



# LUDWIG FREYTAG



## Company values

Core values, ethics, and integrity

(as of August 20, 2025)





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**Note:** For the sake of readability, we often use the masculine form – however, the feminine/diverse forms are always implied.

## **1 Scope**

Our corporate values apply throughout the entire LUDWIG FREYTAG Group, including all subsidiaries, dependent and independent branches, departments, and affiliates, and to all employees. The management of the Group, the operating managers of all subsidiaries, the branch managers, and all executives assume special responsibility for implementing these values.

These corporate values are intended to help answer questions that arise in connection with strategic considerations and operational decision-making processes correctly and appropriately.

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

The corporate values also apply to our contractual partners. They are required to accept our corporate values unless they have already implemented comparable principles in their own companies. The contractual partners undertake to involve their subcontractors in the implementation of these values. The agreement is an integral part of all future business relationships. A violation of these values may ultimately be grounds and cause for the LUDWIG FREYTAG Group to terminate business relationships, including all associated contracts.

The corporate values come into force upon signing.



## 2 Statements by the management

The LUDWIG FREYTAG Group hereby establishes corporate values that are decisive and forward-looking for its business activities. We act in accordance with these values in the conviction that maintaining and enhancing the reputation of the LUDWIG FREYTAG group of companies as a trustworthy, fair, and law-abiding partner strengthens our position in the market. The fundamental values formulated here are binding for us.

The management of the LUDWIG FREYTAG group of companies and all executives of the group actively participate in promoting and maintaining the corporate values.

The corporate values are communicated to all employees of the LUDWIG FREYTAG Group as a supplement to their employment contracts. Compliance is mandatory for all employees of the Group. Employees who violate the provisions of our corporate values must expect disciplinary measures or consequences under labor law.

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

Our actions and conduct within the LUDWIG FREYTAG Group are guided by the fundamental value of integrity. The reputation for fair, reliable, and contract-compliant planning and execution of our activities, which has been built up by our managers and all employees in our long company tradition, must be confirmed in every new business transaction, from calculation and the purchase of materials to subcontractor services, execution, and invoicing. We are committed to fulfilling the requirements specified by our clients in compliance with all official, legal, and technical requirements and our binding obligations. We want the services we provide and those we commission to be carried out safely, in an environmentally friendly manner, and without injury to persons or damage to property.

We pursue our business objectives exclusively by means that are lawful and ethically acceptable. Corruption, manipulation, anti-competitive agreements, illegal employment, disclosure of business or trade secrets, and other illegal activities are strictly prohibited. We do not tolerate such behavior, either explicitly or implicitly.

We also expect our partners, such as public and private clients, contractors, subcontractors, and suppliers, to adhere to the same values. We promote this through appropriate contract design.

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



## 2.1 Statements on our core values

- We respect international human rights.
- We do not tolerate child labor, forced labor, or other involuntary labor in accordance with the conventions of the International Labor Organization.
- We maintain fair working conditions, working hours and payment of reasonable wages, as determined by national and local standards and regulations.
- We observe the 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 information protection and cybersecurity.
- We respect the right to freedom of association and collective bargaining to protect and promote working and economic conditions.
- We treat our fellow human beings with respect.
- We do not tolerate discrimination of any kind, bullying or harassment, whether based on derogatory remarks or behavior, offensive jokes or images, insults or aggressive, intimidating behavior within the LUDWIG FREYTAG group of companies or at subcontractors commissioned by us.
- No one may be discriminated against or degraded based on ethnic origin, gender identity, religion or worldview, disability, age, sexual orientation, language, union membership, or political views.
- With regard to sustainability, we act in an economically, socially, and ecologically responsible manner. Economic, social, and ecological responsibility are considered and evaluated in all activities.
- We strive to improve the quality of life in society through our general business activities, but also through the use of products such as the provision of construction services.
- We ensure that all applicable regulations regarding our financial responsibility, including the associated documentation, are complied with.
- In our activities, we take into account the sanctions lists provided by governments regarding country and person-specific embargoes, export controls, and economic and financial sanctions.



## 2.2 Statements on environmental protection

- Through sustainable action, we contribute to the protection and preservation of natural resources.
- We, our contractual partners, and our suppliers are prohibited from unlawfully evicting people from their homes and from unlawfully depriving them of their land, forests, and water for any purpose. People's livelihoods must not be endangered by development, which also includes consideration of soil quality.
- Legal requirements and official regulations on environmental protection are implemented as standard. Anything not regulated by law is carried out on our own responsibility in accordance with the principles of environmental protection.
- We comply with all environmentally relevant obligations, taking into account the precautionary principle.
- Through the economical use of resources (raw materials, energy, water) and continuous development, we minimize the environmental impact of our activities. We reduce environmental impact—such as exhaust gases, noise, waste, and wastewater—to an economically acceptable minimum. Particular attention is paid to energy efficiency and reducing greenhouse gas emissions. We prioritize reducing material use and recycling materials over disposal.
- We actively promote environmental awareness among our employees.
- We consider the environmental impact of future investments and purchases; environmentally friendly options or the sensible use of alternative energy sources are preferred.

## 2.3 Statements on quality

- We want to achieve trusting cooperation with satisfied clients through high-quality, on-time, and economically successful project management.
- Our goal is to continuously improve our work processes.
- Through regular training, we give our employees the opportunity to adapt their knowledge to ongoing developments and requirements.
- We use modern, state-of-the-art working methods.
- We avoid damage to property.
- We strive to provide services of the highest standard in compliance with the law.
- We provide targeted information to improve cooperation between all parties involved.
- We promote a culture of error management in which mistakes are not ignored but rather used as opportunities for improvement.



## 2.4 Statements on occupational health and safety

- Our vision is: zero accidents – prevention of accidents at work, commuting accidents, and occupational illnesses.
- We contribute to maintaining the safety and health of all employees and third parties.
- We avoid work-related health hazards.
- We strive to continuously improve our occupational safety standards and promote occupational safety as a profitable 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 suitable work equipment for the tasks to be performed, taking into account the safest, most environmentally friendly, and most economical way of working.
- Safety is an integral part of our operating processes and an essential aspect of our employees' thinking and behavior at work.
- Our managers address employees and subcontractors in a positive manner when undesirable behavior occurs.
- Our occupational safety officers and all employees can contact the company management directly at any time.
- When selecting our contractual partners, their conduct and performance in the area of occupational health and safety are important factors.
- We do not tolerate the consumption of alcohol, drugs, or intoxicating substances in the workplace. People under the influence of such substances will be expelled 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 only permitted in designated areas.



## 2.5 Statements on our integrated management system

- We strive to continuously improve our integrated management system. Through extensive checks, inspections, internal and external audits, and the introduction of suggestions for improvement, our management systems are constantly updated and thus made more effective in the spirit of a "continuous improvement process."
- We strive to continuously improve our procedures and processes in the areas of occupational safety, health, environmental compatibility, and quality improvement. Through targeted cooperation between all parties involved, e.g., through various committees, meetings, or toolbox meetings, the above statements can be realized and sustainable improvements achieved within our LUDWIG FREYTAG group of companies. Managers also have a particularly positive impact on the achievement of our goals. It is important to set an example for all employees and demonstrate the importance of the company's goals.
- The specialist departments for occupational safety, environmental protection, and quality management are actively supported by the company management.

## 2.6 Statements on compliance, ethics and integrity

- We are committed to complying with applicable law and our self-imposed corporate values. This also applies to overarching international laws regarding, for example, international law, environmental and climate protection laws, criminal law, labor and antitrust laws, data protection, and trade agreements. At the LUDWIG FREYTAG Group, compliance with rules stands for fair treatment of our employees and all contractual partners or other parties.
- We ensure compliance with all relevant competition law requirements. Agreements and arrangements that influence prices, conditions, strategies, or customer relationships, especially in connection with participation in tenders, are prohibited. The same applies to the exchange of competitively sensitive information and any other behavior that restricts or may restrict competition in an impermissible manner.
- We undertake to comply with all tax regulations, not to conceal important information, not to evade taxes illegally, and not to obtain any improper tax advantages. All employees cooperate with the tax authorities to provide the tax information required by law.
- We undertake to comply fully with all applicable legal provisions on combating money laundering and terrorist financing and only accept funds from legal sources.
- We do not participate actively or passively in money laundering. All employees are required to be vigilant if there are doubts about the integrity of natural or legal persons with whom a contract is to be concluded.
- We take existing embargoes and sanctions and terrorist lists into account in our activities.
- Our employees and those of our contractual partners are required to respect the property of others, the operating assets of our group of companies, 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 documents, and our corporate image.



- All employees are responsible for the proper and exclusively business-related use of company assets, whether 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 objects, vehicles, machines/equipment, tools, IT systems, and documents. Intangible resources include our know-how, trade secrets, and other important information that must be protected for our group of companies.
- We treat information from our business partners confidentially within the LUDWIG FREYTAG group of companies. We expect the same conduct from our business partners.
- Our employees are prohibited from engaging in secondary employment or participating in other companies. Exceptions must be expressly approved in writing by the management.
- Within the LUDWIG FREYTAG Group, it is prohibited to give or accept dubious gifts or other benefits to clients and contractors that could be considered unfair business influence. See also section 3.1. This applies to business contacts with both private and public clients. No behavior that calls our integrity into question or could damage our reputation will be tolerated.
- Donations are made by us on a voluntary basis and without expectation of any economic 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 as appropriate. See also Section 3.1.
- We respect and value the intellectual and material property of our group of companies and that of our contractual partners.
- We treat knowledge and information about clients, contractors, and other business partners that we obtain in the course of our business activities as confidential.
- Fairness is our top priority when drafting contracts, negotiating prices, and invoicing. Our conduct toward contractual partners in bidding and working groups as well as toward our subcontractors is also characterized by a high degree of fairness.



## 2.7 Complaints system and whistleblower protection system

We have introduced a complaint system and a whistleblower protection system so that employees and other stakeholders can report possible violations of laws and corporate values while maintaining confidentiality and effective protection against discrimination. Our suppliers and subcontractors are also required to set up a similar complaint system.

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

**Personal/confidential**

**einfach.effizient. Treuhand 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](mailto:hinweise.lf-gruppe@treuhand.de)) or by telephone (0441 9710-500). Personal meetings to discuss the matter can also be arranged by prior agreement.



## 3 Prevention of corruption

Our corporate values also aim 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, our corporate values serve to raise awareness among all employees.

**Corruption is not a trivial offense, but violates the fundamental values of the LUDWIG FREYTAG Group and is punishable by law.**

It should be noted that corruption begins with small favors or gifts, as the transition to criminal corruption is fluid. Before accepting or offering a gift or invitation, it must be ensured that the value is within reasonable limits and cannot be regarded as undue influence on a business decision.

Dealing with public officials, government representatives, or state organizations involves particular risks that must be handled appropriately.

The above aspects apply to all employees of the LUDWIG FREYTAG group of companies as well as to our clients and the partners and subcontractors we commission.

### 3.1 Regulations for an appropriate framework for donations

#### 3.1.1 Hospitality

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

#### 3.1.2 Gifts

- There must be a justified reason or purpose for accepting or presenting the gift (anniversary, birthday, farewell, etc.).
- A value limit of €50 net per year and recipient applies.
- Gifts 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 occasion 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 environment through donations and sponsorship. This is reviewed and authorized by the management as appropriate.
- The company group only makes donations to charitable organizations.
- The identity of the recipient and the intended use must be transparent and traceable.
- Sponsorship and donations must not damage the reputation of the company. The goals and intentions must be in line with the values of the LUDWIG FREYTAG group of companies.
- Sponsorship and donations may not be used to gain any dishonest advantages for the LUDWIG FREYTAG group of companies or to pursue any unfair purposes.
- Sponsorship is provided exclusively on the basis of a written agreement in return for appropriate consideration.
- Payments may not be made to private accounts.
- Donations must be documented in the form of a certificate issued by the accounting department.

### 3.2 Separation from the private sphere

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

In the case of private contacts with persons with whom business relationships 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 must be maintained between work and private life in order to avoid any suspicion of accepting or granting advantages.

If existing or potential conflicts with work activities are identified in private contacts, these must be reported immediately in writing to the immediate superior and avoided at all costs.

### 3.3 Determination of work areas susceptible to corruption

All positions within the LUDWIG FREYTAG Group that are susceptible to corruption have been identified.

Any area of work or position in which information is available or decisions are made that could represent a significant material or immaterial advantage or disadvantage for third parties outside the immediate LUDWIG FREYTAG group of companies is considered to be at risk of corruption.

All employees are obliged to report any incidents as soon as they become aware of them.



## 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 of corruption prevention

The central point of contact for all tasks relating to the prevention of corruption throughout the LUDWIG FREYTAG group, including all its companies and subsidiaries, is

**Attorney Stephan Schade**

**Tel.: 030 54703040**

**Email: [schade@juskonzept.de](mailto:schade@juskonzept.de)**

## 3.6 Procedure in the event of suspected corruption

Our employees are obliged to report any concrete suspicion of corruption to the central point of contact for all tasks relating to the prevention of corruption immediately and in writing. From there, the management of the LUDWIG FREYTAG group of companies will be informed immediately.

The central contact point must then, after consulting with the management of the LUDWIG FREYTAG Group, immediately investigate the reported suspicion of corruption. The results of the investigation are documented in writing and kept at the central contact point.

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

Information about the investigation of specific allegations of corruption or the results of such investigations shall only be disclosed to public authorities, in particular criminal investigation authorities, after consultation with and written consent from the management of the LUDWIG FREYTAG Group.

This does not affect the right of any person to file a criminal complaint themselves. However, the prohibitions on the disclosure of business and trade secrets by employees protected by the Criminal Code must be observed.



### **3.7 Procedure in the event of confirmed corruption**

If corruption is detected, it will be reported immediately to all parties responsible for taking such measures, in particular the criminal prosecution authorities.

Furthermore, internal disciplinary measures, in particular measures under employment contract law, including dismissal, will be examined without delay, pursued consistently, and enforced.

If damage has been caused, claims for damages will be seriously examined and consistently enforced in accordance with the provisions of employment contract law.

## **4 Monitoring the implementation of corporate values**

The LUDWIG FREYTAG Group reserves the right to check the implementation of corporate values and carry out legally required audits both internally and at the premises of contractual partners, and to document the results. The LUDWIG FREYTAG Group also requires its contractual partners to check their business partners and subcontractors with regard to the implementation of corporate values.

The implementation of and compliance with these values are ensured through internal company information, training, instructions, internal and external audits, and the central responsibilities within the LUDWIG FREYTAG group of companies.

Oldenburg, 20.08.2025

**Management of the LUDWIG FREYTAG Group**