

CODE OF CONDUCT FOR LOBBYING ACTIVITIES BY COMPANIES OF THE WIENERBERGER GROUP

THIS CODE OF CONDUCT IS ADDRESSED TO THE GOVERNING BODIES AND THE STAFF OF COMPANIES IN WHICH WIENERBERGER AG, VIENNA, HOLDS MAJORITY PARTICIPATIONS.

Principles to be observed in lobbying activities

1. Professionality

Lobbying activities always have to be conducted in a fair and professional manner, based on the highest ethical and moral standards. Any impression of inappropriate behavior is to be avoided.

2. Compliance with legal provisions

Any lobbying activity conducted must be in compliance with the applicable legal provisions, in particular the provisions of the Austrian Lobbying Act.

3. Candor

Obtaining information in the course of lobbying activities in a dishonest manner or any attempt to do so is forbidden. Any inappropriate behavior or pressure on officials is to be abstained from.

4. Prohibition of corruption

Granting, offering and promising inadmissible advantages to officials is forbidden. Participation in any activities that may appear to be corrupt or illegal is to be abstained from.

5. Honesty

Corporate lobbyists provide open, comprehensive and truthful information on their lobbying activities, their employer and the specific causes pursued by the latter. In the conduct of lobbying, lobbyists are to provide officials and other stakeholders with up-to-date and correct information at any time.

6. Integrity / Confidentiality

The highest level of integrity is to be observed in the conduct of lobbying. Any information received as confidential in the course of lobbying activities is to be protected from disclosure to individuals

from outside the company. Unless required by law or by the public authorities, such information must neither be disseminated nor used for purposes other than those intended in its disclosure.

7. Conflicts of interest

Any action that would expose officials to a conflict of interest is to be avoided. This applies, in particular, if there are grounds to assume that officials would be influenced in the unbiased exercise of their office through such action. Persons conducting lobbying activities have to gather prior information on any restrictions and incompatibility rules which the official is subject to, provided such rules have been publicly communicated, and consider such information in their lobbying activities.