



CODE OF CONDUCT AND ETHICS POLICY

1. PURPOSE

The Code of Conduct and Ethics Policy of the companies of the PURLE® Group

- SLB GmbH Safety Services in Railway Construction
- 2P GmbH Safety technology in railway construction
- SLB Service-Leistungen Bau GmbH

and

- PURLE Holding GmbH & Co. KG

set out the principles, values and standards of conduct that are expected of all employees, contractors, suppliers and other authorised third parties when representing the company. This policy serves as a guide to ensure ethical behaviour, integrity and adherence to the highest standards of business ethics.

2. SCOPE

The purpose of this policy is to:

- to promote a culture of honesty, integrity and transparency within the PURLE® Group.
- set clear expectations for ethical behaviour in all business activities.
- Ensure compliance with applicable laws, regulations and industry standards.
- Protecting the reputation and interests of the PURLE® Group companies, its stakeholders and the wider community.

3. CORE VALUES

At the PURLE® Group, we are guided by the following core values:

Integrity: We conduct ourselves with honesty, sincerity and consistency in all interactions and transactions.

Respect: We treat all people with dignity, respect diversity and value the opinions and perspectives of others.

Responsibility: We take responsibility for our actions, decisions and their consequences.

Transparency: We provide accurate, complete and clear information to internal and external stakeholders.



Compliance: We comply with all applicable laws, regulations and industry standards. Adherence to this principle is also in the long-term interest of the company and forms the basis for sustainable corporate development and job security.

Excellence: We strive for excellence in our work and continuously improve our skills and processes.

4. EXPLANATIONS OF THE GUIDELINES

Conflicts of interest

Employees must avoid situations in which their personal interests conflict with the interests of the companies of the PURLE® Group. All actual or potential conflicts of interest must be reported immediately to the responsible personnel.

Confidentiality

Employees must maintain the confidentiality of sensitive information belonging to all companies within the PURLE® Group, as well as the personal and protected information of colleagues, customers and partners. Confidential information may only be disclosed to authorised persons or when required by law.

Compliance with laws and regulations

Employees must comply with the laws, regulations and industry standards applicable to their area of responsibility. Ignorance of the law is no excuse for non-compliance. Group management determines training needs and provides regular training for employees.

Violation of legal requirements can have significant consequences for both the company and the individual in the form of fines, penalties and damage to reputation.

Compliance with all requirements is the responsibility of each individual. Management will pursue a zero-tolerance policy with regard to any violations.

Ethical decision-making

Employees are expected to make ethical decisions, taking into account the best interests of the PURLE® Group, its stakeholders and the wider community. In the event of ethical dilemmas, employees should contact the appropriate departments.

Discrimination and harassment

The companies of the PURLE® Group are committed to creating a workplace environment that is free from discrimination and harassment based on race, gender, age, religion, disability or any other protected category. Such behaviour will not be tolerated.

Use of Company Resources

Employees should use company resources, including time, property and equipment, responsibly and for business purposes. The unauthorised use of company resources for personal gain is prohibited.





Reporting violations

The companies of the PURLE® Group encourage their employees to report suspected violations of this Code of Conduct and the Ethics Policy through the designated channels, e.g. to supervisors, managers or the Group's Compliance Officer. Reports can be made confidentially and retaliation against whistleblowers is strictly prohibited.

5. RESPONSIBILITIES

Employees: You are responsible for familiarising yourself with this policy, complying with its principles, and reporting violations or concerns.

Supervisors and managers: They are responsible for promoting ethical behaviour within their teams, addressing ethical concerns promptly, and serving as role models for ethical behaviour.

Human Resources: Responsible for disseminating, interpreting and enforcing this policy, as well as conducting ethics training and awareness programmes.

6. COMPLIANCE AND CONSEQUENCES

Failure to comply with this Code of Conduct and Ethics may result in disciplinary action, up to and including termination of employment, in accordance with PURLE® Group policies and procedures.

7. REVIEW OF THE POLICY

This Code of Conduct and Ethics will be reviewed annually or more frequently as necessary. Updates or changes to the policy will be communicated to all relevant employees to ensure continued compliance with ethical guidelines.

Münchenbernsdorf, August 2024

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