

Code of conduct for business relationships - principles for impeccable

1. PREAMBLE

The PCM RAILONE Group manufactures concrete sleepers and track systems for local and long-distance transportation and also offers its expertise in the fields of engineering and plant construction. The Group comprises several companies, production sites and offices worldwide. The development of the PCM RAILONE Group has always been based on a foundation of ethical principles and values, including the principle of legality. This principle of legality obliges us to comply with the laws of all the countries in which we operate, because we believe that reliability, credibility and, above all, legality are fundamental to the success of our business.

Careful monitoring of compliance with legal regulations and the principles of integrity, honesty and fair business practices are standards for our conduct and components of our corporate culture and values. To ensure careful monitoring, the PCM RAILONE Group has implemented a compliance management system.

This Code of Conduct applies to the entire PCM RAILONE Group and is therefore derived from international declarations such as the "Universal Declaration of Human Rights", the "Declaration on Fundamental Principles and Rights at Work" of the International Labor Organization ("ILO") and the "Rio Declaration on Environment and Development". If additional requirements are necessary under national law, the subsidiaries may have their own company-related codes of conduct. The PCM RAILONE Group requires all subsidiaries and all business partners to observe the following principles. In addition, we expect our business partners to require their own suppliers to comply with these principles as far as possible and to ask them to do the same in their supply chains.

In this Code of Conduct, the term "employee" refers to all employees, including management and all company representatives of the PCM RAILONE Group. The term "employee" includes all men, women and intersex people. To make the text easier to read, the form "he or she" is not used in the following.

2. CORPORATE SOCIAL

We are convinced that social responsibility is a key factor for the long-term success of our companies and therefore an indispensable element of our value-oriented corporate management. We therefore expect our employees, business partners, suppliers and shareholders to follow these principles and corporate values and implement them without exception.

All employees and especially the management should be guided in their actions by the following simple rule:

Avoid any behavior that could damage the reputation of the PCM RAILONE Group or a PCM RAILONE Group company.

3. PRINCIPLES

3.1. Human rights

The PCM RAILONE Group is committed to the promotion of human rights. We respect human rights as set out in the United Nations Universal Declaration of Human Rights and demand the same from our business partners.

A1 We support and respect the protection of internationally proclaimed human rights

The PCM RAILONE Group is committed to the promotion of human rights. We strive to uphold human rights through our actions and to ensure that our actions comply with all human rights standards. The Group values compliance with all applicable laws and respects internationally recognized human rights in all countries in which the Group operates.

A2 We ensure that we are not involved in human rights abuses

We respect international guidelines and standards on the use of force and continuously engage with relevant stakeholders inside and outside the Group. We raise awareness within the Group of known human rights issues within the Group's sphere of influence. We identify the functions that are at risk of being associated with human rights abuses and where there are opportunities to promote human rights.

3.2. Work

The PCM RAILONE Group undertakes to comply with the eight fundamental conventions of the International Labor Organization (ILO). These fundamental principles and rights at work are also contained in the ILO's "Declaration on Fundamental Principles and Rights at Work" at. Compliance with these principles and rights must also be the basis for all our business partners' actions.

B1 We ensure that we uphold the freedom of association and the right to collective bargaining

The PCM RAILONE Group values the opinions of all employees. We therefore respect the right to freedom of expression, including trade union freedom. All our employees have the right under national law to form, join and lead their own organizations without fear of negative consequences.

a) At work

We respect the right of all employees to form and join a trade union of their choice, as long as the process is in accordance with national law. We implement non-discriminatory policies and procedures regarding union organization, membership and activity in areas such as job applications and decisions on promotion, dismissal or transfer.

We provide the employee representatives with suitable facilities to support them in drawing up effective collective agreements. In addition, we do not interfere with the activities of employee representatives if they perform their duties in a manner that does not interfere with regular company operations. Practices such as facilitating the collection of union dues on company premises, issuing union notices, distributing union literature and providing office space have proven to be beneficial to management-employee relations and are therefore supported by the PCM RAILONE Group.

b) At the negotiating table

We recognize representative organizations for the purposes of collective bargaining. We use collective bargaining as a constructive forum for discussing terms and conditions of employment and relations between employers and employees or their respective organizations. We address any problem solving or other needs of interest to workers and management, including restructuring and training, layoff procedures, safety and health issues, grievance and dispute resolution procedures, disciplinary rules, and family and community welfare.

B2 We advocate the abolition of all forms of forced and compulsory labor

In accordance with ILO Conventions No. 29 and No. 105, we ensure that there is no forced or compulsory labor and that we offer our services without coercion. Employees are free to resign in accordance with the established regulations.

B3 We promote the effective abolition of child labor

Child labor is a form of exploitation that constitutes a violation of human rights. We therefore strictly reject any form of child labor. The minimum age for admission to employment or work may not be below the age at which compulsory schooling is completed and may under no circumstances be below the age of 15. We ensure that ILO Conventions No. 182, No. 138 and Recommendation 190 as well as national laws for the protection of children are complied with.

B4 We affirm that we will eliminate all discrimination in respect of employment and occupation.

We do not treat our employees differently or less favorably based on characteristics unrelated to their merit or the requirements of the job. Under national law, these characteristics generally include race, color, gender, religion, political opinion, national origin, social origin, age, disability, HIV/AIDS status, union membership and sexual orientation. In addition, discrimination can occur in a variety of work-related activities, such as access to employment, certain professions, promotions, training and career counseling. It can also occur in relation to employment conditions, such as recruitment, pay, working hours and rest/paid leave, maternity protection, job security, job duties, performance appraisal and promotion, training and opportunities, employment prospects, social security, health and safety at work.

B5 We protect our employees from harassment

We do not accept any form of corporal punishment, physical, sexual, psychological or verbal harassment or abuse.

B6 We comply with the regulations on remuneration and fringe benefits

The labor standards with regard to remuneration, in particular equal pay in accordance with ILO Convention No. 100 and all applicable laws and regulations are complied with.

B7 We respect health and safety standards

All employees are obliged to comply with the applicable health, safety and environmental laws and regulations at all times. It is the general duty of every employee to avoid risks to people and the environment, to minimize the impact on the environment and to use resources sparingly.

Processes, facilities and resources must comply with the applicable legal and internal requirements for occupational safety, health protection, fire protection and environmental protection. To ensure health and safety, we reject the use of drugs and alcohol in the workplace as well as working under the influence of alcohol.

B8 We comply with applicable standards regarding working hours

We are committed to ensuring that our employees' working hours comply with national laws and industry standards as well as ILO Conventions 1, 14 and 106.

B9 We enter into regular employment relationships that meet the applicable standards

We comply with national and international laws and industry standards when classifying and executing employment relationships, e.g. with regard to employees, subcontractors, independent contractors, etc. This includes employment on the basis of regular employment relationships or employment letters in language that applicants and employees can understand and in accordance with national and international laws and industry standards.

B 10 We advocate and promote charitable work and volunteering

The PCM RAILONE Group contributes to the social and economic development of the countries and regions in which it operates and promotes corresponding voluntary activities by its employees.

3.3. Integrity

The PCM RAILONE Group complies with the applicable legislation of all countries in which the Group operates. The conduct of all employees and management is guided by general moral values and principles, in particular integrity, transparency, honesty, respect for human dignity, openness and non-discrimination with regard to race, ethnic origin, gender, religion or belief, disability, age or sexual identity. Furthermore, we emphasize that we reject corruption and bribery in accordance with the UN Convention. We also do not tolerate facilitation payments. We support acting with integrity, responsible management and control and demand the same from our business partners.

C1 We ensure that we handle information responsibly and in accordance with the following principles

a) Principles of proper accounting

All records and reports, regardless of whether they are intended for internal or external use, must be accurate and truthful.

The principles of proper bookkeeping and accounting must be complied with. Accordingly, data entry and other records must be complete, correct, up-to-date and system-compatible at all times.

The copying, reproduction and/or processing of records of confidential company data and confidential data relating to the PCM RAILONE Group is only permitted if these copies and records are in the direct interest of the PCM RAILONE Group.

b) Principle of confidentiality

The PCM RAILONE Group is aware that the preservation, protection and responsible handling of company property and assets, including intellectual property, are essential for maintaining competitiveness. Therefore, all appropriate measures must be taken to protect these assets as well as confidential information and property rights of third parties. All non-public information about the Group or its companies is considered confidential information and must be kept secret. It is irrelevant whether the information is in written, verbal or electronic form. This obligation also applies beyond the duration of the employment relationship.

The PCM RAILONE Group respects the efforts of third parties to protect their confidential information. For this reason, confidential information of our joint venture partners, suppliers or customers must be treated with the same care as confidential information of the PCM RAILONE Group.

Non-public information should only be disclosed to individuals who are both authorized to have access and need to know the information in order to perform their duties. Appropriate measures must be taken to

protect classified information, such as requiring companies or individuals outside the PCM RAILONE Group to sign a confidentiality agreement before being granted access to non-public information.

c) Principle of data protection and information security

The protection of personal data and the security of all business data must be ensured for all business areas, taking into account the applicable legal provisions. To this end, we ensure that we maintain a high standard of technical security precautions against unauthorized access and comply with all relevant data protection laws.

C2 We avoid conflicts of interest

In the case of transactions with companies in which an employee, spouse or partner or a close family member is involved or acts in a managerial capacity and this person can influence the business relationship, it must be ensured that no conflict of interest arises. In cases of doubt, the approval of the responsible RAILONE management must be obtained.

In general, close family members and partners of employees may only be employed or hired as consultants if the decision is based on qualifications, performance, ability and experience.

In addition, participation is only permitted if the work performance agreed in the employment contract is not impaired and the acceptance of participation in individual cases does not violate statutory regulations or this Code of Conduct. This includes, among other things, activities that are likely to impair the competitiveness of the PCM RAILONE Group or individual companies. In cases of doubt, each employee is personally responsible for obtaining the express approval of the PCM RAILONE Group before accepting an equity investment. Such prior approval must also be obtained in all cases where an investment in a company that is in competition with the PCM RAILONE Group and an investment in suppliers and customers is sought.

C3 We do not take possession of land unlawfully or evict people illegally

We respect and observe all property and participation rights protected by national and international law. For this reason, we reject, among other things, any form of illegal expropriation or eviction. If large areas of land, water or forest are affected or indigenous population groups are affected, our business partners undertake to the principles comply with of ILO Convention 169, which also the basis of our actions forms in this case.

C4 We instruct to security forces commissioned by us act in accordance with the law

We instruct the private and public security forces ensure that their deployment we employ to does not lead to unlawful harm to life and limb, violate freedom of association or the UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment. We also demand this behavior from our business partners.

C5 Embargoes, sanctions, export and import controls

We comply with applicable laws and regulations in international goods and financial transactions and also in this context observe existing embargoes and sanctions.

3.4. Environment

The PCM RAILONE Group complies with regulations and standards for the protection of the environment. Based on the principles of the Rio Declaration on Environment and Development, we use resources responsibly and also comply with the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants (POPs) and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal. the same We expect from our business partners .

D1 We support a forward-looking approach to environmental issues

We take safety precautions and take into account the degree of uncertainty resulting from scientific findings when there is a reasonable suspicion of harm or a threat of serious or irreversible damage. Our precautions include the systematic application of risk assessment, risk management and risk communication. The "acceptable" level of risk includes not only a scientific and technical assessment and an economic cost-benefit analysis, but also political considerations such as public acceptance.

D2 We take measures to strengthen environmental sustainability

We encourage ownership and are guided by appropriate codes, charters and initiatives that are integrated into all elements of corporate planning and decision making. It is important to us to promote openness and dialog with employees and the public, and we ensure that our activities in our operations do not harm the environment.

D3 We promote the development and dissemination of environmentally friendly technologies

We use all resources in a more sustainable way and our technologies include a variety of clean production processes and pollution prevention.

3.5. fight against corruption

We take a clear stance against corruption in all its forms, including extortion and bribery.

We ensure that we take action against the misuse of the funds available to us for private purposes, which includes not only financial but also non-financial benefits.

In accordance with the UN Convention against Corruption, we hereby declare that, to the best of our knowledge and belief, we are taking appropriate measures to prevent, in particular, the direct and indirect commission of the following offenses:

Robbery, embezzlement, money laundering, terrorist financing, fraud, breach of trust, forgery of documents, anti-competitive agreements in public tenders and betrayal of business and trade secrets as well as unauthorized use of templates or instructions of a technical nature, corruption and bribery in business dealings, granting of advantages and benefits or other benefits to employees of business partners

or acceptance of such advantages or benefits, unlawful material and immaterial contributions of any kind to political parties, their representatives as well as elected officials and candidates for political office.

Bribery is defined as the offering or receiving of gifts, loans, fees, rewards or other benefits to or from a person as an inducement to do something that is dishonest, illegal or a breach of trust in the conduct of the company's business.

Donations are only made on a voluntary basis and without expectation of anything in return. The sponsorship of individuals, groups or organizations is not used to gain unlawful business advantages.

When selecting and deploying consultants, agents or other intermediaries, we use their qualifications, suitability and integrity as selection criteria and ensure an appropriate relationship between the service provided and the remuneration.

The PCM RAILONE Group pursues reputable and recognized business practices and fair competition, in particular with regard to antitrust and competition law.

It is very important to us that our business partners also comply with the UN Convention against Corruption and ensure that the above-mentioned violations are prevented.

3.6. Reporting irregularities

Every employee has the right to inform his or her superior of circumstances which, on an objective assessment of the overall circumstances, indicate a breach of the regulations contained in this Code of Conduct, without suffering any disadvantages as a result.

3.7. Monitoring and audits as well as consequences of violations

Just as we can be audited by our customers to ensure compliance with the business principles set out in this Code of Business Conduct, we reserve the right to take appropriate measures to ensure that our business partners also comply with the principles set out here. In this respect, we strive for cooperation with our business partners in order to jointly demonstrate compliance with the business principles or to work on their improvement if necessary. In this context, business partners shall conduct documented training for their employees and for persons working for them to ensure compliance with the business principles.

However, should a business partner seriously violate this Code of Conduct (in particular if a criminal offence is suspected), RAILONE reserves the right to impose appropriate sanctions on the respective business partner. This may also result in the immediate termination of the business relationship and the assertion of claims for damages and other rights.