

CODE OF CONDUCT



of the ALHO Group



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Dear employees and employees,

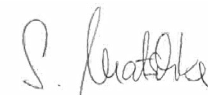
The good reputation of the ALHO Group in the business and social environment is the basis for our success. Customers and business partners, colleagues and our social environment expect us to behave fairly, with integrity, honestly and reliably towards them.

This expectation applies to all employees of the Group, from the management to the trainees. Through their actions, everyone can help to promote the good reputation of the Group and thus contribute to our success. To give you guidance, we have drawn up a Code of Conduct. The Code is based on our shared corporate values and formulates guidelines on how we can live by them in our day-to-day work. Our aim is to create a corporate culture based on trust and integrity.

Our corporate values and the Code of Conduct are binding for all employees of the ALHO Group. Please read it carefully and ensure that it is adhered to in your professional and social environment.

If you are unsure whether you are behaving correctly in accordance with the Code, or if you notice anything unusual in your environment, please contact us. We will be happy to provide you with advice and support.

Kind regards



Silvia Matschke
Owner



Achim Holschbach
Owner



Anette Höchst
CEO ALHO Holding GmbH



Dr. Nicole Steinmetz
General Manager ALHO Holding GmbH



Jens Vetter
General Manager ALHO Holding GmbH

Foreword

ALHO has been producing modular buildings as a sustainable alternative to conventionally constructed buildings for over 55 years. As a family-run company with over 1,300 employees, we are one of the market leaders in the industry. Fairness, honesty and reliability in our dealings with customers, employees and partners are essential prerequisites for our business success. These basic values have guided our daily actions since the very beginning of the company's history.

Appreciation, integrity, sustainability and social responsibility are central pillars of our corporate culture. We are committed to respecting human and children's rights, protecting the environment, ethical behaviour and the principles of fair competition. We expect each of our employees to be aware of their responsibilities in this regard and to always act in accordance with our corporate values.

In our Code of Conduct, we have described in detail what is particularly important to us in this context. This Code of Conduct applies to all employees and all companies that manufacture or provide goods or services for the ALHO Group. The principles are just as binding for our employees, suppliers, subcontractors and their suppliers as the national and international laws to be complied with.



Of all the following regulations, the one most suitable for realising the protective purpose is always decisive. If in doubt about correct behaviour in business dealings, seek advice from your line manager. This Code of Conduct offers no protection for third parties and does not give third parties any claims against the ALHO Group.

Modular buildings correspond to the idea of a building that is intelligently planned with regard to the material cycle and designed with foresight. They allow the greatest possible flexibility of use. Additions, extensions, conversions, reutilisation and recycling are possible at any time and ensure many phases of use of the modular buildings.



1. Honest and legally compliant management

We conduct ourselves fairly and in compliance with the law. In all countries in which we operate, we comply with the applicable laws, other regulations and official directives. We expect our employees and business partners to behave in the same honest and lawful manner.

2. Commitment to fair competition

We respect the principles and rules of fair competition. Anti-competitive behaviour, such as cartel agreements or the abuse of a dominant market position, will not be tolerated. All employees are obliged to strictly comply with the provisions of competition and antitrust law applicable in their country.

3. No corruption and bribery

We win orders fairly through the quality and prices of our products and services. We reject all forms of corruption and bribery as a matter of principle. No employee may offer, promise or grant - directly or indirectly - unjustified advantages to public officials or persons in the private sector in connection with business activities, or authorise or accept such advantages. No monetary payments or other benefits may be made in order to influence business decisions or to gain an unjustified advantage.



4. Fair employment conditions

As a family business, a fair and collegial working environment is important to us. We consider it a matter of course to respect human and children's rights in this context.

The ALHO Group complies with the applicable labour and employment laws in each country and is expressly committed to fair labour conditions.

The ALHO Group rejects any use of child, forced or compulsory labour as well as any form of modern slavery and human trafficking. This applies not only to co-operation within the Group, but also to the behaviour of and towards business partners. The national Youth Protection Act and internationally applicable standards, such as the United Nations Convention on the Rights of the Child, are always complied with.

We do not tolerate any form of discrimination or harassment in the workplace, be it on the basis of age, disability, origin, gender, race, nationality, religion or sexual orientation, nationality, religion or sexual orientation.

The ALHO Group is committed to honest and fair dialogue with employee representatives.



5. Occupational safety

The health and safety of employees at their workplace is a top priority for the ALHO Group. The ALHO Group is committed to complying with national and international occupational health and safety regulations. All employees are called upon to support the ALHO Group to the best of their ability in its endeavours to create safe working conditions. Employees are obliged to observe all relevant regulations and safety instructions and to wear the appropriate protective equipment.

The ALHO Group provides reliable emergency care. In addition, the company provides adequate facilities for reporting and fighting fires at all locations. A sufficient number of trained first aiders are available at all locations.



6. Environmental and climate protection

The protection of natural resources and the environment are important to the ALHO group of companies. Environmentally conscious and conscientious behaviour is expected of both employees and business partners. business partners.

In the production process, the need for primary raw materials and energy requirements are minimised as far as possible. All resources are utilised as efficiently as possible. We also aim to maximise value retention and the longest possible product life cycle as possible.



In order to conserve natural resources, all ALHO Group products are designed and produced to be as recyclable as possible. Residual materials and packaging waste are consistently avoided. Unavoidable waste is disposed of responsibly and returned to the raw material cycle as far as possible.

The ALHO Group commits itself and its business partners to complying with the relevant environmental laws and regulations. We organise our processes in such a way that no unnecessary soil contamination, water pollution, air pollution, harmful heat emissions or excessive water consumption occur.



7. Recording and reports

We document correctly and promptly. All records and reports and reports on business transactions must be complete and correct. The principles of proper bookkeeping and accounting are adhered to. Data entry and other records must always be complete, accurate, timely and system-compliant. These principles must also be observed when accounting for travel costs and expenses.

8. Dealing with company income

We expect all employees to treat company property with care. Financial resources must be used sparingly. Company property must not be misused.

9. Avoidance of conflicts of interest

Conflicts of interest must always be avoided. All employees are prohibited from directly or indirectly requesting or accepting gifts and gratuities in connection with business activities. This does not apply to occasional invitations and gifts of insignificant financial value, which correspond to normal business practice. The prerequisite for accepting such gifts is always that no legal provisions are violated and that any influence and that any influence on a business decision can be ruled out from the outset.



10. Data protection and information security

The ALHO Group ensures that all relevant data protection regulations and laws are complied with when processing personal data. Business partners are also obliged to act within the framework of legal requirements, taking into account information security laws to ensure the security of all business information.



11. Whistleblower management

The ALHO Group provides all employees with a whistleblowing mechanism in the form of a reporting channel. If violations of the principles listed in the Code of Conduct are reported and identified, the ALHO Group undertakes to take appropriate remedial action.



Click [here](#) to the reporting channel!

