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Contents

Objectives.....	1
BeMo’s Code of Conduct.....	1
1. Introduction.....	1
2. Corporate values, management philosophy and responsibilities	2
3. Equal opportunities and mutual respect	2
4. Abiding by the law	2
4.1 Data confidentiality	3
4.2 Freedom of competition, market practices and action against corruption	3
5. External relations.....	3
5.1 Company information releases	3
5.2 Behaviour towards clients, partner companies, subcontractors and suppliers.....	3
6. Commitment to social responsibility	3
6.1 Sponsorship and initiatives for the common good	3
6.2 Health, safety and environmental protection.....	4
7. Compliance with Code of Conduct / Reporting	4
8. Validity of Code	4
Applicable Documents.....	4

Responsible:	Board of Directors (GF), IMS officer within top management (IMB)
Contributors:	All employees

<p>Objectives</p> <ul style="list-style-type: none"> • To develop, promote, strengthen and practise a uniform culture of action that is accepted and respected by all employees • To set guidelines in ethical, social and ecological matters for all BeMo activities and the conduct of BeMo employees
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<p>BeMo’s Code of Conduct</p> <p>1. Introduction</p> <p>BeMo is aware of its role in society and of its responsibility to clients, business partners, employees and shareholders. The company is therefore committed to clear principles. These form the framework for its entrepreneurial and corporate action.</p> <p>BeMo will recognise the following core values based on the United Nations Global Compact Initiative, and put them into practice within its sphere of influence:</p> <ul style="list-style-type: none"> • Protection of internationally proclaimed human rights • Support for the elimination of all forms of forced and compulsory labour and the abolition of child labour • Elimination of discrimination in respect of employment and occupation • Responsible approach to the handling of ecological resources • Combating corruption <p>The integrity of all actions is a fundamental prerequisite for sustainable business success. The integrity of the conduct and decisions of our employees goes hand in hand with this. Integrity of conduct means that we comply with or observe legal, social, ethical and ecological principles and standards which apply to our firm, or which we have accepted voluntarily. The company-wide rules of conduct guide and govern this integrity, as described by and set forth in the following BeMo Code of Conduct and the applicable accompanying documents.</p> <p>It must be clear that no misconduct ever serves the company’s interest. Even a one-off act may have consequences, perhaps years later, while minor infringements are not petty or negligible.</p> <p>The decisive factor, which securely anchors the Code of Conduct in the company as a whole, is the commitment by management and managerial employees to express and communicate it clearly.</p> <p>Every managerial employee of our company must put the Code of Conduct into practice and require that decisions and actions taken in the sphere of their responsibility comply with the applicable legal requirements and BeMo’s values and rules.</p>
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2. Corporate values, management philosophy and responsibilities

Our employees identify with the corporate values and ethos:

- Responsibility
- Reliability
- Commitment and team spirit
- Cooperative
- Efficiency and excellency
- Innovation

Starting with the Board of Directors (GF), BeMo expects all managerial staff to pursue management practices in line with the following principles:

- Systematically and credibly exemplify the desired practices
- Fair interaction that preserves dignity and respects the individual
- Clear communication and information
- Provide direction, motivate and inspire
- Openness to different ideas and opinions
- Introduce changes
- Check whether their subordinates have understood the requirements of the statement of principles and ensure that they have the necessary means of fulfilling and implementing them
- Support employees who refer to them with questions

All BeMo employees must take responsibility for the following:

- Comply with the requirements of this statement of principles
- Comply with the laws, ordinances, regulations, standards and other requirements governing their activities
- If in any doubt, seek advice from line management and ask for help
- Participate in company training courses
- Provide notification of non-compliance with or infringement of the practices listed in this statement of principles
- Contribute actively and constructively to internal checks / audits to identify and rectify the company's shortcomings and weaknesses

3. Equal opportunities and mutual respect

BeMo preserves the dignity of all employees and respects the individual. We treat one another with mutual respect and fairness. Managerial staff set an example and act as competent people to contact, especially in situations of conflict.

BeMo promotes equal opportunities and diversity. No employees or job applicants are discriminated against on grounds of gender, marital or civil status, nationality, age, ethnic and social origin, political outlook, religion, sexual orientation or impairment / disability. Decisions on the selection, training and promotion of employees are based entirely on job-related criteria.

Outstanding performance is a condition of business success. BeMo will therefore especially promote talents whose technical competence and social skills contribute to the company's sustainable success. Accordingly, BeMo offers opportunities for professional and personal development and encourages everyone to make use of them.

BeMo seeks to ensure that employees can reconcile corporate interests with their personal lives. A particular focus is placed on work-life balance.

4. Abiding by the law

BeMo is bound by laws, ordinances, decrees, standards and similar regulations in all areas of its corporate action. For example, these prescribe safety and environmental standards and requirements for the quality of products and services. They govern behaviour on the various markets and prohibit certain forms of behaviour and practice.

The overriding objective for BeMo is to meet these requirements and act only within this prescribed framework.

As stated in FD12 – Compliance Policy, BeMo expects employees to do more than just obey the rules and follow set sequences. They are expected to **act responsibly**.



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All employees must therefore ask themselves the following four questions whenever they make decisions for BeMo:

- **Is my decision in the interest of BeMo?**
- **Is it compatible with the BeMo corporate values?**
- **Is it lawful?**
- **Am I ready to take responsibility for my decision?**

If even one of these questions gives rise to uncertainty, BeMo expects the employee to seek advice so that they are fully able to stand by their decision; otherwise, it must not be made.

4.1 Data confidentiality

All BeMo employees are obliged to comply with the data protection legislation and only process the data they need to fulfil their tasks and activities at the company efficiently. Employees further pledge to treat all data and information which comes to their knowledge during their professional activities as confidential, and handle it with due discretion. See also [FD1331 – Data Protection Guidelines](#).

4.2 Freedom of competition, market practices and action against corruption

All BeMo employees pledge to comply with the legislation on freedom of competition and against corruption. They must avoid all actions which amount, or appear to amount, to abuse, unfair restraint of competition or corruption.

Based on the principles of [FD12 – Compliance Policy](#) and pursuant to the document [FD33 – Compliance Management System \(CMS\)](#), the documents [FD1310 – Corporate Guidelines Against Corruption](#) and [FD1320 – Corporate Guidelines on Competition Law](#) serve to support employees during business operations, by means of specific instructions on action to be taken and case studies.

5. External relations

BeMo always pursues its business by lawful means and fully expects its employees to do the same. BeMo also monitors its business partners, suppliers and clients to ensure they also comply with this principle.

The personal interests of BeMo employees and the interests of the company must be kept strictly separate. A conflict of interests occurs when personal interests clash with those of BeMo.

5.1 Company information releases

BeMo engages in frank and professional dialogue with all interest groups. All information releases from BeMo are comprehensive, factual, comprehensible and timely, and their contents are accurate. To guarantee uniform communication, only authorised persons are allowed to release information to the public, to the media or other third parties. See [UA30 – Communication and Documentation](#).

5.2 Behaviour towards clients, partner companies, subcontractors and suppliers

BeMo views its contract partners, subcontractors, suppliers and their partner companies as essential to the achievement of its goals. It therefore strives, whenever possible, to implement and practise its values / principles in relations with these partners.

All BeMo employees involved in procedures for the selection of partner companies, subcontractors, suppliers and external labour must act impartially and objectively and make their choices based on logical criteria.

6. Commitment to social responsibility

Fulfilment of responsibility to society and the environment is a fundamental factor in sustainable business success. Through its constructions, products and services, its investments and its role as an employer, BeMo fulfils a task of structural importance to the whole economy.

BeMo acts responsibly at international, national, regional and local levels and as a living part of the host communities. For this purpose, BeMo engages in dialogue with groups who are affected by its business activities, or whose activities influence BeMo's own business activity.

BeMo welcomes social and political engagement by its employees, provided this is appropriate in the respective national, regional or local circumstances and does not clash with BeMo's business interests.

6.1 Sponsorship and initiatives for the common good

If BeMo expresses its social commitment by allocating resources to organisations (sponsorships, patronages, donations, etc.), this must always be in harmony with corporate strategy and subject to all necessary internal approvals. It must be totally transparent and traceable.



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6.2 Health, safety and environmental protection

BeMo works to continuously improve occupational health and safety and environmental protection. The workforce shares responsibility for the protection of people and the environment within the sphere of its work. See also [FD11 – Integrated Safety, Environmental and Quality Policy](#).

7. Compliance with Code of Conduct / Reporting

If questions arise about this Code and compliance with it, all employees should seek clarification from their line managers in the first instance. They will explain how to interpret individual sections of the Code or how to measure individual conduct against its standards.

If employees have evidence of a breach of the Code by other employees, third parties or themselves, they must initially report them in the relevant working area, provided that this seems reasonable, sensible and feasible. Otherwise, employees and / or their line managers must refer to the Board of Directors or Compliance Officer (CO). Other possible contact persons are the works council delegates, safety representatives (SVP) or safety officers (SiBe) or the ombudsman and attorney (OVA) for questions / incidents relating to competition and anti-corruption law.

On request, these people will treat every question, information referral and idea as strictly confidential and proceed as appropriate in the individual matters of concern. Employees need fear no disadvantage, except penalties for their own infringements of the Code of Conduct.

[FD2210 – IMS Organisation Chart - Structure](#) shows the names of the appointed CO and SVP / SiBe.

[FD12 – Compliance Policy](#) provides the name, address and contact details of the designated external OVA.

8. Validity of Code

The Board of Directors periodically checks that the Code of Conduct is up to date and revises it if necessary. It remains in force until the board of directors decides to update, revise or cancel it.

Version 2 cleared by the responsible GF, Innsbruck, on 15.01.2020, reviewed 13.07.2021.

Applicable Documents

Document no.	Brief Description
As mentioned in text	

Processor / Date:	13.07.2021
Changes to the previous version:	Additions are highlighted in grey

Thomas Wechner
Director BeMo Tunnelling UK
July 2021