Code of Conduct

STRABAG
WORK ON PROGRESS

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Introduction by the Management Board

As a globally active European technology group for construction services, STRABAG is aware of its responsibility to foster and vouch for an ethical and legally impeccable conduct of business relationships. We accept this responsibility as an employer towards our employees, as a publicly listed company towards our shareholders, and as a business partner and market player in economic transactions towards society as a whole. Together with our stakeholders, we are actively shaping the future of the group and the society in which we operate, building on a successful past as we move into the future.

Our success in past we owe above all to our reputation and a conduction of business founded on our corporate values. These are the following:

Partnership, trust, solidarity, innovative spirit, commitment, modesty, sustainability, respect and reliability

In addition to our aim to create a high level of added value for our clients, to achieve an attractive return for our shareholders and to be an appealing employer for our employees, we also strive to make a valuable contribution to society in line with these corporate values.

In order to achieve these goals, the highest level of integrity and professionalism is essential.

Responsibility requires trust

In our line of business, success depends to a large extent on the trust placed in us by our customers, shareholders, employees, suppliers and business partners. With this Code of Conduct, we intend to define and lay down the basis of our value system in order to maintain and further expand the trust of our stakeholders. The principles described in this Code of Conduct serve as an ethical compass and an aid in decision-making for us all.

The entire management and all employees are responsible for complying with applicable laws and legislation, internal and external guidelines, and relevant regulations, as well as for conducting business practices in accordance with our corporate values. At STRABAG, we always act in a responsible, objective and ethical manner.

Precisely because we are such a multicultural and diverse group of companies with a global orientation, we need a common, clear and unambiguous understanding of what we mean by responsible, objective and ethical business practice.

We, the members of the Management Board of STRABAG, stand personally behind the values described in this Code of Conduct.

Hereby we commit to ensure a framework that provides the best possible conditions for employees to comply with the Code of Conduct in their daily work.

The Management Board of STRABAG SE
Vienna, 10th January, 2023

Why to have a Code of Conduct?

The Code of Conduct is the guiding document for our corporate ethics. It summarises the most important principles for ethical conduct. Nowadays, an effective business compliance management system is a fundamental prerequisite for a successfull operation in a competitive environment and for a seamless cooperation with business partners. Ethically correct behaviour is also the basis for the individual success of our employees and for overall the success of our company. The Code of Conduct supports us to make the right decisions. Supplemented by the internal guidelines and directives of our group companies and divisions (see as well Clause 2), the Code of Conduct provides assistance and orientation in uncertain situations. The prescribed principles contained in this Code of Conduct mould our corporate culture and remind all of us of the obligations and expectations set by the group.

Whom is the Code of Conduct addressed to?

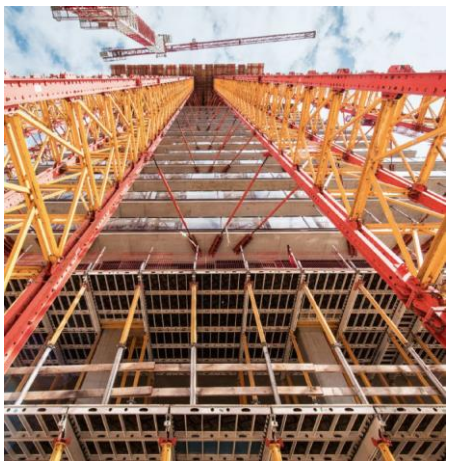
The Code of Conduct is binding document for all employees, management personnel and members of the Management Board in all companies and corporate entities of the entire STRABAG Group. The role model function of our management level has a special importance, because it serves as an example for ethically correct behaviour through its own conduct and decisions. Our management accepts this role model function regarding any dealings with employees, clients, suppliers, competitors, authorities or the general public.

We expect our employees to know and follow the values and principles set out in present Code of Conduct. Consistent ethical behaviour on behalf of all STRABAG employees is a must to create and maintain a corporate culture that values all participants and therewith ensures our long-term success.

The principles of the Code of Conduct have also relevance for our business partners, from whom we likewise expect a commitment to identical values as laid down herein.

How is the Code of Conduct implemented?

To ensure that our employees live by our Code of Conduct, everyone must be aware of its content. Therefore, the Code of Conduct is available in all group languages and is published on the intranet as well as on the company's website. To the extent legally possible, the Code of Conduct is an integrated part of employment contracts. All employees are contractually required to inform oneself regarding the applicable compliance regulations and the respective documents. The content and the structure of the Code of Conduct, particularly the Business Compliance Management System, are communicated to all employees through online and presence trainings.



Violations of the company's behavioural guidelines and of any legal regulations are - regardless of and in addition to any criminal or civil law consequences - subject to the corresponding organisational, disciplinary and legal measures – ranging from warnings to dismissals – in order to respond accurately and to prevent any future infringements.

1. STRABAG values

In all our considerations for and our actions on behalf of STRABAG, we are guided by our nine corporate values. They form the basis of our success.

Partnership for us means…
…being appreciative in our interactions with one another.
…encounter each other on an equal basis.

Trust for us means…
…being able to count on each other.
…being aware of our responsibility at all times.

Solidarity for us means…
…standing up for each other.
…living the team spirit – also when it is difficult.

Innovative spirit for us means…
…creating space for new ideas.
…shaping the future of the construction and real estate industry actively and confidently.

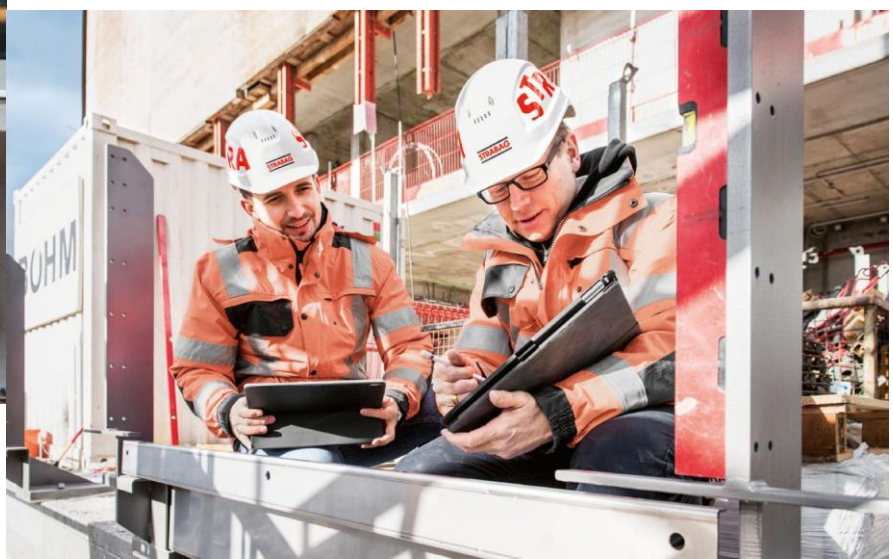
Commitment for us means…
…defining and pursuing common goals.
…participating pro-actively.

Modesty for us means…
…setting realistic expectations of ourselves and others.
…staying down-to-earth.

Sustainability for us means…
…taking on and sharing responsibility for ourselves, for our company and for our environ ment – now and tomorrow.
…thinking in the long term.

Respect for us means…
…being open to different views and ideas.
…being appreciative, dignified in our interactions with each other.

Reliability for us means…
…standing by our word.
…saying what we do and doing what we say.



2. Business compliance

The principles contained in the Code of Conduct are further specified and regulated in detail by our Group Directive 003 on the Business Compliance Management System (BCMS) and by the further management directives of the BCMS. These are continuously monitored, audited and refined by the Business Compliance Central Staff Division (KSB Business Compliance). The Business Compliance Staff Division is supported by the Internal Audit Central Stuff Division in its monitoring and auditing tasks.

Based on a comprehensive analysis of the business and social risks affecting our company, the BCMS includes clear instructions regarding avoidance of corruption and other white-collar crimes, handling (potential) of conflicts of interests, as well as concerning competition-compliant behaviour, with the aim to avoid any violations of antitrust or competition law. Therewith, we take our responsibility for compliance with these standards seriously. The BCMS is further complemented by our Supplier Code of Conduct, through which the essential principles behind our understanding of compliance is communicated to our suppliers and as applicable to other contractual partners, and which must be acknowledged by our partners in order to therewith contribute to the implementation of a positive compliance culture in society.

Corrupt, antitrust and anti-competitive behaviour is against the law and contradicts our corporate values, therefore it will not be tolerated at STRABAG under any circumstances. The far-reaching consequences, in the form of fines, damage claims, breach of trust and reputational harm, represent additional risks for STRABAG and our stakeholders, thus it must be eliminated
or reduced to the extent possible. Furthermore, corruption and other criminal acts shall be prevented through transparency.

The focus of Business Compliance is on the following:

– **Antitrust and competition law**
  - We are committed to free competition; we do not engage in cartel agreements and we always encourage competition.

– **Corruption and white-collar crime**
  - We do not commit any criminal offences and are particularly vigilant in our contacts and business relationships with public officials.

– **Money laundering and terrorism financing**
  - We implement transparent processes to ensure that money laundering and terrorist financing cannot take place with our (even unknown) assistance. We report any suspicion we might have.

– **Sanctions**
  - We do not violate applicable sanctions and avoid doing business with sanctioned states, companies and individuals.

– **Business partners**
  - We know our business partners or check their integrity in order to avoid any sanction and money laundering risks. This enables us in the best possible way to ensure reliability and professionalism of our partners for our (public) clients and for ourselves as well.

– **Conflicts of interest**
  - We act in an objective and professional manner and transparently disclose even potential conflicts of interest.

– **Donations and sponsorship**
  - We engage in donations and sponsoring activities in a targeted and conscious manner to support others according to our values. Under no circumstances we use these activities to gain dishonest advantages.

– **Gifts and invitations**
  - We avoid the resemblance to any improper motives or objectives even when it comes to (small) gifts and invitations.

– **Employee training**
  - We invest in our employees and provide them with all the knowledge and background they need to help them identify any potential risks and to satisfy our business compliance requirements.

– **Incident management**
  - We encourage the reporting of any (suspected) misconduct or violations. These reports are taken seriously, treated discreetly and clarified to the best possible extent. Disclosures can be made (anonymously, if desired) via the STRABAG whistleblower platform (see item 7).

– **Internal audit**
  - We also scrutinise our own actions and activities by checking our compliance with all legal and internal requirements regularly

– **Continuous development of the BCMS**
  - We are constantly enhancing our BCMS and adapting it to the challenges of the future. We regularly review the risks in our business area and adapt our conduct accordingly.

More detailed and in-depth information is available to all employees on the Business Compliance page of our intranet site. Business partners and other interested parties can find further information regarding business compliance on our website and in the latest annual report, which can be downloaded from www.strabag.com.

3. Our responsibility towards our employees

At STRABAG, we take our responsibility for and towards our employees earnestly and we actively engage to shape such responsibility. STRABAG is particularly committed to the core principles of the International Labour Organisation (ILO) and to the UN's Universal Declaration of Human Rights. As a signatory to the UN Global Compact, STRABAG is dedicated to uphold the principles set out therein. The company has also signed the UN Women's Empowerment Principles. We believe that these commitments show what is important in our opinion in the construction industry: professional services and harmonious collaboration among the people performing this work together. As a team, we not only achieve our corporate goals but also create an appreciative working atmosphere for our employees. Moreover, we respect and strive to protect the privacy and personality rights of our employees.

The following principles are supporting us to live up to this responsibility:

– **Health and Safety**
  - We take an active role in protecting our staff and others at and during work. Health and safety has a high priority for us, in line with our zero-accident target, which is why each and every one of us is called upon to act responsibly and with foresight.

– **Anti-discrimination**
  - Discrimination of any kind has no place at STRABAG. We live solidarity and foster diversity.

– **Gender equality**
  - We are devoted to equal opportunities and equal treatment for all. We ensure that men and women receive the same pay and other contractual benefits for the same work and actively strive for a higher representation of women within the corporate group.

– **Inclusion**
  - We embrace diversity and see it as a key element for our success.

– **Mental and physical health**
  - Our employees are our most valuable resource and we are committed to protecting and promoting their overall health.

– **Continuing education**
  - We support our employees in their professional and personal development and require them to participate in compulsory trainings.

– **Fair working conditions**
  - All STRABAG employees are performing their work under fair conditions and receive fair renumeration for their performance.

4. Our responsibility as a business partner

We convince through the quality, performance, price and suitability of the products and services we perform. We only offer what we can deliver, we fulfil our obligations and we take responsibility for our actions, our performance and our products. Our relationships with our business partners, clients, joint venture partners, subcontractors, suppliers and consultants are based on the following principles:

– **Integrity**
  - We conduct ourselves reliably and ethically and expect the same from our partners.

– **Fair competition**
  - We respect our competitors and believe that fair competition promotes efficiency and quality for the benefit of all.

– **Confidentiality**
  - We handle sensitive information of our business partners with utmost diligence. In return, we expect the same regarding our sensitive information.

– **Decision making**
  - We believe in transparency and honesty in case of practices regarding conclusion of contracts, pricing and invoicing. We do not allow any illicit behaviour to influence our decisions.

– **Customer satisfaction**
  - We are inspired by the wishes and needs of our customers and strive to meet, or even to exceed such expectations.

– **Quality**
  - We set high standards of quality for ourselves so that our products, results and services are convincing.

5. Our responsibility towards other stakeholders

We accept our responsibilities towards regulatory and governmental agencies and strictly comply with all applicable laws, legislations, guidelines, standards and practices of the countries in which we operate. We handle the investments of our shareholders responsibly and aim for a sustainable return. We are committed to a transparent information policy and to good and responsible corporate governance. The wishes and expectations of our stakeholders are at the centre of our concerns and actions, our plans and performance. Through sustainable and responsible management, based the values set out in this Code of Conduct, we achieve long-term success for ourselves and our shareholders.

Furthermore, we recognise the role of the media, maintain a dialogue with journalists, and support them in their task of reporting objectively about our company.

6. Corporate responsibility

Learn more about the UN Global Compact!

WE SUPPORT UN GLOBAL COMPACT

Like the structures we build, our business activities as well have an enormous and long term effect on people and on the environment.

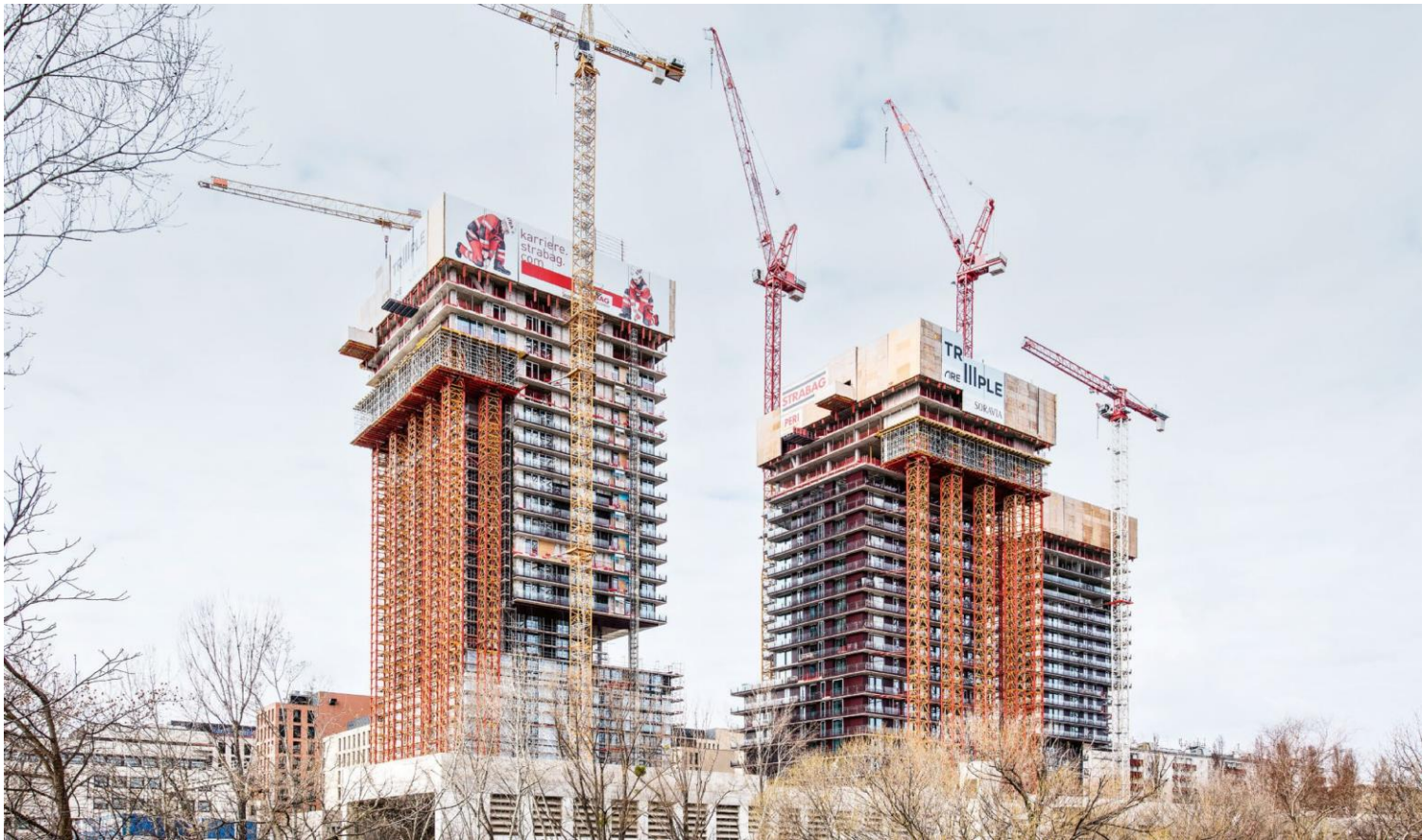
As an internationally active company, beside the other parties involved in construction, we consider it our responsibility to ensure that the future generations are secured a liveable environment, wherever and however to the extent have the power to exercise influence. We take such a responsibility very seriously.

In March 2021 STRABAG has joined the UN Global Compact. Therewith we have committed ourselves to complying with the Ten Principles of the UN Global Compact in the areas of human rights (including but not limited to the prohibition of slavery and child labour), labour, environment and anti-corruption. We are committed to protect the environment and human rights within our corporate group and expect the same from our suppliers, subcontractors and other business partners.

Our Corporate Responsibility Policy as part of the STRABAG management system prescribes our understanding of sustainability and as well as of the most important guiding and handling principles regarding a responsible conduct of business.

The requirements regarding sustainability against our suppliers are also set forth in our Supplier Code of Conduct.

A commitment to society is an important matter that enjoys a high level of support from the company's management. Based on transparent criteria we endorse selected long-term initiatives with humanitarian, social, charitable, educational or cultural objectives, therewith aiming at a tangible contribution to our local society.



7. The STRABAG Whistleblower System

Our systems are designed to prevent non-compliant behaviour and to identify any occurred violations. To that end, we expect the support of all of our employees and of the management. Therefore, we have established our whistleblower system.

The whistleblower system allows all employees, business partners, clients or anyother third parties to report any violations regarding business compliance, human rights, discrimination, working conditions, environmental protection or health and safety. Regardless of how they reach us, STRABAG investigates these reports, initiates an investigation and if necessary takes appropriate action.

All reports are assigned and handled accordingly, such as cases of:
- corruption, antitrust violations or property offences are referred to KSB Business Compliance.
- discrimination of any kind, human rights violations or adverse working conditions, such as bullying and sexual harassment, are allocated to the relevant ombudspersons.
- violations regarding health and safety, environment protection are forwarded to the Group Coordinator for Health, Safety and the Environment.

In addition to the usual reporting channels (telephone, e-mail, fax, anonymous letter, etc.), it is also possible to raise concerns or report suspected violations (also anonymously) via the STRABAG whistleblower platform. The platform provides for a two-way exchange of information while maintaining the whistleblower's anonymity. It allows to pose questions on the platform in order to clarify directly whether the reported behaviour does constitute a violation. This lowers the inhibition threshold for submitting a report, as no accusations are made. Above all, protecting whistleblowers is a top priority for us. Whistleblowers shall in no case have to fear any adverse consequences and are protected even if their reports turn out to be erroneous, as long as they were in good faith and not made abusively. All relevant data protection and labour law regulations are duly considered during any case handling.

The platform also provides further information regarding the respective contact persons.
https://strabag.integrityplatform.org/

business.compliance@strabag.com

We are saying YES to proper conduct!

The answering of the following questions shall help our employees to make the right decision.

Employee self-assessment to support decision making

Is my decision in line with the present Code of Conduct and with the principles of the group directives, in particular those included in the BCMS?

Does my decision benefit STRABAG as a group without infringing the rights of third parties?

Is my decision justifiable? If I imagine that my conduct was published in a newspaper, would I be able to show the article to my family, friends and acquaintances with a good conscience?

Would I make the same decision in a similar situation? Would others in the company decide in the same way?

Yes

Good for you! Your decision is in line with our compliance principles.

No

If you are still insecure or if you answered NO to one or more of the above questions, please contact your supervisor and/or KSB Business Compliance.

We are committed to dialogue!

Would you have any questions in relation to any business compliance topics, the KSB Business Compliance is more than happy to assist you any time.

business.compliance@strabag.com

Further information regarding business compliance and the current contact details of KSB Business Compliance can be found on the STRABAG website. Employees can also visit the Business Compliance page via the group's intranet.

The ombudspersons will gladly answer any questions you may have regarding discrimination, health and safety. More information on the ombudsman system and the current contact persons can be found on the STRABAG website. Employees can also visit the Business Compliance page on the intranet.

Website:

Intranet:

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