LUDWIG FREYTAG



Corporate Values

Core Values, Ethics and Integrity

(As of 3rd December 2025)

LUDWIG FREYTAG

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Note: For the sake of readability, we often use the masculine form - however, the feminine and diverse genders are always included.

1 Scope

Our corporate values apply throughout the entire LUDWIG FREYTAG Group, including all subsidiaries as well as all dependent and independent branches, departments, and affiliates, and to all employees. Special responsibility for implementing these values rests with the Group's executive management, the operating managing directors of all subsidiaries, branch managers, and all executives.

These corporate values are intended to help provide correct and appropriate answers to questions that arise in connection with strategic considerations and operational decision-making processes. The statement of corporate values also serves as a statement of principles in accordance with the LkSG.

Our corporate values are based on our convictions, national laws and regulations such as the Supply Chain Due Diligence Act and occupational safety regulations, as well as international conventions such as the United Nations Universal Declaration of Human Rights and the labour standards of the International Labor Organization.

These corporate values also apply to our contractual partners. They are required to accept our corporate values unless they have already implemented comparable principles within their own companies. Contractual partners undertake to involve their subcontractors in the implementation of these values as well. This agreement forms an integral part of all future business relationships. A violation of these values may ultimately constitute grounds for the LUDWIG FREYTAG Group to terminate the business relationship, including all associated contracts.

2 Statements from the Management

The LUDWIG FREYTAG Group hereby sets forth corporate values that are fundamental to its business activities and guide its future direction. We act in accordance with these values in the belief that maintaining and enhancing the reputation of the LUDWIG FREYTAG Group as a trustworthy, fair, and law-abiding partner strengthens our position in the market. The core values set forth here are binding for us.

The management of the LUDWIG FREYTAG Group, as well as all executives within the Group, actively contribute to promoting and upholding these corporate values.

All employees of the LUDWIG FREYTAG Group are made aware of these corporate values as a supplement to their employment contracts. Compliance with these values is mandatory for all employees of the Group. Employees who violate the provisions of our corporate values must expect disciplinary action or consequences under labour law.

Within the LUDWIG FREYTAG Group, officers have been appointed or external agencies have been engaged to oversee sustainability, compliance, human rights, and occupational, environmental, and health and safety matters.

Our actions and conduct within the LUDWIG FREYTAG Group are guided by the core value of integrity. The reputation for fair, reliable, and contractually sound planning and execution of our activities—built up by our managers and all employees over our long corporate tradition—must be reaffirmed in every new business transaction, from cost estimation through the procurement of materials and subcontractor services to execution and billing. We are committed to fulfilling the requirements specified by our clients while complying with all regulatory, legal, and technical requirements, as well as our binding obligations. We ensure that the in-house and outsourced services entrusted to us are carried out safely, in an environmentally responsible manner, and without causing injury to persons or damage to property.

We pursue our business objectives exclusively through means that are legally compliant and ethically sound. Corruption, manipulation, anti-competitive agreements, illegal employment, disclosure of trade or business secrets, and other unlawful acts are strictly prohibited. We do not tolerate such conduct, either explicitly or tacitly.

We also expect our partners—including public and private clients, contractors, subcontractors, and suppliers—to adhere to the same standards of values. We promote this through appropriately structured contracts.

Our corporate values are also communicated externally by the relevant departments.

2.1 Statements on our core values

- We uphold international human rights.
- We do not tolerate child labour, forced labour, or any other form of involuntary labour, in accordance with the conventions of the International Labor Organization.

- We uphold fair working conditions, working hours, and the payment of fair wages, as determined by national and local legal standards and regulations.
- We comply with applicable laws and regulations (GDPR) when we collect, store, process, or transfer personal data and information.
- We comply with all applicable guidelines and requirements regarding data protection and cybersecurity.
- We respect the right to freedom of association and the right to collective bargaining to safeguard and promote working and economic conditions.
- We treat others with respect.
- We do not tolerate discrimination of any kind, bullying, or harassment—whether in the form of derogatory remarks or behaviour, suggestive jokes or images, insults, or aggressive, intimidating behaviour—within the LUDWIG FREYTAG Group or among the subcontractors we engage.
- No one may be discriminated against or demeaned on the basis of ethnic origin, gender identity, religion or belief, disability, age, sexual orientation, language, union activity, or political views.
- With regard to sustainability, we act in an economically, socially, and environmentally responsible manner. In all our activities, we consider and evaluate aspects of economic, social, and environmental responsibility.
- We strive to improve the quality of life in society through our general business activities, as well as through the use of products and the provision of construction services.
- We ensure compliance with all applicable regulations regarding our financial responsibility, including the associated documentation.
- In our activities, we take into account the sanctions lists provided by governments regarding country- and individual-specific embargoes, export controls, and economic and financial sanctions.

2.2 Statements on environmental protection

- Through sustainable practices, we contribute to the protection and preservation of natural resources.
- The prohibition against unlawful forced evictions and the prohibition against the unlawful expropriation of land, forests, and water bodies for any purpose applies to us, as well as to our contractual partners and suppliers. People's livelihoods must not be endangered by development, which also includes consideration of soil quality.
- Legal requirements and regulatory mandates regarding environmental protection are implemented as standard practice. Matters not regulated by law are carried out on our own initiative in accordance with our commitment to environmental protection.
- We comply with all environmental obligations in accordance with the precautionary principle.
- Through the efficient use of resources (raw materials, energy, water) and continuous improvement, we minimize environmental impacts within the scope of our activities. We reduce environmental impacts—such as exhaust emissions, noise, waste, and wastewater—to the economically feasible minimum. Particular attention is paid to energy efficiency and the reduction of greenhouse gas emissions. We prioritize reducing material consumption and recycling materials over disposal.
- We actively promote environmental awareness among our employees.
- We consider environmental impacts before making future investments and purchases; environmentally sound alternatives or the sensible use of alternative energy sources are given preference.

2.3 Statements on quality

- We aim to achieve a trusting partnership with satisfied clients through high-quality, on-time, and economically successful project execution.
- Our goal is the continuous improvement of our work processes.
- Through regular training, we give our employees the opportunity to adapt their knowledge to evolving developments and requirements.
- We employ modern, state-of-the-art working methods.
- We prevent property damage.
- We strive to provide services that comply with the law and meet the highest standards.
- We provide targeted information to enhance collaboration among all stakeholders.
- We foster a culture of accountability where issues are not ignored but rather addressed to seek improvement.

2.4 Statements on occupational safety

- Our vision is: Zero Accidents—preventing workplace accidents, commuting accidents, and occupational diseases.
- We contribute to maintaining the safety and health of all employees and third parties.
- We prevent work-related health hazards.
- We strive for continuous improvement of our occupational safety and health standards and promote occupational safety and health as a value-adding factor for the LUDWIG FREYTAG Group.
- We encourage our employees to actively participate in identifying and eliminating unsafe situations and actions, and in recognizing the need for action, both for themselves and for others.
- We provide our employees with appropriate equipment for the tasks they perform, taking into account the safest, most environmentally sound, and most economical methods of work.
- Safety is an integral part of our operational processes and, in the minds and behaviour of our employees, a key aspect of their work.
- Our managers address employees and subcontractors in a positive manner regarding undesirable misconduct.
- Our occupational safety and health representatives and all employees can contact company management directly at any time.
- When selecting our contractual partners, their conduct and performance in the area of occupational safety are key considerations.
- We do not tolerate the consumption of alcohol, drugs, or intoxicants in the workplace. Individuals under the influence of such substances will be removed from the company premises or construction site.
- To protect the health of all employees, smoking is strictly prohibited in all areas. This also applies to e-cigarettes and vaporizers. Smoking is permitted only in designated areas.

2.5 Statements regarding our Integrated Management System

- We strive for the continuous improvement of our integrated management system. Through comprehensive inspections, site visits, internal and external audits, and the submission of suggestions for improvement, our management systems are constantly updated as part of a "continuous improvement process," thereby making them more effective.
- We strive for the continuous improvement of procedures and processes in the areas of occupational safety, health, environmental sustainability, and quality enhancement. Through targeted collaboration among all stakeholders—for example, through various committees, meetings, or toolbox meetings—we can realize the aforementioned objectives and achieve sustainable improvements within our LUDWIG FREYTAG Group. Management, in particular, has a positive impact on the achievement of our goals. It is essential to lead by example and demonstrate the importance of the company's goals to all employees.
- The departments responsible for occupational safety, environmental protection, and quality management are actively supported by corporate management.

2.6 Statements on compliance, ethics and integrity

- We are committed to complying with applicable laws and our self-imposed corporate values. This also applies to overarching international laws regarding, for example, international law, environmental and climate protection laws, criminal laws, labor and antitrust laws, data protection, and trade agreements. For the LUDWIG FREYTAG Group, compliance with regulations stands for fair treatment of our workforce and all contractual partners or other parties.
- We ensure compliance with all relevant competition law requirements. Collusive arrangements and agreements that influence prices, terms, strategies, or customer relationships—particularly in connection with participation in bids—are prohibited at our company. The same applies to the exchange of competitively sensitive information, as well as to any other conduct that unlawfully restricts or may restrict competition.
- We are committed to complying with all tax laws, not concealing important information, not illegally evading tax payments, and not obtaining improper tax advantages. All employees cooperate with tax authorities to provide the tax information required by law.
- We are committed to full compliance with all applicable laws and regulations regarding the prevention of money laundering and terrorist financing, and we accept only funds derived from legal sources.
- We do not participate in money laundering, either actively or passively. All employees are required to remain vigilant if there are doubts regarding the integrity of any individuals or legal entities with whom a contract is to be entered into.
- In our activities, we take into account existing embargoes, sanctions, and terrorist lists.
- We, as well as the employees of our contractual partners, are required to respect the property of others—including the business assets of our corporate group, our customers, and our partners—and to handle them with care. This also includes the handling

of intangible assets such as our intellectual property, financial records, and our corporate image.

- All employees are responsible for the proper and strictly business-related use of company assets, whether they be buildings, equipment, computers, materials, information, etc. The protection of our company's tangible and intangible resources is a high priority for all employees. Tangible resources include all items, vehicles, machinery/equipment, tools, IT systems, and documents. Our company's intangible resources consist of our know-how, trade secrets, and other important information that must be protected for the benefit of our corporate group.
- Within the LUDWIG FREYTAG Group, we treat our business partners' information as confidential. We expect the same conduct from our business partners.
- Our employees are prohibited from engaging in secondary employment with or holding interests in third-party companies. Exceptions must be expressly approved in writing by management.
- Within the LUDWIG FREYTAG Group, it is prohibited to give or accept questionable gifts or other benefits to or from clients and contractors that could be viewed as unfairly influencing business dealings. See also Section 3.1. This applies to business dealings with both private and public clients. We do not tolerate any conduct that calls our integrity into question or could damage our reputation.
- We make donations on a voluntary basis and without expecting any financial consideration in return. We do not use sponsorship of individuals, groups, or organizations to obtain unlawful business advantages, and such sponsorship is reviewed and authorized by management based on its appropriateness. See also Section 3.1.
- We respect and safeguard the intellectual and tangible property of our corporate group and that of our contractual partners.
- We treat knowledge and information about clients, contractors, and other business partners that we receive in the course of our business activities as confidential.
- When drafting contracts, negotiating prices, and preparing financial statements, fairness is our top priority. Our conduct toward contractual partners in bidding consortia and joint ventures, as well as toward our subcontractors, is also characterized by a high degree of fairness.

2.7 Complaint system and whistleblower protection system

We have implemented a complaint system and a whistleblower protection system so that employees and other stakeholders can report potential violations of laws and corporate values while ensuring confidentiality and effective protection against retaliation. Our suppliers and subcontractors are also required to establish a similar complaint system.

We have contracted a service provider to operate our reporting office. You can confidentially report violations by mail to the following address:

Personal/Confidential
Treuhand Weser-Ems Unternehmensberatung GmbH & Co. KG
Reporting Office of the LUDWIG FREYTAG Group
Langenweg 55
26125 Oldenburg

In addition, our internal reporting office can also be contacted by email (hinweise.lf-gruppe@treuhand.de) or by phone (0441 9710-500). Personal meetings to discuss the matter are also possible by prior arrangement.

3 Prevention of corruption

Another goal of our corporate values is to prevent any form of corruption in the conduct of our business activities and to consistently pursue any individual cases of corruption that arise. At the same time, these corporate values serve to raise awareness among all employees.

Corruption is not a trivial offense; rather, it violates the core values of the LUDWIG FREYTAG Group and constitutes a criminal offense.

It is important to note that corruption can begin with even small favors or gestures, as the line between such actions and criminally relevant corruption is blurred. Before accepting or offering a gift or invitation, one must ensure that its value remains within reasonable limits and cannot be viewed as an improper attempt to influence a business decision. Dealing with public officials, government representatives, or government organizations involves specific risks that must be addressed appropriately.
The aspects mentioned above apply to all employees of the LUDWIG FREYTAG Group as well as to our clients and to the partners and subcontractors we engage.

3.1 Guidelines for an appropriate framework regarding gifts

3.1.1 Entertainment

- There must be a business-related connection and a specific professional topic.
- The entertainment receipt must be submitted to the accounting department.

3.1.2 Gifts

- There must be a valid reason or purpose for accepting or giving a gift (anniversary, birthday, farewell, etc.).
- A value limit of €50 net per year per recipient applies.
- Gifts in the form of cash, bank transfers, checks, or similar are strictly prohibited.
- Gifts of any kind to public officials are not permitted.

3.1.3 Invitations and events

- The event must be business-related.
- A value limit of €50 per person applies.
- All expense reports must be documented in the accounting department.

3.1.4 Sponsorship and donations

- The LUDWIG FREYTAG Group is committed to actively shaping and supporting its local community through donations and sponsorship. These are reviewed and authorized by management on a case-by-case basis.
- The corporate group makes donations exclusively to nonprofit organizations.
- The identity of the recipient and the intended use of the funds must be transparent and verifiable.
- Sponsorships and donations must not harm the company's reputation. Goals and intentions must be consistent with the values of the LUDWIG FREYTAG Group.
- Sponsorship and donations must not be used to obtain any improper advantages for the LUDWIG FREYTAG Group or to pursue any unfair purposes.
- In particular, sponsorship must be provided exclusively on the basis of a written agreement in exchange for appropriate consideration.
- Payments must not be made to private accounts.
- Donations must be documented by the accounting department in the form of a receipt.

3.2 Separation from private life

Business and private contacts must be strictly separated, as it is notoriously difficult to refuse or accept a "favour" when good private relationships exist.

In the case of personal contacts with individuals with whom business relationships currently exist or may exist in the future, as well as with their relatives, it must therefore be made clear from the outset that a strict separation between professional and personal life is required in order to avoid raising the suspicion of accepting or granting favors.

If existing or potential conflicts with official duties are identified during personal interactions, these must be reported immediately in writing to the immediate supervisor and must be strictly avoided.

3.3 Identification of work areas vulnerable to corruption

All positions within the LUDWIG FREYTAG Group that are at risk of corruption have been identified.

Any work area or position is considered at risk of corruption if it involves information or decision-making that could result in a significant material or immaterial benefit—or a disadvantage—for third parties outside the immediate LUDWIG FREYTAG Group.
All employees are required to report any incident as soon as they have reason to suspect it.

3.4 Dual-Control principle

In work areas or positions at risk of corruption, decisions must be made using a dual-control or dual-signature system.

3.5 Central function for corruption prevention

The central point of contact for all matters related to the prevention of corruption throughout the LUDWIG FREYTAG Group, including all of its companies and subsidiaries, is

Attorney Stephan Schade
Phone: 030 54703040
Email: schade@juskonzept.eu

3.6 Procedure in case of suspected corruption

Our employees are required to immediately report any specific suspicion of corruption in writing to the central point of contact for all matters related to the prevention of corruption. The central point of contact will then immediately notify the executive management of the LUDWIG FREYTAG Group.

The central contact point must then, after consulting with the executive management of the LUDWIG FREYTAG Group, conduct an immediate investigation into the reported suspicion of corruption. The results of the investigation are documented in writing and retained by the central contact point.

The investigation itself and its results, including the documentation, must initially be kept strictly confidential and internal to the company. However, strict care must be taken to ensure that any subsequent investigations by law enforcement authorities are not jeopardized and, in particular, that those involved in the offense are not warned.

Any disclosure to public authorities, particularly criminal investigative authorities, regarding the investigation into a specific suspicion of corruption or the results of such an investigation may only take place after consultation with and written approval from the management of the LUDWIG FREYTAG Group.

This does not affect the right of any individual to file a criminal complaint on their own behalf. However, the prohibitions against the disclosure of trade and business secrets by employees, as protected by the Criminal Code, must be observed.

3.7 Procedure in the event of confirmed corruption

If corruption is detected, it will be promptly and consistently reported to all parties responsible for addressing such matters, in particular law enforcement authorities. Furthermore, internal disciplinary measures—particularly those under employment contract law, including termination—will be immediately reviewed, consistently pursued, and enforced.

If damage has occurred, claims for damages will be thoroughly reviewed and consistently enforced in accordance with the provisions of employment contracts.

4 Risk analysis and risk management in accordance with the LkSG

Within the LUDWIG FREYTAG Group, appropriate risk analyses are conducted regarding human rights compliance within each business division and among direct suppliers, subcontractors, and service providers, taking into account the proportionality criteria set forth in Section 3(2) of the LkSG.

The risk analysis procedure is documented in a procedural guideline and is carried out by the responsible department. The management of the LUDWIG FREYTAG Group is regularly informed of the results and provides support as needed.

The risk analysis is conducted once a year and as needed. Based on the procurement structure, an abstract risk analysis of suppliers is conducted according to their respective industry and country of origin. For the analysis of potential risks within our own business unit, identification and assessment take place as part of the annual materiality analysis and within the framework of our management systems.

For suppliers classified as potentially critical, we obtain additional information—such as the supplier's self-disclosure—and use our expertise to determine whether a risk actually exists.

In addition, an annual review of potential risks is conducted, taking into account the adequacy criteria under Section 3(2) of the LkSG, to enable the prioritization and weighting of risks. The following risks, in particular, were identified as priority risks:

- For subcontractors in the construction sector and for our own employees, health risks arise from workplace accidents, noise exposure, and potential exposure to hazardous materials. By applying our occupational safety management systems and a wide range of preventive measures and training programs, we ensure a high level of safety. This is also demonstrated by our additional certifications under DIN ISO 45001, the Safety Culture Ladder (SCL), and the Safety Certificate for Contractors (SCC).
- In the upstream supply chain, the resources required pose a risk of environmental impact due to greenhouse gas emissions, pollution, and water consumption, as well as waste generation and impacts on biodiversity. Within the LUDWIG FREYTAG

Group, we are constantly working to reduce resource consumption and to develop building materials and processes that have a lower environmental impact and minimize risks.

- Likewise, the construction industry carries a risk of corruption, which the LUDWIG FREYTAG Group resolutely opposes. The measures taken are outlined in Chapter 4 of the Corporate Values.

5 Monitoring the implementation of corporate values

The LUDWIG FREYTAG Group reserves the right to verify the implementation of the corporate values as well as to conduct legally required audits both internally and on-site at its contractual partners' locations, and to document the results. Likewise, the LUDWIG FREYTAG Group urges its contractual partners to also verify the implementation of the corporate values by their own business partners and subcontractors.

The implementation of and compliance with these values are ensured through internal company communications, training, instruction, internal and external audits, and the central responsibilities within the LUDWIG FREYTAG Group.

If a violation of due diligence obligations is identified within one's own business unit or among direct suppliers, appropriate corrective measures are taken immediately to ensure that the violation is remedied and its extent minimized.

Oldenburg, December 3, 2025

Management of the LUDWIG FREYTAG Group