

COMPLIANCE – CORPORATE ETHICS HOTLINE

ROLE AND OBJECTIVES OF THIS COMPLIANCE GUIDELINE

As a company, the Standardkessel Baumgarte Group is committed to the legally and supra-legally binding value decisions applicable to German companies on a national and international level and has laid down the essential guidelines for its business activities in its Code of Conduct. This clear commitment of all companies of the Standardkessel Baumgarte Group is an overarching orientation system for all managers and employees and a clear statement to all business partners.

Essential areas relevant to the compliance of the group of companies - such as the fight against corruption and the observance of competition law regulations - have also been specifically defined and put into effect with internal guidelines for the conduct of all managers and employees.

The management of the Standardkessel Baumgarte Group of Companies considers it necessary to expand the possibilities for auditing compliance with the statutory provisions and, in particular, the compliance guidelines that have been put into effect, and likes to open up a more extensive possibility for participants to have possible violations of these guidelines audited by a body appointed for this purpose, the ombudsman. This procedure and the associated examination effectively puts us in a position to pursue and punish possible violations of the existing compliance guidelines and to keep any resulting damage away from the company and the employees involved.

Following this, this "Corporate Ethics Hotline" of the Standardkessel Baumgarte Group is put into effect.

The "Corporate Ethics Hotline" is a reporting system which executives and employees of the Standardkessel Baumgarte Group as well as their contractual partners and their employees can use if they consider violations by executives or employees of the group of companies against applicable law and in particular against the applicable compliance guidelines of Standardkessel Baumgarte Group or its Code of Conduct to be possible and if they would like to bring these violations to investigation. The Corporate Ethics Hotline is intended to provide the reporting party with the necessary protection against reprisals within the company. Therefore, under this Corporate Ethics Hotline, the aforementioned violations can be reported, under strict confidentiality, to an external lawyer ("Ombudsman" as he is called), who will take on the investigation and assessment of the respective case and hand over his findings to the management for a decision.

The management of SBH, as the parent company of the Standardkessel Baumgarte Group, is convinced that the establishment of the Corporate Ethics Hotline is another important step to support and promote compliance in the Standardkessel Baumgarte Group.

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I. Recording of the notification by a person of trust

1. Who may notify?

All managers and employees of the Standardkessel Baumgarte Group as well as their contractual partners and employees of these contractual partners. Contractual partners are also companies with which the companies of the Standardkessel Baumgarte Group are in contractual negotiations without having already concluded a contract with them in a legally effective manner.

2. Permissible subject of the notification

2.1 The subject of a notification under this Corporate Ethics Hotline is

an action of a manager (including the managing directors) or an employee of the Standardkessel Baumgarte Group,

if and to the extent that there is a suspicion that such action may violate

applicable law, i.e. applicable statutory (including ordinances) or official regulations

or the compliance guidelines of the Standardkessel Baumgarte Group (such as the Anti-Corruption Guideline, the Antitrust Guideline, the Modern Slavery Statement for the UK and the SB Code of Conduct,

hereinafter referred to as "breach". In doing so, the notifying person must have reasonable grounds to believe that the reported information about a violation is true at the time of the report.

The Corporate Ethics Hotline is open to all eligible persons at any time. However, before using the hotline, each person notifying should consider whether other channels of communication may be more effective or appropriate to address the violation being notified. All managers and employees of the group of companies are obliged at all times to remedy violations of the aforementioned regulations upon notification by their employees or colleagues.

Notifications are to be formulated in a strictly factual manner and may only contain the reporting notifying person's own perception.

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2.2 The following in particular may not be the subject of a notification to the Corporate Ethics Hotline:

- Dissatisfaction with services or their evaluation;
- Reproduction of rumours or hearsay;
- Statements which themselves violate applicable law, e.g. insults or defamation.

3. No anonymous notifications, assurance of confidentiality, instructions on disclosure of the person reporting and notification of results.

Anonymous notifications are not allowed under this Corporate Ethics Hotline and will not be processed. However, the confidentiality of the identity of the notifying person will be ensured when the notification is made to the Ombudsman and subsequently when the notification is processed and action is taken, if necessary. In any case, it is ensured that the notifying person is not subjected to reprisals by making a notification.

For reasons of data protection, details of the result of the investigation and any consequences that may be drawn in consequence thereof will not be disclosed to the notifying person.

4. To whom may be reported and how?

The Standardkessel Baumgarte Group has appointed

Dr. Andreas Grüter, attorney at law

to perform the duties of the ombudsman under this Compliance Guideline. Notifications may only be made in writing, send by mail and be addressed to:

**Grüter - Rechtsanwaltsgesellschaft mbB
Herrn Rechtsanwalt Dr. Andreas Grüter
- Ombudsmann der Standardkessel Baumgarte Gruppe -
Stresemannstraße 20-22
47051 Duisburg**

The costs of the ombudsman's activities are borne by the Standardkessel Baumgarte Group.

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5. Respectful use of the Corporate Ethics Hotline

The Corporate Ethics Hotline was created to increase the compliance of the group of companies by providing an opportunity to report violations committed without fear of reprisals.

Any notification can lead to serious consequences for the persons concerned. For this reason, Standardkessel Baumgarte Group asks for respectful use of the Corporate Ethics Hotline. Any misuse of the Corporate Ethics Hotline will be handled in accordance with the applicable rules and regulations.

II. Processing and verification of the notification

1. Report to the notifying person

The ombudsman confirms receipt of the notification to the notifying party within seven days.

2. Determination of the actual facts on the basis of the notification and legal assessment by the ombudsman

After receipt of the notification, the ombudsman investigates the actual facts of the case. For this purpose, the ombudsman can proceed at his own discretion and receives access to all necessary information from the companies of the Standardkessel Baumgarte Group, as far as legally possible.

If, in order to protect the rights of the employee who has been accused of a violation by the person notifying the violation (hereinafter also referred to as the "affected person"), the ombudsman considers it necessary under the Federal Data Protection Act to inform the employee of the investigation, he will inform the management concerned. The management shall decide whether the affected person shall be informed and, if so, when this shall be the case. If necessary, the management may withhold the information in accordance with the Data Protection Act in order not to jeopardise the success of the investigation.

The ombudsman evaluates his investigations from a legal point of view on whether or not a breach of applicable law or of compliance guidelines as set out in section I. 2.1. was committed.

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3. Writing a report on the notification and handing it over to the management of the company concerned

After completing his investigation and assessment of a notification, the Ombudsman shall write a report which he hands over to the managing directors of the company of the Standardkessel Baumgarte Group whose manager or employee is accused of a violation in the report (hereinafter also the "affected managing directors"). The Ombudsman does not mention the name of the notifying person in his report. The managing directors of Standardkessel Baumgarte Holding GmbH shall receive a copy of the report for their information.

III. Further procedure

1. Decision by the management

After presentation of the ombudsman's report, the management decides on the necessary further measures. The reporting person does not have a right to get information about particulars of the ombudsman's investigation or of its result, but the reporting party shall receive feedback from the ombudsman within three months of the confirmation of receipt of the notification.

2. Involvement of the data protection officer

The management concerned will involve the data protection officer of the Standardkessel Baumgarte Group within the framework of this Compliance Guideline as required in order to ensure that the investigation is conducted in accordance with data protection law.

3. Involvement of the works council

The management concerned shall involve the works council in the investigation in such a way that it can exercise its rights as works council.

General notice:

In case of ambiguities or questions regarding this Corporate Ethics Hotline, you may contact the Compliance Officer of Standardkessel Baumgarte Holding GmbH:

Mr Nils Brammer, Tel. 0208 20768 -178, Nils.Brammer@SB-Group.com