult supervisors, managers or other appropriate personnel if they are unsure of the appropriate course of action in a specific situation. Breaches of the laws, rules and regulations of this Code of Conduct must be reported immediately to the INFRA Group Sustainability & ESG Officer, stating all known facts and circumstances. This report will be treated confidentially and the identity of the person reporting the breach will not be disclosed, subject to the provisions of the compliance rules.

**Disciplinary measures**
This Code of Conduct sets out binding and unambiguous rules governing the way in which INFRA Group operates. It enables us to conduct business in accordance with the Group's values. The Group expects employees of all INFRA Group companies to adhere to its ethical principles, which will be continuously monitored by the INFRA Group Sustainability & ESG Officer. INFRA Group expects and requires all members of the management of INFRA Group companies and entities to comply with and communicate these principles. INFRA Group or the relevant INFRA Group company or entity will take appropriate warning and/or corrective measures against anyone who breaches this Code of Conduct, which may lead to the termination of the employment contract.

**Updates**
From time to time, at the initiative of the INFRA Group Sustainability & ESG Officer, online updates or other amendments to this Code of Conduct may be published on the INFRA Group intranet and website.