



Implenia

Code of Conduct

Company guidelines and
behavioural guidelines



Implenia®



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«By working together as a team according to our values we will continue to build a sustainable future for Implenia.»

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

A handwritten signature in black ink, appearing to read 'A. Wyss'.

André Wyss
CEO

Company Guidelines and Behavioural Guidelines of the Implenia Group

1. Values of Implenia

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

- **Integrity:** Integrity lies at the core of our actions.
- **Sustainability:** We take responsibility for ourselves as well as for our environment and society.
- **Awareness of opportunities and risks:** With business constantly on our minds, we recognise opportunities and risks in a timely manner.
- **Transparency:** Transparency is the principle guiding us in our internal and external dealings with stakeholders.
- **Operational and financial excellence:** We deliver an outstanding operational and financial performance.
- **Customer orientation:** Customer-oriented solutions are our priority.
- **Innovation:** Our future depends on our ability to keep up with the times and move forward.
- **Reliability:** We are a reliable partner you can count on.

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:

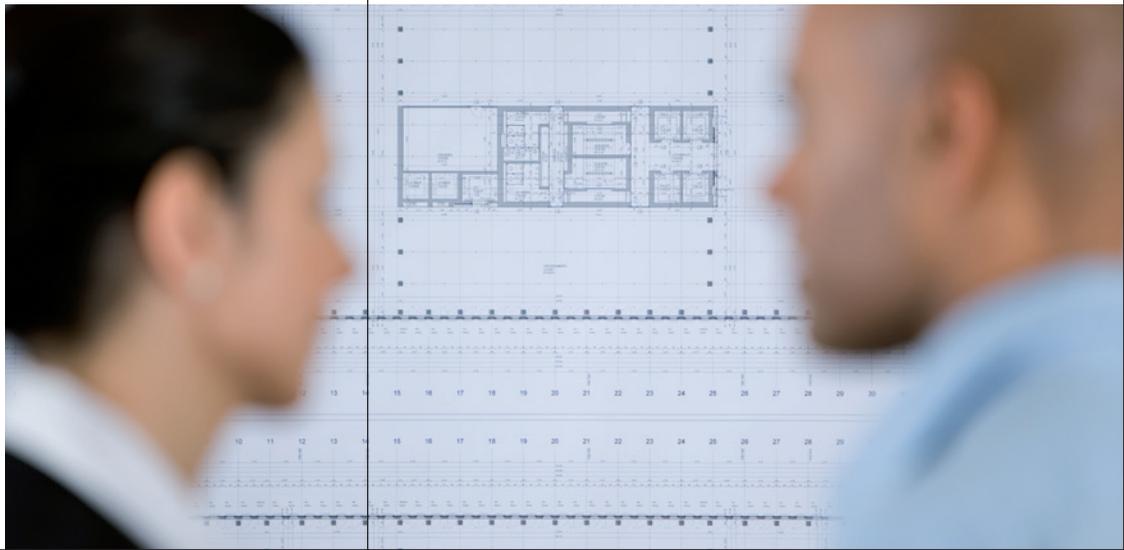
- We inform our employees about the most important laws and internal rules on a regular basis and oblige them to comply with them.
- Breaches of laws and rules must be reported to the Compliance Officer without delay to ensure the breach stops immediately.
- We ensure that our operating assets and our 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

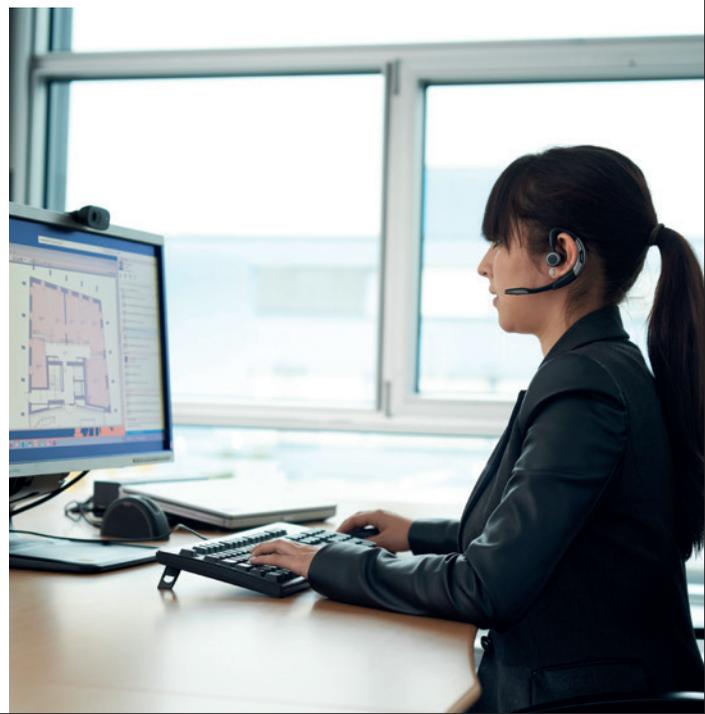
We avoid situations which could lead to conflict between our personal interests and the interests of Implenia:

- 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 Implenia shall abide by the statutory prohibition of insider trading and by our internal rules.
- As long as information about Implenia 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.
- Implenia 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 internal 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 Implenias IT infrastructure or which may result in legal, financial or intangible damage for Implenias.
- 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 or of racist or morally offensive material.
- The necessary care must be exercised when using the Internet.
- Implenias 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 Implenias.

8. Health & Safety

We promote the health and safety of our employees and third parties:

- We strictly comply with our Health & Safety principles and so create a healthy, safe and motivating working environment with the aim of preventing accidents. Shortcomings or breaches must be remedied and reported immediately.
- We have zero tolerance for alcohol, drugs and other substances which impair judgement and occupational health and safety, at work and also during work breaks. This means that they may not be consumed.
- The possession of or dealing in drugs or other substances which impair judgement and occupational health and safety is also forbidden during work or at events for which Implenias provides financial support.



9. Social responsibility

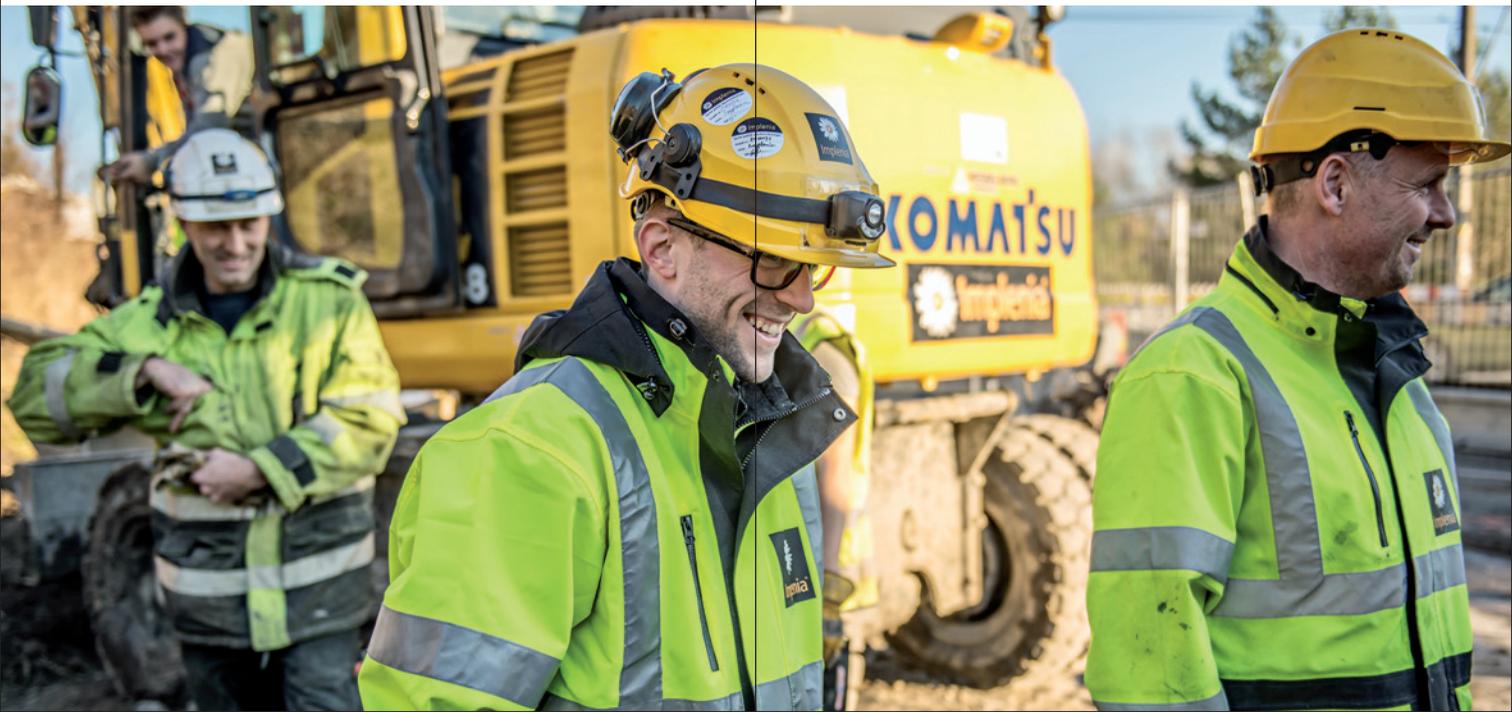
We offer our employees a motivating and safe working environment:

- 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:

- Implema 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.

- We prefer subcontractors who are certified in accordance with ISO 9001/14001/OHSAS 18001 or similar, to subcontractors who are not certified.
- Our suppliers shall promote the contents of the Code of Conduct among their own suppliers in an appropriate manner (supply chain).



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 Implenia employees (anonymously if preferred) via the report form on the Implenia Intranet.

Hotline

Chief Compliance Officer	German Grüniger T +41 58 474 05 72 german.grueniger@implenia.com
Board of Directors	Henner Mahlstedt T +41 58 474 16 95 henner.mahlstedt@implenia.com

Contacts

Media Relations	Reto Aregger Head of Communications Group T +41 58 474 12 81 communication@implenia.com
Ombuds Office for social responsibility and occupational health and safety	Irene Rombach Head of Corporate Health Management T +41 58 474 12 04 irene.rombach@implenia.com
	Thomas Foery Head of Human Resources Group T +41 58 474 07 51 thomas.foery@implenia.com
Point of contact for women	Dominique Disler Legal Counsel T +41 58 474 15 37 dominique.disler@implenia.com

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