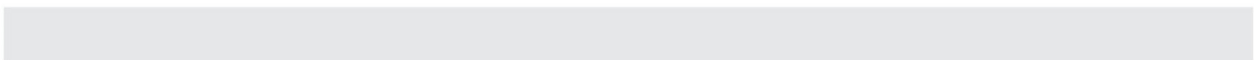


Code of Conduct 2015



Putzmeister



Putzmeister Code of Conduct 2015

Foreword from management

Putzmeister is a worldwide operating company and attaches great importance to action and behaviour which are legitimate and guided by ethical basic principles and binding standards of conduct. This code is used as a binding guideline for all employees to act with integrity. It is binding for all employees¹ of the Putzmeister Group and is applicable worldwide in business dealings with third parties, when dealing with the general public, but also for the daily interaction within the Group. The principles contained therein serve as guiding principles and should shape the thinking and action of our employees and are also aimed at our business partners.

Putzmeister's management exerts a role model vis-à-vis the employees and promotes the developments of the standards set. All employees are also requested to adhere to the applicable and legal regulations in their work environment for their field of activity and to observe the standards of conduct stipulated below, as well as to act responsibly, with consideration and integrity, and fairly, both for themselves, as well as on behalf of Putzmeister.

We stand by our employees as contact persons within the meaning of lived and open communication policy at any time.

PUTZMEISTER CONCRETE MACHINES Pvt. Ltd.



Wilfried Theissen

Vivekanand Pauskar

¹ For enhanced readability the use of the male form also includes the female.

1. General principles

<i>Integrity Credibility</i>	Putzmeister performs its business dealings and makes decisions in accordance with ethical principles, in particular integrity, sincerity, credibility and trust, mutual respect and respect for human dignity.
<i>Transparency Social responsibility</i>	Transparency, responsible management and checks in the company are encouraged in a suitable manner. Putzmeister is committed to the basic principles of social responsibility, equal opportunities and fairness.
<i>Field of application</i>	The Code of Conduct applies to all locations and business units of Putzmeister in all countries in which the Putzmeister Group is active. Management fulfil a particular role model function in the implementation of and compliance with the standards.
<i>Compliance with laws</i>	Compliance with the law is top priority for all employees of Putzmeister and it is of utmost importance to Putzmeister to satisfy the legal requirements and constantly observe these requirements. To guarantee this each employee must observe the legal regulations and conditions applicable to him and the company for the area of his activity. This applies for each legal system in whose framework the employee is active. He is also responsible for obtaining information on the legal regulations applicable in his area of activity.
<i>Embargo and export control regulations</i>	Putzmeister observes the national and international embargo and export control regulations in particular. Any violation of embargo and export control regulations can have serious consequences for Putzmeister.
<i>Money laundering</i>	Putzmeister is committed to the goal of preventing and fighting money laundering and terrorist financing.

2. Relationships with competitors, business partners and third parties

<i>Competition and anti-trust law</i>	Putzmeister respects the rules of fair and open competition and does not come to any arrangements which could influence competition in an inadmissible way. Laws on the protection of competition which are applicable in the individual countries must be observed and guaranteed by all employees.
<i>Corruption</i>	Putzmeister specifically opposes all forms of corruption at home and abroad and already aims to avoid the occurrence, through unfair commercial practices, having an influence on business decisions. No employee may abuse his position at Putzmeister to request or accept inappropriate benefits for himself or third parties. It is forbidden to request, be promised or accept money or objects of value as consideration for the purchase of products or other services. Each material or immaterial donation to an employee or representative of a business operation as consideration for preference in the commercial transaction is forbidden.
<i>Agreement of commission payments</i>	We acquire orders on the quality and performances of our products and not as a result of offering improper and inadmissible benefits to others. Putzmeister does not tolerate the guarantee of unjust advantages to sales and marketing partners. Agreements on commission payments are only allowed if the amount of the commission is appropriate to the performance and it is recognisable to what performance the commission payment relates. Putzmeister regulates the details in a separate commission directive ("rules of commission").
<i>Invitations and gifts</i>	The award and acceptance of typical courtesy and promotional gifts of minimal value, as well as business lunches and invitations to events with a direct business relationship in a framework appropriate to the business situation and the position of those involved, are permitted if they do not create the impression of improper and impermissible influence or even obligation.
<i>Office holders</i>	Benefits of any type to officials and other office holders, as well as officials of state institutions, also indirectly via third parties, are generally prohibited.
<i>Parties and mandate holders</i>	The relevant applicable laws are observed with respect to donations to parties and political organisations, as well as mandate holders and candidates for political offices.
<i>Consultants and agents</i>	The commissioning of consultants, agents and other mediators must not be used to bypass the ban on bribes.
<i>Conduct of suppliers and customers</i>	Putzmeister expects its suppliers and customers to support the compliance of the applicable laws in its company and in particular to preventively confront punishable and objectionable conduct in its company in every regard. It is expected that they introduce suitable processes which assure compliance with the principles and expectations dealt with in this Code of Conduct. Putzmeister therefore does not maintain any business relationships with suppliers and customers where it is publicly known that such suppliers and customers violate the basic principles set down in this Code of Conduct.

3. Avoiding conflicts of interest

<i>Loyalty</i>	<p>Putzmeister expects its employees to be loyal and is careful that its employees do not end up in situations in which their personal or financial interests conflict with those of the company or its business partners.</p> <p>Putzmeister expects its employees and board members to not practice any activities or assume any tasks which run contrary to the interests of Putzmeister. All business activities which are opposed to the interests of Putzmeister and could damage the company must be refrained from.</p> <p>The employee must immediately report any conflicts of interests to management.</p>
<i>Secondary employment and shareholdings</i>	<p>Secondary employment and shareholdings in competitors or business partners must not impact on the interests of the company. This also applies to the shareholding of an immediate family member or life partner.</p>

4. Handling information

<i>Company and business secrets</i>	<p>Putzmeister binds its employees to keep secret company and business secrets and other internal matters. This applies accordingly to information about contractual partners and customers that is not accessible to the public, and also after termination of the employment contract.</p> <p>Putzmeister respects the confidential information of the suppliers; the exchange of information is protected by signing a confidentiality agreement.</p> <p>The intellectual property rights, as well as the investments and objects of Putzmeister, can only be used for operational purposes. Confidential information cannot be abused for personal or external use.</p>
<i>Data protection</i>	<p>Putzmeister guarantees compliance of data protection regulations. Every type of processing of personal data (e.g. details on employees, customers and suppliers) must be affected in conformity with the data protection laws.</p> <p>Documents with personal data on employees are treated confidentially and protected against unauthorised access.</p>

5. Principles of social responsibility

Social responsibility is an essential element of company management that is oriented to values and is an important factor for sustainable business success.

<i>Human rights</i>	Putzmeister respects and supports internationally recognized human rights.
<i>Child labour and forced labour</i>	The prohibition of child labour and forced labour in any form is observed.
<i>Ban on discrimination</i>	<p>Putzmeister respects the different cultural, ethical and religious backgrounds and commits itself to the principle of equality, independent of nationality, race or ethical origin, age, disability, appearance, other physical capacity, skin color, sexual orientation, gender, religion and world view or other features protected by law.</p> <p>Putzmeister does not condone any discrimination in this regard, and also does not tolerate harassment and offence and expects all employees to respect and value the personality, dignity and privacy of each individual.</p>
<i>Equal opportunities</i>	Putzmeister promotes equal opportunities among its employees. The employees are selected and promoted solely on their competencies, skills and performance.
<i>Employment rights</i>	The freedom of assembly and association of the employees is recognized insofar as it is legally permitted according to national regulations. Putzmeister respects the applicable national laws and labour standards with regard to appropriate remuneration and maximum working time and overall ensures fair working conditions.
<i>Occupational safety and health protection</i>	Occupational safety and health protection at the workplace are guaranteed within the framework of national regulations.
<i>Environmental protection</i>	<p>Putzmeister is committed to its responsibility for environmental protection, sustainability and environmentally friendly handling of natural resources. Each employee must contribute through his own conduct to organizing the business of Putzmeister in an environmentally friendly manner</p> <p>It is also expected that the suppliers use the natural raw materials economically and minimize or eliminate negative effects on the environment or climate.</p> <p>Putzmeister is committed to the environmental protection standards applicable for its respective company location and pays attention to observing the laws.</p>
<i>Active citizenship</i>	Putzmeister contributes to the social and economic development of the country and region in which the Putzmeister Group is active.

6. Adherence to the Code of Conduct

<i>Communication</i>	Putzmeister makes its employees familiar with the content regulated in the Code of Conduct and explains the resulting obligations. Putzmeister actively communicates the principles of the Code of Conduct to its business partners.
<i>Questions regarding the Code of Conduct</i>	Putzmeister takes care that its employees have a competent contact person who can help them with any questions relating to this Code of Conduct and clarify cases of doubt.
<i>Directives and processes</i>	The basic values observed in the Code of Conduct are implemented by Putzmeister through the introduction of all necessary, suitable organizational measures, as well as appropriate directives and processes.
<i>Checks</i>	Putzmeister advises that organizational measures, directives and processes are regularly checked for their compliance, insofar as they have been introduced.
<i>Notification of breaches</i>	All employees are obliged to report serious breaches of laws, internal regulations and the Code of Conduct to their superior and the Compliance Officer. The employee who provides the information shall not suffer any disadvantage as a result of doing so.
<i>Consequences of breaches</i>	Breaches of the Code of Conduct and legal regulations may involve ramifications under employment and liability law depending on the severity and may also have criminal sanctions as a result.