

# HOCHTIEF commitment to human rights

## Position Paper – Statement of intentions

### 1. HOCHTIEF commitment to human rights

HOCHTIEF, as a global infrastructure group that operates under high social, environmental and ethical standards, is aware of its duty of care and is committed to respecting and observing internationally recognized human rights and freedoms, as set forth in:

- The Universal Declaration of Human Rights (UN, 1948)
- The International Covenant on Civil and Political Rights (UN, 1966)
- The International Covenant on Economic, Social and Cultural Rights (UN, 1966)
- The ILO Declaration on Fundamental Principles and Rights at Work and its Follow-Up (ILO, 1998)
- The Convention on the Rights of the Child (UN, 1989)
- The UN Global Compact (UN, 1999).

The Group commits to actively avoid causing or contributing to any form of adverse impact on the human rights of the people involved in its global operations and value chain and to tackle any such impacts, should they occur, supporting the application of the UN Guiding Principles on Business and Human Rights (UN, 2011) and the OECD Guidelines for Multinational Enterprises (OECD, 2011) and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (ILO, 2017).

At the same time, HOCHTIEF acknowledges its obligation to human rights as a contribution towards its commitment to strict compliance with the statutory rules and provisions, while, in those countries where HOCHTIEF human rights principles come into conflict with the national legislation or regulations, it is the stricter human rights principles and standards which are to be applied in each case.

### 2. HOCHTIEF human rights principles and standards

The Group's expectations regarding the respect and observance of human rights are incorporated in the HOCHTIEF Vision, the Corporate Principles, the HOCHTIEF Code of Conduct and the remaining directives<sup>1</sup> for the development of the basic principles contained therein.

The observance of these expectations is mandatory for all employees within the Group, and the HOCHTIEF Code of Conduct for Business Partners<sup>2</sup> requires the same degree of human rights observance among its customers, suppliers and further contractual parties (hereinafter referred as "Business Partners").

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<sup>1</sup> The Group Directive Occupational Safety Health Environmental and Climate Protection, the Impact Management Position Paper and the Stakeholder Management Program, among others.

<sup>2</sup> Acceptance of the HOCHTIEF Code of Conduct for Business Partners or its content is a general prerequisite for all contractual agreements between HOCHTIEF and its Business Partners.

The key human rights principles and standards, protected and promoted in the scope of HOCHTIEF'S global operations and value chain, under the above mentioned internal mandatory rules, are:

**Respect of the rights of its own employees and the employees of Business Partners, providing decent work conditions** under the following principles:

- Respecting Human Dignity
- Rejection of Child Labor
- Rejection of Forced Labor
- Humane Treatment, Antidiscrimination and Diversity
- Providing Occupational Health and Safety
- Right of Association and Right of Collective Bargaining
- Fair Working Conditions and Remuneration
- Equal Opportunity and Professional Development

**Protection of Local Communities and the Environment**, the Group contributes towards conserving resources and habitats in its operations and respects the rights of the communities to live in a clean and healthy environment under reasonable standards of living. Expecting the same from its Business Partners under the following standards:

- Protection of soil, water, air, biological diversity and cultural heritage
- Reduction of pollution and resource saving
- Safe handling of hazardous materials
- Responsible management of waste water and solid waste
- Prevention and emergency preparedness

**Providing Integrity and High Ethical Standards**, HOCHTIEF collaborates with its stakeholders and formalizes its commercial relations on the basis of trust and mutual benefit, committing to comply with the following principles:

- Privacy, Data Protection and Confidentiality
- Actively and Effectively Fighting Against Every Kind of Corruption and Bribery including Fiscal Responsibility

Special regard is taken over the application of these human rights principles and standards among vulnerable groups, such as indigenous peoples and other minorities, migrant workers, children, youth employment, pregnant women and people with disabilities and/or reduced mobility.

### **3. HOCHTIEF approach for the respect and observance of human rights** **Due diligence**

In order to ensure that these principles and standards govern HOCHTIEF global operations and value chain, the Group will improve implemented due diligence measures and procedures for the identification, prevention and mitigation of the, actual and potential, adverse impacts on human rights directly linked to its activities and commercial relations. The Group ensures to provide effective remediation when appropriate in collaboration with the affected parties and authorities.

In this sense, HOCHTIEF undertakes to clearly assign human rights due diligence responsibilities among its different divisions and to promote its implementation through the provision of training on human rights for its employees.

#### **4. Monitoring observance**

Observance of human rights' principles and standards is monitored within the scope of project audits conducted by Corporate Auditing. Furthermore, a questionnaire based on the HRIA<sup>3</sup> tool is used within the framework of project audits focused on human rights in order to identify possible risks.

Human rights aspects are integrated into workflows concerning the selection of Business Partner, e.g. in HOCHTIEF's procurement processes. Specific categories of Business Partners, such as joint venture partners or a certain type of consultants<sup>4</sup> are to be approved by Compliance (HOCHTIEF Business Partner Compliance Due Diligence).

#### **5. Complaints procedure and process in the event of violations**

HOCHTIEF provides several ways of reporting non-compliance with statutory or company regulations: whistle-blower internal and external tip hotlines and an e-mail contact address are available globally for employees as well as third parties, where potential and/or actual human rights violations can be reported anonymously, without discrimination of any kind and without risk of being retaliated against under the provisions of HOCHTIEF Code of Conduct and HOCHTIEF Code of Conduct for Business Partners.

##### **Internal hotline**

Telephone +49 201 824-2222

Telephone (UK) +44 7973793343

##### **External hotline**

Telephone 0800 8862525 (calls from Germany, free of charge)

Telephone +49 30 88625254 (calls from outside of Germany)

##### **E-mail address**

[compliance@hochtief.de](mailto:compliance@hochtief.de)

HOCHTIEF does not retaliate against anyone for submitting in good faith a report of suspected or known misconduct, nor do we tolerate others retaliating. Similarly, the partner must not retaliate or tolerate retaliation against anyone who, in good faith, reports suspected or known misconduct. "Good faith" means that to the best of a person's knowledge and belief, everything reported is true and that everything known is reported.

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<sup>3</sup> Human Rights Impact Assessment, developed on the basis of the Danish Institute for Human Rights' compliance assessment tool.

<sup>4</sup> As defined in the Group Directive on Agreements with Intermediaries ("Consultancy Directive").

Additionally, through its Stakeholder Management Program, HOCHTIEF maintains a regular dialogue with its stakeholders, allowing them to raise their concerns and expectations about the respect and observance of human rights at HOCHTIEF Group.

This commitment on human rights will be reviewed and updated, where applicable, to bring it into line with any changes that the business model or the context where the Group operates may undergo, ensuring at all times its effectiveness.

**This Statement was approved by the Executive Board of HOCHTIEF  
Aktiengesellschaft on 28 April 2021.**