



**Implenia**

# **CODE OF CONDUCT**

**for External  
Business  
Partners**



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# FOREWORD

## Dear External Business Partners of Implenla

Implenla has an excellent reputation based on the high quality of our work and the consistent fulfillment of our commitments and agreements. Integrity and ethics are very important to us in our dealings with our customers and with you as a partner. Our corporate culture and business model are based on the values of excellence, collaboration, agility, sustainability and integrity.

We expect you as a partner to respect these values and to comply with all applicable laws, regulations and your contractual obligations to Implenla.

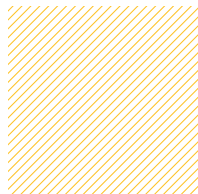
The “Code of Conduct for External Business Partners” defines the most important principles of our cooperation and is part of your contracts with us. So that we can build a long-term partnership characterised by trust and transparency, please read and follow this “Code”.

We look forward to a successful collaboration with you.

Best regards



**Jens Vollmar**  
CEO



**«WE LOOK FORWARD  
TO A SUCCESSFUL  
COLLABORATION WITH  
YOU.»**





# 1. BUSINESS INTEGRITY

## 1.1 Compliance with Applicable Laws

Implenia's external business partners (hereinafter "Business Partners") and its affiliated subsidiaries and group companies (hereinafter "Implenia") shall observe all applicable laws and regulations and must therefore be familiar with the laws, regulations and guidelines relevant to their specific activities. Implenia will not tolerate any illegal or irregular conduct by its Business Partners.

## 1.2 Compliance with Foreign Trade Law

Implenia's Business Partners shall ensure that transactions with third parties do not violate current economic embargoes or regulations on trade, import and export controls or regulations on the prevention of terrorism financing.

## 1.3 Fair Competition

Competition is the basis of a functioning market economy and any restriction of free competition distorts the market and slows down economic, social and democratic development. Therefore, Implenia's Business Partners must act in accordance with all applicable antitrust and competition rules. Therefore, illegal practices concerning price-fixing, agreements on quantity, market allocation, or collusive tendering or any act that intends or results in any restriction of competition are prohibited and will not be tolerated by Implenia. Business Partners shall employ fair business practices, including accurate and truthful advertising.

## 1.4 Prevention of Corruption

Implenia does not tolerate bribery or any other form of corrupt business conduct. Business Partners must deal responsibly with gifts and may not accept or offer gifts in any form whatsoever from which it must be assumed that they may exercise undue influence on commercial decisions. Implenia does not associate with companies or private individuals that use corrupt methods and does not conclude any contracts with them. In addition, Business Partners must take appropriate measures to ensure that their employees recognise and report corrupt behaviour and do not offer or accept improper benefits from stakeholders (in particular to/from public officials and decision-makers). Any successful offer must be made honestly and in compliance with the law.



### 1.5 Intellectual Property

Business Partners must respect and protect the intellectual property of Implenla, such as trademarks, copyrights, designs, patents, trade secrets, models and know-how, and the intellectual property of third parties.

### 1.6 Protection of Implenla's Resources and Property

Business Partners shall ensure that Implenla's resources and property are treated with care and shall only be used for their intended purpose. Any form of fraud (e.g. embezzlement, theft, misappropriation) is prohibited and unacceptable, regardless of whether Implenla's assets or third-party assets are affected.

### 1.7 Data Protection

When collecting, storing, processing or transferring etc. personal data (e.g. name, address, telephone number, date of birth, health information etc.) relating to employees, customers or other third parties, Implenla's Business Partners shall observe the applicable laws and rules and shall exercise great care and maintain strict confidentiality. Any questions regarding data protection should be addressed to [dataprivacy@implenla.com](mailto:dataprivacy@implenla.com).

### 1.8 Confidentiality

Business Partners shall ensure that confidential information is stored carefully, that it is not passed on or made available to unauthorised persons and that it is only used for the agreed business purposes. Business Partners shall respect the know-how, intellectual property rights, trade and business secrets of Implenla and of third parties. They shall not disclose such information to third parties in violation of the law or without the express written consent of Implenla or in any other inadmissible manner.

### 1.9 Responsible Sourcing

Implenla's Business Partners shall use its best efforts to ensure that their own business partners, whom they appoint to work for or on behalf of Implenla, are familiar with and comply with the requirements of the Implenla Code of Conduct for External Business Partners. Business Partners must ensure that goods and materials – including, but not limited to metals, timber, other bio-based materials, natural stones and conflict minerals – are not sourced in a dubious or illegal manner. They are obliged to implement measures for the responsible procurement of goods and materials to ensure compliance with laws and regulations as well as the respective specification outlined by Implenla and to contribute to sustainable development. Business Partners are required to disclose the origin and sources of the materials used by them.

### 1.10 Product Quality and Safety

Business Partners must focus clearly on quality and safety with regard to their product and service delivery and undertake to fulfil all specified quality requirements as outlined by Implenla as well as all generally applicable standards and guidelines. Business Partners must also examine their supply chain and ensure that they procure high-quality products or services that can be used and applied safely. Business Partners shall clearly communicate information on the safe usage of their products as well as on possible quality deviations.



**WE ALL SHALL TAKE  
RESPONSIBILITY  
FOR OUR ACTIONS.**

## 2. HUMAN RIGHTS AND LABOUR CONDITIONS

### 2.1 Free Choice of Employment

Business Partners shall not use forced, bonded, indentured or involuntary labour. All work must be voluntary, and workers shall be free to leave work or terminate their employment on reasonable notice. Business Partners shall not unreasonably restrict the freedom of movement of workers. Employers and labour agents must not hold or otherwise destroy, conceal, confiscate or deny employees access to their identity or immigration documents. Workers shall not be required to pay recruitment fees or other fees related to their employment to employers or agents.

### 2.2 Prohibition of Child Labour and Respect of Human Rights

Business Partners shall comply with the fundamental labour and human rights contained in international conventions, programmes, and standards. In particular, this includes the prohibition of child and slave labour. Business Partners must operate in compliance with local laws and the core International Labour Organisation (ILO) standards on child labour including ILO Convention 138. The employment of anyone under the age of 15 in any position is prohibited. Young workers under the age of 18 are not allowed to perform hazardous work or work night shifts or overtime.

### 2.3 Work Environment

Implenia's Business Partners shall maintain a respectful, dignified and inclusive relationship with their employees, free from harassment, discrimination, bullying or intimidation, and promote equal opportunities for all. Discrimination on the basis of ethnicity, skin colour, religion, gender, age, sexual orientation, gender identity, marital status, political affiliation, trade union membership, disabilities or other personal characteristics will not be tolerated.

### 2.4 Health and Safety

Business Partners shall adhere to all government health and safety laws and regulations and so create a healthy, safe and motivating work environment to prevent injuries and illness. In particular, Business Partners shall protect workers from undue exposure to chemical, biological, psychological and physical hazards both; in the workplace and in any company-provided living quarters. While present on an Implenia site, Business Partners shall also comply with the applicable Implenia policies, instructions etc., such as the Implenia Safety Rules. Anyone, in our workplaces, has the right and duty to intervene and suspend the activities if there is any doubt that health or safety may be compromised.

**THE MOST VALUABLE  
RESOURCES ARE  
EMPLOYEES.**

### 2.5 Fair Treatment

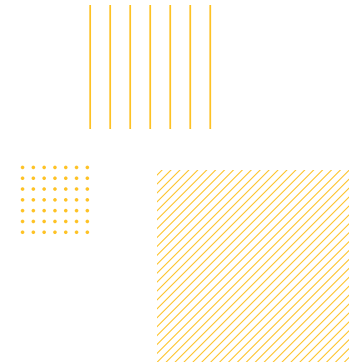
Business Partners shall provide a workplace free from harsh and inhumane treatment. Employees shall not be subjected to or threatened with sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse. The Business Partner shall not use or engage security personnel who, due to a lack of instruction or supervision, violate the prohibition of torture, violate life and limb, or interfere with the freedom of association or otherwise interfere with the rights of employees by improper means.

### 2.6 Wages, Benefits and Working Hours

Business Partners shall pay workers in accordance with applicable wage laws, including minimum wages, overtime hours and mandated benefits. Business Partners shall communicate with the worker in a timely manner the basis on which they are being compensated. Business Partners are also expected to communicate with the worker whether overtime is required and the wages to be paid for such overtime. In the absence of national regulations, remuneration must be sufficient to meet basic needs, in accordance with ILO Convention C131 on Minimum Wage Fixing. A working week, including overtime, shall not exceed applicable local legal requirements regarding maximum working hours. In the absence of such requirements, Implenia recommends that working hours, including overtime, shall be not more than 60 hours per week, except in emergency or unusual situations. Implenia further recommends that workers be given at least one day off every seven days. Employees are entitled to a regular annual leave.

### 2.7 Freedom of Association

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Business Partners shall respect the rights of workers to associate freely, to bargain collectively, to join or not to join trade unions, to seek representation and to join workers' councils, in accordance with local laws. Workers should be able to communicate openly with management about working conditions without fear of reprisal, intimidation or harassment.







## 3. ENVIRONMENTAL PROTECTION

### 3.1 Environmental Compliance

Business Partners shall comply with all applicable environmental regulations relating to the supply chain and operations as well as products or services supplied. All required environmental permits, licences, information and registrations shall be obtained and their operational and reporting requirements complied with.

### 3.2 Environmental Protection

Protecting people and the climate is an integral part of Implenía's policy. Implenía expects its Business Partners to

- take all possible steps to mitigate and minimise the impact of their business activities on the climate;
- actively protect the climate and the environment in accordance with international standards and legal provisions; this includes avoiding emissions and waste wherever possible, as well as taking steps to continually improve resource efficiency;
- protect the environment, in particular with regard to nature conservation, the preservation of biodiversity and ecosystems, the depletion of natural resources and the management of waste, emissions and toxic substances;
- limit the impact on local communities;
- reduce energy consumption, greenhouse gas emissions, discharges to water, air and soil, and waste;
- reduce water consumption, and
- continually seek to improve the effectiveness of its efforts in this regard.

Business Partners shall have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. Any waste, wastewater or emissions that may have an adverse effect on human health or the environment must be properly managed, controlled and treated. When working on a Implenía construction site, Business Partners shall also comply with the Implenía Environmental Standard. Implenía requires its Business Partners to ensure the safe, environmentally sustainable development and manufacture of their products, their packaging, and their transportation. Implenía aims to select and evaluate its Business Partners based on climate, safety, and security performance aspects. Successful cooperation between Implenía and Business Partners is based on mutual trust, transparency reliability and fairness.

### 3.3 Environmental Incidents

Business Partners shall have systems in place to prevent and mitigate accidental spills and releases into the environment.

### 3.4 Environmentally Friendly Products and Services

In view of a zero-carbon net and circular economy, Implenía's Business Partners shall ensure the development and provision of environmentally friendly products and services with a low environmental footprint. The products should be as suitable as possible for repair, reuse or recycling. All substances whose presence or release poses a threat to humans and the environment or that hinder recycling must be avoided. Products supplied to Implenía must comply with the applicable legislation at the place of production and in the country/countries of destination of the products, in particular with substance regulations such as RoHS or REACH. Products supplied shall not contain any restricted substances and no "substances of very high concern" (SVHC). Business Partners shall provide all legally required or agreed information in due time, including disclosures and product information required for the implementation of Implenía's sustainability programme, in particular with regard to carbon footprint calculations and life cycle assessments.



**A GOOD MANAGEMENT SYSTEM  
SUPPORTS COMPLIANCE WITH THIS  
CODE AS WELL AS  
APPLICABLE LAWS  
AND REGULATIONS.**

## 4. MANAGEMENT SYSTEMS

### 4.1 Commitment and Accountability

Business Partners shall demonstrate their commitment to the concepts described in this document by allocating appropriate resources. Business Partners shall ensure that the principles of this Code are implemented by their sub-suppliers as well. Therefore, Business Partners are accountable for compliance within their supply chain and area of influence.

### 4.2 Legal and Customer Requirements

Business Partners shall identify and comply with applicable laws, regulations, standards, and relevant customer requirements. Implenía will not tolerate any illegal or irregular conduct by Business Partners. Implenía gives preference to Business Partners who are certified in accordance with ISO 9001/ISO 14001/ISO 45001 or similar, to partners who are not certified.

### 4.3 Risk Management

Business Partners shall have an adequate risk management system in place and periodically carry out a risk analysis of their own risks with regard to possible human rights violations and environmental damage as well as of any risks along their supply chain.

### 4.4 Reporting System for Complaints

Business Partners shall have a reporting system in place to ensure that employees and third parties, can raise complaints about any aspects of this Code. All complaints shall be investigated in a fair and timely manner.

### 4.5 Documentation

Business Partners shall maintain documentation necessary to demonstrate compliance with this Code and with applicable laws and regulations.

### 4.6 Training Programme

Business Partners shall have a training programme that achieves an appropriate level of knowledge, skills and abilities in management and workforce to meet the expectations set forth in this Code.

## 5. IMPLEMENTATION AND MONITORING

Business Partners must assign responsibility for the Code of Conduct for External Business Partners concerning a body that Implenía can call upon if necessary. This body is also responsible for ensuring that the resulting requirements are implemented, and that compliance is periodically reviewed.

Implenia reserves the right to monitor and verify compliance with the requirements of this Code by its Business Partners, either through Implenía's own employees, independent third parties, certifications, or other forms of official assurance, or by means of topic-specific on-site audits.

## 6. SUB-SUPPLIERS

Business Partners shall forward the principles of this Code to its subcontractors and sub-suppliers and shall work towards compliance with the provisions of this Code.

## 7. SPEAK UP!

All Business Partners must provide adequate systems, training, and leadership support to maintain a healthy and effective “speak up” environment. As part of this, all Business Partner employees must know that they will be protected from any form of retaliation for raising a concern, issue, or question in good faith.

Violations of this Code of Conduct for External Business Partners, concerns or issues can be reported via [Implenia.com/compliance](https://implenia.com/compliance) or by sending an email to [compliance@implenia.com](mailto:compliance@implenia.com).

## 8. VIOLATIONS

Should Implenía (or the Business Partner) determine that there is an actual risk of a violation of the standards, rules and laws referred to herein, Implenía and the Business Partner shall immediately work within their capabilities to minimise or eliminate the risk and, to this end, shall prepare and implement an appropriate corrective action plan. Implenía reserves the right to suspend the business relationship during the development and implementation of the appropriate corrective action plan.

The effectiveness of the remedial measures must be confirmed by the Business Partner within one year of the development of the plan. In the event of repeated and/or serious violations of the principles set out in this Code, Implenía reserves the right to terminate the business relationship.



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