



Implenia

CODE OF CONDUCT

Company
guidelines and
behavioural
guidelines



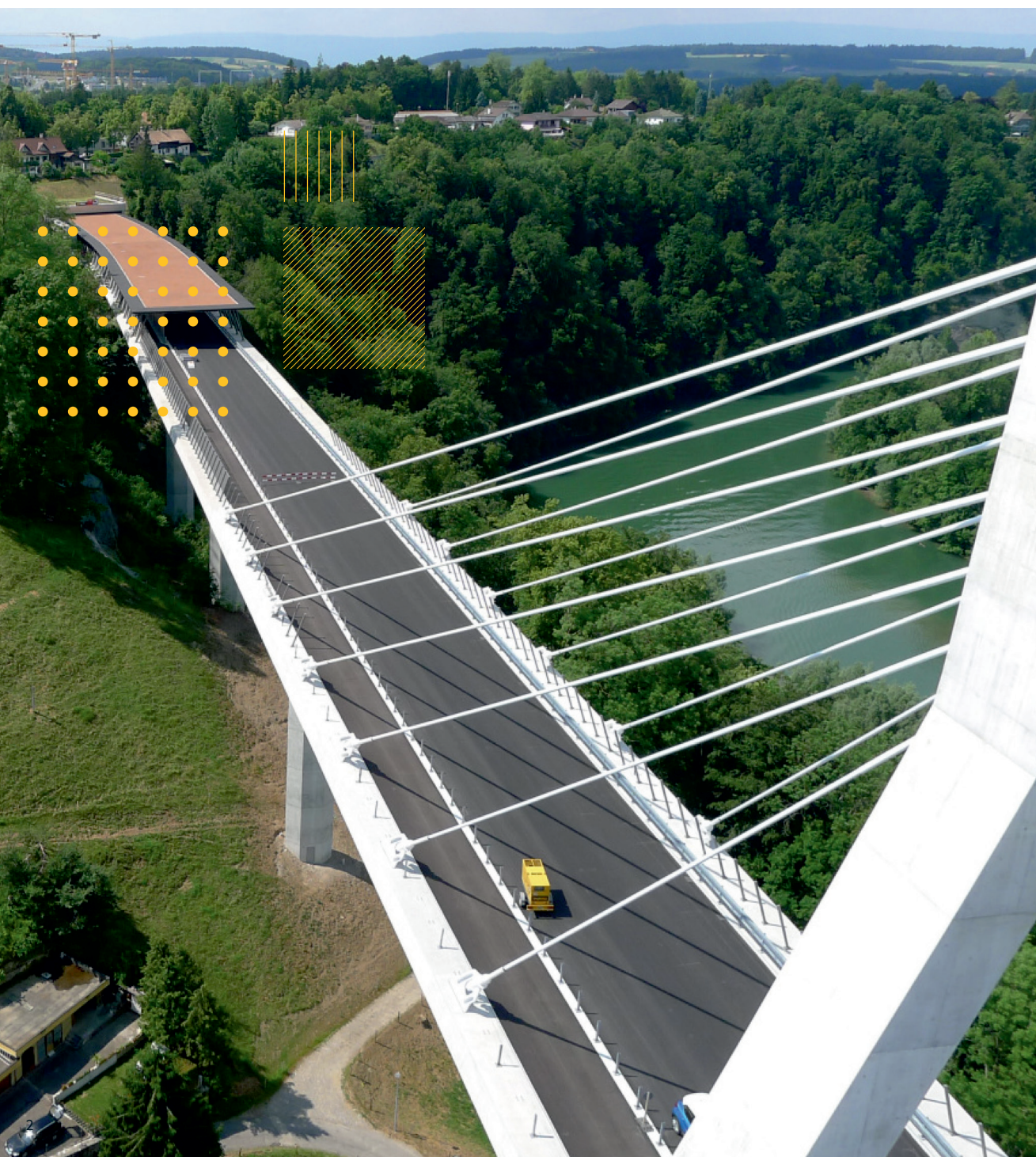


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FOREWORD

Why do we need behavioural guidelines?

Implenia is a strong company with an excellent reputation, which I am very proud to serve as CEO since October 2018. This reputation is one of our most important assets, to which many factors contribute, such as quality, on-time delivery and cost of course, but also how we act and behave in our relationships with customers, suppliers, competitors, colleagues and the authorities.

Indeed, what makes us working together and thereby fosters our success is a common set of values which guide us day by day in our work and in the decisions we take on behalf of the company.

Our Code of Conduct outlines these values and is therefore an integral part of our corporate culture, our social responsibility and our approach to safety, occupational health and the environment.

Thank you for reading and understanding our Code of Conduct; by living it day by day we make sure that our company will remain as successful and maintain its excellent reputation.

Best regards



André Wyss
CEO



**«BY WORKING TOGETHER
AS A TEAM ACCORDING
TO OUR VALUES WE WILL
CONTINUE TO BUILD A
SUSTAINABLE FUTURE
FOR IMPLENIA.»**

EXCELLENCE
COLLABORATION
AGILITY
INTEGRITY
SUSTAINABILITY

COMPANY GUIDELINES AND BEHAVIOURAL GUIDELINES OF THE IMPLENIA GROUP

1. Values of Implenla

The values form the basis of our corporate culture and must be applied and lived up to by all our employees:

- **Excellence:** We meet the most demanding requirements in our projects, services and internal processes. We live up to Excellence by setting standards based on tradition and innovation that help us exceed our partners' expectations. Today and tomorrow.
- **Collaboration:** We merge our diverse market knowledge and insight with professional expertise to the benefit of our customers and other stakeholders. We live up to Collaboration by creating trust through fairness, transparency and respect. With all our partners.
- **Agility:** We recognize opportunities and threats at an early point in time, and we address them quickly – both strategically and operationally. We live up to Agility by being a highly mobile, passionate, multinational team that constantly looks for new and innovative ways of overcoming barriers, thus achieving the best value for our customers.
- **Integrity:** We meet high ethical standards, are honest, and act in accordance with the agreements we make. We live up to Integrity by being honest and reliable, acting respectfully and always doing so with a smile :-)
- **Sustainability:** We generate results that endure and we protect our fellow human beings and the environment. We live up to Sustainability by working together to create a future worth living for everyone.

2. Integrity and lawful actions

Integrity forms the basis for our actions. Implenía expects its employees to comply strictly with the applicable laws and internal directives in their work:

- We inform our employees about the most important laws and internal rules on a regular basis and oblige them to comply with them.
- Breaches of laws and rules must be reported to the Compliance Officer without delay to ensure the breach stops immediately.
- We ensure that our operating assets and our resources are only used for their intended purpose and in an appropriate manner. The prevention of loss or theft is a matter of particular importance for us.
- Data, information and documents which we have prepared or for which we are responsible (such as the annual report, project or tender documentation, claims for expenses or e-mails) must be correct.
- The falsification of reports and files or the distorted presentation of facts may constitute a criminal offence. Implenía as a company may be called to account just as much as employees who share responsibility for such illegal actions.





3. Prevention of corruption

Implenia aims to be successful in a freely competitive market. Every successful offer must come about honestly and be lawful. This means for all of us:

- We adhere strictly to the prohibition of corruption and bribery.
- Each employee is also personally responsible for compliance with the prohibition of corruption and bribery and the respective Group guidelines. This includes the fact that no employee may accept or offer gifts in any form whatsoever from which it must be assumed that they can exercise inappropriate influence on commercial decisions. Please contact the Compliance Officer if you have any uncertainties.
- Employees must report behaviour patterns which breach the prohibition of corruption and bribery and other provisions, or relevant suspicious facts without delay to the Compliance Officer. Reports may be made via the hotline or (anonymously if preferred) via the report form available for this purpose on the Implenia Intranet. Employees submitting these reports do not risk being disadvantaged in any way unless a report is submitted improperly and without good cause.
- Implenia combats corruption and reports illegal patterns of behaviour among its employees.
- Sponsoring or donations to non-political organisations must be transparent and must not take place with the aim of influencing pending decisions.
- If at all and if permitted under the applicable laws, Implenia only makes open, transparent contributions to political organisations or individual politicians. In each case, the decision lies with the Group Executive Board.
- Implenia does not associate with companies or private individuals which make use of corrupt methods and does not conclude any contracts with them.

4. Compliance with competition law

Implenia advocates free and effective competition. Restrictions of free competition distort the market and undermine economic, social and democratic development as well as the development of Implenia. This is why the following principles apply:

- We abide by the provisions of competition law, which forbid unlawful restrictions of competition (such as price, customer or territorial agreements between competitors).
- Each employee is personally responsible for compliance with the provisions of competition law. If you have any uncertainties in relation to competition law-compliant behaviour, please contact the Compliance Officer immediately.
- Employees must report breaches of competition law or relevant suspicious facts without delay to the Compliance Officer. Reports may be made via the hotline or (anonymously if preferred) via the report form available for this purpose on the Implenia Intranet. Employees submitting these reports do not risk being disadvantaged in any way unless a report is submitted improperly and without good cause.
- If you are encouraged or forced into illegal behaviour by competitors or a supplier, clearly distance yourself from this immediately and inform the Compliance Officer.





5. Confidentiality and conflicts of interest

We avoid situations which could lead to conflict between our personal interests and the interests of Implenla:

- Secondary employment and investments in business associates and competitors must be disclosed and approved in writing.
- Employees with access to confidential information which may have an impact on the market price of shares or other securities issued by Implenla shall abide by the statutory prohibition of insider trading and by our internal rules.
- As long as information about Implenla is confidential, it may not be disclosed to third parties or made public.
- All employees are forbidden from transmitting information, statements or opinions to people working in media without prior approval from the Communications department and may be punished. The Head of Communications Group must be contacted in any case of uncertainty as to whether an inquiry comes from a person working in the media or will be transmitted to such a person.

6. Data protection

We comply with the legal provisions governing how we deal with commercial and personal data:

- Large quantities of data are collected in both written and electronic form in our company. They include, among others, commercial customer and supplier data as well as personal data from current but also from former employees.
- Implenla as a company and all employees exercise the greatest degree of care in dealing with these data.
- If you have any uncertainties in dealing with data, please contact the responsible Data Protection Coordinator / Data Protection Officer.



7. Use of resources to process information

Our IT infrastructure serves the business. The flawless functioning of our computer systems and their security is of the greatest importance for seamless business operations. We therefore abide by the following principles:

- No actions are permitted which impair the operational safety and reliability of Implenia's IT infrastructure or which may result in legal, financial or intangible damage for Implenia.
- The systems (these include e-mails) may never be used in a way that causes offence, unrest or other harm. This includes the creation, display, storage or transmission of pornographic images or messages of racist or morally offensive material.
- The necessary care must be exercised when using the Internet.
- Implenia does not use any software that has been copied or bought illegally. The illegal use of software can have legal consequences both for individual employees and for Implenia.

8. Health & Safety

The safety of our employees and third parties is of highest priority to Implenia.

- We strictly comply with all company and government Health & Safety principles and so create a healthy, safe and motivating working environment with the aim of preventing injuries and accidents.
- It is prohibited to work while impaired or intoxicated by legal or illegal substances, including alcohol or prescription medications and drugs.
- In case of questions or concerns, contact your management immediately.
- Inform your management immediately about all breaches, injuries and accidents.

9. Social responsibility

We offer our employees a motivating and safe working environment:

- We repudiate illegal employment practices.
- We protect our employees from physical dangers, sexual harassment and discrimination in the workplace.
- We abide by the principles of equality, do not tolerate any unequal treatment and respect our employees' privacy.

10. Sustainability and environment

The construction industry has a major impact on the environment:

- Implemia consistently pursues sustainable approaches and plays an active role in the effort to establish sustainable construction standards. Suppliers must also be involved in the development of sustainable products and services.
- We do all that is needed to treat the environment with care and protect it where we are able to do so. We strive to increase energy efficiency and to optimise the consumption of resources.
- We monitor environmental performance systematically using a tailor-made monitoring system and set ourselves ambitious targets.



11. Obligations of Implenia's suppliers

Implenia expects its suppliers (namely manufacturers, suppliers and subcontractors) to make an active contribution to implementing the contents of the Implenia Code of Conduct:

- We do not tolerate any illegal or irregular behaviour by our suppliers.
- Our suppliers also comply strictly with the prohibition of bribery and corruption. This includes, among other issues, the fact that suppliers deal responsibly with gifts and may not accept or offer gifts in any form whatever from which it must be assumed that they may exercise undue influence on commercial decisions.
- Our suppliers acknowledge that sustainable action is one of Implenia's fundamental values. We expect our suppliers to establish and apply an appropriate programme of measures concerning the environment, occupational health and safety, risk management and compliance.
- Implenia expects its suppliers to comply with the fundamental employee and human rights contained in international conventions, programmes and standards. In particular, this includes the prohibition of child and slave labour.





12. Adoption of additional rules

In addition to the principles explained in the present Code of Conduct, the associated Group guidelines contain specific codes of behaviour, compliance with which is mandatory for employees.

To take account of country-specific circumstances, regional guidelines may envisage additional rules, which may not, however, conflict with this Code of Conduct and the Group guidelines.

13. Implementation of the Code of Conduct

The rules of this Code of Conduct and the (Group) guidelines are an integral component of Implenia's corporate culture:

- Employees shall actively obtain information on the applicable laws and guidelines.
- The individual rules of conduct are mandatory: each employee shall bear part of the responsibility. Breaches shall entail sanctions.
- The superior and the responsible Compliance Officer shall ensure that the rules of conduct are implemented and will be available as a point of contact for employees who have any questions or are unclear about certain aspects. Inquiries or reports may also be made via the hotline or (anonymously if preferred) via the report form available for this purpose on the Implenia Intranet.
- The Code of Conduct will be discussed at least once a year by the Board of Directors. In the process, they will review whether it is being implemented correctly and, if necessary, the rules of conduct or the organisational measures will be adjusted.
- The Chief Compliance Officer is responsible for the implementation of these rules. He reports directly to the CEO.

HOTLINE AND CONTACTS

Your contact persons

In addition to the responsible Compliance Officer, the persons listed below are your points of contact for your inquiries and reports. Inquiries and reports may also be made via the hotline or for Implenla employees (anonymously if preferred) via the report form:

Hotline

Head Compliance

Stephanie Männl
T +41 58 474 37 90
stephanie.maennl@implenia.com

Board of Directors

Henner Mahlstedt
T +41 58 474 16 95
henner.mahlstedt@implenia.com

Contacts

Communications

Silvan Merki
Chief Communications Officer
T +41 58 474 74 77
communication@implenia.com

Point of contact for women

Stephanie Männl
Head Compliance
T +41 58 474 37 90
stephanie.maennl@implenia.com



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