

Anti-Bribery Statement

HOCHTIEF is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK. Every employee and individual acting on the organisation's behalf is responsible for maintaining the Company's reputation and for conducting company business honestly and professionally.

HOCHTIEF considers that bribery and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

The Company benefits from carrying out business in a transparent and ethical way and helping to ensure that there is honest, open and fair competition in the Construction industry. Where there is a level playing field, the organisation can lead the market through its engineering excellence, providing innovative solutions and by delivering excellent civil engineering schemes to its clients.

Transparent, fair conduct helps to foster deeper relationships of trust between the organisation and its business partners and clients. It is vital for HOCHTIEF's reputation and future growth.

The Company does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, or consultants or any persons or companies acting or on its behalf. The board and senior management are committed to implementing and enforcing effective systems throughout the organisation to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

HOCHTIEF has an anti-bribery procedure outlining the Company's position on preventing and prohibiting bribery. The anti-bribery procedure applies to all employees, as well as agency workers, consultants and contractors. All employees and other individuals acting for the organisation are required to familiarise themselves and comply with the organisation's anti-bribery processes including but not limited to HOCHTIEF AG's Code of Conduct, Code of Conduct for Business Partners and HOCHTIEF (UK) Construction's Managing Ethical Risks in Business Relationships procedure with immediate effect. All these documents can be found on the Compliance Section of the Intranet.

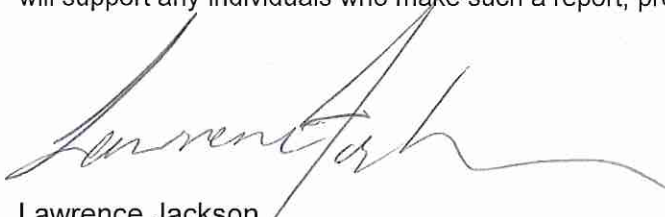
A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly. Employees and others acting for or on behalf of the Company are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As part of its anti-bribery measures, HOCHTIEF is committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance, in accordance with the procedures set out in the Company's anti-bribery procedure.

A breach of the Company's anti-bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal. Employees and other individuals acting for the organisation should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation.

The Company will not conduct business with service providers, agents or representatives that do not support the Company's anti-bribery objectives. HOCHTIEF reserves the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, the Company with immediate effect where there is evidence that they have committed acts of bribery.

The success of the Company's anti-bribery measures depends on all employees, and those acting for the Company, playing their part in helping to detect and eradicate bribery. Therefore, all employees and others acting for, or on behalf of, the Company are encouraged to report any suspected bribery to the Compliance Officer who is Chris Barlow, his contact details are 01793 755587, chris.barlow@hochtief.co.uk. HOCHTIEF will support any individuals who make such a report, provided that it is made in good faith.



Lawrence Jackson
Managing Director
2 August 2019