

Code of Conduct of the Builtech Group

Foreword by the CEO

Dear colleagues,

our goal at the Builtech Group is to shape the future of skilled trades – bridging tradition and innovation. Our success is based on our strong regional ties and close cohesion within the entire Builtech Group. At the heart of this success is our employees' hard work and motivation.

A sustainable future can only be created by acting responsibly for our society, our environment, and ourselves. It is not easy to do the right thing, but it is always necessary. To live up to this responsibility, we have set out the values and ethical principles that guide us at the Builtech Group in this Code of Conduct. This code serves as a guide for all Builtech Group employees in their professional and entrepreneurial activities and as a basis for responsible decision-making.

We can only overcome the major challenges of our industry together, requiring trust as the basis for good cooperation. Longstanding relationships need to be nurtured, and new partnerships built to turn challenges into opportunities and therefore progress and success. Our culture is built on collaboration, ensuring everyone has the opportunity to participate and our interactions with each other and with our customers, business partners and suppliers are characterised by trust and respect. We strive to set an example with our values and integrity. We are only satisfied when our customers are satisfied.

This code applies to all employees of the Builtech Group, regardless of the area in which they work, whether on the construction site or in the office. Every employee is committed to upholding these values.

Thank you for joining us on this journey into the future. Let's create great things together!

Maurice Frhr. von Dalwigk
CEO, Managing Director



A wide-angle photograph of a large-scale solar farm. Two men in dark jackets and light-colored trousers are walking across a vast field of solar panels. The panels are arranged in neat, parallel rows that stretch towards the horizon. In the background, there are rolling hills and a clear sky. The overall scene conveys a sense of modern, sustainable energy production.

**“Builtech brings the future
to the skilled trades —
and the skilled trades into
the future.”**

Maurice Frhr. von Dalwigk

Introduction

The aim of this Code of Conduct:

- **To ensure respectful and trusting cooperation**
- **To embed a culture of integrity within the Builtech Group**
- **To maintain and strengthen the trust of our customers and other stakeholders and strengthen it**
- **To clearly and comprehensibly define our values and ethical principles**
- **To prevent harassment, discrimination, and inappropriate behaviour**

The Builtech Group operates in a dynamic, economic and political environment. We have set ourselves the goal of preserving skilled trades in the field of technical building services, maintaining regional ties and ensuring high-quality craftsmanship. By uniting under the Builtech Group, the resilience of both the entire organisation and each individual business is strengthened. We aim to lead the industry into the future as a pioneer and driver of innovation and to contribute to both the environment and society.

This Code of Conduct has been designed as a central guideline for all employees of the Builtech Group and comprises our values and ethical principles. Every employee is committed to these values. This code supports employees in realising our vision of

“Better Buildings” and helping create climate- and environmentally-friendly building stock in Europe.

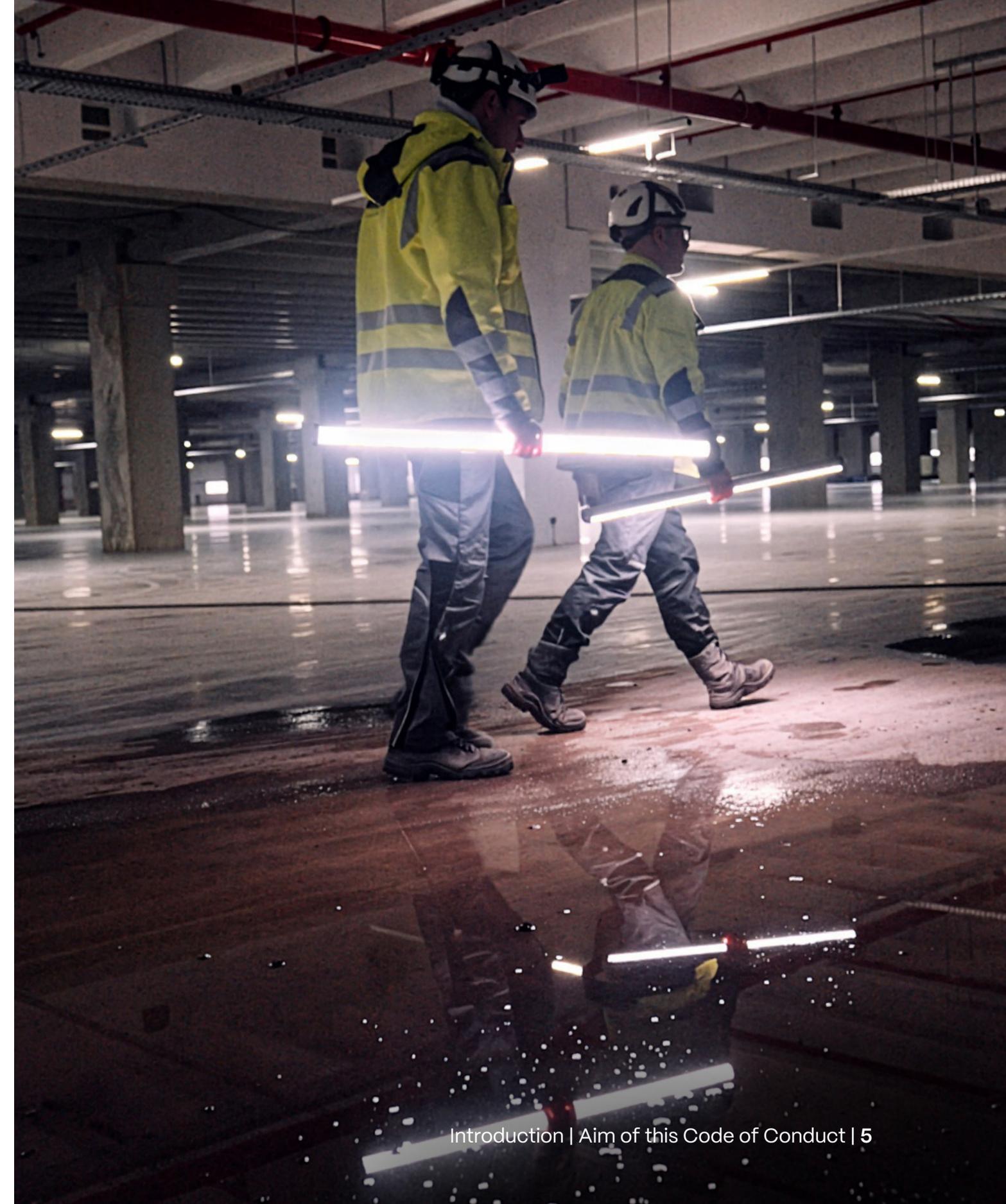
The Builtech Group is a rapidly growing group of companies that strives to do justice to social change and help shape it. Even though these written values and ethical principles are universal and enduring, we expressly point out that any feedback, suggestions for improvement and criticism are appreciated and will be dealt with carefully. Comments on this Code of Conduct can be sent to the following email address:

sustainability@builtech.de

In the event of violations against this Code of Conduct, the Builtech Group reserves the right to take appropriate measures. Depending on the severity and circumstances of the violation, these may range from mandatory training and disciplinary action to termination of employment.

The Builtech Group is convinced that all employees have the ability to make decisions in a social context based on ethical and moral principles.

In addition to the values set out in this Code, all employees are expected to use their common sense. Not every day-to-day situation can be covered by this Code of Conduct and in such cases the use of common sense is mandatory. This Code of Conduct is more than just a set of rules; it is the foundation of the Builtech Groups corporate culture. It reflects our values and provides guidance in difficult situations. All Builtech Group employees are expected not only to understand this Code of Conduct but also to actively live and implement it. Together, we can create a work environment distinguished by responsibility, integrity and mutual respect. This Code is a promise of the Builtech Group to its customers, its partners, to society and to itself to always act according to the highest ethical standards and thus ensure the sustainable success of the company.



The scope of this Code of Conduct covers the entire Builtech Group, involving the following companies and their subsidiaries:

1. Builtech Holding GmbH
2. Jächel Kälte Klimatechnik GmbH
3. B.R.A.S.S.T. Bau GmbH
4. Botic GmbH Fliesenarbeiten
5. Heil Bedachungs-GmbH
6. topinstallateur GmbH
7. Jalousien-Böttcher GmbH
8. Ragas Dachdecker-
meisterbetrieb GmbH
9. Paul Messdienste GmbH
10. Hertner GmbH
11. Hertner Building Technology EOOD
12. Hertner Building Technology S.R.L.
13. VolkertGSR GmbH
14. Schlau Elektrotechnik GmbH
15. Sanitär-Union S.U. GmbH
16. Sanitär Union Langenzenn GmbH
17. Müllers GmbH
18. B.R.A.S.S.T. Elektrotechnik GmbH
19. Alfred Schmidt Gebäudetechnik GmbH
20. Steiger Elektroinstallationen GmbH
21. G.S.M Gas-Heizungen und
Sanitärinstallationen GmbH
22. Otto Zepp HLK GmbH
23. Otto Zepp HLK Service GmbH
24. Schönewolf Haustechnik GmbH
25. Floßmann & Grünbeck GmbH
26. hoffmann elektrotechnik GmbH
27. Weisenberger Gebäudetechnik GmbH
28. Dürr & Feil Gebäudetechnik GmbH
29. Backes + Scholz GmbH
30. CMS electric GmbH
31. Emi AG Gebäudetechnik
32. Brion Rör AB
33. Brion Ventilation AB
34. Brion Teknik AB
35. Brion Teknik Fyrbodal AB
36. Brion Solenergi AB
37. Brion VS Skåne AB
38. Brion Lidköping EI AB
39. Brion Service Skåne AB
40. Brion Ventilation Borås AB
41. Brion Ventilation Skaraborg AB
42. Brion EI Trollhättan AB
43. Brion Mariestad AB
44. Brion Rör Helsingborg AB
45. Brion Rör Jönköping AB
46. Brion Ventilation Helsingborg AB
47. Brion EI Göteborg
48. Trafiksystem Väst AB
49. Nytorps Rör AB
50. Effektoptimering Stockholm AB
51. Opalab Relining AB
52. BL EL & Design AB
53. elektroNWS AG
54. Elektro Gebhardt

No excuses!

By adhering to these standards, we prevent

- ⊗ Verbal abuse such as yelling, insulting, criticizing or belittling another individual
- ⊗ Threatening, humiliating or intimidating another individual
- ⊗ Making sexual advances or touching someone against their will
- ⊗ Displaying images, posters or videos of a sexual nature
- ⊗ Not offering a position to someone based on a personal characteristic, such as age, gender, race, nationality, religion or sexual orientation

Compliance with these standards enables us to

- ✔ Treat everyone we meet during business with dignity and fairness, understanding the impact we can have on others
- ✔ Always stay respectful
- ✔ Speak up or ask for help when we experience or witness inappropriate behavior
- ✔ Be a strong team

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1. Human rights and ethics principles

Respecting human rights and always acting ethically.



1. Human rights

We fully comply with and promote internationally recognized human rights.



2. Ethical behaviour

Our actions are based on integrity, transparency, and a sense of responsibility for ourselves and all stakeholders, and in all business relationships and activities.





3. No exploitation, slavery and forced labour

We categorically reject any form of forced or compulsory labour, human trafficking and modern slavery. All employment relationships are voluntary and can be terminated by employees at any time with reasonable notice.



4. Equality and anti-discrimination

We actively promote equal opportunities and diversity in our company. Any form of discrimination, harassment, coercion, or other type of offensive behaviour based on age, migration background and nationality, gender and gender identity, physical and mental abilities, religion and worldview, sexual orientation, and social background is unacceptable and will not be tolerated.



5. Combating child labour

We do not tolerate any form of child labour.



2. Social and Corporate Culture Principles

Promoting an inclusive corporate culture, valuing social commitment and caring for the wellbeing of our employees.



1. Working conditions and occupational health and safety

Ensuring safe and fair working conditions is a top priority for us. We are continuously monitoring and improving the safety of our employees where possible. Our remuneration system is based on industry and legal standards and ensures fair compensation.



2. Diversity, equity and inclusion

We strive for an inclusive work environment in which all employees have equal access to resources, development opportunities and leadership positions regardless of age, migration background and nationality, gender and gender identity, physical and mental abilities, religion and worldview, sexual orientation, and social background.



3. Mental health

We attach great importance to the mental health of our employees and promote a culture in which mental health is openly discussed.



4. Customer satisfaction and protection

Customer satisfaction and protection are core elements of our corporate strategy. We are committed to transparent and fair business practices, including clear product information and ethical marketing strategies. We implement strict technical and organizational precautions to protect the security of our customers and maintain their trust.



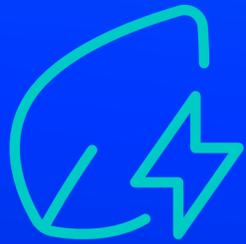
5. Sustainable procurement

We take environmental, social and ethical criteria into account when selecting our suppliers and materials. We implement a comprehensive supplier Code of Conduct that defines minimum standards regarding working conditions, human rights, environmental protection and business ethics, and preferentially select suppliers who demonstrably apply sustainable practices.



3. Environment and nature

Valuing environmental protection and the sustainable use of natural resources.



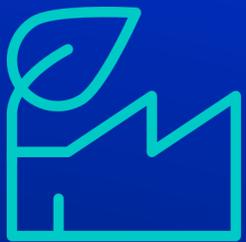
1. Energy consumption

We are committed to continuously improving our energy efficiency. We set ourselves measurable targets for the annual reduction of our energy consumption and report transparently on our progress.



2. Water consumption

We strive to continuously minimise our water consumption and protect water quality.



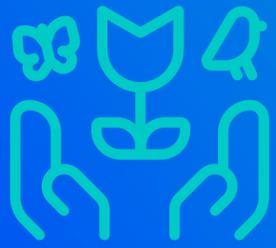
3. Greenhouse gases

We systematically account for our greenhouse gas emissions in line with the Greenhouse Gas Protocol. Through targeted measures, we continuously reduce our emissions and work toward achieving climate neutrality ("Net Zero").



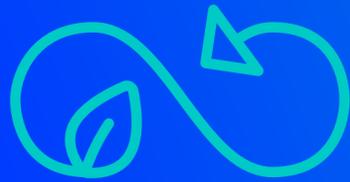
4. Waste and pollution

We strive to reduce waste and pollution and to implement circular economy principles in all business areas. We endeavour to reduce the use of hazardous substances and ensure the environmentally sound disposal of unavoidable waste.



5. Protection of biodiversity

We recognise the importance of biodiversity for healthy ecosystems and are committed to unlocking potentials for its active protection and promotion.



6. Sustainable consumption

We actively promote sustainable consumption by developing and implementing strategies to reduce our environmental footprint, promoting the use of renewable resources and supporting our employees in adopting sustainable lifestyles.





4. Business integrity

Committing to acting honestly and lawfully in all our business activities.



1. Transparent business activities

We are committed to full compliance with all relevant laws and regulations regarding financial transparency and reporting. We implement robust internal control systems and conduct regular independent audits to ensure the accuracy and integrity of our financial information.



2. Prevention of money laundering

We are committed to preventing money laundering through ongoing transaction monitoring and training for key employees.

3. Combating corruption and fraud

We have a zero-tolerance policy towards corruption and fraud. We conduct risk assessments and implement comprehensive training programs for all employees.



4. Avoidance of conflicts of interest

We implement clear guidelines and processes for identifying, disclosing and managing conflicts of interest. All employees are obliged to proactively report potential conflicts of interest.





5. Prohibition of bribery

Any form of bribery is strictly prohibited, and all employees receive comprehensive training in this area.



6. Avoidance of anti-competitive practices

We are committed to fair and legal competition. We stand for transparent and fair business practices. Any anti-competitive agreements or concerted practices with competitors, suppliers, or customers are strictly prohibited. We strictly comply with the applicable antitrust and competition laws in all markets in which we operate.



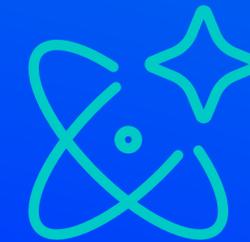
7. Data protection and security

We are committed to strict compliance with the General Data Protection Regulation (GDPR). We implement comprehensive technical and organisational measures to protect personal data and train our employees in data protection practices. Our privacy policy ensures full transparency about our data processing practices.



8. Economic sustainability

We are committed to economic sustainability in all aspects of our business activities in order to provide opportunities for the current generation without limiting the opportunities of future generations. We strive for long-term economic success while making a positive contribution to environmental protection and social justice.



9. Innovation and quality

We focus on innovation, maintaining the highest quality standards in all business areas and investing in research and development. We promote a culture of innovation through regular ideas competitions, collaboration with research institutions and the implementation of agile development methods.



5. Compliance

Promoting continuous improvement through targeted implementation and careful monitoring of our processes.



1. Fostering ongoing improvement

We strive for ongoing improvement in all business processes. We set measurable targets, monitor performance using key performance indicators (KPIs) and conduct regular management reviews to identify and implement opportunities for progress.

2. Establishment of compliance structures



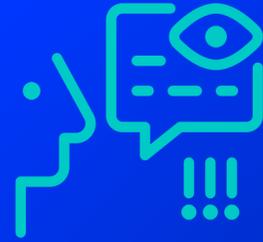
We have established a robust compliance management system. This includes clearly defined responsibilities, documented policies and procedures and regular risk assessments.





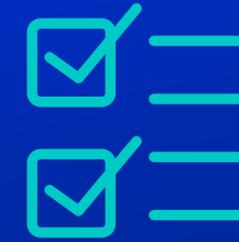
3. Regular training and internal audits

We conduct a comprehensive training program that trains all employees on relevant compliance topics. The training courses are regularly updated, and their effectiveness is evaluated.



4. Whistleblower protection

We have established a secure whistleblowing mechanism that guarantees absolute confidentiality. Strict guidelines are in place to protect whistleblowers from any form of retaliation.



5. Engagement with external stakeholders

We actively uphold the UN Guiding Principles on Business and Human Rights across our supply chain. We conduct due diligence on our business partners and suppliers, requiring them to sign our Supplier Code of Conduct.

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