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Table with 2 columns: Field (Preparer/Date, Verantwortliche) and Value (Prepared by: Thaler & Schneider 01/2010, Last Revision: Ebnicher/Thaler 02/2016, Management)

Goals:
• Develop, promote, strengthen and live a uniform culture with regard to actions taken, which is accepted and respected by all coworkers.
• Issue guidelines on ethical, social and ecological questions for all BeMo activities and the conduct of its personnel.
• Strengthen the awareness of BeMo management and BeMo personnel for legal regulations in order to prevent infringement of laws.

Description of Process/Module:
1. Message sent out by the Management of BeMo Tunnelling GmbH
BeMo Tunnelling GmbH is aware of its role in society and its responsibility toward customers and business partners as well as its employees and owners. BeMo thus acknowledges its duty to adhere to clear principles. These principles form the framework for the company's business and social dealings.
Hereinafter the term "BeMo" shall refer to all subsidiaries, branches, work sites and all venues where BeMo Tunnelling GmbH personnel work.
For us compliance means the adherence to legal, social, ethical and ecological principles and standards that apply for our company and to which BeMo voluntarily subordinates itself. These include BeMo's rules of conduct that are valid for the entire company and that shall be described and set forth in the following "BeMo Code of Conduct" as well as in this documents.
Acting in Accordance with the Law is a Motto of our Corporate Culture.
BeMo takes steps to ensure that legal framework conditions as well as company-internal guidelines and ethical, social and environmental standards are observed.



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The conduct of BeMo and its personnel is characterized by responsibility, honesty, loyalty and respect toward our fellow human beings and the environment. BeMo's management bears a special responsibility in this respect.

2. Scope of Application

The Code of Conduct is applicable throughout the entire BeMo group of companies. It extends to official matters in the company and to all areas in which personnel are perceived to represent BeMo Tunnelling GmbH.

The Code of Conduct is the basis for other company rules that may give consideration to industry- and country-specific particularities. When necessary, BeMo foreign business units shall comply with stricter national regulations in implementing this Code of Conduct, provided this does not negatively affect its basic principles.

3. Principles

In keeping with the Global Compact Initiative of the United Nations BeMo shall within its sphere of influence recognize the following basic values and adhere to them in its business practices:

- support and respect the protection of internationally proclaimed human rights
- eliminate all forms of forced and compulsory labor and effectively abolish child labor
- eliminate discrimination in respect of employment and occupation
- deal cautiously with ecological resources
- work against corruption in all its forms

Furthermore, the BeMo-specific basic values, keeping our word, reliability, stability and professionalism shall form the basis for the actions undertaken by all BeMo personnel.

3.1. Equal Opportunity and Respect toward other Persons

BeMo respects the dignity of all its employees and respects each of them as an individual. Their dealings with each other are characterized by mutual respect and fairness. Management shall set an example and especially in conflicts shall be competent contact partners.

BeMo promotes equal opportunity and diversity. No employee or job applicant shall be discriminated because of sex, family status, nationality, age, ethnic or social origin, political ideology, religion, sexual orientation and shall also not be at a disadvantage due to an impairment/handicap. Employees are chosen, trained and promoted exclusively on the basis of job-specific criteria.

Excellent performance is the prerequisite for corporate success. BeMo will thus especially promote those talented persons, who through their professional competence as well as their social skills contribute to the company's sustainable success. BeMo offers suitable opportunities for professional and personal development and encourages all employees to accept such offers. BeMo advocates that its personnel balance their company activities and their private life. In this connection special attention is given to balancing family and work responsibilities.

4. Conduct and the Law

In all areas of its business dealings BeMo subordinates itself to laws, orders, legal decisions, standards and comparable regulations. These are international and national rules as well as regional and local regulations; they set safety and environmental standards, make demands of the quality of products and services, regulate conduct in the various markets or forbid particular conduct and/or practices.



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It is BeMo's foremost goal to meet these demands and to act only within this prescribed framework. The integrity of all our actions is a fundamental prerequisite for sustainable and successful business. BeMo expects conduct that is in conformity with law and BeMo itself will undertake everything necessary to instruct its personnel with regard to the rules that pertain to them and their obligation to comply with those rules.

The framework for BeMo's corporate activities is not only dictated by international and national law, but also by a large number of rules (social, cultural, social welfare...). BeMo also incorporates these, often unwritten, rules in its decision-making processes and strives to act in accordance with them.

4.1. Confidentiality of Data

All BeMo employees are duty-bound to comply with data privacy laws and to retrieve and use exclusively those data that are necessary for efficient performance of their tasks and activities in the company. BeMo employees are also duty-bound to treat confidentially and discretely all data and information that they receive or that comes to their attention in the framework of their job responsibilities. For further details check back document [FP14mdoc03 – Company Data Protection](#).

4.2. Respect for Free Competition and Conduct in the Marketplace

All BeMo employees are duty-bound to respect the principles of free competition and to adhere to all relevant laws and not undertake any actions that would constitute an abuse or unfair restriction of competition. For further details check back document [FP14mdoc02 - Company Guideline Antitrust Law](#).

5. Third-Party Relationships

BeMo conducts its business by legal and ethical means and expects the same of its employees. It is important for BeMo that its business partners, suppliers and customers also adhere to this principle.

The personal interests of BeMo's employees and the company's interests are to be kept strictly separate. A conflict of interests occurs when personal interests collide in any way with BeMo's interests, or even only if such an impression is given.

Gratuities from third parties that are not based on contractual performance may neither be requested, accepted, offered nor granted by BeMo employees. This holds true without exception and in particular toward all government office holders or persons acting in an official capacity.

Other types of gratuities from suppliers, customers or other business partners may not be requested. Such gratuities - insignificant gifts, hospitality or other gratuities - may be accepted only in the framework of general customary business practices and to the extent that they do not influence company decisions. Such gratuities may be offered or granted only in the framework of customary customer retention practices, provided no unreasonable exercise of influence can be seen therein. For further details check back document [FP14mdoc01 - Anti Corruption](#).

5.1. Company Information

BeMo conducts an open and factual dialogue with all interest groups. Information published on the company is comprehensible and documented. All BeMo communications are thus complete, factual, have correct content and are understandable as well as current. In order to guarantee a uniform appearance only specially authorized persons are authorized to pass information to the public, the media or other third parties.

5.2. Conduct toward Customers, Partner Companies, Subcontractors and Suppliers

BeMo Tunnelling GmbH acts with the goal and intention of offering the highest possible level of quality and excellence in rendering its services.

Furthermore, BeMo generally views its contractual partners, subcontractors, suppliers and its partner companies as indispensable in reaching its goals and makes an effort to implement and live as far as



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possible its values/principles also in its relationships to its partners. Collaboration with companies that demonstrate advanced or high quality, social, ethical or ecological standards is supported.

All BeMo employees who are involved in procedures to select partner companies, subcontractors, suppliers and external co-workers must act in an impartial and objective manner and base their actions on transparent criteria in accordance with the corresponding internal guideline for such selection procedure.

In its relations to employers, partner companies, subcontractors and suppliers it is important for BeMo that the rules of the Code of Conduct be adhered to, and for this reason BeMo maintains no business contacts to companies who are publicly known to violate the principles underlying the Global Compact. In its business relations BeMo moreover advocates further implementation of the Global Compact.

6. Commitment to Social Responsibility

Meeting its responsibility toward society and the environment is an essential factor in a corporation's sustainable success. Through the buildings, products and services it provides, as well as through its investments and its role as employer BeMo meets an essential structural and macroeconomic responsibility.

BeMo acts in a responsible manner at the international, national, regional and local level and as a living part of the particular communities. For this purpose BeMo seeks a dialogue with groups affected by its corporate activities or whose activities influence BeMo's corporate activities.

BeMo welcomes participation by its personnel in social and political life, provided it is appropriate under the particular national, regional or local circumstances and provided that no collision occurs with BeMo's business affairs.

While in cooperation with other relevant new employers, related companies, subcontractors and suppliers we will propose the code of conduct of BeMo as well as the main principles of the Global Compact and will take actions in case of violation.

6.1. Sponsoring und Initiatives for Promoting General Well-Being

Whenever BeMo expresses its commitment to society by allotting funds to organizations (sponsoring, patronage, donations, etc.), this must always be done in accordance with company strategy, on receipt of all necessary internal and external approvals and must also be completely transparent and documented.

6.2. Labor, Health and Environmental Protection

BeMo endeavors to continually improve its labor, health and environmental protection measures. BeMo personnel shares in the responsibility for protecting human beings and the environment in their particular work environment. All relevant laws and regulations are to be adhered to.

7. Adherence to the Code of Conduct / Reporting

All BeMo employees shall receive a copy of the Code of Conduct. Management is called upon to actively promote implementation of the Code of Conduct. Internal audits shall examine adherence to the principles of the Code of Conduct.

In all matters involving this Code of Conduct and adherence thereto, an employee shall first seek clarification from her/his superior or the pertinent company department. To be clarified are how individual passages of the Code are to be understood and how a person's particular conduct is to be measured against the standards of the Code. If an employee suspects that she/he, a third parties or a different employee is infringing or has infringed the Code, such suspicions are first to be clarified in the pertinent department as long as they seem appropriate, reasonable and feasible. Contrary the employees shall contact the management or the "Advisory Board".



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7.1. Advisory Board on the Code of Conduct

If clarification with the employee's superior or in the particular department is not possible or does not appear appropriate, an employee may turn to the Advisory Board.

The persons serving on the Advisory Board shall be:

- Dipl. -Ing. Thomas Thaler (thomas.thaler@bemo.net)
- Arnold Luschnik (arnold.luschnik@bemo.net)

The Advisory Board will treat every inquiry, every report and every suggestion in strict confidentiality and pursue such matters in an appropriate manner. At the employee's request the employee will be informed of the steps initiated and the action taken. No employee shall fear disadvantages as a consequence of referring a matter to the Advisory Board, except for penalties for an infringement or infringements of the Code of Conduct.

7.2. Confirmation and Reporting

Every management employee with responsibility for BeMo personnel shall report once a year to the responsible compliance manager concerning implementation of the Code of Conduct in her/his area of responsibility and for this purpose shall use the prescribed form; infringements against the Code of Conduct are to be reported.

8. Validity of the Code

This Code of Conduct was released by the BeMo management and shall remain in force until management resolves that it be updated, revised or revoked.

The Code shall at the Management Meeting be periodically checked for currency and revised by management.

The Code of Conduct in its latest version (Index/Version) shall be published and managed by QMS in the IMS. It shall enter into force on being published (month/year, see footer).

Monitoring/Monitoring Features:

Registered infringements against the Code of Conduct.

Process/Modules Valid in Connection with the Code of Conduct:

Process	Brief Description
FP0	Process Modell Graphic Overview
FP1	Management Processes – Overall Concept and Goals

Documents Valid in Connection with the Code of Conduct:

Dokument	Kurzbeschreibung
FP10	Integrated Safety, Environmental and Quality Policy
FP14mdoc01	Company Guideline Anti Corruption
FP14mdoc02	Company Guideline Antitrust Law
FP14mdoc03	Company Data Protection
FP31	Management Manual
Management and Work method Metrostav - DE	Metrostav a.s. Unsere Art zu leiten und zu arbeiten

Changes to latest Revision: complement marked GREY