

## PRINCIPLES OF EMPLOYMENT CONDITIONS AND HUMAN RIGHTS – COMPLEMENTARY ANNEX TO THE CODE OF CONDUCT

### **1. Purpose and objective**

The following principles of employment conditions and human rights build upon the values and principles of the STRABAG personnel policy, which are anchored in the Code of Conduct and supplement this or state it more precisely taking account of the provisions of the United Nations Universal Declaration of Human Rights that are relevant for employment relationships, as well as the core labour standards of the International Labour Organisation (ILO) as a specialised agency of the United Nations.

### **2. Principles**

STRABAG is committed to creating and maintaining employment conditions that take account of the following principles:

#### **a. Prohibition of discrimination in respect of employment and occupation**

The management of STRABAG and all employees are asked to refrain from and prevent any form of discrimination in connection with employment relationships concerning STRABAG.

STRABAG has set itself the objective of eliminating discrimination in respect of employment and occupation by encouraging equality of opportunity and treatment.

Discrimination is defined in particular as differentiation, exclusion or preference that is exercised on the basis of skin colour, gender, creed, political opinion, nationality or social origin and leads to the nullification or impairment of equality of opportunity and treatment in employment and occupation.

#### **b. Prohibition of slavery and human trafficking**

The management of STRABAG and all employees are fully committed to banning slavery and human trafficking as defined in the Universal Declaration of Human Rights, according to which no one shall be held in slavery or servitude and slavery and human trafficking are banned in all their forms.

#### **c. Prohibition of child labour**

The management of STRABAG and all employees with responsibility for staff are obliged to ensure that in employment relationships with STRABAG companies the minimum age is not below the age at which compulsory schooling ends, and in no event is below 15 years.

This does not apply to work undertaken by children and young people attending general schools, vocational or specialist schools or other educational establishments, or by persons who are at least 14 years old, and in businesses insofar as this work is an integral element

- of an educational or training course for which the school or educational establishment bears the main responsibility,
- of a recognised training programme which is mainly or exclusively undertaken in a company,
- of an advisory or orientation programme intended to facilitate the choice of a profession or training course.

### **3. Ensuring sustainable observance and compliance with these principles**

#### **a. Group management**

The management of STRABAG is asked to guarantee compliance with the principles of employment conditions and human rights by means of appropriate measures within the framework of its area of responsibility.

#### **b. Companies in the STRABAG supply chain**

STRABAG also expects these principles of employment conditions and human rights to be complied with by its supplier companies, subcontractors and their employees, and other contractual partners. The STRABAG employees involved in issuing purchase orders are asked to bring these principles to the knowledge of business partners accordingly during the course of issuing orders.

In the event that infringements of these principles by companies in the supply chain are identified, the management of STRABAG will apply corresponding sanctions to the company concerned, up to and including termination of contracts.

#### **c. Whistleblower system**

The ombudspersons at STRABAG (external ombudsman, internal ombudsman, regional ombudspersons) are available throughout the Group to both STRABAG employees and employees of companies in the supply chain within the framework of a whistleblower system, and indications of infringements of these principles can be directed to them. Indications of possible infringements will be reviewed in confidence by the ombudspersons, and the further handling of these will be agreed with the responsible top management.

#### **d. Internal audit**

The remit of the Central Staff Division "Audit" within the framework of the audits it is commissioned to undertake in respect of the lawfulness and correctness of the actions and processes within an organisation unit of the Group includes scrutinising the observance of and compliance with these principles.

### **4. Sanctions for infringements**

In the event of infringements of these principles, the necessary organisational and legal measures will be taken to respond appropriately to infringements that have been identified and sustainably prevent these in future.

Updated: 01.01.2018  
A. Ebner / H. Herzog