

# STRABAG UK Tax Strategy

## Introduction

In accordance with the requirements of Schedule 19 of the UK Finance Act 2016, STRABAG SE publishes the below statement on behalf of the UK permanent establishments of STRABAG-group (“STRABAG”). It is effective for the year ended 31. December 2022 and remains effective until another tax strategy is published.

## Background

STRABAG is a European-based technology group for construction services. The services span all areas of the construction industry along the entire construction value chain. The ultimate parent company is STRABAG SE with registered office in Austria. STRABAG employs a total of about 74,000 people. Of these, roughly 40% are white-collar / salaried employees and 60% are blue-collar / wage employees. In recent years, the annual group output has amounted to approximately EUR 15,5 billion. Under the ultimate parent company STRABAG SE, there are a number of legally independent companies with tax residence in Austria and abroad.

## Tax planning strategy

STRABAG commits itself to conduct all business transactions in a proper, fair, impartial and ethical manner, to fully comply with all statutory obligations and to a full disclosure to tax authorities. All employees are required to strictly follow these principles, including in all dealings in relation to tax. STRABAG further ensures that all its tax obligations are met as required and seeks to ensure that tax is paid where and when it is due. Because STRABAG aims to ensure full compliance with all statutory obligations, STRABAG does not enter into any artificial arrangements to gain tax advantages. In case of cross border-transactions, STRABAG fully complies with the terms of the relevant double tax treaties and with the OECD-guidelines regarding matters such as transfer pricing or the establishment of a taxable presence.

## Working with tax authorities

STRABAG has an open, honest and constructive working relationship with tax authorities including regular dialogues regarding significant issues and developments regarding STRABAG’s business. Whenever disagreements regarding the interpretation and application of tax law arise, STRABAG seeks to meet with tax authorities in a timely manner to commonly work on fair and reasonable solutions.

### Managing tax risks

Due to increasing complexity and changes in legislation, STRABAG has implemented reasonable controls to ensure that no material misstatements of STRABAG's tax obligations can occur. Accordingly, appropriately qualified and trained employees which have access to daily tax updates and opportunities to obtain professional tax qualifications work to minimise any tax risk to an acceptable level, e.g. by regularly monitoring new and developing tax legislations around the globe. Where appropriate, STRABAG engages outside tax specialists to obtain comfort that STRABAG's tax treatments are valid interpretations of existing tax law. Further, STRABAG regularly meets with industry groups or tax authorities to discuss and monitor potential tax compliance risks.

### Tax risk appetite

STRABAG aims at complying with all statutory obligations and thus seeks to minimize tax risks to an acceptable level wherever possible. Therefore, STRABAG has a low tolerance for tax risks and proactively engages to achieve certainty regarding its tax position.