

# CODE OF CONDUCT FOR THOMAS CONCRETE GROUP

Date: 1 November 2025

## 1. Background and basic principles

Thomas Concrete Group ("TCG"), including all subsidiaries, is an international group developing, producing and selling concrete and related services.

TCG has established this Code of Conduct as a manifestation of its basic values regarding lawful and ethical business activities.

We describe the requirements we have established for the actions and behaviors of our board members, management and employees, which we also assume are respected by all our business partners.

In Team Thomas we all care for our colleagues, company and customers. Employees in managerial positions shall exercise an extra degree of care and act as role models for others.

All employees within our Group shall continuously assess their work and their acts in relation to this Code of Conduct. In the assessment of potential and current suppliers, customers or any other parties this document shall be applied.

We encourage all employees to report findings or suspicions that we are not living up to our standards in this Code-of-Conduct.

This Code of Conduct is our common minimum standard within the Thomas Concrete Group.

## 2. Business principles

In every country in which TCG operates, we respect and comply with competition laws, environmental legislation, labor market laws, safety requirements, and made agreements. We want to work with suppliers that adhere to these standards.

All employees must act in accordance with good business practices and in furtherance of the interests and objectives of TCG.

A TCG employee shall refrain from ending up in a relationship with a customer, a distributor, a supplier or other relations to TCG that may prevent or impair the employee from acting unbiased.

The employee shall refrain from private commercial relations with businesses or persons that the employee has a commercial relationship with, through the employment by TCG.

TCG employees in managerial, purchasing or sales positions are obligated to inform their immediate superior of any business activity that the employee conducts outside TCG. Or any activity she/he thinks is outside this policy.

An employee may not subject themselves to a situation where their actions, or personal interests, may conflict with the interests of TCG.

All financial transactions by TCG must be reported in accordance with generally accepted accounting principles.

### 3. Employee Relations

In Team Thomas we set safety first and provide a safe and healthy working environment.

We are committed to fostering a respectful and inclusive workplace where every individual is valued. Discrimination and harassment are not tolerated under any circumstances, including on the basis of age, gender, nationality, religion, skin color, sexual orientation, social or ethnic origin, disability or any other personal characteristic.

All employees must abide by the ethical rules of their industry role if such rules exist. Furthermore, all employees must adhere to the internal rules, instructions and policies of TCG.

Company property and equipment cannot be used for private use, if not regulated otherwise in our policies.

We provide training and education opportunities for employees that support their current and future work plans.

Family relationships in the company must be handled with care, to avoid dependencies or conflicts of interests.