Principles

Sustainability is a high priority for HOCHTIEF. We are dedicated to actively supporting the environment and responding to social and economic concerns. Our commitment to these principles is expressed in numerous ways.

1. Guiding principles

Our commitment to the principle of sustainability is anchored in our <u>guiding principles</u>. Further principles include: a client-oriented service spectrum, successful employees and a value-oriented strategy.

2. German Corporate Governance Code

Transparent corporate governance, above and beyond the legal requirements, is important to HOCHTIEF. In this area, we are guided by the stipulations of the <u>German Corporate</u> Governance Code.

3. HOCHTIEF Code of Conduct

Our own corporate <u>Code of Conduct</u> lays out the requirements for a positive daily working environment. Its focus is on the ethical principles which support our business and which are binding for all HOCHTIEF staff, whether employees or management. 2010 the HOCHTIEF Code of Conduct was revised and supplemented to incorporate international standards on areas such as employee rights, forced labor, child labor and environmental protection. <u>more</u>

4. Procurement Directive/Code of Conduct for Business Partners

The ethical principles for procurement are outlined in the <u>Procurement Directive</u>. These describe the key values, responsibilities and standards of conduct for all HOCHTIEF employees involved in the procurement process. These rules supplement the HOCHTIEF Code of Conduct. HOCHTIEF also demands high ethical standards from its subcontractors and suppliers and has formulated these in a special <u>Code of Conduct for Business Partners</u>. HOCHTIEF cooperates only with partners who observe these standards and who also insist that their own subcontractors and suppliers comply with these standards.

5. UN Global Compact

Taking up an initiative of the CSR Committee, HOCHTIEF Aktiengesellschaft became an official member of the <u>United Nations Global Compact</u> initiative at the beginning of November. Global Compact's goal is to advance a total of ten principles in the areas of human rights, labor, the environment and anti-corruption worldwide.

Here you find HOCHTIEF's Communication on Progress.

6. Code of Responsible Conduct for Business

In November 2010, HOCHTIEF together with 20 other German companies, presented the <u>Code of Responsible Conduct for Business</u>. With this Code, the signatories give their voluntary commitment to fair competition, social partnership and sustainability. The shared aim is to integrate the stated values into the companies' management processes and to define visible, practicable and controllable standards for responsible entrepreneurship with the Code.

7. Transparency and anti-corruption

HOCHTIEF firmly believes in fair competition and transparency in the construction industry. Our consistent anti-corruption policies are reflected, among other things, in membership of Transparency International going back to 1999. HOCHTIEF is the only German provider of construction services to be a member. The company is also a founder-member of Netzwerk Compliance, a network of German companies aiming to combat unfair business practices. In addition, HOCHTIEF is a member of the World Economic Forum's international Partnering Against Corruption Initiative.

8. Directive on Occupational Safety, Health and Environmental Protection

The 2002 implemeted <u>directive on environmental protection</u>, <u>health and safety</u> is based on the international environmental management standard ISO 14001. The directive expresses the company's environmental protection and occupational safety policy and imposes minimum requirements for each Group division and company with regard to environmental and safety management. This ensures that the legislative and official requirements of each geographical location are precisely adhered to and implemented. This proactive approach allows us to identify risks early on and thus prevent serious accidents and environmental damage to the greatest extent possible. In so doing, we protect the health of HOCHTIEF staff members and third parties. At the same time, we minimize or even completely prevent material damage or a potential loss of corporate image. Our corporate directive on environmental protection, health and safety outlines the minimum requirements which must be met by all corporate divisions.

9. Standards of the International Labour Organization (ILO)

The first construction company worldwide to do so, HOCHTIEF in 2000 committed to comply with the standards of the <u>International Labour Organization (ILO)</u>. This UN agency strives to promote free, equitable, safe and humane working conditions for women and men worldwide.

10. Diversity Charter

We actively manage diversity to create an environment in which every individual enjoys respect and individual advancement. Equal opportunities are enshrined at HOCHTIEF not only through relevant legislation, they are part of our guiding principles. In July 2008 we signed the <u>Diversity Charter</u> published by the German government. In the <u>charter</u> we committed to creating a working environment free of prejudice.

11. encord: Sustainable Development Charter

In June 2010, HOCHTIEF and 19 other European construction companies as members of encord, the European Network of Construction Companies for Research and Development, signed the <u>Sustainable Development Charter</u>. Under the terms of the Charter, the companies undertake to integrate sustainability principles into their corporate strategies and—especially in the area of Research & Development—to promote them.