

Whistle Blower Policy of Putzmeister

I. Objectives and Purpose

All Putzmeister Group Companies consider themselves obliged to practice open internal communication and to meet high ethical standards. The perpetration of criminal acts within the Putzmeister Group shall not be tolerated under any circumstances. Employees and representatives of Putzmeister are expected to practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Thus Putzmeister intends to set up a company-internal whistle blowing system on a voluntary basis (hereinafter referred to as “whistle blowing”).

The objectives of Putzmeister’s whistle blower policy are to:

- Provide the employees of all Putzmeister Group Companies, with a facility for passing information about violations of the law, irregularities and risks to, and within, the respective company and thus

- Positively reinforce and influence compliance with all applicable laws and regulations, and help provide a workplace conducive to open discussion of the business practices.

II. Main Principles

The main principles of Putzmeister’s whistle blowing policy are as follows:

1. Voluntary Reporting

The employees of Putzmeister shall be enabled to give information on a voluntary basis about violations of the law, irregularities and abuses related to company operations. There shall be no adverse consequences for an employee who declines to report an issue, unless he is forced by law or his employment contract to do so.

The information provided shall be accompanied by an account of the observed facts which is as complete as possible, and, if available, appropriate documents.

2. No Retaliation of Whistleblowers

Any barriers which prevent employees of Putzmeister from reporting detected violations of the law, irregularities or operational risks are to be removed. No employee who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence.

3. Addressee of Whistle Blowing Reports

The whistle blowing system shall be assigned to the Chief Compliance Officer of the Putzmeister Group. Reports can be sent to the Chief Compliance Officer via the following channels of communication:

Telephone: +49-7127-599 9428

E-mail: Compliance@pmw.de

Furthermore, the normal reporting channels used to date (line manager, HR department, works council, company management, etc.) shall remain unaffected.

4. Prosecution by the Chief Compliance Officer

The Chief Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and shall advise the management of Putzmeister.

- Should the suspicions raised by the report be reinforced or confirmed by facts, the employee involved shall be confronted with, and acquainted with, the accusations. The Chief Compliance Officer shall manage exchanges of correspondence and the processing of the reports.

- Should the information prove to be without substance, the internal review shall be closed and the report shall be treated in line with data protection laws.

Putzmeister shall protect the rights of any suspects, to whom the presumption of innocence applies.

5. Data Protection and Confidentiality

Putzmeister shall treat as confidential all facts and data disclosed in connection with the whistle blowing system and shall keep such information secret from third parties.

Putzmeister shall observe the applicable data protection laws and shall provide appropriate technical and organizational measures to safeguard personal data against unauthorized processing. Personal data shall be safeguarded against accidental loss, destruction, damage and disclosure.

III. Implementation and Information about the Whistle Blowing System

Each Putzmeister Group Company shall implement a whistle blowing system which observes the main principles as described under items II.1) to 5) and inform its employees in accordance with the respective applicable laws.

As the whistle blowing system may intervene in the operating process of the Group Company's business and thus affect the respective employees' rights it is in particular recommendable to ensure its compatibility with the local labor laws. Against this background the whistle blowing system is based on a voluntary principle to ensure the highest possible degree of effectiveness. In addition, it cannot be ruled out that a works committee or a comparable employees' representation – if existent – may have a co-decision power regarding the implementation of the whistle blowing system as, for example, is the case in Germany.