

Code of Conduct

Our values form the backbone of how we think and act. But what do those values look like in everyday working life?

As a family-owned company with more than 100 years of history, Piepenbrock stands for reliability, fairness, and entrepreneurial responsibility. We have a clear understanding of how we want to interact with the world and the people around us. This Code of Conduct sets out our core values and serves as a practical guide for fair, lawful, and sustainable conduct in our daily work. It also provides ethical orientation and support in decision-making.

Who does the Code of Conduct apply to?

The Code of Conduct applies to all employees, managers, and members of the executive management of the Piepenbrock Group – regardless of role, employment type, or location. Our managers bear a special responsibility: They provide direction, embody the company's values, and build trust through transparent and consistent action.

The expectations outlined in this Code likewise apply to our business partners and suppliers. A separate Supplier Code of Conduct has been developed for them.

Arnulf and Olaf
Piepenbrock,
Managing Directors



How do I use the Code of Conduct?

The Code of Conduct is designed to help address ethical and legal questions that arise in day-to-day work and to support sound decision-making. Not every situation is clear-cut – and not every answer can be found in a set of rules. In such cases, the following guiding questions can help:

- Does my decision align with the values and principles of our company?
- Am I confident that my actions are legal and do not violate any laws or internal policies?
- Would I make the same decision if it were made public – through the media or within my personal circle?

If you are unsure, talk openly with your manager or seek advice from the appropriate department. Together, we'll find a solution that reflects our values and complies with the law.

Our principles

Our actions are guided by shared values that are binding for all employees of the Piepenbrock Group. We act lawfully, with integrity, transparency, respect, and responsibility. That means: We know and comply with all

regulations and guidelines relevant to our area of work. We keep our word, take responsibility for our actions, and communicate openly, clearly, and with integrity – both within the company and externally. We treat everyone fairly, value diversity, and show appreciation and respect for others. And we think ahead, weigh the consequences of our decisions, and act sustainably – economically, socially, and environmentally.

Everyone who works at Piepenbrock shares responsibility for upholding these values and for maintaining the spirit of cooperation that defines our company.

Social responsibility and human dignity

Piepenbrock stands for mutual respect, equal treatment, and the protection of human rights. We foster a work environment defined by fairness, safety, and appreciation. The following principles apply:

Human rights and labor standards

We respect human rights and are committed to upholding the ILO Core Labor Standards. Child labor, forced labor, discrimination, or intimidation are incompatible with our values. We respect the right to freedom of asso-

ciation and collective bargaining. We also expect our service providers and business partners to observe these same principles.

Working conditions and compensation

All employees are entitled to fair working conditions, transparent employment contracts, timely payment, paid vacation, and legally regulated working hours. We make sure that social security contributions, bonuses, and rest periods are correctly applied and documented.

Occupational safety and health protection

We provide safe and healthy workplaces. This includes risk assessments, safety training, personal protective equipment, medical checkups, and ergonomic, accessible workplace design. We take mental health seriously and promote a culture of mutual care and attentiveness.

Equality, diversity, and inclusion

We promote equal opportunity and do not tolerate any form of discrimination – whether based on gender, origin, age, sexual orientation, religion, disability, or other personal characteristics. We view diversity as a strength. We support inclusion and embrace diversity as part of our corporate culture.

New employees are hired based on their individual skills, qualifications, and potential – regardless of personal characteristics. At the same time, we focus on long-term employment prospects: through targeted qualification and training programs, we encourage personal development, strengthen professional expertise, and enable career growth.

Integrity, trust, and compliance

Honesty, transparency, and reliability are the cornerstones of our corporate culture. We take responsibility for our actions – consciously, consistently, and with full accountability. The following principles apply:

Financial integrity

We record all business transactions, assets, and liabilities completely, accurately, and in a traceable manner. Accounting and reporting are carried out in accordance with applicable financial reporting standards. Fraud, theft, embezzlement, the financing of terrorism, and money laundering are strictly prohibited. Every employee is responsible for the proper use of company resources.

Anti-corruption

Piepenbrock does not tolerate any form of bribery or corruption – whether active or passive. Our decisions are not influenced by gifts, invitations, or other personal benefits. Permissible tokens of appreciation must remain within reasonable limits, be properly documented, and, where required, approved. Suppliers and service providers are selected based on objective, factual criteria.

Competition and procurement

We comply with all applicable competition laws. Fair competition is essential for free markets and sustainable business development. Agreements on prices, capacities, or conditions that restrict or distort competition are prohibited. In tender processes, we act fairly, maintain confidentiality, and refrain from using insider information.

Conflicts of interest

We strictly separate business and personal interests. Decisions at Piepenbrock are based on objective considerations and must not be influenced by personal relationships, financial dependencies, or private advantages. Potential conflicts of interest – such as family ties or secondary employment – must be disclosed openly and discussed with the relevant manager.

Data protection, plagiarism and intellectual property

We handle personal data and confidential information with the utmost care and in compliance with all applicable data protection laws. We protect the company's intellectual property as well as that of our business partners. The use, transfer, or publication of protected content is only permitted when there is a valid legal basis. The creation or distribution of plagiarized material is strictly prohibited.

Safety and product liability

We provide safe, high-quality services. All legal, safety-related, and technical requirements are observed. Employees receive regular training to identify potential safety risks early and to take appropriate measures. We continually review and improve our standards.

Export controls and sanctions

In international business relationships, we comply with all applicable import and export control laws, sanctions, and embargoes. We verify whether partner companies, countries, or products are subject to legal restrictions and act exclusively within the applicable legal framework.

Donations and sponsorships

Piepenbrock makes donations and sponsorship contributions solely on the basis of clear and transparent criteria. We do not donate to political parties, individuals, or organizations whose objectives conflict with our values. Donations for education, science, culture, sports, or social causes are made transparently – with a clearly defined purpose, legal authorization, and documented approval.

Environmental and climate responsibility

We all share responsibility for protecting the environment and using resources sustainably – both in our daily work and in the services we provide. Piepenbrock is committed to climate protection and strives for the continuous reduction of environmental impact. Together, we contribute to this goal through environmentally conscious decisions in our offices, on-site operations, and across all processes. The following principles apply:

Climate protection and resource conservation

We are committed to reducing our carbon footprint, for example through energy-efficient processes, low-emission mobility, digital solutions, and the selection of sustainable materials.

Employees are expected to act in an environmentally responsible manner within their area of work, use electricity, water, and heating energy sparingly, and help prevent waste.

Waste and chemical management

We aim to minimize waste, separate recyclables consistently, and promote reuse, recycling, and environmentally sound disposal. Cleaning, maintenance, and hazardous substances are handled responsibly, efficiently, and safely. Chemicals must be labeled, stored, and used in accordance with applicable regulations.

Biodiversity and land use

When undertaking construction, technical, or operational projects, we pay attention to environmental compatibility and the preservation of natural resources. Green and open spaces are designed and maintained as close to nature as possible. We support measures that promote biodiversity and respect ecological interdependencies, for example through sensitive land-use planning, sustainable maintenance concepts, and the avoidance of environmentally harmful practices.

Sustainability and social engagement

For Piepenbrock, sustainability means more than protecting the climate – it is part of who we are. We are committed to supporting education, culture, health, and social justice – both within our company and in society at large. Employees who wish to volunteer or contribute sustainable ideas are warmly encouraged to get involved.

Whistleblowing system and protection against retaliation

Piepenbrock provides a central whistleblowing system through which suspected violations of legal requirements or of the standards set out in this Code can be reported. Reports may be submitted at any time, confidentially, and, if desired, anonymously via the website.

All reports are handled in strict confidence and reviewed as part of a structured, fair, and legally compliant process. Piepenbrock guarantees protection for whistleblowers against any form of discrimination, retaliation, or other disadvantage – even if a reported suspicion later proves to be unfounded.

Implementation, monitoring, and cooperation

To ensure that everyone at Piepenbrock actively lives by the values set out in this Code of Conduct, we make certain that its content is well known, accessible, and easy to understand. The Code is available on the intranet and website, and is introduced as part of onboarding and through regular training programs.

To ensure its effectiveness, we regularly assess how well the principles described in the Code are understood and applied in daily work. This evaluation is carried out annually and as needed within the framework of our risk and compliance management. We draw on existing internal processes for risk analysis, goal tracking, and progress documentation, which allow us to systematically review, assess, and further develop each topic area in terms of relevance, objectives, and level of implementation.