

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.

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.

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.

All employees and other individuals acting for the organisation are required to familiarise themselves and comply with the HOCHTIEF procedure covering the handling of gifts, hospitality and invitations (00000-HUK-GCM-XX-PC-Z-0008) as well as the Code of Conduct (00000-HTI-GEN-XX-PO-0020) and HOCHTIEF Code of Conduct for Business Partners (00000-HTI-GEN-XX-PO-Z-0023). All these documents can be found on the Compliance Section of the Intranet and regular training in these procedures is conducted to ensure a high level of compliance.

A breach of the Company's handling of gifts, hospitality and invitations procedure or Code of Conduct by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and immediate dismissal.

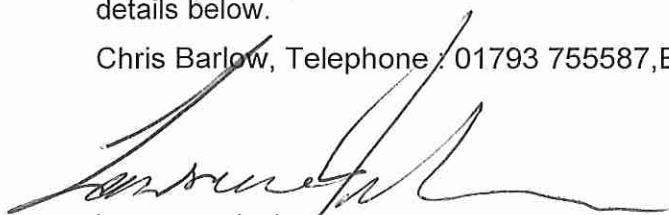
Employees and other individuals acting for the organisation should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for the organisation.

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, the Whistleblowing Procedure (00000-HUK-GHR-PC-Z-0005) give details on how to report any suspected incidents. These can be reported confidentially either to HOCHTIEF (UK), the HOCHTIEF Corporate Compliance Department based in Germany or to an external Lawyer from the law firm Tierel and Muhlenfeld who are engaged by HOCHTIEF as an Ombudsman.

Any queries or questions can also be directed to HOCHTIEF's UK Compliance Officer, details below.

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