Group management report – ESG performance

2025

Consolidated non-financial statement

The Sustainability Reporting Act (Nachhaltigkeitsberichtsgesetz, NaBeG) entered into force on 19 February 2026 and generally applies to financial years beginning on or after 1 January 2024. For financial years ending before the date of entry into force, however, a transitional provision applies, permitting the application of the relevant provisions in the version in force prior to NaBeG.

STRABAG SE has therefore made use of this option and, for the 2025 financial year, will once again prepare a consolidated non-financial statement as part of the Group management report. The company prepares this consolidated non-financial statement in accordance with the European Sustainability Reporting Standards (ESRS). The consolidated non-financial statement also includes the required disclosures pursuant to the EU Taxonomy. A voluntary audit of this sustainability reporting was carried out by PwC Wirtschaftsprüfung GmbH, Vienna.

General information

2025

About this report

ESRS 2 BP-1; ESRS 2 BP-2

STRABAG SE's consolidated non-financial statement for the 2025 financial year was prepared in accordance with the European Sustainability Reporting Standards (ESRS). The scope of consolidation for the consolidated non-financial statement corresponds to the IFRS scope of consolidation for the consolidated financial statements and, in addition to STRABAG SE, includes all major domestic and foreign subsidiaries directly or indirectly controlled by STRABAG SE.

In carrying out the materiality assessment, the time horizons specified by ESRS (short-term – within one financial year; medium-term – within five years; long-term – more than five years) were taken into account. For the analysis of physical and transition climate risks, short-term (until 2030), medium-term (until 2040) and long-term (until 2085) time horizons were considered in order to align these risks with the Group's emission reduction targets, among other things. The risk assessments described in the report also take into account risks within the upstream and downstream value chains.

The report contains quantitative information (metrics) which generally relates to the scope of consolidation; certain metrics (E1-6) also capture aspects of the downstream value chain.

Developing a structured approach to data collection is a demanding task for a Group of our size and level of diversification. In some cases, therefore, estimates were made in the chapters "Climate change" (E1-6), "Water" (E3-4) and "Circular economy" (E5-4, E5-5) to report metrics for which the required data quality is not fully available. This is due to the predominantly cost-based data collection. For the calculation of metrics in accordance with ESRS requirements, cost-based data is in some cases converted into quantities using conversion factors. The transition in data collection is being implemented step by step in order to reduce potential distortions and uncertainties. Estimates are also used for forecasts, for example in the context of our reduction pathway. Further information on the data sources used and the calculation methodology is provided alongside the relevant metrics.

In the present report, STRABAG carried out a retrospective adjustment to the materiality assessment for ESRS E3 (Water and Marine Resources).

This report includes comparative metrics for 2024. Metrics from previous years can be found in the annual reports of past financial years and in the ESG Data Factsheet. The metrics in this report are subject to a voluntary limited assurance engagement by PwC Wirtschaftsprüfungsgesellschaft GmbH, Vienna.

For the 2025 financial year, STRABAG SE is making use of the extended transitional provisions under Appendix C of ESRS 1 introduced as part of the "quick fix" amendments and does not disclose expected financial effects in the context of ESRS E1, ESRS E3, ESRS E4 and ESRS E5 nor does it provide disclosures for ESRS S1-11, ESRS S1-12, ESRS S1-14 (88d) and ESRS S1-15. Similarly, no disclosures are made regarding the resilience analysis in the context of ESRS E4.

No content has been omitted on the grounds of intellectual property or similar reasons.

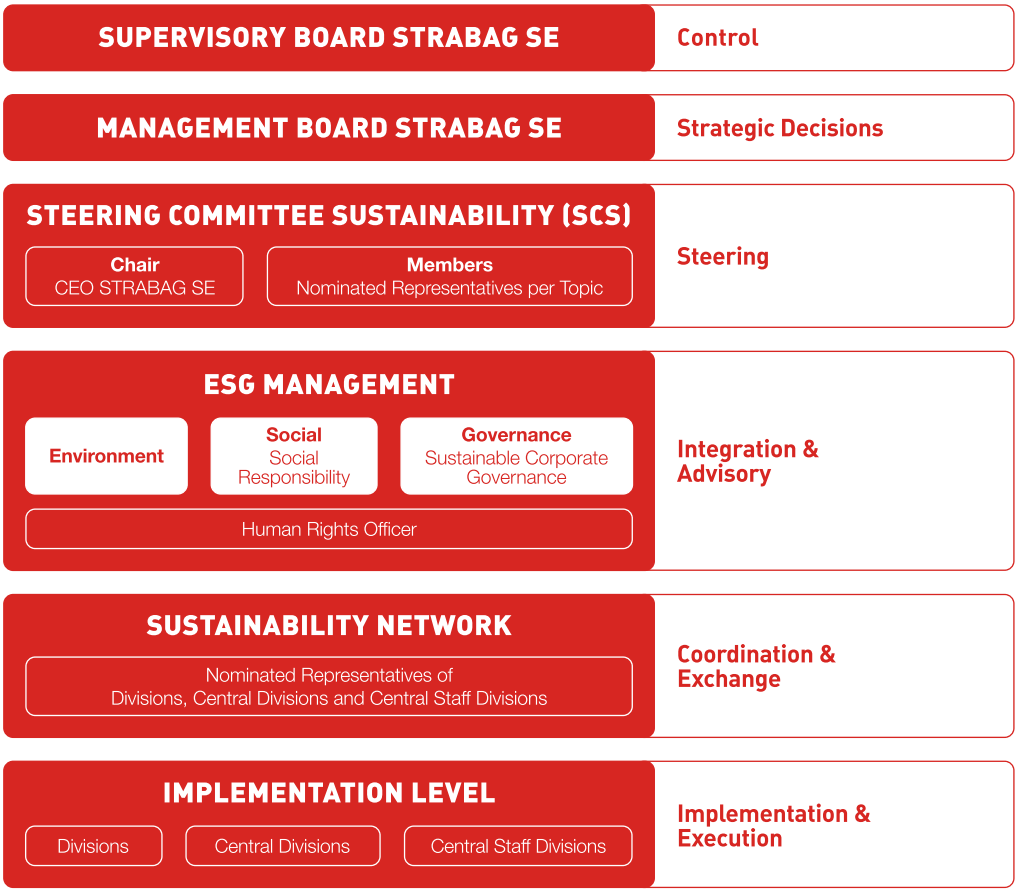
Sustainability management

Governance

ESRS 2 GOV-1; ESRS 2 GOV-2

Achieving STRABAG's sustainability targets requires a leadership and accountability structure that involves all representatives within the Group. The most important bodies and committees of STRABAG SE entrusted with the oversight and management of sustainability matters are described below. The governance structure and the associated responsibilities and supervisory duties are formally regulated in the Group-wide Sustainability Directive. The illustration below provides an overview of the relevant bodies and committees.

Governance structure



Role of the highest governance bodies

The **Supervisory Board** acts as the supervisory body within STRABAG SE. The Supervisory Board is kept informed of all relevant matters concerning the company's business development, including the risk situation and risk management, and is involved in decision-making processes through regular meetings (at least four per financial year) and through ad hoc communication. The Supervisory Board may also request reports from the Management Board and inspect the company's books, records and assets. The Chairman of the Management Board (CEO) reports to the Supervisory Board on sustainability matters – including, for example, strategic objectives and progress made – on an ad hoc basis or separately as part of an annual ESG update (since 2024). The Management Board also reports to the Supervisory Board at least once a year on measures taken to combat corruption. The Supervisory Board is likewise informed in the event of fatal workplace accidents. As the

highest supervisory body, it plays a central role in overseeing and reviewing the Group's annual sustainability reporting. The Supervisory Board has discussed the implementation of the new statutory sustainability reporting requirements together with the external auditor. In this context, the improvement proposals identified by the auditor were discussed in detail. There was no separate sustainability committee during the reporting period.

The **Management Board** of STRABAG SE constitutes the executive body of the Group. It is responsible for the Group's day-to-day operations. In addition to the day-to-day business, Management Board meetings (usually held every two weeks) also address the implementation of the long-term corporate strategies. These include sustainability topics in particular, which are of central importance and are treated as a separate agenda item at every Management Board meeting. Due to the Group-wide integration of ESG management, this agenda item is introduced by various specialist departments who prepare comprehensive analyses that serve the Management Board as a basis for setting its targets. Regular reporting within the Management Board meetings, as well as in other meetings and Group conferences, ensures that the Management Board stays informed of and can monitor the progress in achieving the strategic objectives.

The inclusion of Management Board members in strategic sustainability initiatives and committees, together with ongoing reporting, ensures that the STRABAG SE Management Board receives regular and ad hoc training and information on material sustainability topics and the associated impacts, risks and opportunities, enabling it to take strategic decisions for the Group when required. The Chief Executive Officer (CEO) and the Chief Financial Officer (CFO) are informed annually about and approve the results of the materiality assessment (including impacts, risks and opportunities). This process is embedded throughout the Group through the Sustainability Directive.

In line with the international orientation and organisational structure of STRABAG SE, each member of the Management Board is responsible for one or more Group entities, either geographically and/or by business area. The heads of the divisions, central divisions and central staff divisions therefore play a particularly important role in overseeing the sustainability-related impacts, risks and opportunities affecting the entire Group by reporting regularly and directly to the Management Board.

The reporting mechanisms described above ensure that both the Management Board and the Supervisory Board are kept informed of current sustainability topics, including sustainability-related risks, enabling them to fulfil their respective functions as executive and supervisory bodies. The Management Board's executive responsibilities include, in particular, determining the long-term corporate policy (strategic management) as well as planning, organising and monitoring the pursuit of the company's objectives. The STRABAG Group's Rules of Procedure regulate specific business transactions that require the approval of the Management Board. These include, among other things, strategic and operational planning as well as personnel measures such as the appointment of individuals to management positions. This ensures that the Management Board can fulfil its function as an executive and control body – including in the area of sustainability management. Within the framework of investment and financial planning, the Management Board also has the opportunity to appropriately consider sustainability topics and sustainability-related risks. In this way, the information also feeds into strategic considerations and major transactions, particularly with regard to expanding into new and market-oriented business fields. In line with Strategy 2030, acquisitions in the areas of water technology, value stream management and decarbonisation of existing buildings were approved by the Management Board and Supervisory Board during the financial year. In these business areas, both bodies see growth potential in line with the EU's climate targets. Through the further development of ESG risk management and its integration into other control and risk systems within the Group, work is under way to establish a robust basis for balancing economic, environmental and social aspects. On this basis, the Management Board can also adopt operational measures to consistently implement our reduction pathway. During the financial year, among other things, the STRABAG SE Management Board decided to gradually operate the Group's own construction machinery using the alternative fuel HVO 100.

Besides the internal reporting mechanisms, the Management Board's sustainability expertise is also strengthened through active participation in external committees and exchange formats, including, for example, support of Stiftung KlimaWirtschaft.

The table below summarises the composition of the Management Board and the Supervisory Board in the 2025 financial year.

Composition of the Management Board and Supervisory Board

Name	Start of current period of office	End of current period of office	Gender	Year of birth	Nationality
Management Board					
Number of members **5**					
Average ratio of female to male members **0%**					
Dipl.-Ing. Stefan Kratochwill (CEO)	19 February 2025[1]	31 December 2026	Male	1977	Austria
Klemens Haselsteiner, BBA, BF (CEO)	1 January 2023	17 January 2025[2]	Male	1980	Austria
Dipl.-Ing. (FH) Péter Glöckler	11 August 2025	31 December 2026	Male	1977	Hungary
Mag. Christian Harder	1 January 2023	31 December 2026	Male	1968	Austria
Dipl.-Ing. (FH) Jörg Rösler	1 January 2023	31 December 2026	Male	1964	Germany
Dipl.-Ing. Siegfried Wanker	1 January 2023	31 December 2026	Male	1968	Austria
Dipl.-Ing. (FH) Alfred Watzl	1 January 2023	6 August 2025[3]	Male	1970	Germany
Supervisory Board[4]					
Number of members **11**					
Average ratio of female to male members **36 %**					
Shareholder representatives					
Mag. Kerstin Gelbmann (chairwoman)	24 June 2022	Until 2028 AGM[5]	Female	1974	Austria
Mag. Erwin Hameseder	24 June 2022	Until 2028 AGM[5]	Male	1956	Austria
Dr. Andreas Brandstetter	24 June 2022	Until 2028 AGM[5]	Male	1969	Austria
Dr. Valerie Hackl	25 January 2024	Indefinite	Female	1982	Austria
Dipl.-Ing. Sebastian Haselsteiner	13 June 2025	Until 2029 AGM[5]	Male	1979	Austria
Mag. Gabriele Schallegger	24 June 2022	Until 2028 AGM[4]	Female	1972	Austria
Delegated by the works council					
Dipl.-Ing. Andreas Batke	1 October 2009	Indefinite	Male	1962	Germany
Karl Gerdes	1 August 2024	Indefinite	Male	1963	Germany
Magdolna P. Gyulainé	1 October 2009	Indefinite	Female	1962	Hungary
Georg Hinterschuster	13 October 2014	Indefinite	Male	1968	Austria
Daniel Riesenberg	1 September 2025	Indefinite	Male	1971	Germany

[1] Stefan Kratochwill was appointed CEO of STRABAG SE on 19 February 2025 with immediate effect.

[2] Klemens Haselsteiner passed away suddenly and unexpectedly on 17 January 2025.

[3] Alfred Watzl resigned from his seat on the Management Board in agreement with the Supervisory Board, effective 6 August 2025 EOD.

[4] Five of the six members of the Supervisory Board of STRABAG SE and of its committees who have been elected by the General Meeting or delegated by the shareholders are independent pursuant to Rule 53 ÖCGK.

[5] Annual General Meeting

Prerequisites for election to the Management Board of STRABAG SE include the right professional qualifications, personal skills as well as many years of industry and leadership experience.

The Management Board should collectively cover a sufficiently broad range of expertise as well as educational and professional backgrounds in line with the business activities of the STRABAG Group, with the members complementing one another in terms of their knowledge and skills. Particular attention should be paid to achieving a balanced mix of technical and commercial backgrounds. This ensures that the Management Board as a whole possesses experience in the key business areas of the STRABAG Group.

Several mechanisms govern the composition of the Supervisory Board. The capital representatives are elected by the General Meeting or delegated by shareholders. The employee representatives are delegated in accordance with the Austrian Labour Constitution Act (Arbeitsverfassungsgesetz, ArbVG).

Through the active participation of Management Board members in internal working groups with an ESG focus (e.g. EDI team, Energy Transition), current developments relating to these topics are discussed at the highest management level. The extensive international management experience of both the Management Board and the Supervisory Board promotes the exchange of perspectives and supports the implementation of Group-wide strategic decisions. Specific expertise in the area of sustainability and the associated impacts, risks and opportunities is also contributed by experts in the various organisational entities. In addition, the Management Board and the Supervisory Board can draw on external experts where required.

The **Steering Committee Sustainability (SCS)** manages the Group-wide sustainability efforts and simultaneously monitors the achievement of the strategic sustainability goals. The composition and membership of the SCS are determined on the basis of the business areas and largely reflect our value chain. Membership of the SCS is associated with responsibility for specific trades and thematic areas.

Tasks of the Steering Committee Sustainability:

- approval of position papers, policies and guidelines on sustainability
- monitoring of the strategy's implementation and of the defined roadmaps to achieve the objectives
- preparation of decision-making criteria for the STRABAG SE Management Board
- formulation and further development of minimum sustainability standards

SCS decisions are taken several times per year and on an ad hoc basis by way of circular resolutions. At least one in-person meeting is held each year.

The **ESG management** is structured according to the topics of **environment**, **social responsibility** and **sustainable corporate governance**. Owing to their broad scope, these topics are addressed and managed by different central organisational entities within the Group. These units are responsible for operationalisation by providing the framework and tools needed to translate requirements, strategies and measures from management decisions into implementation. These central organisational entities also provide their expertise to the STRABAG SE Management Board, the Steering Committee Sustainability, and to the divisions, central divisions and central staff divisions, and act in an advisory capacity in implementing the sustainability strategy and the associated requirements and measures. The organisational unit "Sustainability – Governance, Reporting & Data" supports the establishment of the governance structure for sustainability and is also responsible for organising and coordinating development and updates of the sustainability strategy as well as for Group-wide sustainability reporting.

The role of the **Human Rights Officer** is another central function within ESG management. The Human Rights Officer is responsible for monitoring the human rights risks management system and the complaints procedure, as well as for reviewing their effectiveness, and acts in an advisory capacity to the Management Board of STRABAG SE and to the heads of the divisions and central divisions responsible for fulfilling human rights due diligence obligations. The Human Rights Officer acts independently and is not bound by instructions.

The corporate **sustainability network** includes one nominated representative from each division, central division and central staff division. The purpose of the network is to facilitate the exchange of experience and knowledge within the Group and to share information on best practice examples. The representatives are tasked with conveying information from the sustainability bodies (SCS, ESG management) to their respective division and of reporting to their management as well as communicating information about their own sustainability-related activities, actions and projects back to the network. The representatives also provide their specific expertise for Group-wide projects and in response to relevant enquiries. The sustainability network meets four times a year.

At the **division**, **central division** and **central staff division** level, the minimum sustainability standards and the associated measures are implemented and applied in compliance with legal requirements. Working together with ESG management, these entities are responsible for developing and implementing the respective roadmaps.

ESRS 2 GOV-3

Group-wide sustainability-related performance criteria for inclusion in remuneration systems are currently under evaluation. In particular, defining, measuring and managing appropriate target values (key performance indicators) remains challenging. As a result, sustainability criteria are currently not used in determining the remuneration of members of the Management Board or Supervisory Board.

ESRS 2 GOV-4

Due diligence encompasses the processes and procedures implemented by STRABAG that aim to identify and adequately manage actual or potential adverse impacts on people or the environment. The core elements of due diligence are reflected in the sustainability statement.

Core elements of due diligence	Reference in the sustainability statement
Embedding due diligence in governance, strategy and business model	Sustainability management
Engaging with affected stakeholders in all key steps of the due diligence	Our social responsibility; Own workforce; Workers in the value chain; Affected communities
Identifying and assessing adverse impacts	Impacts, risks and opportunities
Taking actions to address those adverse impacts	Our social responsibility
Tracking the effectiveness of these efforts and communicating	Our social responsibility

ESRS 2 GOV-5

STRABAG has established various control mechanisms to ensure transparent and compliant reporting. However, these are not embedded in a dedicated risk management process specifically for sustainability reporting.

ESG-related risk management processes are described and regulated through overarching Group requirements, including the Management Manual of STRABAG SE with its associated policies and in the Group Sustainability Directive adopted in 2025. The Sustainability Directive defines the responsibilities and accountabilities for the provision of sustainability data and information.

To implement the CSRD reporting obligations, a steering group has been established, comprising representatives of the ESG management team and BRVZ, that meets several times per year. Based on the ESRS requirements and existing data processes, this steering group aims to further develop sustainability reporting at STRABAG. Control mechanisms such as the

interim preparation of key figures ensure that the collected data are validated and that relevant processes are further developed as required.

In line with the Group-wide data strategy and the associated transition towards a data-driven organisation, increasing standardisation and automation of data collection and processing are being pursued. The measures already implemented for this purpose have a long-term impact, meaning that significant progress can be expected in the coming years. Plans also include strengthening data governance, which will provide for enhanced quality controls of collected data at different hierarchical levels in order to make them available for analysis and management purposes. These and further measures are intended to prevent potential risks associated with sustainability reporting.

As the collection and processing of sustainability data affect the entire Group, approval must generally be obtained from the Management Board of STRABAG SE or from the relevant management units. Information is therefore communicated on an ad hoc basis.

Value chain and strategy

ESRS 2 SBM-1

The construction industry – and therefore STRABAG as well – faces major challenges. Mitigating climate change requires a significant reduction in greenhouse gas emissions, particularly in climate-intensive industrial sectors such as construction. To meet the demand for housing and infrastructure, existing buildings must be refurbished and new structures built to sustainable standards. Innovative construction methods are therefore needed to align these activities with new and future requirements regarding energy efficiency, land use and resource consumption. This obliges STRABAG to act with foresight, but it also underscores the fact that the construction sector is a key industry in achieving sustainability targets.

Services along the entire construction value chain

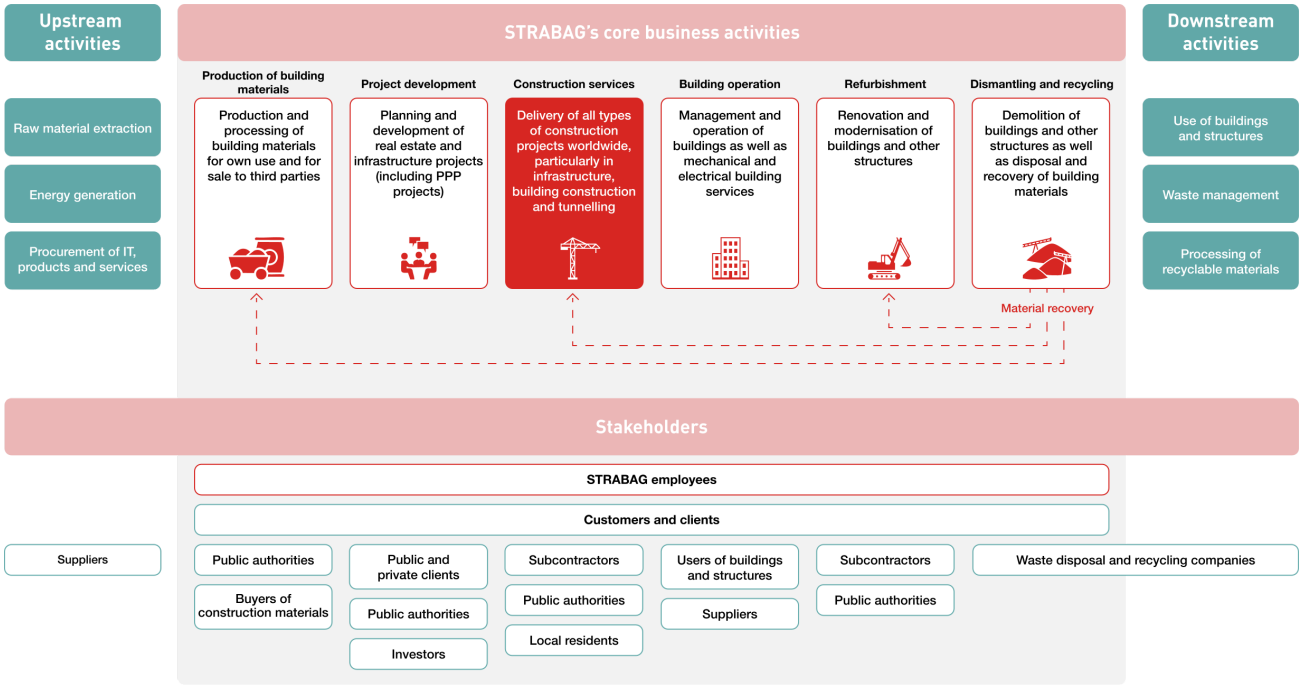
STRABAG operates predominantly in Europe and – particularly in its core markets in Central and Eastern Europe – provides services along the entire construction value chain. Our company's activities are correspondingly diverse. Outside Europe, STRABAG focuses primarily on the English-speaking world and on long-standing established markets in South America and the Middle East. In 2025, the acquisition of Georgiou Group also opened up Australia as a market with regionally distributed operations.

The diversity of our value chain is matched by the capabilities and expertise of our 88,556 employees who deliver our services. Partnership, trust and reliability are central values that guide our interactions with stakeholders.

STRABAG's activities cover all areas of the construction industry and span the entire construction value chain. The Group's core products are structures of all kinds, which form the focus of the company's activities and account for 85% of Group output. These include both building construction projects and infrastructure schemes in the areas of transport routes, bridges, tunnels, rail infrastructure, public transport as well as energy and water infrastructure. With just under 70%, a substantial share of these construction services is carried out under public-sector contracts and serves the general public. In addition, STRABAG operates a dense network for the production of building materials and provides services in the fields of planning, project development as well as the structural refurbishment and decarbonisation of buildings and their operation. As of 1 January 2025, STRABAG bundles its expertise in energy and water infrastructure within the new corporate division Energy Infrastructure.

As a result of these diverse business areas, several value chains exist within the Group. For the purposes of focused presentation, the emphasis here is placed on the core business of providing construction services. The following descriptions are therefore structured according to the life cycle phases of structures and cover the key activities and principal partners along this process.

Presentation of the STRABAG SE value chain for disclosure requirements in connection with ESRS 2 SBM-1



Production of building materials

STRABAG operates a dense network of its own production facilities to ensure the supply of building materials from in-house resources. The most important building materials include asphalt, concrete, cement, stone and gravel, which are used both for the company's own needs and are offered for sale to third parties. In the case of asphalt in particular, a particularly high self-sufficiency rate of 86% is achieved. The other building materials and raw materials used are largely sourced from regional suppliers to keep transport costs economically viable. Strategic objectives to expand our capabilities in the procurement and handling of construction materials as well as in dismantling and recycling aim to increase resource efficiency. This not only reduces our dependence on third parties but also helps to limit human rights risks and compliance risks that can arise from complex global supply chains. Our production facilities also represent an important lever for the decarbonisation of the Group, for example by converting asphalt mixing plants to renewable energy sources. In addition to mineral-based building materials, STRABAG also uses renewable raw materials, including those based on wood, straw or hemp – albeit to a comparatively limited extent. With the acquisition of Naporo Klima Dämmstoff GmbH in the 2024 financial year, STRABAG expanded its product portfolio in the area of sustainable building materials and is pursuing the strategic objective of further expanding the production of renewable raw materials.

Project development

Considering the entire life cycle of structures during the planning and design phase is crucial for forward-looking construction shaped by trends such as increasing urbanisation and the climate crisis. Concrete policy objectives, such as those set out in the European Green Deal, call for the low-emission construction and operation of structures as well as an increase in renovation rates. Despite these objectives, however, sustainability criteria such as those

outlined in the EU Taxonomy are generally not yet taken into account in tender procedures. Partnership-based collaboration with clients is therefore regarded as an important means of designing and planning structures in line with new requirements. With **TEAMCONCEPT**, STRABAG pursues a partnering model in which the client and contractor form a team already during the planning phase. STRABAG also offers additional planning-related **consulting services** (e.g. sustainability potential analysis) that specifically address sustainability requirements for structures and involve clients in the planning and development of projects at an early stage. An additional benefit for clients and partners arises from the broad implementation of ISO 9001 certification within the STRABAG Group. The certification represents a structured and transparent quality management system. It builds confidence in the quality of our services and supports efficient collaboration. In 2025, measured by revenue, around 99.6% of the permanent regional business was ISO 9001 certified.

STRABAG's service portfolio also includes the development of real estate, infrastructure and renewable energy projects. The Group develops, builds, sells and leases real estate projects with a focus on building developments that are constructed in a resource-efficient manner and operated with high energy efficiency. In addition, STRABAG has a successful track record spanning more than three decades in the field of concession models, with a portfolio of 44 public-private partnership (PPP) projects in the areas of mobility, energy and water infrastructure as well as social infrastructure (building construction).

Construction services

Construction forms the core of STRABAG's business model, with the transportation infrastructure and building construction segments accounting for nearly 70% of our output in 2025. In building construction, more than in transportation infrastructures, STRABAG also outsources some of its work to subcontractors, enabling capacities to be adapted more flexibly to the current market environment. Through these two business areas, STRABAG contributes to municipalities and other public clients primarily through the expansion of infrastructure – particularly in the area of mobility – and housing. Through its service offering for infrastructure maintenance, STRABAG also secures long-term contracts and recurring revenues. Employees as well as investors benefit from the Group's economic stability. Employees gain the security of stable jobs and incomes, while investors can expect continuous returns, reduced risk and sustainable value growth of their investments. The transformation of our construction processes represents a key lever for achieving our sustainability targets. A large share of STRABAG's emissions is energy-related, which is why the operation of construction machinery constitutes a central action area in our transition plan.

Services for decarbonising the construction industry

Building operation

In 2022, the operation of buildings accounted for around 26% of global energy-related greenhouse gas emissions (IEA, 2023). In addition to traditional facility management, STRABAG is expanding its service offering in the field of mechanical and electrical engineering services (M&E), with a particular focus on implementing and providing sustainable energy management solutions across a wide range of property types – including the company's own real estate, existing properties and new builds, and highly complex facilities such as those in the healthcare sector – thereby contributing to the decarbonisation of existing buildings.

Refurbishment

The construction and operation of buildings involves a high level of resource consumption. In addition to energy use, the material intensity of the construction sector is of considerable environmental relevance. Among other factors, the demolition, dismantling and deconstruction of buildings – which generate large quantities of construction waste and hard-to-recycle materials – as well as the low rates of reuse and recycling for many building materials, contribute to make the construction sector one of the most waste-intensive industries (European Commission, n.d.). The action area of Reconstruction, Conversion & Refurbishment brings together the activities required to use existing buildings sustainably while conserving both energy and material resources: **deconstruction**, **maintenance**, **renovation** and **modernisation**.

Dismantling and recycling

To close the loop towards a circular economy, STRABAG also offers services related to demolition and dismantling, including the recycling of building materials. The aim is to conserve resources, upgrade materials to a high quality and avoid landfill disposal.

Contribution to sustainability targets

STRABAG offers a broad range of services that are aligned with global sustainability objectives. Through the construction, expansion and modernisation of infrastructure, STRABAG makes a significant contribution to the development of cities and regions. This includes in particular construction services in the areas of rail and energy infrastructure, the construction of energy-efficient buildings as well as projects aimed at adapting to the impacts of climate change. At the same time, current construction methods and practices present challenges, as construction projects are generally associated with high emissions, land use and interventions in ecosystems. In particular, the use of energy-intensive materials such as concrete and asphalt as well as the use of fossil-fuel-powered construction machinery remains in tension with climate targets, even though progress is being made in recycling, alternative building materials and low-emission powertrain technologies. Digital planning methods such as Building Information Modelling (BIM) also enable more precise use of resources.

To evaluate our sustainability performance, STRABAG carried out an SDG Impact Assessment in the 2025 financial year. The aim was to analyse our business activities with regard to the UN Sustainable Development Goals. The results of the assessment are presented in the ESG Data Factsheet.

To minimise negative impacts, STRABAG has defined a set of strategic sustainability targets and is continuously working on the sustainable transformation of the company. This includes the further development of products and services – such as the use of sustainable building materials and construction methods – as well as measures to uphold our social responsibility towards our own employees, those within the supply chain and local communities.

Expanding our sustainability strategy

To strategically anchor the considerable opportunity potential of our value chain, STRABAG adopted its first sustainability strategy in 2021 with a clear commitment to decarbonising the value chain by 2040. This strategy was expanded in 2024 to include additional topics relating to environmental, social and governance aspects.

In recent years, the topic of sustainability has become increasingly prominent across all areas of life and the economy. This can be seen in more stringent legal requirements, changing expectations among our stakeholders, and the growing body of scientific evidence relating to climate change, biodiversity loss and other global challenges. These developments call for a new approach, which at STRABAG is reflected in an updated sustainability strategy that was adopted by the STRABAG SE Management Board in the first quarter of 2025 and is **applicable across the entire Group**.

The **expanded sustainability strategy** comprises several focus topics assigned to the areas of environment, social responsibility and sustainable corporate governance. Through its activities as a construction group, STRABAG has potential impacts within these focus topics that must be carefully considered – because STRABAG can influence them both positively and negatively, and because they involve both risks and opportunities.

STRABAG has defined various action clusters for these focus topics, with specific KPIs established for some of these actions. Progress in implementing the actions is presented in the respective thematic chapters.

Our sustainability strategy

Environmental

- **Decarbonisation**: With a science-based reduction pathway, we are lowering greenhouse gas emissions across our entire value chain. By 2030, we aim to reduce our Scope 1 and Scope 2 emissions by 42% and our Scope 3 emissions by 25%, with the goal of becoming climate neutral by 2040.
- **Circular economy**: We are putting circular economy principles into practice by reducing the consumption of primary raw materials, minimising waste and preserving resources at a high level of quality.
- **Biodiversity**: By establishing a biodiversity management system, we minimise our negative impacts on the local flora, fauna and funga while contributing to the preservation of intact ecosystems.

Social

- **Our employees**: Protecting and promoting the health of all our employees, fostering a strong learning culture and creating an inclusive work environment are key action areas for us to maintain our position as an attractive employer.
- **Human rights along the value chain**: The value chain in the construction industry is complex – our social responsibility and due diligence obligations therefore extend not only to our own employees but also to a wide range of other stakeholders, particularly suppliers and their employees.
- **Added value for society**: By strengthening the positive dialogue with local communities, we can shape our impact responsibly for all.

Governance

- **Fair competition**: In order to live up to our commitment to being a reliable business partner, contractor and employer, STRABAG promotes compliant behaviour and ethical conduct as well as a corporate culture based on partnership and trust.
- **Sustainable corporate governance**: To ensure sustainable corporate governance, we rely on clear structures, processes and responsibilities. This enables us to safeguard integrity in our business conduct and to identify impacts, risks and opportunities at an early stage.

Stakeholder engagement

ESRS 2 SBM-2

Stakeholders have various opportunities to contribute their interests and views as a way of providing impulses for STRABAG's strategy and business model. The wide range of options for engagement allows individual and targeted forms of collaboration to be shaped flexibly depending on the context and specific needs. Any adjustments to strategic objectives and business models are therefore also based on changing stakeholder expectations. Such changes include, for example, actions to expand the service portfolio to include sustainable construction services and to strengthen decarbonisation initiatives. Plans also include increased investment in low-emission technologies and the expansion of partnerships to promote sustainable value chains (chapter "Climate change").

Stakeholder group	Key engagement and dialogue formats	Frequency	Main purpose of the engagement and dialogue format
Own employees	Employee appraisal interview	Annually	Exchange on performance, strengths and opportunities to improve collaboration, as well as promotion of professional development.
	Onboarding and offboarding discussions	Event-driven	Further development of processes and due diligence obligations in connection with personnel and organisational development.
	Investigation of workplace accidents	Event-driven	Further development of processes and due diligence obligations in connection with occupational safety.
	Participatory innovation management (e.g. intrapreneurship programme adASTRA, ideas management)	Continuous exchange	Submission of ideas and improvement proposals that contribute to STRABAG's strategic action areas, including the development of new business models.
Customers and clients	Standardised customer satisfaction surveys	After project completion1	Obtaining feedback on project execution and deriving improvement measures.
	Joint planning of construction projects (e.g. within partnering models such as TEAMCONCEPT)	Continuous exchange	Early alignment of requirements and expectations as well as consistent alignment of construction projects towards sustainability.
Suppliers	Audits	Continuous exchange[2]	Prevention of human rights and environmental risks and strengthening of supplier relationships.
	Negotiation meetings	Continuous exchange	Further development and management of supplier relationships through regular coordination on performance, terms and areas for improvement; ensuring supply capability and quality throughout the contract term.
Investors	Annual General Meeting	Annually	Provision of information on the company's position as well as dialogue and voting by shareholders on key corporate decisions.
	Investor meetings, conferences and roadshows	Continuous exchange	Provision of information and promotion of dialogue on a wide range of company-related topics.
	Capital Market Day	Event-driven	Provision of information on strategic developments or progress.
Affected communities and local residents	Community management	Continuous exchange	Exchange regarding concerns raised by local residents; provision of transparent information on construction projects.
NGOs	Stakeholder dialogues and expert discussions	Continuous thematic exchange	Obtaining external perspectives on sustainability topics; exchange of information on current developments; understanding societal expectations.
Universities and research institutions	Research collaborations	Continuous project-related exchange	Joint development and validation of solutions.
Peers	Committees and industry events	Continuous exchange	Exchange on current industry developments in order to take them into account in strategic considerations.

[1] For projects with a contract value of > € 500,000

[2] Suppliers are selected on a risk-based basis

The structured engagement formats for our own employees include the appraisal interviews that are held annually in accordance with the respective Group directive, as well as the exit interviews conducted when an employee leaves the company. These conversations provide valuable insights that inform the continued refinement of our human resource development processes. When investigating workplace accidents, the parties involved in the incident are also included where appropriate and possible in order to conduct a structured analysis of the events.

Our employees can raise their concerns and issues at any time through channels such as the whistleblower platform or the ombuds system. Potential remedies, along with the regular review of their effectiveness, provide valuable input for assessing our processes. STRABAG also relies on **participatory formats**, including the adASTRA intrapreneurship programme and a structured ideas management. adASTRA has already led to the establishment of new companies that contribute to STRABAG's strategic action areas.

In addition to engaging with our internal stakeholders, we also seek the dialogue with other relevant stakeholders outside the Group. These include, in particular, our customers, investors and suppliers. We also maintain contact with universities, research institutions, the media, political institutions and NGOs as spokespeople for “silent” stakeholders such as nature. To foster exchange between STRABAG and these stakeholder groups, we use a variety of engagement formats, including participation in trade fairs and industry events, stakeholder dialogues and the establishment of research collaborations. When updating our Group strategy, we engage with analysts and investors through dedicated events, as was the case in 2023 with the Strategic Update 2030.

Customer satisfaction survey

Clients are among STRABAG’s key stakeholders. In order to secure new contracts on a regular basis and improve internal processes, customer satisfaction is measured according to a standardised Group-wide approach. To assess customer satisfaction, contracting authorities in all Group countries are invited to provide project-related feedback through an online survey (for projects with a contract value of > € 500,000) on the following aspects:

- Organisational efficiency and technical realisation
- Responsible and sustainable handling of people and resources
- Professional competence as well as communication and cooperation within and with our team

The corresponding process is embedded in the Group-wide minimum standards for the procurement and execution of construction projects (Common Project Standards). The management system officers coordinate the standardised measurement methodology and reporting at Group level. At country level, implementation is monitored by the designated officers as part of internal audits. Additional procedures for measuring customer satisfaction may be implemented by the operational entities.

Customer satisfaction results

In 2025, customer satisfaction was surveyed across 1,500 construction projects (2024: 1,893). The response rate was 40%, unchanged from the previous year (2024: 40%). The results are shown in the table below.

Aspects	**2025**	2024
Organisational efficiency and technical realisation	4.45	4.39
Responsible and sustainable handling of people and resources	4.43	4.41
Team: professional competence as well as communication and cooperation	4.67	4.61
Total	**4.52**	**4.46**

Degree to which expectations are met according to the clients’ assessment: 0 = not met; 1 = hardly met; 2 = partly met; 3 = largely met; 4 = met; 5 = exceeded.

Through active participation in various committees with peers – for example the Federation of the German Construction Industry (Hauptverband der Deutschen Bauindustrie) as well as sustainability-oriented initiatives such as the Stiftung KlimaWirtschaft – STRABAG gains insights into current industry developments and incorporates them into its strategic considerations. An internal working group coordinates the flow of information on the positions represented and forwards it in a structured manner to the Steering Committee Sustainability, which is chaired by the CEO.

Stakeholder dialogue

STRABAG not only participates in but also actively organises exchange formats with external stakeholders. Most recently, in September 2024, the company organised a stakeholder dialogue on the topic of “Ecological and social supply chain” was organised. Participants included representatives of the STRABAG Group as well as external stakeholders such as suppliers, partner companies, clients and academia. This group covered a significant part of the construction value chain, which is affected to varying degrees by new regulatory requirements and challenges along the supply chain. In various interactive dialogue settings, the availability of data was identified as a key lever for fulfilling due diligence obligations and addressing these challenges. Building on the insights gained and an expanded network, a further stakeholder dialogue on the topic “Sustainable transformation” is planned for 2026.

Specific stakeholder dialogues on human rights topics are conducted as part of the roll-out of our Social Compliance Management System and the associated risk analyses as well as during the development of specific actions. Further information can be found in the chapter Workers in the value chain.

At the level of our construction projects, affected communities and local residents represent another key stakeholder group. Dialogue with these stakeholder groups is often required by law. A key initiative to strengthen the dialogue with these stakeholders is the planned implementation of a Group-wide guideline for engaging local communities and residents at project level. In 2025, the existing concept was further refined in order to facilitate practical application of the guideline for the operational units of the STRABAG Group.

Sources – Sustainability Management

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International Energy Agency. (2023). *Buildings*. Retrieved 18 February 2026.

Impacts, risks and opportunities

ESRS 2 IRO-1

STRABAG uses a variety of methods to identify impacts, risks and opportunities. In the year under review, additional risk analyses were conducted alongside the double materiality assessment (DMA) for the topics of climate, water, biodiversity, human rights and business compliance. These topic-specific risk analyses also serve as inputs for the double materiality assessment. Consistency of evaluation is ensured by involving the same group of individuals both in the DMA and in the other risk processes. For the topics E2 (Pollution) and E5 (Circular Economy), no in-depth risk analyses were conducted beyond the double materiality assessment. Consequently, neither location-specific analyses nor consultations with affected communities were carried out.

Double materiality assessment

Responsibilities at a glance

As part of the double materiality assessment in accordance with ESRS 1, STRABAG identifies impacts, risks and opportunities (IROs) related to the defined ESRS topics (including sub-topics and sub-sub-topics). The materiality assessment is coordinated by the Group's "Sustainability – Governance, Reporting & Data" entity and conducted together with experts from other corporate entities who, through their role within the Group, possess the relevant expertise on a given topic. Given STRABAG's decentralised structure, the engagement with internal stakeholders from our central divisions, central staff divisions and operating divisions is crucial for taking into account business- or activity-specific factors as well as the business relationships that arise along the value chain. Impacts, risks and opportunities are identified and assessed in terms of their materiality for STRABAG using internal Group expertise and topic-specific risk analyses, as well as industry reports and other scholarly publications. This makes it possible to identify risks specific to the construction industry as well as opportunities representing an important basis for discussion when conducting the analysis. The results of the materiality assessment are validated annually in order to incorporate any material events and developments into the evaluation and thereby ensure continuous monitoring of impacts, risks and opportunities. The results are presented annually to the CEO and CFO for approval.

Further information on the approach is provided in the descriptions below:

A comprehensive reassessment of all ESRS topics most recently took place for the 2023 financial year. Interactive, topic-specific workshops with internal experts were held to first identify points of interaction with individual ESRS topics, sub-topics or sub-sub-topics and to identify and assess corresponding impacts, risks and opportunities. The workshops also included the identification of interdependencies between the individual IROs. The results of the materiality assessment are validated annually in order to incorporate any relevant events and developments into the evaluation and thereby ensure continuous monitoring of impacts, risks and opportunities.

External stakeholders were most recently involved during the stakeholder dialogue held in September 2024. Several group discussions were used to gather additional perspectives and opinions on selected topic aspects whose materiality had previously been subject to particular internal debate. The results obtained from the analysis up to that point were validated by identifying and discussing points of interaction, challenges, and opportunities related to the topics introduced. To this end, the internal assessments conducted up to that point were compared with the inputs provided by external stakeholders in order to distinguish between more and less relevant manifestations of the topics.

Software-supported approach since 2025

For the 2025 financial year, the results compiled by "Sustainability – Governance, Reporting & Data" and the experts involved were reviewed for currency, plausibility and relevance. STRABAG also implemented dedicated software and made minor methodological adjustments. These activities served to ensure a more structured implementation and documentation of the materiality assessment and did not have any significant impact on the results.

In line with ESRS requirements, all identified **impacts** are assessed in terms of their scale, scope, remediability and likelihood of occurrence. These parameters are evaluated using the following intensity rankings:

- **Scale (1–5)**: The scale indicates the **magnitude** of the impact. The assessment considers the size of the group of people and/or environmental area affected by an impact. A high rating indicates that nearly all relevant stakeholders or environmental areas are affected by a significant impact.
- **Scope (1–5)**: The scope indicates the **geographical extent** of the impact. The assessment considers whether impacts occur only locally (e.g. on a construction site), extend to the regional or national level, or occur across national borders. A high rating indicates that impacts extend over a wide area up to and including global effects.
- **Remediability (1–5; for negative impacts)**: Remediability indicates the extent to which an impact can be **reversed or mitigated**. The assessment considers whether impacts are fully reversible without lasting damage or whether long-term or permanent damage remains. A high rating indicates that the impacts are predominantly or entirely irreversible.
- **Likelihood of occurrence (for potential impacts)**: unlikely; likely; very likely

The assessment of impacts is calculated as the sum of the factors scale, scope and remediability multiplied by the likelihood of occurrence. The result is divided by the maximum achievable score in order to obtain a normalised rating. This value is then scaled to position it on a five-point scale. Where negative impacts on human rights are identified, their severity is given priority over likelihood of occurrence. A threshold value of 3 is applied for all types of impacts (negative / positive, potential / actual). This threshold allows the IROs to be prioritised.

Identified **risks and opportunities** for STRABAG are assessed based on their scale and likelihood of occurrence:

- **Scale (1–5)**: The assessment of financial scale indicates the extent to which risks or opportunities may affect the company's financial position. The assessment considers whether the effects are merely short-term and operational in nature or have strategic significance. A high financial scale rating indicates that significant financial losses or opportunities may arise and that key business processes, market positions or customer relationships may be substantially affected.
- **Likelihood of occurrence**: unlikely; likely; very likely

The rating of a risk or opportunity results from the product of scale and likelihood of occurrence. Dividing this by the maximum achievable score yields a normalised rating. This value is then scaled to position it on a five-point scale. The threshold value is likewise set at 3.

IROs that reach at least the threshold value of 3 are included in the reporting: they are presented both in aggregated tabular form and explained in greater detail in the respective thematic chapters. ESG risks are not prioritised over other identified risk categories (see Risk management).

The interpretation of the opportunities and risks described in the ESG area (environment, social, governance) requires a differentiated perspective. In order to identify environmental opportunities and risks, quantitative analyses are also used on the basis of internal experience – for example with regard to the expansion of the service portfolio or potential cost increases. Compared with the assessment of opportunities and risks in the environmental area, the approach for social topics is considerably more complex. Opportunities in the social area have a long-term effect and strengthen the company's resilience but are difficult to translate into monetary terms. The assessment of such opportunities and risks therefore relies predominantly on external data sources such as scientific studies and industry analyses.

Physical and transition climate risk analysis

The materiality assessment has allowed STRABAG to identify and assess the impacts, risks and opportunities relating to the topics of climate change mitigation, climate change adaptation and energy. STRABAG SE's business model was assessed with regard to its vulnerability to climate-related physical and transition risks for the first time in 2023.

The climate risk analysis carried out in 2024 provides a broader perspective by identifying specific risks and opportunities for STRABAG arising from climate change. Analysing physical risks (e.g. extreme weather events) and transition risks (e.g. legal requirements) helps to identify relevant climate-related factors that influence both the business strategy – which is regularly reviewed for short-, medium- and long-term risks – and long-term value creation.

To further develop the maturity of the climate risk analysis and to incorporate additional locations into the analysis, dedicated software was acquired in 2025. The integration of the existing results into the platform and the expansion of the site analyses will be carried out step by step. The insights gained will be disclosed in the coming years.

Physical climate risk analysis

As part of the project, material activities within the Group's own operations as well as along the upstream and downstream value chain were evaluated in order to assess the climate-related physical risks. STRABAG's actual and potential vulnerability was analysed based on its exposure across the short, medium and long term.

To carry out a meaningful analysis of the physical climate impacts on the company, a selective sample of relevant site locations was taken along the upstream and downstream value chains. The upstream value chain was covered by analysing suppliers and their site locations, as well as the risk exposure of relevant building materials. The analysed sites are predominantly located in Central and Eastern Europe, as a significant proportion of the project and construction materials production business and, consequently, the primary supply sites are located here. For STRABAG, the completed construction projects analysed as part of the physical climate risk analysis cover both its own business activities as well as the downstream value chain.

The first step was to identify objects of analysis belonging to the areas of business activities, own assets and value chain. These were then analysed based on factors such as the output generated per Group country, the expenditure volumes for externally sourced building materials and the Group's own construction material production volumes. This analysis was supported by experts within the Group. The aim was to determine representative locations for the clusters that have strategic and financial relevance and which provide the broadest possible coverage of the Group's activities. The site selection focused on values from the 2023 financial year, which were validated in workshops with internal expert groups. The first risk assessment was carried out in 2024, with key findings approved by the Management Board as the highest governance body.

In a second step, the selected site coordinates were transferred into climate analysis software in order to evaluate the exposure values for each defined climate-related hazard based on the chosen climate scenario from RCP8.5/SSP5-8.5. These mandatory climate scenarios describe global conditions in which emissions continue to rise at current rates without policy intervention, leading to global warming of around 4 °C by the year 2100.

As part of the initial analysis in 2024, the RCP8.5/SSP5-8.5 climate scenario was deliberately chosen in order to test the resilience of the business model to physical climate risks. This made it possible to ensure a robust assessment of potential exposure. In the 2026 financial year, the analysis will be expanded to include additional climate scenarios in order to further improve the resilience test with regard to physical risks. The assumptions used for the climate scenario analysis are aligned with the climate-related estimates contained in the financial reports.

The software used for the climate risk analysis is based on climate projections that combine global and regional models derived from climate models provided by the CORDEX initiative. A few other indicators are drawn from external databases such as the Aqueduct global platform for water stress, coastal and riverine flooding or the CATNAT natural disasters platform. The

damage functions are based on climate-related hazards or corresponding indicators derived from publicly available climate databases such as Copernicus, WIR, ESGF, CATNAT and Arup.

In the final step of the physical climate risk analysis, the sensitivity of the site locations examined was assessed together with subject-matter experts from selected divisions and central divisions taking into account likelihood, scale, duration and geospatial coordinates. The exposure of STRABAG's activities and supply chains to these values was also analysed across three time horizons.

The risks and opportunities relevant for STRABAG (gross assessment) were qualitatively assessed by means of scenario analysis for short-term (up to 2030), medium-term (up to 2040) and long-term (up to 2085) time horizons in order to estimate their potential impacts on the entire value chain as well as their likelihood of occurrence. The short- and medium-term horizons are aligned with the Group Strategy 2030: People. Planet. Progress. and the 2040 climate neutrality target. Long-term impacts were derived with regard to asset lifespans. No material climate risks were excluded from the risk analysis.

The following table describes the identified material **physical climate risks** that entail potential risks for the company along the entire value chain.

Description of physical risks	
Acute climate risks: extreme weather events, heat and heavy rainfall	Construction work takes place predominantly outdoors, leading to increased vulnerability for both employees and machinery. Potential impacts from acute extreme weather events such as heavy rainfall or heatwaves primarily affect the company's own business activities. In the medium and long term, these impacts may lead to temporary construction stoppages.
Chronic climate risks: drought and rising temperatures	Chronic effects such as prolonged periods of drought and rising temperatures will impact business activities and employees in the long term. One possible consequence is increased dust exposure at urban construction sites, necessitating changes in building design to meet the new climatic requirements.

Transition climate risk analysis

During the analysis of the climate-related impacts on the company, relevant events were identified that arise from the transition to a 1.5 °C-compliant economy, society and policy framework. These events impact the business activities and assets within STRABAG's own operations as well as those along its upstream and downstream value chains. Their exposure to these impacts was then analysed, followed by an assessment of the resulting implications for short-, medium- and long-term time horizons. The upstream value chain was included through consideration of rising raw material and energy costs. The downstream value chain was analysed, among other aspects, by taking into account risks such as changes in consumer behaviour and uncertainty regarding market signals.

The first step was to apply the International Energy Agency's NZE transition scenario (Net Zero Emissions by 2050), which describes how to achieve the 1.5 °C temperature target by 2050 and outlines the underlying assumptions. These include, for example, the rapid deployment of efficient technologies and sustainable energy supply systems, which STRABAG examined in order to assess the related impacts. Specifically, STRABAG analysed its business activities, assets and supply chain with regard to their **exposure to the following transition events**:

- CO_2e targets of key building material suppliers
- increased demand for renewable energy and the associated risks to supply security and costs
- price developments for fossil fuels
- rising CO_2e prices for emissions-intensive industries, as projected through the Carbon Border Adjustment Mechanism (CABM) and the European Union Emissions Trading System (EU ETS)

By combining an ambitious 1.5 °C scenario with a scenario characterised by significant physical risks, the analysis covers both transition and physical risks. These scenarios represent the range of global climate pathways currently considered plausible by scientific research and enable a robust assessment of the resilience of our business model. In the coming years, the analysis will be expanded to include additional transition climate scenarios in order to further improve the resilience test with regard to transition events.

In a second step, the relevance of these transition events was discussed together with subject-matter experts and a consulting firm in order to describe the Group's vulnerability to the identified risks and opportunities. This included determining whether there was a touchpoint within the value chain and what impacts could be expected as a result. When assessing vulnerability to transition events, both operating and central specialist entities were specifically involved to ensure the broadest possible coverage of the affected value chain.

The table below presents an aggregated overview of the selected transition events, their impacts, the likelihood of occurrence, the duration of the events and the scale of the potential material risks across three time horizons (2030, 2040 and 2050). No material climate risks were excluded from the risk analysis. Likewise, no material embedded greenhouse gas emissions associated with the most important assets and products were identified that could jeopardise the achievement of the long-term emissions reduction target or exacerbate transition risks.

Description of transition risks	
Future mandates and regulation	European Union mandates such as the Circular Economy Action Plan (CEAP), the European Deforestation Regulation (EUDR) and the Corporate Sustainability Due Diligence Directive (CSDDD) or product-specific regulations such as the Construction Products Regulation (CPR), the Ecodesign Directive and the Energy Performance of Buildings Directive (EPBD) are creating changing requirements that construction companies must be prepared for. Potential cost factors include investment costs for the use of sustainable technologies, adaptation costs and minimum quotas for recycled building materials in response to stricter standards. The risk of exclusion from procurement procedures due to a lack of compliance with new sustainability requirements is another potential impact.
Demand for low-carbon products and services	The use of new technologies resulting from the demand for low-carbon products and services brings both risks and opportunities. An ambitious climate target requires investment in new technologies that may not meet the usual prices on the market in the short term but which could achieve significant competitive advantages in the long term.
Rising raw material and energy costs	Transition impacts on construction companies from rising raw material and energy costs can vary greatly. The scenarios developed by the International Energy Agency (IEA) and the World Economic Outlook (WEO) suggest that by 2050 certain raw materials will no longer be available in sufficient quantities to meet demand for the 1.5 °C transition. Increased efficiency and a higher recycling rate will be necessary to offset rising costs in the long term.

Description of transition opportunities	
Potential for revenue growth through new business models	Clients are expected to shift towards low-carbon and energy-efficient construction services in the long term, which means that the development and expansion of more environmentally friendly services and products in the construction sector are predicted to bring opportunities for growth.
Risk minimisation through sustainability strategy and target setting	STRABAG sees significant business opportunities in the decarbonisation of its value chain to strengthen the resilience of vulnerable business activities to transition impacts. These can be leveraged to develop new business models that could further consolidate the company's market position in its core markets.

Resilience to climate risks confirmed

In 2025, STRABAG analysed the resilience of its strategy and business models in the context of climate change, taking into account both material physical and transition climate risks. As part of this analysis, both the company's own business activities as well as the upstream and downstream value chain were examined with regard to the impact of climate-related risks on their resilience. The analysis is based on the International Energy Agency's Net Zero Emissions by 2050 (NZE) scenario and follows the same short-, medium- and long-term time horizons used in the transition risk analysis.

The resilience of the business model was assessed by translating the material gross physical and transition risks into net risks. For each identified risk, existing and planned strategic actions as well as investment considerations relating to climate change adaptation were compared in order to identify how they contribute to reducing gross risks. The analysis also documented uncertainties regarding the scope and timing of price developments for sustainable raw materials and energy sources, as well as future customer demand for sustainable products. No risk-prone assets or business activities were identified. The results of the analysis show that STRABAG's business model and strategy are resilient to material climate risks. This resilience is based on three key factors: the diversification of business activities, strategically aligned actions and the planned financial resources to actively leverage opportunities arising in the context of climate change.

Water risk analysis

To identify and assess site-specific water risks, a Group-wide risk analysis was carried out for the first time using the Aqueduct Water Risk Atlas developed by the World Resources Institute. The analysis considered sites owned by STRABAG. The tool is based on a wide range of hydrological, climatic and socio-economic datasets and evaluates various dimensions of water risks. These include physical risks (e.g. water scarcity, flooding, changes in water availability and quality), regulatory risks (e.g. stricter abstraction limits, changes in water pricing or water rights) and reputational risks, which may arise, for example, from conflicts over water use with local communities.

The analysis was carried out using the Aqueduct Water Risk Atlas version 4.0. The assessment was conducted in November 2025 on the basis of the globally harmonised hydrological, climatic and socio-economic datasets provided by the tool. Aqueduct 4.0 integrates, among other sources, datasets from the FAO, NASA, GRDC, as well as modelled hydrological scenarios developed by the World Resources Institute.

The analysis enables a comparable assessment of risks at the location level and supports the prioritisation of action in water management. In the course of the evaluation, all physical, regulatory and reputational risk parameters available in the Aqueduct model were considered. For the purpose of site-specific prioritisation, particular emphasis was placed on the indicators for baseline water stress (BWS) generated by the tool. Only the values originally generated by the tool were used. No subsequent adjustment or weighting of the parameters was carried out.

The results are evaluated on a site-specific basis in order to prioritise sites according to the level of identified water risk. Sites with the BWS labels "High" (category 3) and "Extremely High" (category 4) were identified as sites with potentially material risk and assigned to a more detailed assessment so they can be evaluated in a targeted manner with management measures prioritised accordingly. For sites situated in areas with high water stress, water consumption is reported separately. In line with the methodology of the Aqueduct model, the site assessments were carried out at the level of river basins.

Site-specific biodiversity risk analysis

As part of the double materiality assessment, systemic risks relating to biodiversity that affect STRABAG at a higher level were also considered. These may have both direct and indirect impacts along the value chain. No consultations with potentially affected communities were carried out.

In addition to the Group-wide materiality assessment, STRABAG conducts a site-specific biodiversity risk analysis. Since 2025, risks have been assessed using a Nature Risk Score, which combines nature-related dependencies, potential impacts and ecological sensitivity. The methodology applied is aligned with the internationally recognised **LEAP framework of the Taskforce on Nature-related Financial Disclosures (TNFD)**. This approach ensures that nature-related risks are systematically captured – from identifying relevant sites and assessing dependencies and potential impacts to evaluating the associated risks. The system combines site-specific data with global biodiversity information and enables a consistent assessment of ecological sensitivities. This ensures that both proximity to protected areas and the extent of nature-related risks are incorporated into the analysis.

To this end, all sites owned by STRABAG were integrated into a site-based analysis model that links geographical information with nature-related indicators. The site catalogue includes, among other things, extraction sites, production facilities, workshops, warehouses, landfills, office buildings and undeveloped land. Construction sites – including those with longer project durations – were not included in the scope of the analysis, as in previous assessments. For each site, a nature-related risk profile was derived that systematically captures potential impacts on biodiversity as well as site-specific dependencies on ecosystem services. Identification was carried out on the basis of site-specific activity profiles and globally available datasets on regulating, provisioning and supporting ecosystem services (e.g. water availability, soil stability, erosion control and local climate regulation). Dependencies along the upstream and downstream value chain are not taken into account.

The underlying assessment logic combines three elements:

- nature-related dependencies on ecosystem services (dependency risk)
- potential impacts of the location on ecosystems and biodiversity (impact risk)
- a consolidated risk value derived from these factors (Nature Risk Score) that reflects the relative significance of a location in terms of nature-related risks

The Nature Risk Score is calculated from a weighted aggregation of dependency risk and impact risk and differentiates between five rating levels. The two highest rating levels, “high” and “very high”, are defined as threshold values above which sites are considered potentially material and are subjected to more detailed analysis. Assessment criteria include the type of activities, use of ecosystem services, the potential scale of negative impacts on habitats and the ecological sensitivity of the surrounding area. For sites whose Nature Risk Score reaches these thresholds, a geographical sensitivity analysis is conducted using internationally recognised datasets on protected areas and areas of high biodiversity importance, including the World Database on Protected Areas and Key Biodiversity Areas.

Human rights risk analysis

To analyse human rights and environmental risks in our own operations and in the supply chain, a methodology was developed to identify potential negative impacts on people and their natural livelihoods based on country and sector risks. In 2025, the methodology for risk analysis within STRABAG's own operations was applied across the Group for the first time. An extension of the methodology to suppliers is planned for the future. The risk analysis methodology is based on relevant sources and legal requirements (see the guidance issued by the German Federal Office for Economic Affairs and Export Control) and relies on internationally recognised risk assessments. **Country risk analyses** are used to identify risks that describe the political and cultural situation of a country in relation to human and environmental rights and to provide indications of possible violations within the company or among suppliers. **Sector risk analyses** are used to identify industry-specific human rights and environmental risks. The methodology is continuously developed centrally within the Corporate Responsibility Office, which also coordinates its implementation in cooperation with operational entities. Risks are specified and prioritised based on the criteria of likelihood of occurrence and severity. The results are subsequently validated using the expertise of operational areas, such as division management and purchasing, in order to ensure a realistic and robust analysis. The prioritised human rights and environmental risks are then compared with existing actions in the divisions of the STRABAG Group, which are then adjusted where necessary.

In the risk assessment, particular attention is given to especially vulnerable groups. The vulnerable groups identified include, for example, employees and workers at subcontractors, as well as workers performing manual and physically demanding tasks, particularly those facing language barriers. They also include low-income individuals who may not be aware of their rights, as well as children. The current risk analysis process does not provide for the structured involvement of potentially affected stakeholders. However, the perspectives of such stakeholders are incorporated into the risk assessment process through ongoing dialogue with stakeholders and/or their representatives. Reports received via the whistleblowing platform are also specifically taken into account when assessing risks.

In the construction industry, workers on construction sites are exposed to increased risks, for example when handling large and heavy machinery, working at height and below ground, and performing potentially physically demanding tasks. Construction activities that alter existing systems can also have potentially negative impacts on the natural foundations of local communities, for example through dust emissions during the construction phase. Unequal treatment in employment may occur in the recruitment of staff, in personnel development and in workplace interactions – for example on the basis of gender, disability or social or ethnic background. These risks exist in our core European markets as well as in our international markets. The prevalence of employment agencies and the unauthorised subcontracting of orders are factors that increase the risk of forced labour in STRABAG SE's non-European areas of activity, both in construction and in the service sector. There are no STRABAG companies that show a significantly increased risk of child labour. Awareness of these possible risks, the actions derived, and the implemented policies should permanently minimise the likelihood of these risks occurring. Our Group directives do not include a definition of vulnerable groups, as the directives apply to all persons equally.

Compliance risk analysis

The risk assessment procedure is described in the Business Compliance Risk Analysis appendix as part of the overarching Business Compliance Management System. The definition of risk areas is based on STRABAG's business activities as an internationally operating construction group and is confirmed by many years of experience and industry expertise. Specific risk areas were defined with the support of the operational management, the central staff divisions Internal Audit, Contract Management and Legal (CML) and Bau-, Rechen- und Verwaltungszentrum (BRVZ), along with the Business Compliance (BC) entity located within the Corporate Responsibility Office. In line with STRABAG's international orientation and its organisation into business fields, the risk analysis focuses not on individual operating sites or locations but on organisational entities, which may be structured either geographically or by business field. The identification and assessment of corruption risks are

based on the experience of the operational entities, central staff divisions and central divisions in order to enable responses to incidents at Group level.

As part of the risk analysis, all divisions, central divisions and central staff divisions are subject, among other aspects, to a review of corruption risks and are re-evaluated at regular intervals based on ongoing experience reports. At the procedural level, the risk analysis is based both on ongoing incident reports and on periodic surveys of the respective entities regarding risk developments within their field of activity. These surveys are conducted through the annual Management Business Compliance Reporting.

Material impacts, risks and opportunities

ESRS 2 SBM-3

Changes compared with the previous year

The topic E3 (Water) was assessed as material for the first time in the 2025 financial year. Already in the previous year, industry reports had recognised the increasing urgency of this topic, particularly due to its interconnections with environmental issues such as climate change, biodiversity and resources. The basis for the retrospective adjustment was a risk analysis conducted for the Group, which in the reporting year was carried out for the first time using the Aqueduct Risk Atlas of the World Resources Institute and provides a more detailed specification of the existing analysis methods, as well as the expansion of business activities in the field of water infrastructure. Water is a key resource along the entire value chain. In particular, water is permanently bound and thus consumed in the production of building materials. Innovative business areas such as water treatment plants and sponge city concepts offer strategic growth opportunities for STRABAG.

The application of the double materiality assessment methodology was further refined this year. Compared with the previous year, a number of originally identified positive impacts across topics are therefore no longer reported. Impacts, risks and opportunities related to water are now assessed as material. In addition, linguistic clarifications resulted in further minor adjustments to the IROs compared with the previous year.

The results of the double materiality assessment for all material topics are presented in the table below.

Description of the material impacts, risks and opportunities		Relevant time horizons	Location in the value chain	Sustainability matter
E1 Climate change				
Actual negative impact	High greenhouse gas potential due to the use of fossil fuels	Short, medium and long term	Own operations	Energy
Risk	Volatile energy costs	Short, medium and long term	Upstream	Energy
Risk	Climate change-related extreme weather events and the related damage to fixed assets, limited production capacities, supply shortages, construction delays	Short, medium and long term	Upstream	Climate change adaptation
Risk	Increased requirements and demand for sustainable products and services	Short, medium and long term	Upstream	Climate change adaptation; Climate change mitigation
Opportunity	Independence from fossil fuels through the use of renewable energy sources	Short, medium and long term	Own operations	Energy
Opportunity	Production and consumption of self-generated renewable energy	Short, medium and long term	Own operations	Energy
Opportunity	Development of new business areas	Short, medium and long term	Own operations	Climate change adaptation; Climate change mitigation
E3 Water and marine resources				
Actual negative impact	Permanent binding of water in construction products	Short, medium and long term	Upstream, own operations	Water consumption
Opportunity	Development of business activities in the field of water-related services, e.g. planning and construction of (drinking) water treatment plants and urban climate measures in line with the sponge city concept	Short, medium and long term	Own operations	Water consumption
E4 Biodiversity				
Actual negative impact	Negative impact on biodiversity and ecosystems due to raw material extraction, CO_2e emissions in the construction process and soil sealing	Short, medium and long term	Own operations	Direct impact drivers of biodiversity loss

Description of the material impacts, risks and opportunities		Relevant time horizons	Location in the value chain	Sustainability matter
Actual negative impact	Reduction in the availability of raw materials due to the extraction of finite raw materials	Short, medium and long term	Upstream	Impacts and dependencies on ecosystem services
Risk	Re-evaluation of suppliers to fulfil regulations	Short term	Upstream	Impacts on the extent and condition of ecosystems
Opportunity	Incentives for construction projects with biodiversity and soil improvement measures that exceed legal requirements	Short, medium and long term	Upstream	Impacts on the state of species
Opportunity	Development and expansion of biodiversity- and land-conserving business models, such as renaturation and remediation projects	Short, medium and long term	Own operations	Impacts on the extent and condition of ecosystems
E5 Circular economy				
Actual negative impact	High use of non-renewable raw materials	Long term	Own operations	Resources inflows, including resource use
Actual negative impact	Loss of raw materials through landfilling and lack of recycling options	Short, medium and long term	Downstream	Waste
Potential negative impact	Hazard potential for the environment and humans due to hazardous properties of waste	Short, medium and long term	Downstream	Waste
Potential positive impact	Contribution to resource efficiency through continuously growing anthropogenic material stocks	Short, medium and long term	Downstream	Resource outflows related to products and services
Risk	Rising prices and a lack of availability of raw materials	Long term	Upstream	Resources inflows, including resource use
Risk	Wide-ranging requirements for sustainably operated buildings as a result of regulatory requirements	Long term	Upstream	Resource outflows related to products and services
Risk	Stricter requirements for waste management as well as declining landfill capacities	Long term	Upstream	Waste
Opportunity	Revenue growth and new business areas through the sale and use of renewable raw materials	Long term	Own operations	Resources inflows, including resource use
Opportunity	Development of expertise and services in the field of selective demolition, materials science and the circular economy	Long term	Own operations	Resource outflows related to products and services
Opportunity	Increasing revenue from recycled construction materials, landfilling of waste and landfill construction	Short, medium and long term	Downstream	Waste
S1 Own workforce				
Potential negative impact	Occurrence of accidents and occupational diseases	Short, medium and long term	Own operations	Working conditions
Actual positive impact	Development and training programmes for employees	Short, medium and long term	Own operations	Working conditions
Actual positive impact	Health promotion measures for employees	Short, medium and long term	Own operations	Working conditions
Risk	Absence of employees due to occupational accidents and illnesses	Short, medium and long term	Own operations	Working conditions
Opportunity	Increasing employee satisfaction and employer attractiveness through development and qualification programmes	Long term	Own operations	Working conditions; equal treatment and opportunities for all
Opportunity	Diversity in teams	Short, medium and long term	Own operations	Equal treatment and opportunities for all
S2 Workers in the value chain				
Potential negative impact	Occurrence of accidents and occupational diseases	Short, medium and long term		Working conditions

Description of the material impacts, risks and opportunities		Relevant time horizons	Location in the value chain	Sustainability matter
Potential negative impact	Violations of human rights in the form of forced labour, working time violations, violations of working hours and withheld wages	Short, medium and long term	Upstream	Working conditions; other work-related rights
Risk	Loss of sales and reputational damage due to criminal charges	Short, medium and long term	Upstream	Other work-related rights
S3 Affected communities				
Potential negative impact	Impairment of natural livelihoods due to resource extraction and the execution of construction projects	Long term	Upstream, own operations	Communities' economic, social and cultural rights
Risk	Emergence of land use conflicts and thus restrictions of construction projects	Short, medium and long term	Upstream	Communities' economic, social and cultural rights
Risk	Loss of sales and reputational damage due to criminal charges	Short term	Own operations	Communities' civil and political rights; rights of indigenous communities
Opportunity	Creation of infrastructure for the inclusion of local communities	Short, medium and long term	Downstream	Adequate housing
G1 Business conduct				
Actual negative impact	Negative influence on fair competition through misconduct.	Short, medium and long term	Own operations	Corruption and bribery
Actual positive impact	Definition of minimum standards with regard to corporate culture by means of codices (Code of Conduct, Supplier Code)	Short, medium and long term	Own operations	Corporate culture
Risk	Loss of potential suppliers due to sanctions legislation	Short term	Upstream	Management of relationships with suppliers including payment practices
Risk	Penalties for misconduct	Short, medium and long term	Own operations	Corruption and bribery

STRABAG has identified material impacts, risks and opportunities for the topics and sub-topics listed above and specified by ESRS. These are explained in greater detail in the respective thematic chapters and are covered by the ESRS disclosure requirements. The implications for the business model and strategy are also explained, along with the actions STRABAG is taking to minimise negative impacts and risks and to leverage positive impacts and opportunities.

Identified ESG risks are actively managed through long-term actions and integrated into the company's strategic management. The **resilience of STRABAG's business model** is based on taking material sustainability aspects into account along the entire value chain. In the environmental sphere, the company's long-term adaptability is supported in particular by Group-wide decarbonisation measures, the responsible use of natural resources, and the expansion of circular economy practices and resource efficiency in construction. At the social level, resilience is strengthened through efforts to address the shortage of skilled workers, a preventive management system to ensure occupational safety and health, and the responsible management of supply chains. In addition, responsible corporate governance with clear governance structures supports the stability of the business model.

Alongside the strategic integration of sustainability at STRABAG, global megatrends – in particular increasing urbanisation and the impacts of climate change – create long-term growth opportunities while also strengthening the resilience of the business model. Ongoing urbanisation leads to a structurally increasing demand for both new and modernised infrastructure. At the same time, climate change requires substantial investment in energy-efficient refurbishment, the expansion of energy-related infrastructure, as well as climate mitigation- and climate adaptation-related construction measures. Overall, this suggests a

sustainably stable level of demand from clients, further enhancing the company's resilience to economic fluctuations.

The strategic integration of sustainability and a broad diversification therefore form the basis of a resilient business model that enables risks to be addressed effectively and growth opportunities to be actively leveraged.

Annual materiality review

Topic E2 (Pollution) is currently assessed as not material. STRABAG acknowledges that environmental topics interact with one another and that the climate crisis in particular gives rise to and intensifies other environmental and social challenges. Topic S4 (Consumers and end-users) has likewise been assessed as not material. Building safety is ensured through comprehensive legal requirements and construction standards. STRABAG also provides specialised services such as hazardous substance testing and product management, for example in the context of EU Taxonomy assessments or through cooperation with partners such as bauXund, in order to specifically minimise potential risks for users.

No material company-specific topics were identified in the year under report.

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List of disclosure requirements		Page reference
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Biodiversity and ecosystems
IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	Impacts, risks and opportunities
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	Biodiversity and ecosystems
E4-2	Policies related to biodiversity and ecosystems	Biodiversity and ecosystems
E4-3	Actions and resources related to biodiversity and ecosystems	Biodiversity and ecosystems
E4-4	Targets related to biodiversity and ecosystems	Biodiversity and ecosystems
E4-5	Impact metrics related to biodiversity and ecosystems change	Biodiversity and ecosystems
ESRS E5 Resource use and circular economy		
IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	Impacts, risks and opportunities
E5-1	Policies related to resource use and circular economy	Circular economy
E5-2	Actions and resources related to resource use and circular economy	Circular economy
E5-3	Targets related to resource use and circular economy	Circular economy
E5-4	Resource inflows	Circular economy
E5-5	Resource outflows	Circular economy
ESRS S1 Own workforce		
SBM-2	Interests and views of stakeholders	Sustainability management
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Own workforce
S1-1	Policies related to own workforce	Own workforce; Our social responsibility
S1-2	Processes for engaging with own workers and workers' representatives about impacts	Own workforce
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	Own workforce
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Own workforce
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Own workforce
S1-6	Characteristics of the undertaking's employees	Own workforce
S1-8	Collective bargaining coverage and social dialogue	Own workforce
S1-9	Diversity metrics	Own workforce
S1-10	Adequate wages	Own workforce
S1-13	Training and skills development metrics	Own workforce
S1-14	Health and safety metrics	Own workforce
S1-16	Compensation metrics (pay gap and total compensation)	Own workforce
S1-17	Incidents, complaints and severe human rights impacts	Own workforce
ESRS S2 Workers in the value chain		
SBM-2	Interests and views of stakeholders	Sustainability management
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Workers in the value chain
S2-1	Policies related to value chain workers	Workers in the value chain; Our social responsibility
S2-2	Processes for engaging with value chain workers about impacts	Workers in the value chain

List of disclosure requirements		Page reference
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	Workers in the value chain
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	Workers in the value chain
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Workers in the value chain
ESRS S3 Affected communities		
SBM-2	Interests and views of stakeholders	Sustainability management
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Affected communities
S3-1	Policies related to affected communities	Affected communities; Our social responsibility
S3-2	Processes for engaging with affected communities about impacts	Affected communities
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	Affected communities
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Affected communities
S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Affected communities
ESRS G1 Business conduct		
GOV-1	The role of the administrative, supervisory and management bodies	Sustainability management
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	Impacts, risks and opportunities
G1-1	Corporate culture and business conduct policies and corporate culture	Business conduct
G1-2	Management of relationships with suppliers	Business conduct
G1-3	Prevention and detection of corruption and bribery	Business conduct
G1-4	Confirmed incidents of corruption or bribery	Business conduct
G1-5	Political influence and lobbying activities	Business conduct
G1-6	Payment practices	Business conduct

Environment

2025

EU Taxonomy

Regulation (EU) 2020/852 ("Taxonomy Regulation"), which entered into force on 12 July 2020, establishes the criteria for determining whether an economic activity qualifies as environmentally sustainable. It provides the legal basis for sustainable investments as a way to swiftly implement the European Green Deal. The aim of the regulation is to introduce a uniform classification system ("EU Taxonomy") in order to steer capital flows into environmentally sustainable sectors.

For this purpose, the Taxonomy identifies economic activities that have a significant impact on the EU's environmental objectives.

These six environmental objectives are:

1. climate change mitigation (CCM)
2. climate change adaptation (CCA)
3. the sustainable use and protection of water and marine resources (WTR)
4. the transition to a circular economy (CE)
5. pollution prevention and control (PPC)
6. the protection and restoration of biodiversity and ecosystems (BIO)

For each of these environmental objectives, economic activities and technical screening criteria were defined by means of EU Delegated Regulations.

If one of our business activities falls under the definition of the respective economic activity, it is a Taxonomy-eligible activity; if not, it is a Taxonomy-non-eligible activity. Many of the STRABAG Group's business activities, in particular new road construction, infrastructure project development, building materials production, and property and facility services, are currently not defined as Taxonomy-eligible, i.e., they are not an economic activity as defined by the EU Taxonomy.

Based on this classification of economic activities into those that are Taxonomy-eligible and those that are Taxonomy-non-eligible, the degree to which the activities are environmentally sustainable is assessed on the basis of the technical screening criteria. An economic activity is considered environmentally sustainable if it contributes substantially to one or more environmental objectives, causes no significant harm to any of the other environmental objectives, and is carried out in compliance with certain minimum safeguards. Whether an economic activity makes a substantial contribution or causes no significant harm (DNSH) to an environmental objective is determined on the basis of the technical screening criteria specified in detail by the European Commission.

The criteria and requirements must all be fulfilled **cumulatively**.

Article 8 of Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 requires non-financial undertakings to disclose information on the following in their sustainability report:

- proportion and absolute value of the Taxonomy-aligned, the Taxonomy-eligible but not Taxonomy-aligned, and the Taxonomy-non-eligible turnover (revenue) related to products or services
- proportion and absolute value of the Taxonomy-aligned, the Taxonomy-eligible but not Taxonomy-aligned, and the Taxonomy-non-eligible capital expenditures and operating expenditures related to assets or processes

The detailed calculation of these individual values is described below in the sections on turnover, capital expenditures and operating expenditures.

Management approach

Assessment of Taxonomy eligibility

The mapping of turnover to the economic activities detailed in the EU Taxonomy is based on the business activities and types of works included in the central controlling system. When an order is placed, the project is assigned to a certain business activity with opening of the cost centre. This ensures a clear classification of an economic activity. As the economic activity may be relevant to several environmental objectives, however, it is assessed for Taxonomy alignment according to the technical screening criteria for each environmental objective.

STRABAG's Taxonomy-eligible economic activities in relation to the six environmental objectives are listed below. The environmental objectives and the numbering of the respective delegated regulation are given in brackets.

STRABAG's business activities encompass numerous Taxonomy-eligible economic activities, as the EU Taxonomy also covers the mere construction of such facilities and systems, particularly in the energy sector (1 to 8) and in the areas of water supply and sewerage (9 and 10).

Under Omnibus Package I, the European Commission has introduced simplifications regarding EU Taxonomy reporting. Taxonomy-eligible economic activities that account for less than 10% of total turnover in aggregate no longer need to be reported or audited separately. The following economic activities in the sectors energy, water supply, sewerage, waste management, transport and disaster risk management collectively fall below the 10% threshold of the turnover denominator and are therefore no longer addressed:

1. Electricity generation using solar photovoltaic technology (CCM 4.1)
2. Electricity generation from wind power (CCM 4.3)
3. Electricity generation from hydropower (CCM 4.5)
4. Electricity generation from geothermal energy (CCM 4.6)
5. Electricity generation from biogas (CCM 4.7)
6. Electricity generation from bioenergy (CCM 4.8)
7. Transmission and distribution of electricity (CCM 4.9)
8. District heating/cooling distribution (CCM 4.15)
9. Construction and extension of water supply systems (CCM 5.1 / WTR 2.1)
10. Construction and extension of waste water collection and treatment (CCM 5.3 / WTR 2.2)
11. Infrastructure for personal mobility, cycle logistics (CCM 6.13)
12. Flood risk prevention and protection infrastructure (CCA 14.12)
13. Sustainable urban drainage systems (WTR 2.3)
14. Sorting and material recovery of non-hazardous wastes (CE 2.7)
15. Demolition and wrecking of buildings and other structures (CE 3.3)

The economic activities relevant to the STRABAG SE Group comprise:

1. Infrastructure for rail transport (CCM 6.14)
2. Construction of new buildings (as general contractor) (CCM 7.1 / CE 3.1)
3. Renovation of existing buildings (CCM 7.2 / CE 3.2)
4. Maintenance of roads and motorways (CE 3.4)
5. Use of concrete in civil engineering (CE 3.5)

Rail infrastructure construction encompasses the construction of railway lines, underground railway lines, stations and terminals. These services are provided by the STRABAG Group within its business fields of railway construction, tunnelling and building construction.

As the construction of new buildings is defined as the development of building projects for residential and non-residential buildings and the construction of complete residential or non-residential buildings on contract basis, only those building construction projects in which the

STRABAG Group acts as general contractor or erects entire buildings as part of a project development are included under this activity.

The renovation of existing buildings is defined in the EU Taxonomy as construction and civil engineering works or preparation thereof, which is why the STRABAG Group's renovation and conversion activities in building construction are recorded here.

The maintenance of roads and motorways as defined by the EU Taxonomy includes routine maintenance, preventive maintenance and rehabilitation of asphalt and concrete roads. The maintenance operation mainly concerns the binder course, surface course and concrete slabs. These services are provided within the business field of road construction.

The economic activity "use of concrete in civil engineering" encompasses the use of concrete for new construction, reconstruction or maintenance of civil engineering objects, with the exception of concrete road surfaces and projects already covered by "maintenance of roads and motorways". The projects of the business areas concerned, in which concrete, reinforced concrete or prestressed concrete is used as the main construction material, fall under this economic activity.

Assessment of Taxonomy alignment

As the STRABAG Group's revenue (turnover) stems from a large number of very different individual projects, the examination of the technical criteria of the Taxonomy-eligible economic activities cannot be carried out at the level of the activity itself but only at the individual project level.

The five relevant economic activities mentioned above comprise 7,705 individual projects. The assessment requires a considerable administrative effort due to the extensive and detailed criteria involved. In addition, a wide variety of technical screening criteria were defined for each economic activity within the framework of the delegated regulations. For this reason, only projects with an annual output of more than € 5 million are examined in detail. This represents 57% of the Taxonomy-eligible turnover from the relevant economic activities.

A special software application, the STRABAG-Taxonomiemonitor, was therefore created to carry out the assessment of the individual projects using questionnaires for assessing Taxonomy alignment for the five economic activities listed above. The questions are to be answered by the project managers with verification to document the answers to be uploaded to the system. The questionnaires cover the criteria for making a significant contribution and for ensuring the DNSH criteria at the individual project level.

For the economic activities not examined at the individual project level, an analysis of the technical screening criteria was carried out using typified construction site organisations and structures.

The existence of a robust climate risk analysis is the DNSH criterion for the environmental objective of climate change adaptation in the relevant economic activities to which the projects have been assigned.

As Taxonomy-alignment requires not only a material contribution to an environmental objective but also compliance with the DNSH principle for the remaining environmental objectives, the absence of a climate risk analysis prevents Taxonomy-alignment for the projects concerned.

These projects are therefore only shown as Taxonomy-eligible but not Taxonomy-aligned.

STRABAG SE is a leading European technology group for construction services. These services are provided on the basis of public tenders or specifications from private clients. Sustainable solutions are offered. STRABAG has an influence on the ecological design of buildings only in rare cases or within the scope of its own project developments. In public tenders in particular, the company is usually only commissioned to carry out the construction work.

The review of the individual projects has shown that many criteria specified by the EU Taxonomy are not yet taken into account as standard practice in construction projects. We expect that an increasing number of tenders will meet the EU Taxonomy criteria in the future.

Turnover (revenue)

Determination of the denominator according to Article 8 Annex 1:

The turnover comprises revenue that was recognised in accordance with IAS 1.82(a), determined on the basis of IFRS 15. It includes revenue from construction contracts, revenue from construction materials, revenue from facility management, revenue from project developments and other revenue.

Determination of the numerator according to Article 8 Annex 1:

In line with the management approach described above, the Taxonomy-eligible projects were assessed at the individual project level or through analytical reviews for Taxonomy alignment.

The Taxonomy-aligned projects exclusively involve the economic activities “construction of new buildings” and “infrastructure for rail transport” in relation to the environmental objective of climate change mitigation. With “construction of new buildings”, the criteria for primary energy demand, air-tightness and thermal integrity are met and the life-cycle global warming potential has been calculated. With “infrastructure for rail transport”, the substantial contribution of electrification is met.

With the economic activities “renovation of existing buildings”, “maintenance of roads and motorways” and “use of concrete in civil engineering”, no project was able to fulfil all the technical screening criteria for Taxonomy alignment. While “renovation of existing buildings” failed on various criteria, “use of concrete in civil engineering” and “maintenance of roads and motorways” were unable to meet the required waste treatment and recycling rates. In asphalt road construction, this can be explained by the fact that the existing asphalt mixing plants have lower recycling rates.

The individual economic activities can be Taxonomy-aligned or Taxonomy-eligible with regard to several environmental objectives. The share of the total turnover of Taxonomy-aligned and Taxonomy-eligible economic activities per environmental objective is shown in the overview tables in the Notes. When presenting Taxonomy-aligned or Taxonomy-eligible turnover, duplicate entries are eliminated for KPI determination and not shown in the KPI overview template.

The turnover is as follows:

A detailed presentation by economic activity in accordance with the reporting templates specified in the EU Regulation is available in the Notes.

Turnover (revenue)

	2025		2024	
	€ mln.	**%**	€ mln.	%
Turnover related to environmentally sustainable activities (Taxonomy-aligned)	1,185.61	6.34	1,312.81	7.53
Turnover related to Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned)	8,271.69	44.20	9,281.93	53.28
Total	**9,457.30**	**50.54**	**10,594.74**	**60.81**
Taxonomy-eligible activities not material	1,466.11	7.83	0.00	0.00
Turnover related to Taxonomy-non-eligible activities	7,790.87	41.63	6,827.48	39.19
Total	**18,714.28**	**100.00**	**17,422.22**	**100.00**

The Taxonomy-aligned turnover declined compared to the previous year, as many Taxonomy-aligned new buildings relate to real estate project development. These are still under construction and are not yet included in the turnover due to a lack of investors. Turnover relates exclusively to the environmental objective of climate change mitigation. With regard to the other environmental objectives, the technical screening criteria could not be met for the projects examined.

All turnover reported in the numerator relates to revenue in accordance with IFRS 15 and is reported as revenue in the consolidated financial statements of STRABAG SE.

The result shows that 41.63% of the STRABAG Group's business activities are not covered by the EU Taxonomy. This applies in particular to property and facility services, building materials production and new road construction. As a result, there are no technical screening criteria laid out in the regulation to assess their degree of sustainability.

A large proportion of building construction also does not fall under the Taxonomy-eligible economic activities, as the definition is aimed at the construction of complete residential and non-residential buildings. In many cases, however, STRABAG is only responsible for individual parts of buildings.

Nevertheless, sustainable solutions in essential business activities are key for a successful transition to a sustainable economy. STRABAG relies on relevant standards in this area and pursues a comprehensive sustainability strategy. Detailed information can be found in the ESG performance section of the Group management report.

The EU Taxonomy is constantly evolving. An adaptation and expansion of the economic activities and the screening criteria is to be expected.

Capital expenditures (CapEx)

Determination of the denominator according to Article 8 Annex 1:

Capital expenditures as defined by the EU Taxonomy include additions to tangible and intangible fixed assets, including business combinations. Also included are additions to right-of-use assets in accordance with IFRS 16. The disclosures are made before depreciation, amortisation, impairment or other changes in value. The total capital expenditures in intangible and tangible assets reported in the IFRS consolidated financial statements form the starting point for determining the investments.

Determination of the numerator according to Article 8 Annex 1:

Taxonomy-eligible and Taxonomy-aligned expenditures can be divided into three categories:

- Capital expenditures related to assets that are associated with Taxonomy-eligible or Taxonomy-aligned economic activities
- Acquisition of assets related to Taxonomy-eligible or Taxonomy-aligned economic activities or individual measures that reduce greenhouse gas emissions
- Capital expenditures incurred as part of a plan to expand Taxonomy-aligned economic activities or to allow Taxonomy-eligible economic activities to become Taxonomy-aligned (CapEx plan)

Capital expenditures related to assets that are associated with Taxonomy-eligible or Taxonomy-aligned economic activities

The STRABAG Group has a central equipment management function that controls the procurement, servicing, maintenance, repair, deployment and utilisation of construction machinery, mechanical equipment and vehicles throughout the Group.

A clear allocation of construction equipment and the vehicle fleet to individual projects and thus to economic activities is not possible. In the case of mixed-use assets, these are assigned to Taxonomy-eligible or Taxonomy-aligned economic activities by means of a suitable classification key. STRABAG assigns technical equipment, machinery, the vehicle fleet, and operating and office equipment to this category. The acquisition of these assets through business combinations is also included here.

The equipment intensity in construction projects varies greatly; especially in projects with a high level of subcontractor services, equipment use differs considerably compared to services performed using the company’s own personnel.

The metric of equipment costs, recorded in the management reporting for each project, is used to assign investments as Taxonomy-aligned or Taxonomy-eligible. The percentage of the total equipment costs that is attributable to Taxonomy-aligned and Taxonomy-eligible projects is presented as Taxonomy-aligned and Taxonomy-eligible investments. The non-material economic activities identified in relation to turnover are also not taken into account in relation to capital expenditure.

Acquisition of assets related to Taxonomy-eligible or Taxonomy-aligned economic activities or individual measures that reduce greenhouse gas emissions

Capital expenditures that are not directly attributable to the provision of services are not allocated on the basis of equipment costs.

The buildings constructed by STRABAG for its own use and investments in investment property (acquisition and ownership of buildings – CCM 7.7), as well as investments in electric passenger cars (manufacture of low-carbon technologies for transport – CCM 3.3), are recognised as Taxonomy-eligible economic activities. The real estate and electric passenger

cars acquired or constructed in the respective financial year are assessed against the technical screening criteria and thus for Taxonomy alignment.

The right-of-use assets from leases involve a large number of real estate leases for office locations. These are Taxonomy-eligible in accordance with CCM 7.7 and, due to a lack of available information for assessing Taxonomy alignment, are reported in their entirety as not Taxonomy-aligned.

Investments arising from Taxonomy-eligible or Taxonomy-aligned economic activities that collectively fall below the 10% threshold relate to investments in photovoltaic systems (manufacture of renewable energy technologies – CCM 3.1).

Capital expenditures incurred as part of a plan to expand Taxonomy-aligned economic activities or to allow Taxonomy-eligible economic activities to become Taxonomy-aligned (CapEx plan)

STRABAG is rethinking the future of construction. With numerous innovation and sustainability projects, the Group is working to reduce CO_2 emissions in administration and construction projects in order to achieve the goal of becoming climate neutral in 2040. The circular economy, or circularity, was also defined as one of the six key strategic topics of our Strategy 2030. Detailed information can be found in the ESG performance section of the Group management report.

Whether and to what extent an economic activity can be classified as Taxonomy-aligned is to be assessed on the basis of the screening criteria for the individual construction projects. Since STRABAG essentially provides construction services on the basis of public tenders or specifications from clients, Taxonomy-aligned economic activities can only be expanded together with the clients.

It should be noted that capital expenditures to expand Taxonomy-aligned turnover are to be reported in this category. Since the technical screening criteria usually refer to the building and not to the construction process, there is no direct connection between capital expenditures and Taxonomy-aligned turnover. Therefore, no investment plans currently exist in this regard.

Capital expenditures for Taxonomy-non-eligible economic activities

This category comprises capital expenditures that cannot be allocated to Taxonomy-eligible economic activities. The calculation is based on the total additions to intangible assets and to property, plant and equipment according to the IFRS consolidated financial statements. First, the capital expenditures for the acquisition of assets related to Taxonomy-eligible or Taxonomy-aligned economic activities as well as the Taxonomy-non-eligible expenditures are determined. The remaining expenditures are allocated on the basis of the Taxonomy-aligned and Taxonomy-eligible turnover.

Capital expenditures that are associated with Taxonomy-eligible or Taxonomy-aligned economic activities may be Taxonomy-aligned or Taxonomy-eligible with regard to several environmental objectives due to the allocation according to turnover. The share of the total capital expenditures of Taxonomy-aligned and Taxonomy-aligned economic activities per environmental objective is shown in the overview tables in the Notes. When presenting Taxonomy-aligned or Taxonomy-eligible turnover, duplicate entries are eliminated for KPI determination and not shown in the KPI overview template.

The total capital expenditures are as follows:

A detailed presentation by economic activity in accordance with the reporting templates specified in the EU Regulation is available in the Notes.

CapEx

	2025		2024	
	€ mln.	**%**	€ mln.	%
CapEx related to environmentally sustainable activities (Taxonomy-aligned)	129.69	13.44	182.73	18.79
CapEx related to Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned)	344.96	35.74	559.29	57.50
Total	**474.65**	**49.18**	**742.02**	**76.29**
Taxonomy-eligible activities not material	83.21	8.62	0.00	0.00
CapEx related to Taxonomy-non-eligible activities	407.22	42.20	230.59	23.71
Total	**965.08**	**100.00**	**972.61**	**100.00**

The Taxonomy-aligned capital expenditure is primarily related to the acquisition of investment property. The decline in Taxonomy-aligned CapEx is therefore mainly attributable to lower real estate investments.

The remaining Taxonomy-aligned capital expenditures results exclusively from the allocation of the Taxonomy-aligned turnover, so that the development essentially follows that of the turnover. Slight shifts are possible due to the projects' different equipment costs.

The Taxonomy-aligned capital expenditures include € 105.77 million (previous year: € 143.30 million) related to investment property; € 9.01 million (previous year: € 15.62 million) related to technical equipment and machinery; € 9.26 million (previous year: € 17.84 million) related to other facilities, furniture and fixtures and office equipment; € 1.76 million (previous year: € 2.23 million) related to facilities under construction; and € 3.89 million (previous year: € 0.73 million) related to business combinations. The capital expenditures are shown in the statement of fixed assets under "development of investment property".

Operating expenditures (OpEx)

Operating expenditures as defined by the EU Taxonomy are, in addition to non-capitalisable research and development activities, all maintenance and repair expenditures as well as short-term leasing expenses, building renovation activities and other directly attributable costs relevant to the ongoing maintenance and preservation of the functionality of intangible and tangible assets.

STRABAG makes use of the simplification provision introduced by Delegated Regulation 2026/73, which no longer requires operating expenses to be broken down into Taxonomy-eligible and Taxonomy-aligned categories, as these are not material to the execution of the projects or to STRABAG as a whole.

The disclosure may therefore be omitted because the allocation to projects cannot be made directly but only on the basis of Taxonomy-eligible and Taxonomy-aligned turnover in proportion to equipment costs. Accordingly, Taxonomy-eligible and Taxonomy-aligned OpEx largely follows the same pattern as turnover. Slight shifts are possible due to the projects' different equipment costs.

Total operating expenses for the financial year amounted to € 385.59 million (previous year: € 348.53 million.)

Minimum safeguards

Assessing Taxonomy alignment in accordance with Articles 3 and 18 of the EU Taxonomy Regulation (EU 2020/852) also requires compliance with minimum social safeguards. The EU Taxonomy thus combines economic, environmental and social criteria for classifying sustainable economic activities. The minimum safeguards included in the EU Taxonomy are there to ensure that companies, when carrying out their economic activities, have procedures in place that protect human and workers' rights and which guarantee compliance with standards relating to taxation and fair competition. The safeguards are also designed to prevent serious offences with regard to these issues. An economic activity is carried out in alignment with the minimum safeguards if the following minimum social safeguards are followed in its implementation:

- OECD Guidelines for Multinational Enterprises
- United Nations (UN) Guiding Principles on Business and Human Rights
- Core Conventions of the International Labour Organization (ILO)

These international frameworks comprise principles and guidelines for corporate responsibility in relation to the four previously mentioned topics of human rights, corruption, taxation and fair competition. The Final Report on Minimum Safeguards published by the Platform on Sustainable Finance in October 2022 and the FAQs issued by the European Commission in June 2023 provide comprehensive guidance on interpreting the minimum safeguards requirements, which STRABAG took into account during implementation.

STRABAG has implemented various processes and procedures to ensure compliance with minimum social safeguards. These apply to all Group companies and take into account the upstream and downstream value chain with regard to human rights and anti-bribery compliance. We use various control mechanisms to monitor the processes and procedures, including audits, internal and external reviews, and ongoing risk analyses. Our monitoring systems also include the implementation of corrective measures in the event of non-compliance.

The topics of human rights, corruption and fair competition are covered in the sustainability statement. The topic of taxation, on the other hand, does not form part of the sustainability statement. The principles of STRABAG's tax policy call for compliance with all applicable tax laws and other relevant regulations internationally. Numerous directives, organisational instructions and controls have been implemented in the individual countries to ensure appropriate taxation and compliance with the relevant regulations.

When assessing compliance with the minimum social safeguards, STRABAG also takes into account the relevant Principal Adverse Impacts (PAI) indicators contained in the European Sustainable Finance Disclosure Regulation (EU) 2019/2088 (SFDR) and set out in the European Commission FAQs from June 2023. These include the unadjusted gender pay gap and board gender diversity. Both indicators are included in this report.

The following table provides an overview of the most important Group directives and policies that were analysed and of the chapters in the sustainability statement where these are explained in more detail:

Topic	STRABAG group directives, processes and policies	Reference
Human rights	Code of Conduct, Sustainability Policy, Supplier Code of Conduct, Health and Safety Policy, ombudspersons, Policy on Employment Conditions and Human Rights	Our social responsibility
Corruption	Code of Conduct, Business Compliance Management System, online whistleblower platform, Supplier Code of Conduct	Our social responsibility
Taxation	Directives and technical instructions based on national legislation	Does not form part of the sustainability statement
Fair competition	Business Compliance Management System, online whistleblower platform	Business conduct

Summary of KPIs – Disclosure for the year 2025

2025	T€	%	T€	%	Breakdown by environmental objectives of Taxonomy-aligned activities										
KPI (1)	Total (2)	Proportion of Taxonomy-eligible activities (3)	Taxonomy-eligible activities (4)	Proportion of Taxonomy-eligible activities (5)	Climate Change Mitigation (CCM) (6)	Climate Change Adaptation (CCA (7)	Water (8)	Circular economy (9)	Pollution (10)	Biodiversity (11)	Proportion of enabling activities (12)	Proportion of transitional activities (13)	Not assessed activities considered non-material (14)	Taxonomy-aligned activities, P8year 2024 (15)	Proportion of taxonomy-aligned activities 2024 (16)
Turnover (revenue)	18,714,281.10	50.54	1,185,608.12	6.34	6.34	0.00	0.00	0.00	0.00	0.00	3.76	0.00	1,466,112.78	1,312,805.64	7.53
CapEx	965,077.63	49.18	129,689.59	13.44	13.44	0.00	0.00	0.00	0.00	0.00	0.00	0.00	83,206.46	182,730.82	18.79
OpEx	385,558.06	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	21,800.77	6.26

Turnover (revenue)

2025		%	T€	%	Breakdown by environmental objectives of Taxonomy-aligned activities								
Economic activities (1)	Code (2)	Proportion of Taxonomy-eligible turnover (3)	Taxonomy-aligned turnover (4)	Proportion of Taxonomy-eligible turnover (5)	Climate Change Mitigation (CCM) (6)	Climate Change Adaptation (CCA (7)	Water (8)	Circular economy (9)	Pollution (10)	Biodiversity (11)	Enabling activity (12)	Transitional activity (13)	Proportion of Taxonomy-aligned in Taxonomy eligible (14)
Infrastructure for rail transport	CCM 6.14	9.55	704,310.00	3.77	3.77	0.00	0.00	0.00	0.00	0.00	E		39.48
Construction of new buildings (as general contractor)	CCM 7.1/ CE 3.1	16.23	481,298.12	2.57	2.57	0.00	0.00	0.00	0.00	0.00			15.83
Renovation of existing buildings	CCM 7.2/ CE 3.2	5.68	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		T	0.00
Maintenance of roads and motorways	CE 3.4	12.98	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			0.00
Use of concrete in civil engineering	CE 3.5	6.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			0.00
Sum of alignment per objective					**6.34**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**			
Total turnover		**50.54**	**1,185,608.12**	**6.34**									**12.54**

CapEx

2025		%	T€	%	Breakdown by environmental objectives of Taxonomy-aligned activities								
Economic activities (1)	Code (2)	Proportion of Taxonomy-eligible CapEx (3)	Taxonomy-aligned CapEx (4)	Proportion of Taxonomy-aligned CapEx (5)	Climate Change Mitigation (CCM) (6)	Climate Change Adaptation (CCA (7)	Water (8)	Circular economy (9)	Pollution (10)	Biodiversity (11)	Enabling activity (12)	Transitional activity (13)	Proportion of Taxonomy-aligned in Taxonomy-eligible (14)
Infrastructure for rail transport	CCM 6.14	5.97	17,779.55	1.84	1.84	0.00	0.00	0.00	0.00	0.00	E		30.82
Construction of new buildings (as general contractor)	CCM 7.1/ CE 3.1	3.71	6,133.15	0.64	0.64	0.00	0.00	0.00	0.00	0.00			17.25
Renovation of existing buildings	CCM 7.2/ CE 3.2	1.91	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		T	0.00
Maintenance of roads and motorways	CE 3.4	9.22	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			0.00
Use of concrete in civil engineering	CE 3.5	3.40	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			0.00
Manufacture of low carbon technologies for transport	CCM 3.3	1.73	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00			0.00
Acquisition and ownership of buildings	CCM 7.7	23.24	105,776.89	10.96	10.96	0.00	0.00	0.00	0.00	0.00			47.16
Sum of alignment per objective					**13.44**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**			
Total CapEx		**49.18**	**129,689.59**	**13.44**									**27.33**

Climate change

ESRS 2 SBM-3

As an energy- and resource-intensive industry, the construction sector has a key role to play in and exerts considerable influence on the transition to a low-carbon economy. Fossil fuels are used along the entire value chain, from the operation of production facilities and construction machinery to the operation of the structures we build. This makes the construction industry a source of process- and energy-related emissions. STRABAG therefore seeks to continuously reduce greenhouse gas emissions along the entire value chain (Scope 1, 2 and 3) to achieve the target of climate neutrality by 2040 approved by the SE Management Board. We understand climate neutrality in the sense of the United Nations Framework Convention on Climate Change (UNFCCC, 2021) as the endeavour to minimise greenhouse gas emissions as far as possible and to offset those emissions that are difficult to avoid through targeted compensation measures. According to the current status, targeted compensation measures, such as the purchase of carbon offset certificates, are not expected to be used until the target year 2040. They are intended exclusively to cover the emissions that remain after all technically and economically feasible reduction measures have been exhausted.

For this purpose, a climate transition plan with a corresponding reduction pathway based on science-based targets was developed in the 2024 reporting year. The underlying principles as well as the progress made are described in the following chapter.

In addition to the consistent implementation of actions aimed at climate change mitigation, the impacts of climate change are already being felt today, which makes adaptation processes necessary as well. Construction companies have a decisive role to play in this context. On the one hand, actions to adapt to climate change – such as the construction of protective structures – must already be taken today. On the other hand, sustainable, climate-resilient construction methods can help make buildings and cities more resilient to extreme weather events.

Structures today are built with the aim to have a long service life, to be resource-efficient throughout their operation, and to be able to be repurposed or dismantled at the end of their life cycle. We expect this trend to continue to gain strength in the future, with circular construction and expertise in the energy sector playing a key role in this development. For this reason, STRABAG has defined these areas as key strategic topics and will continue to expand the relevant business models. With our services, we seek to play an important role in the transition to climate-neutral buildings and infrastructure.

Our transition plan

ESRS E1-1

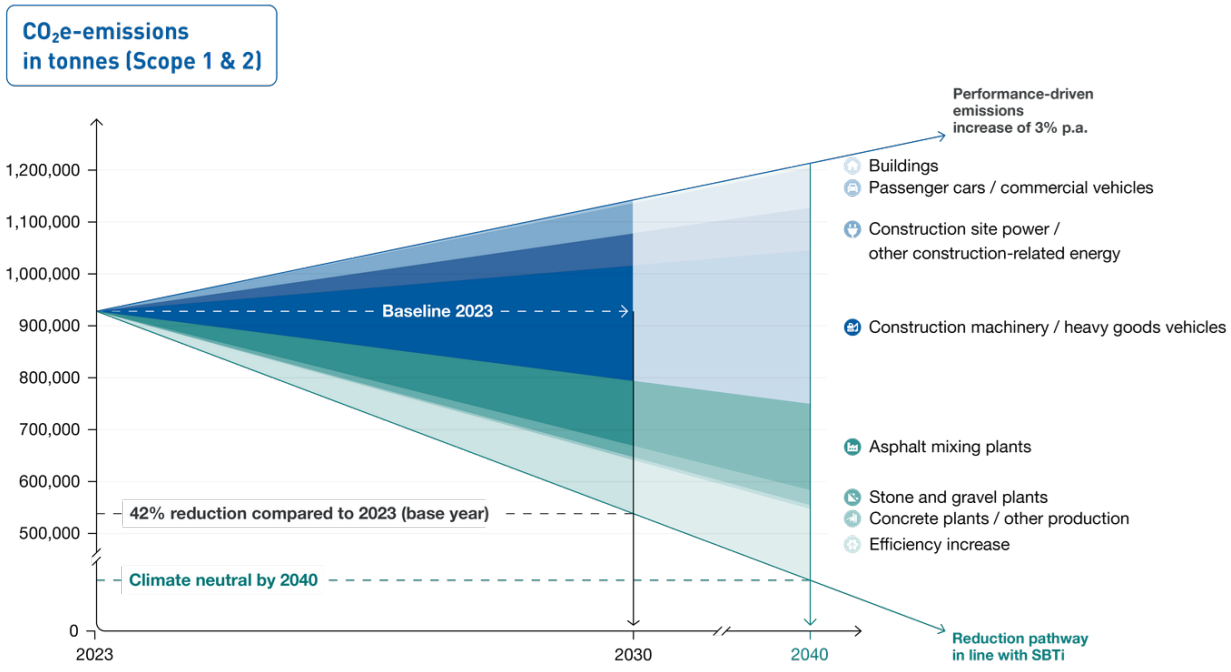
As part of the strategic objective of achieving climate neutrality by 2040, STRABAG has set a science-based interim target for 2030 in accordance with the **Science Based Targets initiative (SBTi)**, thereby committing to mitigating climate change in line with the 1.5 °C target. The underlying resolution was adopted by the Management Board of STRABAG SE. As the target influences the Group's strategic direction, the Supervisory Board was also informed by the Management Board. The central element is a greenhouse gas reduction pathway with science-based targets and corresponding management tools.

Based on an analysis of the Group's energy consumption, seven action areas were identified, supplemented by the potential for efficiency increases as a separate action area. These action areas were defined on the basis of the Group's largest CO_2e reduction potentials. Key actions were specified for each of these action areas in order to avoid or reduce the consumption of fossil energy sources. Specifically, these are:

1. **Buildings**: climate-neutral operation of administration buildings (own and third-party) used by the Group
2. **Passenger cars / commercial vehicles**: conversion of vehicle fleet to renewable energy sources
3. **Construction site power / other construction-related energy**: electrification and environmental optimisation of small equipment, office containers and cranes
4. **Construction machinery / heavy goods vehicles**: conversion of construction machinery and heavy goods vehicles to renewable energy sources
5. **Asphalt mixing plants**: conversion of asphalt mixing plants to renewable energy sources
6. **Stone and gravel plants**: conversion of stone and gravel plants to renewable energy sources
7. **Concrete plants / other production**: conversion of concrete plants and other production to renewable energy sources
8. **Efficiency increase**: leveraging energy efficiency potential through introduction of new technologies such as electrification

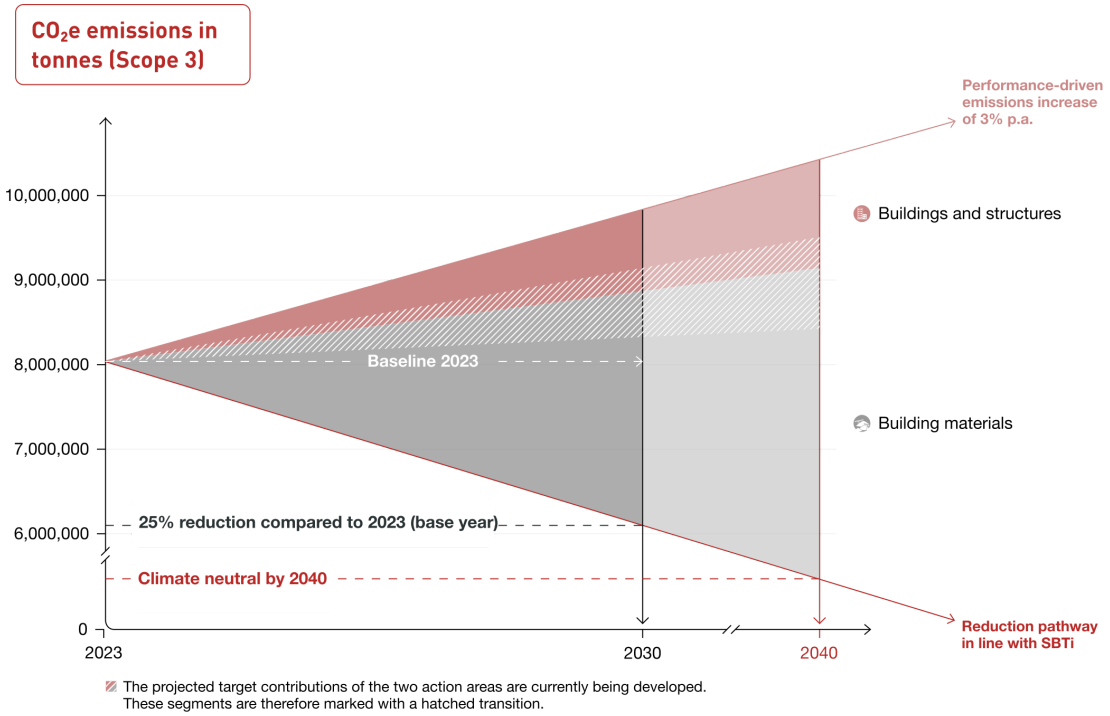
The CO_2e reduction potentials for Scope 1 and Scope 2 emissions were determined for each action area on the basis of a future energy target scenario – both for the interim target year 2030 and the target year 2040. The calculations took into account existing and foreseeable technological developments as well as the expected availability of relevant energy sources. Taking into account additional emissions growth resulting from increased output, the following reduction pathway – broken down by reduction potential per action area – results for achieving the SBTi target by 2030 (for Scope 1 and Scope 2 emissions).

Transition plan



To manage the plan, STRABAG has developed an internal set of KPIs to measure the effectiveness and progress of the ongoing actions. At present, progress is on track in five of seven action areas or shows only minor to moderate deviations. For key actions in the action areas, capital expenditure (CapEx) and operating expense (OpEx) were estimated, taking into account climate policy and energy-market framework conditions. The results of the assessment indicate that implementing the reduction pathway is generally financially feasible under the scenarios considered and – based on the assumptions made – may be associated in the long term with lower aggregated cash outflows compared with a business-as-usual pathway.

Scope 3 emissions account for around 90% of the corporate carbon footprint of STRABAG SE. The main drivers are purchased goods and services (in particular building materials) as well as the use phase of buildings and infrastructure. The reduction pathway for **Scope 3 therefore focuses on the action areas "Structures" and "Building materials"**, with the direct actions "Increasing energy efficiency and circularity of structures" and "Increasing the use of low-emission building materials", supplemented by the indirect actions "Customer engagement", "Data basis for sustainable procurement", "Supply chain engagement" and "Research and development". Taking into account emissions growth resulting from increased output, the following reduction pathway results for achieving the SBTi target by 2030 for Scope 3 emissions. As the target contributions of the two action areas "Structures" and "Building materials" are currently being developed, the two graphical areas are shown with a hatched transition.



As a construction company, the consideration of locked-in emissions is also of central importance for STRABAG, as the structures built generally have a service life of several decades. The conversion of the Group's own production facilities for building materials such as asphalt and concrete from fossil to renewable energy sources is taken into account in the transition plan, meaning that no significant locked-in emissions are expected in this area in the long term. The situation is different for STRABAG's actual products, particularly buildings that have been constructed, whose emissions are accounted for under Scope 3.11 (use of sold products). Actions to reduce product-related emissions have already been developed. Their effectiveness, however, depends largely on framework conditions within the construction and real estate industry – particularly with regard to statutory sustainability standards for buildings and the requirements of commissioning clients. As STRABAG has only limited influence over these external factors, this represents an uncertainty factor for the transition plan, particularly with regard to achieving the targets for reducing Scope 3 emissions.

The EU Paris-Aligned Benchmark Regulation (EU PAB) does not apply to STRABAG.

Policies

ESRS E1-2

The Group-wide Environmental and Energy Policy was revised in 2025 and approved by the Management Board of STRABAG SE in the first quarter of 2026. The policy sets out fundamental principles and action areas relating to climate and decarbonisation, circular economy, biodiversity and ecosystems, and sustainable supply chains. The document also defines responsibilities for implementing these action areas.

A central premise of the document is that sustainable business practices form the basis for future-proof business models and for actively adapting to the impacts of climate change. In the area of climate and decarbonisation, the document includes a range of targets and action areas in line with the transition plan. These include replacing fossil energy sources with renewable energy sources and increasing energy efficiency in all company processes. In addition to action areas within the company's own operations, the document also describes measures to be implemented in the upstream and downstream supply chain. Based on the most significant emissions categories, engagement measures with customers and suppliers – as well as the expanded offering of low-CO_2e buildings and infrastructure – are incorporated into the Environmental and Energy Policy.

The policy also aims to further develop data collection and establish effective management systems in order to continuously improve the management of identified environmental impacts. Responsibility for implementing the defined targets lies with the CEO. As part of the management review of the environmental and energy management system, the document is regularly assessed with regard to its suitability and effectiveness.

Actions and projects

ESRS E1-3

To achieve the stated reduction targets, key actions linked to targets for 2030 and 2040 have been defined for each action area. The following table shows the planned actions as well as the short-term climate targets for the individual action areas.

Decarbonisation actions

Scope	Action area	Action	Scope of application	2030 target
Scope 1 & Scope 2	Buildings	Climate-neutral operation of administration buildings (own and third-party) used by the Group	Concerns existing buildings and new builds (own and third-party) managed by Corporate Real Estate Management in all countries where the Group operates	85,0%
	Passenger cars / commercial vehicles	Conversion of vehicle fleet to renewable energy sources	Concerns the employee vehicle fleet at all divisions, central divisions and central staff divisions as well as commercial vehicles at the operating divisions (in all countries where the Group operates)	50,0%
	Construction site power / other construction-related energy	Energy-optimised container office	Concerns the organisational entity BMTI as well as all divisions that use construction site power (in all countries where the Group operates)	33,3%
		Electrification of small equipment		66,7%
		Energy-efficient crane lighting during purchase of new cranes		100%
	Construction machinery / heavy goods vehicles	Conversion of construction machinery and heavy goods vehicles to renewable energy sources	Concerns the organisational entity BMTI as well as all divisions that use construction machinery (in all countries where the Group operates)	66,7%
	Asphalt mixing plants	Conversion of asphalt mixing plants to renewable energy sources	Concerns the organisational entity BMTI as well as all divisions that with own production facilities	33,3%
	Stone and gravel plants	Conversion of stone and gravel plants to renewable energy sources		50,0%
	Concrete plants / other production	Conversion of concrete plants and other production to renewable energy sources		50,0%
	Efficiency increase	Potential to increase energy efficiency through conversion to the above-mentioned technologies		
Scope 3	Structures	Direct actions: increasing energy efficiency and circularity of structures (buildings, civil engineering works)	Affects operational entities	Currently being developed
		Indirect actions: customer engagement; research and development (3.1 & 3.11)	Affects the upstream and downstream supply chain (suppliers, clients)	
	Building materials	Direct actions: increasing the use of low-emission building materials (steel, cement, concrete, asphalt, alternative materials)	Affects operational entities	
		Indirect actions: customer engagement; data basis for sustainable procurement; supply chain engagement; research and development	Affects the upstream and downstream supply chain (suppliers, clients)	

A set of specific metrics was defined in 2024 to track implementation of the planned Scope 1 and Scope 2 actions and to determine their CO_2e reduction potential. In the year under review, we developed a process for monitoring and reporting these metrics. At the end of 2025, the target–actual comparison of the metrics was reported to the Steering Committee Sustainability and to the Management Board.

With regard to Scope 3 actions, the distinction between direct and indirect actions is relevant, as STRABAG's decision-making influence varies depending on the type of business activity. With in-house developments, decision-making and management authority lie with STRABAG. Both the design of the structures and the selection of construction materials used are subject

to the company's own planning and purchasing decisions. Accordingly, direct measures to increase energy efficiency and implement circular economy principles can be implemented here. In the case of third-party developments, by contrast, the final decision-making authority lies with the client. Here, primarily indirect actions are possible, in particular through targeted customer engagement and the early involvement of relevant stakeholders.

Climate policy and the energy sector as a framework

For the key actions in the individual action areas (Scope 1 and Scope 2), capital expenditure (CapEx) and operating expense (OpEx) for the period 2023 to 2030 were estimated at Group level as incremental additional or reduced expenditure compared with a business-as-usual pathway. Cost developments depend largely on climate policy and energy market framework conditions. To reflect different possible development pathways, the following three scenarios of the Network for Greening the Financial System (NGFS) were used. The underlying transition pathways were calculated using the REMIND-MAgPIE model developed by the Potsdam Institute for Climate Impact Research (PIK):

1. **Net Zero 2050 (NZ)**: In this scenario, climate policy is consistently aligned with the 1.5 °C pathway. This is associated with high CO_2 prices, a massive expansion of renewable energy and a strong decline in fossil fuel demand. Emissions fall immediately and reach net zero by the late 2030s.
2. **Delayed Transition (DT)**: In this scenario, climate policy is significantly tightened only after 2030. CO_2 prices therefore rise abruptly and sharply after 2030. Investments in renewable energy, electrification and hydrogen increase massively within a short period of time. Demand for fossil fuels declines abruptly. Emissions fall only from the 2030s onwards. Global warming stabilises at around 2 °C.
3. **Current Policies (CP)**: In this scenario, only actions that have already been adopted today are implemented under climate policy. CO_2 prices therefore remain low. Investments in renewable energy, electrification and hydrogen increase but remain at a low level. Demand for fossil fuels remains high. The phase-out of coal, oil and gas is significantly delayed. As a result, emissions decline slowly and the world moves towards a > 3 °C pathway by 2100.

The scenarios aren't weighted but are instead used as equally valid development pathways to illustrate a range of possible financial impacts.

The calculations show the additional and reduced costs resulting from the reduction actions. On the investment side, cost differences arise primarily from the retrofitting of existing facilities and from higher acquisition costs compared with conventional fossil-based technologies. Capital expenditures are fully recognised in the year in which they occur and are not spread over the useful life of the facilities. Operating expenses represent the difference in energy costs (energy consumption × energy price) along the reduction pathway compared with a business-as-usual pathway (without transition actions).

The presentation is based on nominal values, taking into account assumed price and cost developments. Project-specific discounting of future cash flows in order to derive investment indicators (e.g. net present value, internal rate of return) is not the subject of this analysis. The calculation serves to provide a strategic assessment of the financial impact of the greenhouse gas reduction pathway at Group level. It does not constitute a traditional economic evaluation of individual investment projects, but rather a comparative analysis of aggregated cash flows under different scenarios.

The calculations are based on simplifying assumptions and forecasts (e.g. regarding technology availability, price developments and economies of scale). For example, the expected economies of scale were derived from external studies and internal expert assessments and may be higher or lower depending on actual market penetration. In addition, the calculations are based on an assumed future energy target scenario that reflects expected technological developments and is based on internal expert assessments. This target scenario is associated with forecasting uncertainties, as it is not yet clear which technological solutions will ultimately prevail in the market. This applies in particular to production facilities and construction machinery, where several low-emission technologies are still in the development and/or pilot phase – electrified solutions and hydrogen- or biomass-based approaches, for example. Political framework conditions further complicate reliable future planning, including the lack of planning certainty for hydrogen infrastructure projects, implementation timelines, import strategies and the development of dedicated pipeline and storage networks, as well as the continuing debate over technology neutrality in energy and industrial policy. Against this background, the calculations relating to the transition are still subject to considerable

uncertainty. The figures presented should therefore be understood as an initial estimate, the underlying data basis of which will be continuously refined and improved in the coming years.

Depending on the scenario, capital expenditures up to 2030 amount to between approximately € 1 billion and € 1.1 billion. Operating expenses show savings of between approximately € 160 million and € 320 million. Only an ambitious climate policy with sufficiently high CO_2e prices will result in the cumulative additional and reduced costs of the transformation measures balancing out compared to the business-as-usual path by 2040. With delayed or less ambitious climate policy, this point shifts to a later period between 2045 and 2055.

Differences between the scenarios affect the individual action areas to varying degrees, particularly due to differences in CO_2e and energy prices. In particular, the conversion of asphalt and concrete mixing plants can achieve sufficiently low renewable energy prices (especially industrial electricity prices) only in the scenario of an ambitious climate policy, enabling a cost-neutral or cost-advantageous conversion of the facilities compared with fossil energy sources. In addition, rapid technological market development is required both for plant technology and for large construction machinery so that the assumed economies of scale can take effect and the costs of the transition (CapEx) can decrease accordingly.

In the remaining action areas – buildings, passenger cars and commercial vehicles, construction site electricity, and stone and gravel plants – it can be assumed in all scenarios that the operational expense savings (OpEx), arising primarily from the technological shift to electrification and the associated efficiency gains, will be sufficient to offset the additional capital expenditure (CapEx). Nevertheless, it is also evident here that the more ambitious the climate policy framework conditions, the sooner this balance will be achieved.

Against this background, STRABAG advocates reliable and ambitious climate policy that provides companies with planning certainty and investment security. Key prerequisites include a future-proof emissions trading system (ETS 1 and ETS 2) and targeted investments in the expansion of renewable energy sources and the associated grid infrastructure in order to effectively support climate-friendly innovation. The scenario analysis also makes clear that the consistent reduction of fossil fuel subsidies strengthens key market-based transition incentives and thus facilitates the economic implementation of the reduction pathway for STRABAG.

As STRABAG's products and services are to a considerable extent commissioned by public-sector clients, public procurement policy plays an essential role. It has a decisive influence on which climate-friendly solutions can be implemented in the market and thus represents a key lever for the successful implementation of the transition pathway.

STRABAG continuously implements actions to mitigate the impacts of the identified physical and transition-related climate risks. **Changes to the climate are already noticeable today. STRABAG responds to these developments with appropriate actions and evaluates their effectiveness.** The Group-wide physical and transition climate risk analysis was reviewed again in the reporting year. STRABAG continues to advance the management of its impacts, risks and opportunities. Additional actions and targets for mitigating material risks and impacts as well as for leveraging opportunities will be developed and disclosed in the coming years.

As these actions are not necessarily implemented as stand-alone, project-based activities and therefore are not subject to specific budgeting, it is not possible to say exactly which financial resources are allocated specifically to which of the actions listed below. Instead, they form an integral part of our ongoing business operations which are seamlessly incorporate into regular processes. Individual actions are, however, partially reflected in the CapEx and OpEx calculations presented above.

Material climate-related risks and opportunities	Current actions	Scope of application
Extreme weather events, heat and heavy rainfall	Implementation of organisational and technical occupational safety actions to raise awareness of climate-related hazards on the construction site	Group-wide with a focus on operating entities
	Increased integration of a Group GIS (geographic information system) to identify areas and regions with flood potential and evaluate potential hazards at an early stage	
Drought and rising temperatures	Conducting location- and project-specific climate risk analyses	Group-wide
	Development and preparation of informative guidelines for project staff to incorporate climate risks into project planning	
Future mandates and regulation	Ongoing interdisciplinary collaboration between specialist departments	Group-wide
	Establishment of an internal network on ESG regulations	
Demand for low-carbon products and services	Implementation of partnering models to ensure that requirements are incorporated into structural planning at an early stage	Group-wide, Supply chain
	Testing, implementing and expanding low-emission business activities and construction methods	
Rising raw material and energy costs	Conducting economic feasibility studies on converting production facilities to alternative energy sources	Group-wide, Supply chain
	Piloting and deploying alternative powertrain technologies for construction machinery	
	Strengthening the Group's own building materials production (mineral and renewable raw materials)	
Potential for revenue growth through new business models	Consolidation of an internal service offering for the development of new business models	Group-wide
	Implementation of the adASTRA intrapreneurship programme	
Risk minimisation through sustainability strategy and target setting	Conducting climate-related risk and resilience analyses and aligning strategy with science-based targets	Group-wide

Targets

ESRS E1-4

More about our SBTi-validated climate targets for 2030

Find out more

STRABAG is convinced that credible climate targets must follow a uniform standard and be externally validated. For this reason, we have committed to participating in the Science Based Targets initiative (SBTi). The targets were validated by the SBTi in the first quarter of 2026.

As part of our transition plan, we use the SBTi methodological framework as the basis for our science-based reduction pathway to 2030. This pathway was developed by an internal Group working group on the energy transition under the leadership of a member of the Management Board and with the involvement of relevant divisions, central divisions and central staff divisions. In the fourth quarter of 2025, an internal progress measurement was carried out for the first time and communicated to the Steering Committee Sustainability and the Management Board. Owing to STRABAG's diversified business model, the cross-sector standard is applied.

The base year selected is 2023, with a baseline value of 927,472 t CO_2e for Scope 1 and Scope 2 emissions (market-based). The base year and the underlying data for the reduction pathway are based on the energy consumption data for the 2023 financial year. Since 2024, STRABAG has applied new conversion factors for calculating greenhouse gas emissions. As a result of the new calculation method, the baseline value for 2023 decreases from 962,944 t CO_2e to 927,472 t CO_2e (-3.68 %). The reason for this is the update of emission factors in the revised internal calculation tool CarbonTracker as part of expanded CSRD reporting requirements. Due to a system change in the database, changes to the reporting boundaries cannot be ruled out. In the base year, there were no unusual capacity utilisations or other exceptional events that would have distorted emissions. When setting the targets, an annual increase in output was taken into account and this output growth was associated with a 50% increase in emissions. Our target for Scope 1 and Scope 2 emissions corresponds to an ambition level that, from a scientific perspective, is necessary to limit global warming to 1.5 °C.

For Scope 3 emissions, the targets were developed in accordance with the well-below-2-degrees scenario (WB2C), using 2023 as the base year. The baseline value for Scope 3 emissions was determined at 8,013,680 t CO_2e for 2023.

The reporting boundaries of the greenhouse gas emissions considered in the reduction targets are consistent with the boundaries of the other reported greenhouse gas emissions. In line with the categories of the Greenhouse Gas Protocol (GHG), we distinguish between:

- **Scope 1 & Scope 2**: Compared with our base year 2023 (of which Scope 1 accounts for 83% and Scope 2 for 17%), we aim to reduce our Scope 1 and Scope 2 emissions by 42% by 2030 in accordance with the 1.5 °C scenario. By 2030, the contribution from Scope 1 to achieving the targets amounts to 32%, that of Scope 2 to 10%.
- **Scope 3**: Starting from the base year 2023, STRABAG aims to reduce Scope 3 emissions by 25% by 2030 in accordance with the WB2C scenario.

From 2030 onwards, the reduction target for Scope 1 & Scope 2 as well as the Scope 3 reduction target will be aligned with a 1.5 °C scenario. Climate neutrality in the target year 2040 encompasses the reduction of greenhouse gas emissions across the entire value chain (Scope 1, 2 and 3).

To achieve our targets for Scope 1, 2 and 3 emissions, we have identified specific action areas and defined concrete actions each of them. Progress in achieving the targets for Scope 1 and Scope 2 emissions is presented in the respective action areas. The action area "Efficiency increase" has been integrated into the other action areas, as its content is attributable to both scopes. The target contribution and progress measurement for the Scope 3 targets are currently being developed.

The following table shows their respective progress and contribution to target achievement.

Progress and contributions to achieving the emissions reduction targets

The shift in the energy mix as part of the transition results in both negative and positive contributions to target achievement. Negative contributions to target achievement in Scope 1 result from the replacement of fossil fuels, while positive contributions in Scope 2 result from the associated increase in electrification.

Action areas	Scope	Contribution to target achievement by 2030[1]	Total contribution[1]		Progress 2025
		t CO_2e[2]	t CO_2e[2]	%	%
Buildings	Scope 1	-3,454	-12,037	2.0	0.5
	Scope 2	-8,583			
Passenger cars / commercial vehicles	Scope 1	-103,220	-95,651	15.9	-0.2
	Scope 2	7,569			
Construction site power / other construction-related energy	Scope 1	-14,433	-90,172	15.0	5.2
	Scope 2	-75,739			
Construction machinery / heavy goods vehicles	Scope 1	-240,450	-236,965	39.3	4.0
	Scope 2	3,485			
Asphalt mixing plants	Scope 1	-107,645	-133,449	22.1	5.1
	Scope 2	-25,804			
Stone and gravel plants	Scope 1	-428	-26,447	4.4	3.8
	Scope 2	-26,019			
Concrete plants / other production	Scope 1	-1,856	-8,025	1.3	0.9
	Scope 2	-6,169			
Total	**Scope 1**	**-471,486**	**-602,747**	**100**	**19.4**
	Scope 2	**-131,261**			
Structures	Scope 3	Currently being developed			
Building materials	Scope 3	Currently being developed			

[1] The metrics for each action area differ from those of the previous year because the previously separate action area “Efficiency increase” has been integrated into the individual action areas.

[2] In accordance with Kyoto Protocol

Overall, Scope 1 and Scope 2 emissions have decreased both relative to output and in absolute terms compared to the base year 2023. This means that nearly 20% of the target contributions for 2030 have already been achieved. Progress in the action areas of buildings, construction site power and production facilities is primarily attributable to a significant decline in Scope 2 emissions resulting from the switch to green power contracts in several countries where the Group operates. In the action area of asphalt mixing plants, two plants were also converted from lignite dust to gas, one plant from heating oil to gas. This led to a reduction in Scope 1 emissions, despite rising production volumes. In the action area of passenger cars and commercial vehicles, the electrification of the fleet that has already begun will result in a reduction of the CO_2e footprint only in the coming years. The background to this is that – despite a decline in the number of diesel passenger cars – challenges remain in mapping consumption data, making a reliable interpretation difficult. The reported progress in construction machinery results primarily from improved data collection, particularly from a more precise delineation of external diesel consumption by subcontractors.

Given these remaining uncertainties in data collection, we assess our progress not only based on our actual CO_2e emissions in the reporting year (compared to the base year 2023), but also using our set of KPIs and those actions whose reduction potential will only be reflected in actual CO_2e emissions in the coming years. These include pilot projects and feasibility analyses, strategic implementation plans for the decarbonisation of our administrative

locations, and transition projects that are currently in the process of implementation. Although these initiatives do not yet show an immediate reduction in emissions in the current financial year, they establish the technological and organisational prerequisites required to achieve our medium- and long-term climate targets. For this reason, this progress assessment is also carried out qualitatively for each action area, as illustrated in the table below. The assessment covers not only the implementation status of the ongoing initiatives but also takes into account external framework conditions – in particular market availability, technological maturity and the prevailing energy price structure for the economic implementation of relevant solutions – on which we are highly dependent.

Action are	Progress	Comment
Buildings	● ● ●	The conversion of Group-owned sites is progressing as planned. Actions such as the expansion of PV systems and the extension of EV charging infrastructure are advancing successfully. For leased properties, refurbishment actions can only be influenced to a limited extent, which is why sustainable minimum standards for new leases were adopted in 2025. For administrative locations owned by the Group, the SE Management Board approved a structured decarbonisation approach.
Passenger cars / commercial vehicles	● ● ○	Continuous transition to electrification with minor deviations from target. There are currently still limitations, particularly for commercial vehicles, due to the limited driving ranges available on the market. The steady expansion of the product portfolio for the existing fleet, however, taking into account technological developments in the market (e.g. battery technology), is increasingly enabling applications with high range requirements.
Construction site power / other construction-related energy	● ● ○	The transition is taking place gradually due to the growing portfolio of manufacturers and shows only minor deviations from the target.
Construction machinery / heavy goods vehicles	● ○ ○	Conversion plans and implementation directives are in place for HVO (hydrotreated vegetable oil). The availability of HVO meeting high sustainability standards is not ensured in all countries, however. In addition, price fluctuations and tax-related framework conditions make its economic use more difficult. For large electric construction machinery, market-ready availability at the required scale is currently lacking. At present, the first electrified large construction machines from various manufacturers are being tested under real operating conditions on construction sites and in production facilities. The introduction of hydrogen-powered construction machinery is delayed, as both the economic availability of hydrogen and the infrastructure fall short of the forecasts made in 2023. As a result, the market penetration of hydrogen-powered large construction machines beyond 2030 is subject to considerable uncertainty. Moreover, no corresponding construction machines are currently available on the market. As part of a pilot project, STRABAG is currently testing a hydrogen-powered wheel loader, including refuelling infrastructure, at its Gratkorn quarry.
Asphalt mixing plans	● ○ ○	Actions to reduce emissions – such as improving efficiency or switching to energy sources with lower specific emission factors – are being implemented within the limits of economic feasibility. The transition to renewable energy sources is proceeding slowly, however, as no economically viable alternatives are available on the market at present and it remains unclear which of the potential solutions – such as electrification, hydrogen or biomass – will prevail among plant manufacturers in the long term. At the same time, however, STRABAG is conducting pilot projects, feasibility analyses and research activities on various technology options. The potential use of biofuels – currently the only measure that could be implemented quickly – is limited not only by high prices and resource constraints but also by tax-related framework conditions, resulting in considerable uncertainty regarding medium- and long-term availability and economic viability.
Stone and gravel plants	● ● ●	Due to the ongoing transition to green electricity, implementation is proceeding as planned.
Concrete plants / other production	● ● ●	Due to the ongoing transition to green electricity, implementation is proceeding as planned.

Metrics

Energy and CO_2e data for the Group are systematically recorded and analysed using CarbonTracker, a software solution developed in-house by STRABAG in 2012. The software is regularly updated and further developed. In the 2024 financial year, CarbonTracker was fundamentally revised in response to changing reporting requirements under the CSRD Directive and the Group's objective of improving data quality. It was further optimised in 2025. These optimisations primarily relate to the recording of accounting data reflecting the progress of ongoing reduction actions. In addition, the data basis was optimised and expanded in the areas of waste disposal, HVO and the use of green electricity, as well as emissions from the use of products (Scope 3.11).

A detailed description is provided in the following sections. The calculation of the energy data published here is largely carried out through our internal ERP system. The energy expenses recorded there are converted into corresponding calorific values using a financial calculation basis. For this purpose, quarterly average prices are determined at country level and used for the conversion. To present Scope 1 and Scope 2 emissions, the calculated calorific values are then linked to the corresponding CO_2e emission factors and mapped in CarbonTracker down to the smallest organisational entity. Given the complexity involved in compiling energy and greenhouse gas data – particularly in a diversified Group of our size – minor deviations may occur.

ESRS E1-5

The functionalities of CarbonTracker enable a detailed analysis of energy consumption across the Group. According to the evaluations for 2025, total energy consumption amounted to 3,290,497 MWh, of which around 7.48% was provided through the generation of renewable energy. This corresponds to an increase in energy from renewable sources of 3.48% compared with the previous year. Particularly noteworthy is the significant increase in the share of green electricity from 3.16% to 6.94%, as well as the proportion of solar energy used for internal consumption, which amounted to 3,187 MWh. A further 1,646 MWh was fed into public grids.

The volume of solar energy produced in-house in 2025 grew to 4,833 MWh compared with the previous year (+55.15%), driven mainly by the commissioning of additional solar power plant sites.

Own energy production

	2024	**2025**
Solar energy (MWh)	3,115	4,833

Energy sources in the fuel category, at 1,849,736 MWh, represent the most significant share for the Group. Of this amount, 13,638 MWh can be identified through detailed analysis as fuel from renewable sources (HVO).

Energy consumption and energy mix

	2024	**2025**
Fossil energy		
(1) Fuel consumption from coal and coal products (MWh)	533,526	542,239
(2) Fuel consumption from crude oil and petroleum products (MWh)	2,089,585	1,980,195
(3) Fuel consumption from natural gas (MWh)	305,123	305,593
(4) Fuel consumption from other fossil sources (MWh)	29,994	40,604
(5) Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	269,707	161,123
(6) Total fossil energy consumption[1] (MWh)	3,227,936	3,029,753
Share of fossil sources in total energy consumption (%)	95.20	92.08
Nuclear energy		
(7) Consumption from nuclear sources (MWh)	43,555	14,600
Share of consumption from nuclear sources in total energy consumption (%)	1.28	0.44
Renewable energy		
(8) Fuel consumption from renewable sources, including biomass (MWh)	9,883	14,714
(9) Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	107,295	228,243
(10) Consumption of self-generated non-fuel renewable energy (MWh)	2,197	3,187
(11) Total renewable energy consumption[2] (MWh)	119,375	246,144
Share of renewable sources in total energy consumption (%)	3.52	7.48
Total energy consumption[3] (MWh)	**3,390,866**	**3,290,497**

[1] Calculated as the sum of lines 1 to 5

[2] Calculated as the sum of lines 8 to 10

[3] Calculated as the sum of lines 6, 7 and 11

STRABAG's business activities were assigned to the individual NACE sections with a higher level of detail compared with 2024. As a result, 87% are classified under NACE section F, 7% under NACE section M, and 5% under NACE section C. Energy intensity per thousand € of revenue amounts to 0.18. The net revenue used to determine this metric corresponds to the revenue presented in the consolidated income statement.

Energy intensity

	2024	**2025**	**% 2025 / 2024**
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh / T€)	0.19	0.18	-7.46

Greenhouse gas emissions

ESRS E1-6

The CO_2e inventory for the 2025 financial year relates to the Group's full scope of consolidation and includes the CO_2e emissions generated in 70 countries. Emissions are reported in Scope 1, Scope 2 and Scope 3 as defined by the GHG Protocol and in accordance with the CSRD Directive.

Notes on Scope 1 and Scope 2 emissions

Scope 1 and Scope 2 emissions are calculated on the basis of the Group-wide energy consumption recorded in CarbonTracker. The calculation follows a spend-based approach. For locations with green electricity supply contracts, an emissions-free electricity supply is taken into account in the market-based calculation of Scope 2 emissions. Compared with the previous year, the share of such locations was expanded from parts of Germany and Austria to additional regions in Poland, Romania, Serbia, Croatia, Hungary, the Czech Republic and Slovakia.

Greenhouse gas accounting is carried out by converting energy values using specific emission factors. These are mainly provided by the database operator Climatiq, which prepares them in accordance with the requirements of the GHG Protocol.

Scope 2 emissions from purchased heat and purchased electricity are reported using both the market-based and the location-based method. In addition, emissions from category 3.3 "Fuel- and energy-related activities not included in Scope 1 or Scope 2" are reported using the market-based calculation approach. The location-based calculation is based on the emission factor database of the International Energy Agency (IEA), whose values are reviewed by STRABAG for currency every two years.

This database is also used for country-specific emission factors for district heating. With regard to the market-based calculation, supplier-specific emission factors are applied for locations with green electricity tariffs, provided the corresponding guarantees of origin (certificates) are available. As a result, bundled contractual instruments account for 57% of market-based Scope 2 emissions. Where no tariff-specific emission factors are available, the emission factor used – provided by the Association of Issuing Bodies (AIB) – is based on the residual mix. This residual mix takes into account green electricity shares already contractually allocated elsewhere and therefore removed from the overall mix. As the residual mix is not available for all Group countries, the IEA emission factor is applied for the remaining countries.

Biogenic CO_2 emissions are reported separately and amount to 6,954 t CO_2 (market-based) and 14,669 t CO_2 (location-based). Of this total, 3,792 t CO_2 arise from Scope 1, 3,162 t CO_2 (market-based) or 10,876 t CO_2 (location-based) from Scope 2, and 0.12 t CO_2 from Scope 3. For lignite dust, emission factors provided by local suppliers are also used.

Notes on Scope 3 emissions

Upstream and downstream Scope 3 emissions for relevant categories were published for the first time in 2024 as part of reporting in accordance with the CSRD. For the 2025 reporting year, categories 3.7 “Employee commuting”, 3.9 “Downstream transportation and distribution”, and 3.10 “Processing of sold products” were classified as not significant. The classification is based on the significance criterion of size, as these categories together account for less than 5% of the total footprint. Other categories of similar magnitude remain classified as significant due to additional criteria such as influenceability and awareness potential. For categories classified as not significant, the emissions of the previous year are carried forward. A recalculation is carried out in the event of significant structural changes within the Group, but at least every three years.

For the six most important building materials used by the Group – asphalt, bitumen, stone/gravel, steel, concrete and cement, and timber – prices are first determined and then converted into CO_2e quantities using suitable quantity-based emission factors. For the remaining upstream Scope 3 emissions as well as for certain downstream Scope 3 categories (e.g. 3.13 “Downstream leased assets” and 3.15 “Investments”), a cost-based approach is applied. In combination with cost-based, country-specific emission factors, the corresponding emission values are determined. The calculation of category 3.3 (“Fuel- and energy-related activities not included in Scope 1 or Scope 2”) is based on the same energy quantities used for Scope 1 and Scope 2, but applies separate emission factors that reflect emissions generated during the production and transport of the energy carriers and electricity used. For category 3.3, a distinction is made between market-based and location-based emission factors. The greenhouse gas inventory under E1-6, however, presents only the market-based approach, as required by the mandatory ESRS table template.

In the 2025 reporting year, the emission factors for category 3.5 “Waste generated in operations” were also adjusted, taking into account disposal assumptions based on literature sources and internal expert knowledge. These replace the conservative emission factors used for the 2024 financial reporting, which had been applied because the methodology for calculating disposal rates had not yet been fully validated at that time. The adjustments underline our ongoing efforts to further develop and improve the underlying data basis. As a result of the adjustments described, the proportion of primary data decreased from the original 2% to 0.17%.

Emissions for Scope 3 Category 5

	2025 (new calculation method)	2024 (new calculation method)	2024 (old calculation method)
Emissions for Scope 3 Category 5 (t CO_2e)	16,686	16,000	229,093

For category 3.11 “Use of sold products”, which considers emissions arising during the use phase of construction projects implemented by STRABAG as general contractor, a more detailed calculation was carried out and the relevant main business field groups were expanded. This was based on the extensive experience of STRABAG’s experts from the respective areas.

The activities of category 3.14 are not part of STRABAG’s business model and were therefore identified as not relevant.

The results of the risk analyses conducted to date confirm that the most significant transition impacts continue to correspond to the largest Scope 3 categories (see upstream “Rising raw material and energy costs” and downstream “Demand for low-carbon products and services”). As part of the annual review of the transition risk analysis, Scope 3 data are continuously incorporated in order to further refine the Group’s understanding of transition-related climate risks.

					Milestones and target years			
	Base year (2023)	**2024**	**2025**	**% 2025 / 2024**	**2025**	**2030**	**2040**	**Annual target compared to base year**
Scope 1 GHG emissions (t CO_2e)								
Gross Scope 1 GHG emissions (t CO_2e)	772,298	790,336	777,946	-1.57				
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0.00	0.00	0.00					
Scope 2 GHG emissions (t CO_2e)								
Gross location-based Scope 2 GHG emissions (t CO_2e)	150,171	156,306	146,722	-6.13				
Gross market-based Scope 2 GHG emissions (t CO_2e)	155,174	158,504	89,283	-43.67				
Scope 3 GHG emissions (t CO_2e)								
Significant Scope 3 GHG emissions	9,910,025	9,053,179	8,586,371	-5.16				
3.1 Purchased goods and services	5,795,372	5,474,338	5,365,165	-1.99				
3.2 Capital goods	193,237	208,674	213,943	2.52				
3.3 Fuel and energy-related activities (not included in Scope1 or Scope 2)[1]	166,679	168,456	155,201	-7.87				
3.4 Upstream transportation and distribution	61,539	64,088	62,791	-2.02				
3.5 Waste generated in operations	236,013	229,093	16,686	-92.72				
3.6 Business travel	33,187	33,055	34,994	5.87				
3.7 Employee commuting	62,676	59,183	59,183	0.00				
3.8 Upstream leased assets	126,528	122,222	126,205	3.26				
3.9 Downstream transportation and distribution	85,674	90,778	90,778	0.00				
3.10 Processing of sold products	20,741	21,978	21,978	0.00				
3.11 Use of sold products	2,218,308	1,704,432	1,539,948	-9.65				
3.12 End-of-life treatment of sold products	687,236	677,545	714,667	5.48				
3.13 Downstream leased assets	11,219	12,329	11,541	-6.39				
3.15 Investments[1]	211,617	187,007	173,291	-7.33				
Total GHG emissions								
Total GHG emissions (location-based) (t CO_2e)	10,839,047	10,027,735	9,532,543	-4.94				

					Milestones and target years			
	Base year (2023)	**2024**	**2025**	**% 2025 / 2024**	**2025**	**2030**	**2040**	**Annual target compared to base year**
Total GHG emissions (market-based) (t CO_2e)	10,837,497	10,002,019	9,453,600	-5.48	10,153,795	8,444,539		-3.15

[1] Only market-based values are reported for this category.

The greenhouse gas intensity per thousand € revenue is 0.51 (location-based and market-based). The net revenue used to determine the metric corresponds to the revenue presented in the consolidated income statement.

Greenhouse gas intensity

	2024	**2025**	% 2025 / 2024
Total GHG emissions (location-based) per net revenue (t CO_2e) / T€)	0.58	0.51	-12.18
Total GHG emissions (market-based) per net revenue (t CO_2e) / T€)	0.57	0.51	-11.38

ESRS E1-7

STRABAG's plants and facilities are currently not required to participate in the European Emissions Trading System (EU ETS). Despite all efficiency and substitution actions, it must be assumed that a baseline level of difficult-to-avoid greenhouse gas emissions that will have to be offset may remain in the medium term. To achieve the climate targets, an internal offsetting guideline was therefore developed to regulate the future purchase of carbon credits across the Group. This guideline stipulates that investments may only be made in Gold Standard–certified projects. Alternatively, in line with the internal requirements, it is also possible to purchase EU carbon allowances under the EU Emissions Trading System. At present, carbon credits or EU carbon allowances are not purchased to offset STRABAG's own emissions. Such actions are carried out exclusively on behalf of customers who wish to use them to optimise their own CO_2e inventory. In these cases, STRABAG acts within the framework of the agreed project requirements and ensures that only Gold Standard–certified projects or EU carbon allowances are considered, as stipulated in the internal offsetting guideline. To date, no proprietary projects have been implemented by STRABAG on the voluntary carbon market.

ESRS E1-8

STRABAG currently does not apply internal carbon pricing.

Sources – Climate Change

United Nations Framework Convention on Climate Change (UNFCCC). (2021). *A Beginner's Guide to Climate Neutrality*. Retrieved 18 February 2026.

Water and marine resources

ESRS 2 SBM-3

Water is needed to provide construction services throughout the entire value chain – from the production of building materials, where large volumes of water become permanently bound in products such as concrete, through operational construction activities in which water is used, among other things, for dust suppression and cleaning, to the operation of buildings and structures, including water-carrying building systems.

Due to its wide-ranging interactions with other environmental topics, the relevance of water has increased even further. STRABAG, as part of the double materiality assessment, therefore carried out a comprehensive reassessment of the topic of water in 2025, identifying material IROs in the process. These include, on the one hand, water consumption – resulting, among other things, from the permanent binding of water in building materials – and, on the other hand, the development of business areas related to water – for example in infrastructure construction and in climate-resilient structures based on the sponge city principle. The analysis was carried out in coordination with internal stakeholders; affected communities were not involved.

Policies

ESRS E3-1

STRABAG has integrated the topic of water into its **Sustainability Policy** as well as its **Environmental and Energy Policy**. Both documents, approved by the Management Board of STRABAG SE, apply throughout the Group and set out key principles and action areas for the responsible management of water. These include, for example, the protection of water bodies and aquatic ecosystems, the reduction of water consumption along our value chain and the development of risk-based measures, including at sites located in water-risk areas. There are currently no specific requirements relating to water in product design or services; these are defined by the respective client.

Water abstraction and discharge are subject to strict legal regulations that vary depending on the country, context and construction project. In addition to the Group-wide provisions contained in the Sustainability Policy and the Environmental and Energy Policy, a range of guidance documents and checklists therefore apply to operational construction activities in individual divisions. Water is also considered a relevant environmental aspect within the meaning of ISO 14001 and is recorded accordingly as part of the Group-wide environmental management system.

Actions and projects

ESRS E3-2

As water is a key resource for the entire construction value chain and therefore for numerous business activities, a wide range of actions is already being implemented. Most of these are required by law and stipulated in project approvals and permits, ensuring that local requirements – for example in water-stress areas – are also taken into account.

In **building materials production**, the current focus lies on actions to reduce process water. Due to existing standards, reducing the proportion of water that is bound as an additive in building materials is outside the company's sphere of influence. Nevertheless, optimisation actions are implemented within the production process to ensure that water abstraction is as efficient as possible – for example through the use of water treatment and recycling systems.

Water management at STRABAG during **construction site operations** is largely project-based. Depending on the size and context of the construction site, various actions are implemented to ensure the protection of water resources and to reduce water consumption. These actions include, among others:

- Use of (mobile) water treatment systems to clean contaminated water and return it to the cycle
- Avoidance of proximity to water bodies when refuelling and storing construction machinery, when handling hazardous substances, etc.
- Substitution of environmentally harmful and water-hazardous substances

Structured monthly water monitoring is carried out as part of the DGNB "Sustainable Construction Site" certification. The analysis of consumption data is to be further developed in the future to derive concrete improvement actions for construction activities.

The **operational phase of buildings** also offers significant leverage for reducing water consumption within the construction value chain. The ÖGNI and DGNB systems as well as the technical assessment criteria for EU Taxonomy compliance include various water-related requirements for buildings, including the installation of water-saving sanitary systems. In this context, STRABAG provides support both through specialised advisory services and through the construction and modernisation of buildings that meet these requirements.

A structured assessment of the costs incurred for implementing actions is currently not possible, as the topic is still at an early stage of knowledge development and concept design. Reporting will be further developed in the future on the basis of reliable data.

Targets

ESRS E3-3

To date, STRABAG has not defined any quantitative targets relating to water and marine resources. The current focus lies on further developing the underlying data basis in order to establish reference values for potential target setting.

Metrics

ESRS E3-4

STRABAG is reporting on the topic of water for the first time in the 2025 financial year. As the data collection processes are still being further developed, the following metrics are largely based on assumptions and estimates derived from cost accounting as well as external sources. Additional sources of information used to determine these assumptions include studies, product data sheets, literature and experience from operational activities. The collection of primary data and volume-based data is being continuously expanded in order to improve the data basis and reporting in the future.

The following metrics currently relate exclusively to production sites for building materials. Real estate locations were classified as not material due to their comparatively very low water consumption relative to production sites and the resulting limited relevance for the metrics.

For construction sites, no reliable estimates of water consumption are yet available for the 2025 reporting year. This is due to the difficulty of quantifying the many influencing factors, which can vary significantly depending on the type of construction activity and the associated resource requirements. These influencing factors include, among other things, the specific materials used, the size and duration of the construction site and the geographical location. Despite the availability of project-related information, these parameters cannot currently be systematically captured across all projects. Given the large number of construction sites and the wide range of potential influencing factors, there is therefore currently no sufficiently robust data basis for producing a reliable estimate of construction-site-related water consumption.

	Unit	**2025**	2024[1]
Total water consumption	m^3	270,969	n.a.
Total water consumption in areas affected by water risks, including areas of high water stress	m^3	39,009	n.a.
Recovered and reused water	m^3	n.a.[2]	n.a.
Stored water	m^3	n.a.[3]	n.a.
Water intensity	m^3 / € mn revenue	14.48	n.a.

1 In the 2025 financial year, STRABAG significantly advanced the collection and processing of water-related metrics and expanded the underlying processes. Due to technical limitations in data availability, a retrospective determination of the metrics for 2024 is not possible.

2 Due to current limitations in data collection, reporting on recovered and reused water is not yet possible.

3 A small number of construction projects implement rainwater harvesting measures in order to reduce piped water consumption. These are not material, however, which is why the collection of stored water is currently not a focus.

Methodological explanations

Reported indicator	Methodological explanation
Total water consumption	Data on water abstraction are based on the commercial records of the production sites. Production sites are defined as those business fields of STRABAG where building materials are produced. These include sand and gravel, asphalt, concrete, precast elements, bitumen emulsion as well as stone and chippings. Water abstraction in these business fields forms the primary data basis for determining water consumption and is applied consistently across all sites considered. Water consumption is determined as the difference between water abstraction and the share of water remaining in the final product as well as process-related evaporation. The assumptions used to derive the volumes of bound water and process-related water consumption are based on internal expert knowledge, experience from comparable production processes and relevant literature sources. As the determination is partly model-based, the metrics are subject to inherent estimation uncertainty.
Total water consumption in areas affected by water risks, including areas of high water stress	To determine the regional restriction of total water consumption, the results of the risk analysis are used as a first step. The calculation of the corresponding water consumption is based on the same methodological assumptions described above.
Water intensity	The indicator is calculated as total water consumption per € million revenue.

Biodiversity and ecosystems

ESRS 2 SBM-3; ESRS E4-1

The construction industry has a significant impact on biodiversity and ecosystems worldwide, particularly along the upstream value chain. This is most evident in the extraction of raw materials used in the production of building materials. Land use and land-use change associated with construction projects represent a major challenge for global flora, fauna and funga. At the same time, soil sealing leads to the loss of important soil functions, which in turn can impair natural habitats and threaten species diversity, particularly in biodiversity-sensitive areas.

Three risk categories are distinguished within the materiality assessment. **Systemic risks** such as climate change, ecosystem degradation and biodiversity loss affect the entire value chain over the long term – directly through raw material scarcity and indirectly through changing regulatory and market conditions. This results in significant dependencies on the availability of natural resources and stable ecological conditions, both of which are essential for business activities. To address these risks, construction projects are subject to legally mandated mitigation and protection actions (e.g. environmental impact assessments) complemented by voluntary standards. **Transition risks** arise primarily from potential regulatory changes, for example stricter material requirements, as well as from climate-related resource scarcity, which can lead to rising raw material costs and supply bottlenecks. **Physical risks** are currently not classified as material, but exist at the interface with climate change and resource availability, as extreme weather events can cause damage to extraction sites and ecosystems.

Alongside these risks, the construction sector also offers opportunities to limit negative impacts on biodiversity and ecosystems and to reduce existing impairments. Through forward-looking planning, consideration of ecological sensitivities and the implementation of legally required mitigation and restoration measures, impacts on flora, fauna and funga can be minimised and impaired ecosystem functions partially restored. Additional actions – such as the resource-efficient use of materials, the reduction of soil sealing and biodiversity-sensitive infrastructure concepts – also help to avoid further pressure on natural habitats and to mitigate regulatory and ecological risks over the course of projects.

STRABAG faces both risks and opportunities arising from the interaction between its business activities and biodiversity protection. In light of global environmental change and stricter legal requirements, precise management of these factors is becoming increasingly important in order to mitigate biodiversity-related risks. The materiality assessment and the site-specific risk analyses serve as initial reference points for enabling a future resilience analysis of the business strategy and business model.

Biodiversity strategically embedded

Forward-looking management provides the foundation for future-proofing the company and continuously aligning corporate strategy with ecological requirements. Within our sustainability strategy, biodiversity is a key topic and we are committed to implementing actions to protect species diversity. This includes the establishment of a Group-wide biodiversity management system and the development of relevant competencies among our employees.

A total of 19 STRABAG sites are located in ecologically sensitive areas and therefore exhibit an elevated nature-related risk profile. The assessment includes location-bound facilities such as asphalt, concrete and emulsion mixing plants as well as landfills, recycling facilities, gravel and sand pits, quarries, aggregate pits and workshops. Identification is based on a further developed methodology that combines site-specific nature-related risks with the geographic location of sites within or near designated biodiversity and protected areas. A detailed breakdown of sites according to identified impacts and dependencies, as well as according to the ecological condition of the respective areas, is currently under development. Such a presentation is not yet possible, as the biodiversity-related data foundation is still being developed. Within the materiality assessment, no significant negative impacts related to land degradation or desertification were identified.

Policies

ESRS E4-2

Due to its close links with other environmental topics, biodiversity is addressed in several cross-cutting policies, particularly in the Environmental and Energy Policy and the Supply Chain Management Policy. All policies apply Group-wide and are approved by the STRABAG SE Management Board. The policies listed below set out the key impacts, risks and opportunities relating to biodiversity within our own operations and along the value chain. Other biodiversity-related aspects that are not material for STRABAG – such as invasive species and desertification – are currently not addressed in these two documents. Likewise, there are no Group-wide policies for land use and agriculture or for oceans and seas. The documents are reviewed at regular intervals with regard to their suitability and effectiveness and adjusted where necessary.

Biodiversity and ecosystems form a central topic within the **Environmental and Energy Policy**, which was revised in 2025 and approved by the STRABAG SE Management Board in the first quarter of 2026. The policy establishes the principle that biodiversity and (water) ecosystems must be protected and promoted across all relevant areas of business activity. The objective is to reduce negative impacts on flora, fauna and funga, strengthen biodiversity across all project phases and at sites located in biodiversity-sensitive areas, raise employee awareness and provide training, ensure the sustainable extraction and use of raw materials and guarantee responsible land use. Responsibility for implementing the Environmental and Energy Policy lies with the CEO.

Also approved in the 2025 financial year was the revised **Supply Chain Management Policy**, which addresses the topic of biodiversity. The policy combines environmental and social responsibility along the entire value chain. Environmental due diligence obligations are intended to protect habitats for both people and wildlife. To ensure transparency in supply chains, STRABAG relies on traceability of materials and services as well as deforestation-free supply chains.

In 2023, the Management Board of STRABAG SE also adopted a Group-wide **position paper** on biodiversity. The document provides clear and practical guidance and recommendations for protecting biodiversity and species in construction projects. Serving as a supporting document to the Environmental and Energy Policy, it provides information to raise employee awareness of biodiversity and offers guidance for environmentally responsible planning and construction processes. Together with the Environmental and Energy Policy, the paper forms the basis for deriving concrete biodiversity protection actions. The guidelines include minimising land consumption, emissions and environmental impacts as well as implementing further actions to reduce impacts on flora, fauna and funga during construction projects.

Actions and projects

ESRS E4-3

Continuous development of biodiversity management

STRABAG is continuously developing a biodiversity management system in order to systematically promote biodiversity at all relevant sites. Biodiversity is therefore being integrated as an additional environmental aspect into the existing ISO 14001 environmental management system, enabling the use of established processes, responsibilities and structures. In 2025, existing biodiversity-promoting actions were systematically recorded across the Group and the existing risk analysis was further developed. Work is currently under way on a concept for future monitoring and reporting.

The following biodiversity-enhancing actions are already being undertaken at STRABAG:

STRABAG, in coordination with local authorities and stakeholders, continuously implements site-specific actions at the Group's own **extraction sites** to minimise its ecological footprint and ensure restoration and renaturation. Nature conservation requirements are defined for each site individually and documented in approval plans. Examples include the creation of replacement biotopes, extensive grassland management, reforestation and the creation of habitats for bird species and amphibians. In addition, regular ecological assessments are carried out to review the effectiveness of these actions and to identify further potential for site-specific initiatives. This ensures that interventions in nature are minimised, land is used sustainably and key ecosystem services are preserved in the long term.

Certain **construction projects** are also subject to statutory and regulatory requirements mandating environmental impact assessments (EIAs). An environmental impact assessment ensures that potential environmental impacts are identified and assessed during the planning and design phase, enabling appropriate mitigation and compensation measures to be developed and implemented. This approach is also applied in countries outside the European Union, for example through environmental impact assessments for certain public- and private-sector construction projects, in accordance with the respective legal requirements.

In the field of **transportation infrastructure** in Germany, STRABAG follows a sustainable construction site concept in line with the standards set by the German Sustainable Building Council (DGNB). Under this concept, biodiversity criteria are considered for the certification of construction sites with a duration of more than three months. This certification takes into account compliance with biodiversity-promoting actions such as the use of environmentally friendly technologies and processes, minimisation of soil sealing and consideration of local flora, fauna and funga.

Targets

ESRS E4-4

To date, STRABAG has not defined any quantitative targets relating to biodiversity and ecosystems. As part of the further development of the Group-wide biodiversity management system, work is currently under way to develop appropriate metrics that could serve as a basis for establishing quantitative targets in the future.

Metrics

ESRS E4-5

For reporting on sites located in biodiversity-sensitive areas, STRABAG fundamentally revised its site-specific risk analysis in 2025. The approach enables the targeted identification of relevant sites and assessment of their nature-related dependencies and impacts. On this basis, regional requirements and project-specific actions can be developed for sites located in biodiversity-sensitive areas. The analysis follows a two-stage process that combines site-specific data with global biodiversity information. The result is an individual Nature Risk Score for each site.

Sites with a consolidated risk score above a defined threshold were initially classified as potentially material within the site-specific risk analysis. This first step resulted in a corridor of 35 sites whose risk profile indicates heightened relevance for biodiversity reporting. A sensitivity analysis was subsequently carried out for these 35 sites with elevated risk levels. The analysis identified 26 sites located within or near sensitive areas. In a further step, sites without economic activity were identified and excluded from the analysis, reducing the number of material sites to 19. Spatial proximity to sensitive areas was determined using activity-based buffer zones reflecting the potential impact area of the respective economic activities.

The process is currently being further developed and will be refined over the coming years, particularly with regard to the integration of additional indicators, consideration of site-specific actions and the establishment of further KPIs for biodiversity management. The aim is to

capture nature-related risks consistently across the Group and to further standardise reporting in line with the ESRS requirements.

Sites located in biodiversity-sensitive areas

The current figures are not comparable with those of the previous year because the methodology was comprehensively adjusted following the introduction of a new risk analysis tool. Whereas the previous year's assessment focused on sites in Germany, Austria and Switzerland using screening tools with relatively coarse resolution, the approach in the current reporting period has been expanded across the Group and replaced with a significantly more precise analytical tool. This development enables a more granular and accurate assessment. The lower number of reported sites therefore reflects improved risk differentiation rather than an actual reduction in risk.

Due to the introduction of the new analysis tool, a retrospective determination of the metrics for 2024 was not technically possible. For the classification and interpretation of the 2024 data, reference is therefore made to STRABAG's 2024 Annual and Sustainability Report.

	2025		2024	
	Number	Area (in ha)	Number	Area (in ha)
Natura 2000 network of protected areas	18	310	29	405
UNESCO world heritage sites	2	40	6	95
Key Biodiversity Areas	12	244	5	25
Other protected areas in accordance with Annex II Appendix D of Delegated Regulation (EU) 2021/2139	19	350	40	677

Some areas may fall into several protection categories. In these cases, the site was counted more than once in order to enable a more precise assessment of the potential impacts on biodiversity.

Circular economy

ESRS 2 SBM-3

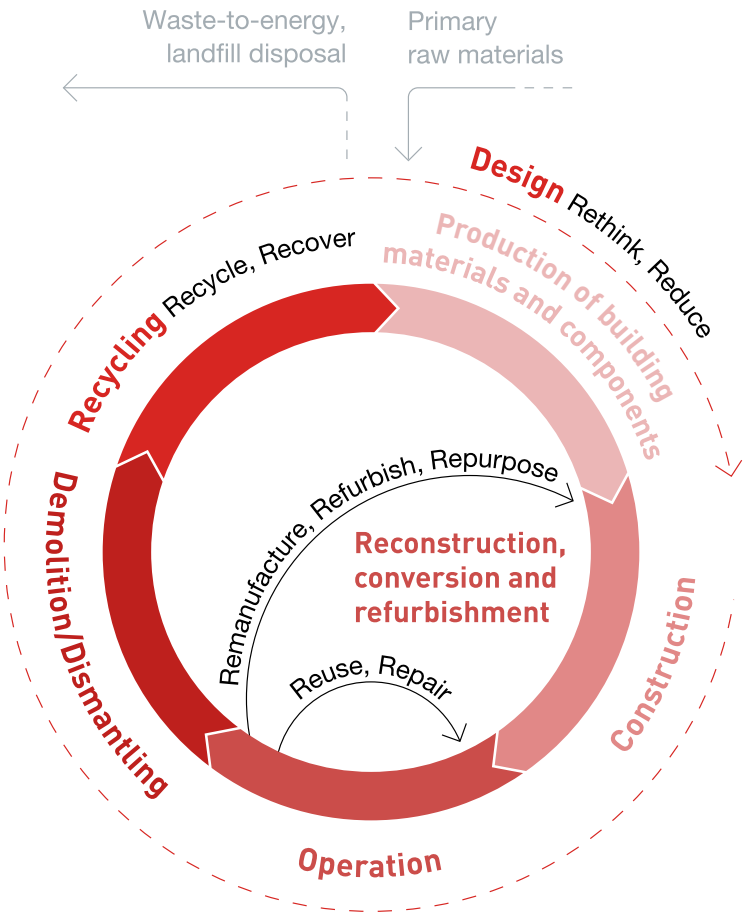
The high demand for raw materials in construction along with the waste volumes generated through demolition make the building industry one of the most **resource-intensive sectors of the economy**. Due to the finite availability of resources, the linear economic system – consisting of raw material extraction, use and disposal – is increasingly reaching its limits.

The construction of buildings requires large quantities of non-renewable building materials such as sand, stone, asphalt and concrete. At the same time, a growing demand for renewable raw materials – above all timber – can also be observed. Large quantities of waste are generated at the end of the life cycle of the structures we build. This waste is often not returned to the economic cycle at an equivalent level of value but is instead recycled or reused at a lower quality. In the worst case, these raw materials are removed entirely from the economic cycle through waste incineration or landfill disposal. A problem with landfill sites is that they cease to be available as inhabitable or cultivable land. Hazardous waste poses an additional risk to people and the environment and involves higher disposal costs. These considerations show that the material negative impacts and risks extend across the entire value chain – from in-house building material producers and/or external suppliers through to waste disposal companies.

These developments also offer opportunities, however. The reuse and recovery of raw materials not only reduces costs in procurement and disposal but also opens up new business areas, for example through the production and use of sustainable building materials and the refurbishment of existing structures. An **extensive in-house building materials network** enables a high degree of vertical integration within the Group. This allows STRABAG to mitigate risks arising from resource scarcity, to meet customer requirements and to minimise disposal costs. When developing strategies and business models, STRABAG aligns itself with the 9R framework of the circular economy: rethink, reduce, reuse, repair, refurbish, remanufacture, repurpose, recycle and recover.

The **circular economy model is firmly anchored as one of six key strategic topics** in our Strategy 2030. We aim to expand our expertise in the procurement and handling of building materials as well as in deconstruction and recycling as a way to continuously increase our resource efficiency. Within the key topic of circular economy, the following additional topics are addressed at Group level through prioritised action areas: value stream management competence; reconstruction, conversion and refurbishment; and building materials production / sustainable building materials.

Circular economy in the construction industry



Policies

ESRS E5-1

This strategic framework gives rise to a number of principles and objectives that are set out in our overarching Sustainability Policy and in our **Environmental and Energy Policy**. These principles and strategic objectives represent commitments and obligations that will guide the future direction of STRABAG's business activities.

The Environmental and Energy Policy specifies the objective of the circular economy as follows:

- **Circular planning**: We offer the design of circular buildings using reused components, secondary raw materials and renewable resources, taking into account resource efficiency, dismantlability and flexibility. We promote circular construction through proactive proposals to our clients. Upon request, we identify potential improvements through building-specific life-cycle assessments and demonstrate to our clients the ecological added value of different construction variants.
- **Circular building materials**: We produce and use building materials made from secondary raw materials and renewable resources, as well as materials with a high potential for reuse and recycling. In addition, we continuously work on technical solutions to increase the recycled content in our products.

- **Deconstruction**: We focus on selective demolition and non-destructive deconstruction in order to recover and reuse valuable materials and components.
- **Zero-waste construction site**: We are working to reduce waste on our construction sites through a high degree of prefabrication, take-back logistics and other actions.
- **Reconstruction, conversion and refurbishment**: We offer solutions for the recording, assessment, repair, modernisation, redesign or extension of existing buildings.
- **Value stream management**: We are improving the cross-site recording and management of value streams in order to ensure the highest possible level of material recovery and to reduce waste. We also offer our clients comprehensive material and waste management concepts, including for the handling of hazardous waste.

The Environmental and Energy Policy applies across the entire Group and affects both STRABAG and our upstream and downstream supply chain. The policy has been signed by the Management Board of STRABAG SE; responsibility for its implementation lies with the CEO.

Actions and projects

ESRS E5-2

STRABAG is pursuing a range of actions and projects to establish the circular economy as a key strategic topic in the Group's sustainable transformation. As these actions form part of the overarching transformation of the Group and therefore involve lasting changes to day-to-day operations and regular processes, it is not possible to say exactly which financial resources are allocated specifically to which of the initiative listed below. The total budget for research and development at STRABAG SE can be found in the present Management Report (Financial Performance).

Reconstruction, conversion and refurbishment

Extending the useful life of structures for as long as possible – through refurbishment or modernisation – is the resource-efficient alternative to demolition and new builds. Reconstruction, conversion and refurbishment are therefore part of a functioning circular economy and can minimise raw material consumption and waste volumes.

As a key action area within Strategy 2030, STRABAG is specifically expanding its activities in reconstruction, conversion and refurbishment under the BESTAND BEYOND brand, among other things by adapting processes, strengthening internal working groups and raising public awareness.

New processes for recording existing building structures have been established and integrated in the central divisions Zentrale Technik (the Group's technical competence centre) and TPA (the STRABAG entity for quality assurance and innovation). These include in particular the digitalisation of existing buildings using stationary and mobile 3D laser scans and the subsequent creation of BIM models (Building Information Modelling). In addition, a practical guide has been developed for building construction projects to support the development of circular economy concepts as part of deconstruction planning.

To further embed the topic within the Group, a five-day training programme for employees was developed and successfully tested in 2025. Two training series per year are planned from 2026 onwards. The training content includes the provision of specialist knowledge as well as proactive client communication in order to address requirements related to reconstruction, conversion and refurbishment at an early stage in project planning. Internal networking and cross-departmental knowledge exchange were strengthened through regular exchange formats. Workshops also analysed uncertainties and challenges from the client perspective in order to respond more effectively to specific requirements. In this way, reconstruction, conversion and refurbishment are being further established within STRABAG's business model.

We are also actively positioning ourselves on the topic of reconstruction, conversion and refurbishment and raising awareness of its advantages and possibilities at specialist events and trade fairs as well as through guest contributions in relevant publications.

Sustainable building materials

Production, use and research of renewable raw materials

Within the field of renewable raw materials, research and development of natural building materials is a key focus, with the aim of expanding the portfolio of circular materials and opening up new applications in the construction sector. Particular attention is given to expanding production at Naporo, which provides insulation and acoustic solutions made from **hemp** and **flax** for the sustainable construction sector.

In addition, various projects and development stages are exploring the potential of **straw** and **clay** as building materials. These actions are ongoing without a defined time horizon.

The different renewable raw materials and their applications are presented at the Reallabor Sustainable Construction in Vienna. The real-world laboratory serves as a location for investigating renewable and circular building materials under real conditions. STRABAG and its partners examine how materials can be used multiple times, recycled and processed in a resource-efficient manner. The laboratory provides a platform for collaboration between research, industry and business. It is used to test the practical applicability and scalability of circular solutions and provides space for workshops, events and meetings. The real-world laboratory opened in May 2025 and is planned to run for two years.

Focus on mineral raw materials

Even though renewable raw materials are becoming increasingly relevant, the construction sector still largely depends on mineral building materials. STRABAG is piloting, researching and applying circular economy potential for key building material groups:

Low-CO_2e concrete

The circular economy plays a central role in the development of low-CO_2e concrete. Residual materials from industrial processes with pozzolanic properties – such as fly ash and ground granulated blast-furnace slag (GGBS) – are already used as supplementary cementitious materials (SCMs). As their availability is declining, we are testing alternative **residual material streams as substitutes**. Concrete recycling as a replacement for natural aggregates also contributes to conserving resources. Further potential lies in the use of residual materials from waste incineration. The aim is to make previously unused material streams available for concrete production through improved processes. These actions are ongoing without a defined time horizon.

Use of mineral waste

A collaborative research project is investigating the possibilities for the **sustainable use of mineral construction waste**. The aim is to explore alternative binder systems – particularly those based on geopolymers – and to evaluate their potential for resource-efficient building materials with a reduced CO_2e footprint. Various material and process approaches are being examined in order to combine ecological advantages with high technical performance. The project began in November 2024 and is scheduled to be completed in April 2026.

In collaboration with a spin-off from ETH Zurich, a **mineral foam insulation board** was developed based on mineral residues from quarries. The board consists of 98% air and 2% secondary raw materials and is fully recyclable. It can be mechanically processed together with the concrete load-bearing structure during deconstruction and reused. The project started in mid-2025 and is scheduled to run until mid-2028.

Actions to optimise value stream management

A robust data basis on current raw material consumption and waste volumes enables us to leverage optimisation potential in order to keep the value streams at STRABAG in continuous circulation.

We are working to obtain information on the fate of our waste within the downstream supply chain and are continuing to develop a digital platform for tracking waste volumes. To this end, we surveyed the requirements with respect to potential software solutions among our operational entities in Austria and Germany. In the 2025 financial year, a concept was developed on this basis for the target process of data collection as well as for the structure and functionality of the software. As this is a multi-year long-term development, no project end date can currently be specified.

Until the tool is deployed across the Group, waste volumes are derived from STRABAG's accounting system. For this purpose, a **standardised methodology for tracking waste volumes** was developed in the 2023 financial year and introduced across the Group in January 2024. The aim of the system is to help improve our data basis so we can more effectively steer our recyclable material flows. To continuously improve our data basis, an extended control system with additional responsible parties was developed in 2025. This system is to be tested and rolled out in 2026. As this too is a multi-year long-term development, no project end date can currently be specified.

At the same time, several KPIs for value stream management capability have been defined. These include, for example, the share of recycled materials in the building materials we produce ourselves and the proportion of recyclable materials from our construction sites that are processed at STRABAG's own value stream management facilities. The necessary recording systems and analyses are currently being developed. In the future, the KPIs will be displayed in a central dashboard and will contribute to expanding material cycles within STRABAG.

As a third component, the network of **STRABAG-owned value stream management facilities** is to be further expanded, for example in the form of recycling and storage sites. In the future, this will enable more materials to be processed at our own facilities and a greater share of recyclable materials to be kept within the Group's circular material flows.

Targets

ESRS E5-3

There are no measurable time-bound outcome-oriented targets related to resource use and circular economy at this time. These are currently being developed and will be established once a sufficient data basis is available. The measurability of strategies and actions will only be possible after these targets have been defined.

STRABAG is working to **further develop its IT infrastructure** and to capture the data basis for the production and use of raw materials along the value chain. This will enable us to set quantifiable targets and to measure progress in the future. For this purpose, a data governance framework is currently being established in line with the Group-wide data strategy. During the reporting year, roles and responsibilities for various data domains were further specified and published internally in a catalogue. In addition to establishing the governance structure, work continued on further developing data storage and data provision. This includes connecting additional data sources to the central data platform and standardising the processes for retrieving and processing data from the source systems.

When defining targets, consideration must be given to the fact that both the use of building materials and the generation of waste in the construction industry depend on the specific project. Achieving a **transition in resource use** therefore requires a new mindset among our clients as well. One of our key tasks is therefore to convince clients of the benefits of circular construction by offering them sustainable solutions that are also economically attractive.

In addition, construction products used within the EU must meet requirements relating to safety-critical functions (mechanical stability, compatibility of different materials, etc.) and comply with pollutant and emission limits. For this reason, there are restrictions at national and regional level on the use of secondary raw materials in construction products, for example in the form of maximum permissible amounts. At present, several EU countries are working on legal frameworks to allow recyclable materials to exit waste legislation in order to promote their use as secondary raw materials.

Metrics

Resource inflows

ESRS E5-4

STRABAG operates its own extraction sites for raw materials as well as production facilities for building materials. These include stone/gravel, asphalt and concrete. The vast majority of the cement used is sourced externally. Bitumen, steel and timber are procured exclusively from external suppliers. Due to this differing structure, various methodological approaches and assumptions are applied when collecting data on resource inflows and the share of secondary raw materials.

STRABAG's main activity consists of construction projects in the fields of transportation infrastructure, building construction and civil engineering. The following building materials are essential for the construction of these structures: stone, gravel, concrete, cement, asphalt, bitumen, steel and timber. In addition to purchasing these materials, STRABAG also produces large quantities of stone, gravel, concrete and asphalt itself. Cement for the production of concrete and bitumen for asphalt production are therefore key materials from our upstream supply chain. We also use water at various stages of our in-house building materials production, for example as a main component of concrete. Critical raw materials play only a minor role at STRABAG and are found only as components of purchased construction products.

In addition to its core construction business, STRABAG also offers further services, including waste management. This includes the recovery and disposal of waste from both our own activities and from our clients. The waste accepted at our sites corresponds in type to our own waste. STRABAG operates its own recycling plants and landfills and also builds and operates landfill sites for clients. Waste from third parties assigned to the waste management business segment is reported separately as resource inflow in this report.

We require a wide range of construction machinery and equipment to build our structures, including cranes, roller-compactors, excavators and wheel loaders. Packaging plays a relatively minor role in STRABAG's resource consumption, as our most important materials are not delivered in conventional packaging but are delivered in substantial quantities as dry bulk or in mixtures directly by heavy goods vehicles. Weight and packaging are therefore not included in our parameters.

We report the six material flows with the largest volumes that were used to manufacture our products and provide our services. Timber was selected as the most important biological building material. Together, these materials account for approximately 72% of the costs of all building materials. The data for asphalt, bitumen, cement, concrete, steel and timber include only those materials that were purchased externally, not those that were produced in-house. The reported purchase volumes are used, among other things, in our building materials production (bitumen and stone/gravel in asphalt, cement and stone/gravel in concrete). Quantities from our own building materials production are therefore not included in the metrics in order to avoid double counting. The reported quantity of stone and gravel, in addition to materials purchased externally, also includes those extracted from the earth at our own quarries and gravel operations as well as recycled aggregates used in our asphalt and concrete mixing plants. To determine the portion from our own extraction activities, it was

assumed that sales volumes correspond to extraction volumes. We also assume that inventory levels from extraction can be neglected, as these quantities remain approximately constant.

The quantities for **stone/gravel**, **asphalt**, **concrete** and **timber** are calculated on the basis of euro values and average prices. The euro values are taken from STRABAG's accounting system. For the average price of timber, data from ZÜBLIN Timber's purchasing department were used. For the average prices of stone/gravel, asphalt and concrete, we used data from our own production of these building materials. One exception is the amount of recycled aggregates as a percentage of the total quantity of stone/gravel. These data are not euro-based; instead, the volumes are recorded directly at the production facilities.

The quantities for **bitumen**, **cement** and **structural steel** are taken from STRABAG's accounting system. For these building materials, country-specific average prices are calculated on the basis of volumes and costs. A price range is defined based on the average price. Entries within this price range are included in the calculation of the metrics using their recorded volumes. Quantity entries outside the price range are included in the calculation using their respective average price and cost value. This results in a total volume per building material and country for the calculation of the metrics.

Materials used

Material	Unit	**2025**	2024
Stone/gravel	thousands of tonnes	78,948	79,878
Bitumen	thousands of tonnes	765	781
Asphalt	thousands of tonnes	4,025	4,520
Cement	thousands of tonnes	1,409	1,266
Concrete	thousands of tonnes	8,315	7,967
Structural steel	thousands of tonnes	316	258
Timber	thousands of tonnes	53	45

Timber is the most important biological building material used in the manufacture of STRABAG's products and the provision of its services. Despite the significantly smaller quantities of timber used compared with other building materials, we therefore report the percentage of sustainably sourced timber in the total weight of materials used. For the calculation, we use volume data derived from average prices.

To determine the amount of timber purchased from sustainable sources, we assume that this corresponds to the percentage of PEFC- or FSC-certified forest areas in the countries from which our timber is procured. No information can be provided on how the procured timber is handled at the end of its useful life nor can we make any statements as to whether the cascade principle is applied. Based on information on the handling of waste wood provided by the German Federal Environment Agency, it can be assumed that most of the timber is incinerated at the end of its useful life.

Percentage of biological materials

Timber	Unit	**2025**	2024
Total weight	thousands of tonnes	53	45
From sustainable sources	%	75	73

The reported figures include the weights and percentages of reused or recycled secondary components, products or materials within the largest material flows by volume, as well as timber as the most important biological building material. Information on the percentage of secondary raw materials for cement and bitumen cannot be provided, as these are used as binding agents in the building materials concrete and asphalt. Current recycling processes allow only the recycling of the building materials themselves and do not permit separation into their original constituent materials.

The percentages of secondary raw materials in the building materials procured are based on the percentages of secondary raw materials in building materials produced in-house (stone/gravel, asphalt and concrete). These data are recorded throughout the year in the ERP systems of the production facilities. It is assumed that externally purchased building materials contain the same percentages of secondary raw materials as those produced by STRABAG itself. The percentages of secondary raw materials in steel and timber are based on information from the literature.

Secondary raw materials

Material	Unit	**2025**	2024
Stone/gravel	thousands of tonnes	1,713	1,562
	%	2.2	2.0
Asphalt	thousands of tonnes	593	615
	%	14.7	13.6
Concrete	thousands of tonnes	8.2	9.1
	%	0.1	0.1
Structural steel	thousands of tonnes	133	109
	%	42.1	42.1
Timber	thousands of tonnes	11	10
	%	21.3	21.3

Waste management

The tables below report the waste generated within the waste management business. The collection of these waste streams follows the same methodology as that used for our own waste.

Waste accepted from external sources

	Unit	**2025**	2024
Total amount	tonnes	2,527,833	2,412,989
Non-hazardous waste	tonnes	2,375,788	2,362,265
Hazardous waste	tonnes	152,045	50,724

Waste accepted from external sources sent for recovery

	Unit	2025			2024		
		Preparation for reuse	Recycling	Other recovery operations	Preparation for reuse	Recycling	Other recovery operations
Total amount	tonnes	1,321,554	74,055	987,132	1,279,066	51,463	997,870
Non-hazardous waste	tonnes	1,321,554	74,055	979,859	1,279,066	51,463	987,001
Hazardous waste	tonnes	0	0	7,273	0	0	10,869

Waste accepted from external sources sent for disposal

	Unit	2025			2024		
		Incineration[1]	Landfill	Other disposal operations[1]	Incineration[1]	Landfill	Other disposal operations[1]
Total amount	tonnes	-	145,092	-	-	84,590	-
Non-hazardous waste	tonnes	-	321	-	-	44,735	-
Hazardous waste	tonnes	-	144,771	-	-	39,855	-

[1] In its capacity as a waste treatment provider, STRABAG does not engage in waste incineration nor does it make use of other non-landfill disposal methods.

Resource outflows

ESRS E5-5

Structures are increasingly being designed and built according to circular economy principles. The application of circular economy methods, however, is project-dependent and is significantly influenced by our clients' requirements. In the production of our own building materials, we are constantly working to make the process more circular. Our central division TPA, together with our production facilities, is developing and testing building materials with higher percentages of secondary raw materials. The addition of so-called rejuvenators is intended to restore the original properties of bitumen from reclaimed asphalt as a way of preparing reclaimed asphalt for use in new asphalt mixtures. The development of alternative binders is also intended to contribute to the increased use of renewable raw materials in construction and to enable building materials to be reused or recovered more effectively in the future.

In the case of building materials, the durability and reparability of our products depend on their specific application within a structure. Every structure is unique and can consist of thousands of different components. At present, no sector-specific evaluation framework exists Information on durability, reparability or the recyclable percentages is therefore difficult to compare and offers only limited informative value.

The situation is different when it comes to the recyclable percentages of our products. The most important building materials produced in-house by STRABAG (stone/gravel, asphalt and concrete) are all 100% recyclable. In practice, however, this recycling rate cannot always be achieved due to legal restrictions and applicable standards. As the above-mentioned research and development activities in building materials progress, the construction industry will be able to make a significant contribution to the transition to a circular economy.

The waste streams reported are those that are recovered or disposed of by external waste management companies. The data are recorded throughout the year as part of STRABAG's accounting processes. For each waste fraction, country-specific average prices are calculated on the basis of volumes and costs. A price range is defined based on the average price. Quantity entries within this price range are included in the calculation of the metrics using their

recorded volumes. Quantity entries outside the price range are included in the calculation using their respective average price and cost value. This results in a total volume per waste fraction and country for the calculation of the metrics.

Each waste fraction is assigned to one of the following categories: preparation for reuse, recycling, or other recovery operations for recovered waste, and incineration or landfill for disposed waste. The allocation to these categories is based on the experience of waste management experts at STRABAG as well as on commonly used information from industry associations in the construction sector.

In doing so, we deliberately distinguish preparation for reuse and recycling from other recovery operations. For the circular economy to succeed in the long term, it is important that raw materials and materials are processed in such a way that they retain their original material quality for as long as possible or can be used in other high-quality applications. This objective can only be achieved if a clear distinction is made between high-quality recovery processes (preparation for reuse, recycling) and lower-value recovery (downcycling, backfilling, etc.). We therefore advocate defining a clear distinction within the relevant legal frameworks and making it mandatory for waste management companies to disclose the final destination of waste to their clients.

We assume that our waste is not disposed of by any other means and that each waste fraction is 100% recovered or disposed of through one of the methods described above.

Waste generated

	Unit	**2025**	2024
Total amount	tonnes	11,808,594	12,172,728
Non-hazardous waste	tonnes	11,463,970	11,861,361
Hazardous waste	tonnes	344,624	311,367

Recovered waste

	Unit	**2025**			2024		
		Preparation for reuse	Recycling	Other recovery operations	Preparation for reuse	Recycling	Other recovery operations
Total amount	tonnes	92,065	2,032,920	8,257,302	168,636	2,466,511	8,129,833
Non-hazardous waste	tonnes	92,065	2,032,920	8,245,645	168,636	2,466,511	8,103,934
Hazardous waste	tonnes	0	0	11,657	0	0	25,899

Disposed waste

	Unit	**2025**			2024		
		Incineration	Landfill	Other disposal operations	Incineration	Landfill	Other disposal operations
Total amount	tonnes	283,585	1,142,722	-	251,025	1,156,723	-
Non-hazardous waste	tonnes	280,758	812,582	-	221,645	900,634	-
Hazardous waste	tonnes	2,827	330,140	-	29,379	256,089	-

Non-recycled waste

	Unit	**2025**	2024
Total amount	tonnes	9,683,609	9,537,581
Percentage	%	82	78

STRABAG's relevant waste streams consist of construction and demolition waste. The most important waste fractions generated in the course of our business activities are excavated material (soil, stones, dredged material and track ballast), concrete demolition waste, construction rubble (a mixture of concrete, bricks, tiles and ceramics), reclaimed asphalt, bituminous mixtures and mixed construction waste (wood, glass, plastics, metals, insulation and plaster). Radioactive waste arises only in exceptional cases in connection with our construction activities, for example during the decommissioning of nuclear power plants. We will therefore report on this only in those years in which we carry out relevant construction projects.

Sources – Circular Economy

Deutsches Umweltbundesamt [German Federal Environment Agency]. (2019). *Altholz* [Waste Wood]. Retrieved 18 February 2026.

Social

2025

Our social responsibility

Construction companies impact people along their entire value chain – above all their own workforce, workers in the value chain and the (local) communities where construction projects are realised. Global and complex value chains increasingly require a broader corporate responsibility. Ensuring that STRABAG's impact is positive over the long term requires safe and fair working conditions and construction projects that add value for communities as much as it means taking environmental sustainability into consideration during all phases of construction.

As a construction technology group, we therefore assume responsibility for our own workforce, for workers along the value chain and for affected communities. We are committed to upholding internationally recognised standards in the areas of human rights and labour. These include:

- the **fundamental principles of the International Labour Organization (ILO)**
- the **International Bill of Human Rights**, which consists, among other things, of the Universal Declaration of Human Rights
- the **OECD Guidelines for Multinational Enterprises**
- the **United Nations Guiding Principles on Business and Human Rights**

Furthermore, STRABAG is a signatory to the **United Nations Women's Empowerment Principles**. As a member of the **United Nations Global Compact**, we report annually on our progress with respect to implementing the Ten Principles of the Global Compact in the areas of human rights, labour, environment and anti-corruption. These internationally recognised standards and principles also form part of our Group directives.

STRABAG has set itself the goal of holding at least one stakeholder dialogue format per year focusing on human rights issues in order to gain a better understanding of the requirements and interests of our stakeholders. These dialogue formats include in-person events with relevant affected stakeholders or their representatives to promote interactive exchange. In 2025, STRABAG initiated its own stakeholder dialogue format with a representative body on the topic of labour exploitation and also participated in several stakeholder dialogues organised by external organisations. Stakeholder dialogues organised by STRABAG that address human rights issues alongside other ESG topics currently take place on a two-year cycle. The next STRABAG stakeholder dialogue will be held in 2026. Through these engagement actions, we are able to act proactively and advance the transformation of the construction sector in a spirit of partnership.

STRABAG's relationship with the three stakeholder groups – own workforce, workers in the value chain and affected communities – varies depending on the group in question. Accordingly, various Group-wide directives and policies define how responsibilities towards these groups are exercised, taking into account their specific characteristics. The respective policies, objectives and measures already implemented or planned are explained in more detail in separate chapters.

Policy on Employment Conditions and Human Rights

The overarching Policy on Employment Conditions and Human Rights sets out commitments and obligations for all three key stakeholder categories, without distinguishing between vulnerable and non-vulnerable groups. The policy is published as an annex to the STRABAG SE Management Manual and is available to all employees. The policy also makes reference to the whistleblower platform for reporting violations of the defined principles. STRABAG's management is sworn to compliance with these principles by taking the appropriate actions within their respective area of responsibility. The policy is overseen by the Head of the Corporate Responsibility Office, whose area of responsibility includes the Social Responsibility group.

In our Policy on Employment Conditions and Human Rights, we are committed to the prohibition of:

- discrimination and harassment in the workplace, meaning all forms of discrimination, including, but not limited to, discrimination based on skin colour, nationality, ethnic origin, social background, gender, sexual orientation, religion, disability or age
- modern slavery and forced labour, human trafficking and torture
- child labour
- unlawful evictions and land seizure
- violence and restrictions on freedom of movement by security personnel engaged by us

We also respect and support:

- the rights of local communities, minorities and indigenous peoples
- children's rights
- the maintenance and continuous improvement of our occupational safety and health standards
- fair and transparent recruitment and hiring practices
- fair working conditions (including fair pay and working hours)
- freedom of assembly and collective bargaining
- data privacy
- the development of society through our contribution to the local economy
- the transfer of our values throughout the value chain
- the safety of our products and services for end users

The policy was approved and published in 2025. Its revision further reinforces our commitment to upholding human rights and the ILO core labour standards, as well as the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. Topics such as engagement with indigenous peoples or the commissioning of security personnel were further specified. Further forms of discrimination – for example discrimination on the basis of political opinion – as well as the safety of our products and services for end users were also included.

Social Compliance Management System

The **Social Compliance Management System (SCMS)** maps our due diligence processes for human rights and environmental risks with the aim of identifying them within our own operations and along the supply chain. Appropriate actions, including training, sustainability audits and the application of Group-wide policies and directives, are taken to prevent, minimise and avoid violations.

In 2025, further work was carried out to implement the comprehensive Social Compliance Management System across the Group. The system goes beyond already implemented minimum standards and already applies to a large number of Group companies. It is also continuously improved through effectiveness reviews conducted annually and on an ad hoc

basis. At present, the Group-wide roll-out of the system has not yet been completed. The groundwork has already been laid, however, through the draft of a corresponding Group directive, the adoption of which is planned for 2026. The further expansion of the comprehensive SCMS will remain a key objective in the coming year as well. Key elements of the Social Compliance Management System include annual and event-driven risk analyses, the derivation of appropriate preventive and corrective actions (remedies), the complaints procedure, as well as documentation and reporting. To further develop the Social Compliance Management System, the risk analysis methodology was revised in the 2025 financial year. The risk analysis for our own operations is carried out across the Group and, through the consideration of country- and sector-specific risks, also provides key insights into risks along our value chain. The more detailed risk analyses conducted as part of the Social Compliance Management System therefore further refine the existing Group-wide general risk analyses from a methodological perspective. This enables the prioritisation of risks and supports the intended risk-based approach to identifying human rights risks.

Despite all risk assessments and preventive actions, non-compliance can never be entirely ruled out. Should a violation occur, remedy will be provided. Each case is assessed individually. Compliance violations can be reported through the STRABAG whistleblower platform (anonymously if desired), through the ombudspersons, or directly to the Human Rights Officer. A special action plan – the **remedy action plan** – was designed to initiate the appropriate remedy in a structured manner. The remedy action plan serves as a guide in identifying actual or imminent violations – both within our own operations and among suppliers. The action plan provides for a clear and immediate process. This process includes, following notification of a violation, the subsequent individual analysis and assessment of the case. The requirements to be met at each step are clearly defined, for example in dealings with rights holders or their representatives, regarding timelines, cooperation within the supply chain, and compliance with relevant due diligence standards. On the basis of this assessment, the plan of action is drawn up and implemented, followed by a final review of its effectiveness and the documentation process.

Reporting on the Social Compliance Management System and the implementation of due diligence obligations is carried out annually and ad hoc to the management, which includes the STRABAG SE Management Board and the management of the relevant corporate divisions. The information is shared with the Supervisory Board upon request and as warranted. Implementation of the Social Compliance Management System in operations takes place through close cooperation with the responsible interface managers in the relevant specialist departments and with the corresponding representatives at country level.

Human Rights Officer

The Human Rights Officer has been responsible for monitoring the Social Compliance Management System and reviewing its effectiveness since 2023 and acts in an advisory capacity to management, which is responsible for fulfilling human rights due diligence obligations. He or she is independent and not subject to instructions. The associated Social Responsibility team focuses specifically on the topics of **human rights**, **labour standards** and **social responsibility**, giving consideration to the needs of our own workforce, workers in the supply chain and the impact of our value chain and business activities on society.

Reporting

In accordance with the UK and Australian Modern Slavery Acts, STRABAG until 2024 published an annual statement highlighting the relevance of human rights risks in our business activities and supply chain. Starting with the 2024 financial year, we publish annual modern slavery statement in accordance with UK and Canadian legislation. As STRABAG had no active projects in Australia in 2024, no statement was published under Australian legislation, in accordance with the legal requirements. Following the acquisition of Australia's Georgiou Group in 2025, an appropriate statement has again been prepared. In line with the German Supply Chain Due Diligence Act, STRABAG publishes a policy statement and an annual report for the Group companies affected by this law in Germany.

Own workforce

ESRS SBM-3

STRABAG's success is built on the hard work and commitment of our dedicated employees. In the following, we report on the material impacts, risks and opportunities identified with regard to our own workforce in the areas of occupational safety and health, human rights and human resource development. Industry-specific characteristics, such as the use of heavy equipment and tools, as well as the exposure of 50,407 blue-collar workers (57% of STRABAG's total workforce) to wind and weather, require a particular focus on **occupational safety** at our construction sites to avoid work-related accidents and ill health. Our adherence to Group-wide standards and the high collective bargaining coverage of our workforce ensure that all work at STRABAG is carried out under **humane and fair conditions** – both by our blue-collar workers on the construction sites as well as by the white-collar employees working in our office locations. STRABAG does not employ any external labour in its own workforce.

The range of services offered, along with the pace of technological progress, requires the use of numerous different skills and job profiles. As skilled labour becomes increasingly scarce, STRABAG is committed to strengthening employee retention and, above all, to attracting and retaining bright minds by offering opportunities for **strategic training and skills development** and fostering a diverse work environment.

We use the materiality assessment to consider and evaluate the negative and positive impacts on our own workforce as well as risks and opportunities with different areas of responsibility as a whole. The assessment of risks and opportunities was carried out primarily on the basis of external data sources such as scientific studies and industry analyses, as risks and opportunities often have indirect and long-term effects and can therefore only be translated into monetary terms to a limited extent.

At STRABAG, negative impacts occur predominantly in isolated cases. There are no indications of systematic occurrences within the Group, although the likelihood of certain negative impacts is higher for industry-related reasons. Due to the thematic diversity involved, the implementation of appropriate actions to manage these impacts and fulfil our due diligence obligations extends across various divisions within the Group. As these actions are an integral part of our ongoing daily business, it is not possible to say exactly which financial resources are allocated to the actions described in this chapter.

Reporting by the individual divisions to the Management Board enables the highest management level to monitor the issues described above. The Management Board also bears responsibility for human rights in this regard.

Embedding social aspects in our sustainability strategy

Aspects of human rights are strategically embedded in our sustainability strategy. We consider our own workforce to be a strategic focus topic here and aim to promote the well-being of our employees through various action clusters. Protecting and promoting the health of all our employees, fostering a strong learning culture and creating an inclusive work environment are key action areas for us to maintain our position as an attractive employer.

Human rights as an overarching topic

As an international technology group for construction services, we take responsibility for protecting human rights within our corporate sphere of influence. Due to the fragmented and complex supply and value chains, risks arise that we have to counter with foresight. Respect for human rights extends to three stakeholder groups: our own workforce, workers in the value chain and affected communities.

The implementation of our **Social Compliance Management System (SCMS)** and the associated actions cover all three of these stakeholder groups, which are therefore addressed in general in the section Our social responsibility and in more detail in the three chapters Own workforce, Workers in the value chain and Affected communities.

ESRS S1-1

Our **Policy on Employment Conditions and Human Rights**, which covers the topics of employment conditions, human rights and diversity, is also explained in more detail in the chapter Our social responsibility. The policy applies to all three stakeholder groups. Other policies and guidelines that specifically concern our own workforce are listed in this chapter. The Group directives described have been approved by the STRABAG SE Management Board.

In the event of a violation, **remedy** is provided. This includes, first and foremost, putting a stop to the violation, planning the necessary actions and initiatives on a case-by-case basis and, if no other solution can be found, taking further consequences such as disciplinary action. Compensation can also be provided. Restitution payments are used on a case-by-case basis, with the amount and scope reviewed and adjusted depending on the incident.

ESRS S1-2

STRABAG uses various channels and a range of formats to enable and promote a respectful dialogue and exchange with our employees. These include the annual appraisal interviews and the exit interviews conducted when an employee leaves the company, with insights gained incorporated into the further development of human resources. Depending on the circumstances and as needed and possible, employees are actively involved in the review of workplace accidents in order to integrate the insights gained into the accident-related lessons learned. There is no further, overarching structured process for ongoing engagement with the company's own workforce that goes beyond this. In principle, employees can take their concerns to their respective supervisors, regional works councils and ombudspersons. Internal networks and programmes such as Female Leaders, as well as interaction opportunities on the intranet, create additional platforms for dialogue. In 2025, the Management Board adopted a mandate to develop a strategy aimed at strengthening the integration of blue-collar employees into the processes of strategic HR development. The objective is to enhance the company's attractiveness as an employer and to strengthen employee retention, particularly among blue-collar staff, including through an expanded range of training and professional development opportunities. To identify appropriate action areas, several hundred interviews were conducted with blue-collar employees.

Employee representation

In several countries where the Group operates, works councils exist in accordance with the relevant national legal frameworks. Depending on the specific legal provisions, the role of the works councils – in the spirit of co-determination within the workplace – is to promote the economic, social, cultural and health interests of employees, thereby supporting both their own well-being as well as that of the company. This includes the involvement of the works council, among other things, in the implementation of training programmes and occupational safety measures. Due to the different legal frameworks, however, there is no uniform standard applicable across the Group.

Regular coordination meetings between works council members and management are intended to ensure a constructive exchange on personnel-related topics. A higher-level body is the SE Works Council of STRABAG SE, which ensures representation for all employees within the EU, the EEA, Switzerland and states currently in accession negotiations with the EU. This body also includes employee representatives from countries where, due to the respective legal framework, no national works council exists. The SE Works Council of STRABAG SE also delegates the employee representatives to the Supervisory Board of STRABAG SE.

ESRS S1-3

At STRABAG, there are several points of contact and channels through which employees can express their concerns, including anonymously. The ombudsperson and whistleblower platform are the central points of contact, in addition to the works councils and the Human Rights Officer. This ensures that employee concerns and potential misconduct are systematically documented and investigated, and that appropriate remedy is provided. Remedy is determined on an individual basis and evaluated as part of the effectiveness reviews by the Social Compliance Management System. The effectiveness review assesses whether the violation has in fact been remedied, whether no recurrence occurs and whether appropriate preventive measures have been implemented.

The ombuds system offers a confidential point of contact for internal conflicts, cases of discrimination and personal hardship. The ombudspersons act as impartial mediators to support employees in finding solutions to their problems. Employees can either contact the ombudspersons directly or submit a report anonymously via the whistleblower platform. The ultimate responsibility for finding a solution lies with the persons concerned, while the ombudspersons accompany and support this process.

Another important channel of communication is the STRABAG whistleblower platform, which offers employees the opportunity to report their concerns anonymously. The platform can be used to report potential misconduct in the categories of discrimination, human rights and working conditions, as well as occupational health and safety. Incidents related to the company's own workforce that were received in 2025 are explained in a separate section of this chapter.

The members of the works councils play a central role in safeguarding employee interests. STRABAG SE has an SE Works Council that delegates the employee representatives to the Supervisory Board of STRABAG SE. In addition to the SE Works Council, there also are country- and business-specific works councils. STRABAG respects the principle of freedom of assembly and free participation in trade unions as well as free participation in works councils in accordance with national legislation.

The Human Rights Officer acts independently and is available as a confidential point of contact for employees to report concerns or violations related to human rights. He or she investigates the concerns for potential violations and, if necessary, initiates the process for providing remedy. In addition, all reports, even if they do not constitute a violation, are included in the human rights risk assessment. The Human Rights Officer is responsible for monitoring the Social Compliance Management System as well as reviewing its effectiveness and acts in an advisory capacity to management.

Policies, actions and targets

ESRS S1-1, ESRS S1-2, ESRS S1-3, ESRS S1-4, ESRS S1-5

Occupational safety and health

A safe and healthy work environment that helps to prevent accidents and work-related ill health is important to STRABAG and a top priority in our corporate culture. A focus on health and safety in the workplace ensures the performance of our employees and the quality of our services. Our health and safety campaign 1>2>3 Safe! combines various awareness-raising initiatives related to occupational safety and health, including ongoing technical and organisational measures and temporary priority actions that were continued in 2025. Both forms are discussed in more detail in the following sections.

The STRABAG Group is certified to ISO 45001 (Occupational Health and Safety Management Systems) and is regularly audited internally and externally in this regard. An obligation to comply with this standard is laid out in an **HSW Group Directive** that applies to all employees within the Group as well as to our external contractors. The directive defines corporate-wide minimum standards for occupational safety and health to avoid accident and health risks in the workplace, including the standardisation of organisational structures, accident reporting processes, accident investigations and personal protective equipment as well as the assignment of responsibilities.

The central staff division Health Safety Wellbeing (HSW) brings together the areas of occupational safety, health and health promotion for all of STRABAG's site workers and office employees. In accordance with the Group HSW Directive, responsibility for this area lies with the Management Board of STRABAG SE, which has tasked the head of the HSW central staff division with implementing measures, strategies and targets. The head of the central staff division reports directly to the CEO. A Group-wide accountability structure ensures the regular exchange and continuous development of these topics:

- HSW Group Committee (meets once a year)
- HSW National Committee (meets once a year in each country)
- Subdivision Occupational Safety Committee (meets at least once a year)
- Knowledge sharing with the HSW national representatives (once a month)
- PSA Group Committee (meets once a year)
- PSA National Committee (meets once a year)

The committees consist of employer representatives and prevention experts as well as employees from various corporate levels. Employees have the opportunity to register relevant topics through the occupational safety specialist and/or the works council as their representative, which are then dealt with by the above-mentioned bodies, depending on the extent to which they affect employees. Country-specific requirements regarding the composition or frequency of meetings are taken into account with regard to the committees' work in each respective country. The management is responsible for convening and conducting the meetings.

To better reflect the STRABAG Group's broad positioning, and to set a more ambitious target in view of the good performance, the acceptable accident frequency rate (number of work-related accidents per million hours worked) was reduced from 35 to 30. The value is valid from 1 January 2026 and applies to all subdivisions and corporate entities. This benchmark was introduced across all countries with the HSW country safety managers, agreed with the works council and ultimately approved by the STRABAG SE Management Board.

To continuously improve the quality and effectiveness of the occupational safety organisation, **occupational health and safety management systems** (ISO 45001, or, for specialist entities, Safety Certificate Contractors) have been **implemented and certified throughout the group**. Occupational health services are guaranteed in accordance with the respective legal requirements in the EU countries where we operate. Compliance is also ensured with the EU's OSH Framework Directive 89/391/EEC, which defines the requirements and basic principles for prevention and risk assessment as well as the obligations of employers and employees with regard to occupational safety and has been transposed into national law in the EU member states.

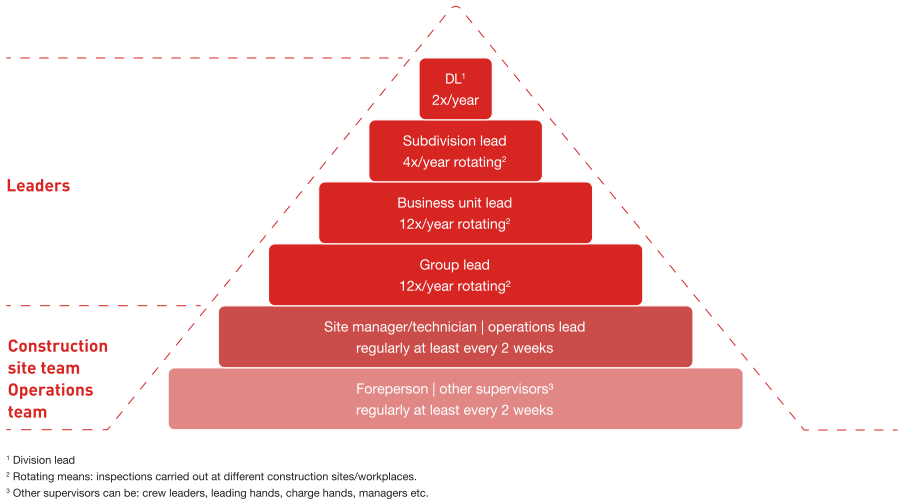
To maintain safe working conditions, risk assessments (both psychological and physical) are carried out for each area of work to derive relevant protective measures and/or, rescue concepts as well as corresponding training and instruction needs. This evaluation is carried out for employees at all levels. In this context, own employees and those of external companies are treated equally and are jointly required to responsibly implement the derived protective measures in their own area of work.

The **HSW inspection pyramid** commits our leaders at all levels to monitor compliance with the protective measures. An inspection form, which varies depending on the area of work and risk assessment, is used to document the HSW inspections. To support the systematic implementation and monitoring of these standards, digital tools and platforms are used across the Group to enable the structured collection, analysis and evaluation of safety and health data. This provides the basis for the continuous improvement of occupational safety and health processes.

LEAN 5S for greater occupational safety

Safety on the construction site is directly linked to safe workplace design. For this purpose, **standardised checklists and questionnaires based on the LEAN 5S approach** have been developed across the Group and integrated into the site inspection process. The 5S questions cover aspects such as cleanliness and order on the construction site, the design and marking of storage areas, and the organisation of routes and walkways. The results and digital evaluations of the 5S inspections are communicated to management in order to implement improvement measures in a targeted manner.

Minimum number of documented inspections



[1] Division lead
[2] Rotating means: inspections carried out at different construction sites/workplaces.
[3] Other supervisors can be: crew leaders, leading hands, charge hands, managers etc.

Serious accidents are thoroughly investigated, if possible and necessary with the persons involved in the accident themselves. An accident analysis sheet is used as a standardised template to systematically document and process a work-related accident. If a cross-organisational learning effect can be derived from the analysis of work-related accidents, an anonymised **lessons-learned report** is created. A lessons-learned report must always be created for life-threatening and fatal work-related accidents and submitted to the HSW country representative for further communication to the construction sites in order to develop specific prevention initiatives. Reports on analysed accidents are made available to employees through publication on the intranet as well as on noticeboards and through instructions at the construction sites. Health actions to prevent work-related ill health are also derived from the anonymised metrics provided by the accident insurance providers. Recognised occupational illnesses include skin diseases, back pain, hearing loss and asbestosis.

In the reporting year, we further pursued the **centralised procurement of personal protective equipment (PPE)**. Personal protective equipment minimises the risk of injuries and work-related accidents by protecting employees from specific hazards in the workplace, making PPE a crucial addition to our technical and organisational safety measures. STRABAG aims to harmonise and standardise the procurement of PPE within the Group by rolling out a central purchasing platform and providing training on proper use and care. This is intended to ensure that all employees are equipped with high-quality protective equipment that complies with the applicable standards and that it is used properly.

Stronger focus on wellbeing

Alongside occupational safety and health protection, the topic of **wellbeing** is also becoming increasingly important within the Group. After all, safe working conditions require not only protection against accidents and illness, but also the physical, mental and social wellbeing of our employees.

To promote wellbeing, a range of actions are coordinated across the Group by the wellbeing specialists in the central Health, Safety & Wellbeing (HSW) staff division and in the currently 16 HSW country organisations, and implemented within the operational entities. A central element is the HSW bus, which is deployed both on construction sites and at office locations.

As part of the HSW bus programme, various screenings are offered, including:

- muscle strength diagnostics
- cardiovascular checks including ECG
- lung function tests
- blood pressure measurement

During the reporting year, 119 bus deployments took place (2024: 67) in Germany, Austria and Switzerland, during which a total of 3,330 employees (2024: 1,860) were examined.

In addition to mobile health checks, Group-wide actions to strengthen mental health are also organised. These include, among other things, programmes for stress management, nutritional counselling, exercise and ergonomics programmes as well as the assessment of psychological strain in the workplace. The actions are offered both online and in person, enabling them to reach a wide audience. In 2025, 40,427 white-collar (salaried) employees (2024: 40,105) and 29,135 blue-collar (hourly) workers (2024: 18,089) made use of the wellbeing programmes.

Another important action that was continued in 2025 is the centralised collection and storage of accident and occupational safety data on an **HSW platform**. Bundling our HSW statistics and documents (e.g. inspection forms, accident analyses) on a central platform will make it easier to evaluate and manage HSW-related topics in a targeted manner within the Group. The platform consists of different modules that are being developed, piloted and rolled out in a step-by-step manner. Group-wide roll-out of the platform is scheduled for 2026.

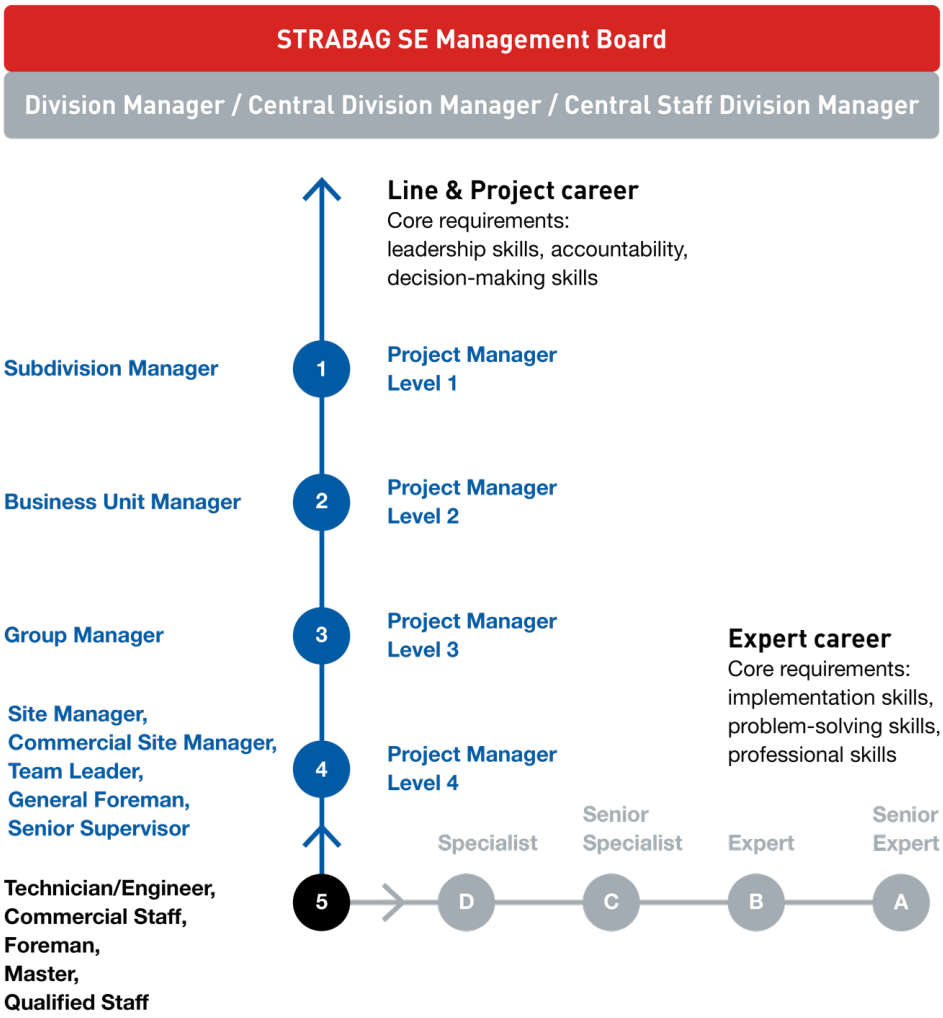
Strategic human resource development

Creating attractive working conditions involves much more than merely implementing occupational safety measures. Our goal is clear: As a leading construction technology company, we want to be **an attractive employer for all people**. To counteract the shortage of skilled workers and the loss of qualified personnel, our focus is on recruiting, training and appreciation. Only by supporting our workforce and taking their needs into account can we ensure employee satisfaction and provide our services on time and to the required quality.

The **Group Directive on People & Culture Development**, approved by the STRABAG SE Management Board, summarises the structures and processes in the area of People & Culture for all Group entities. This covers all phases of the candidate and employee journey at STRABAG – from initiatives to attract personnel to actions designed to retain our employees to processes applied when employees transition internally or leave the company. The directive also includes a guideline for promoting internal employee mobility as a way of increasing the permeability of employees within the Group and improving employee retention by highlighting opportunities for further development in other corporate entities.

The **central division People & Culture Development (P&C DEV)** is a Group-wide organisational entity tasked with supporting STRABAG's strategy and goals in human resource matters in accordance with the Group Directive on People & Culture Development. To ensure successful implementation, the central division develops all guidelines and standards for the search, selection, qualification, promotion and development of employees at all levels.

STRABAG career model



In addition to a career as a line manager, which focuses on general day-to-day operations, two further career paths are also available at STRABAG: expert careers and project management. Experts have a high degree of professional specialisation in a specific field. Project managers possess many years of experience in project management and are responsible for complex construction projects.

The material impacts, risks and opportunities related to human resource topics are reflected in the "People" pillar of our corporate strategy, which includes the goal of **increasing employee retention by 6% year-on-year**. This target was actively developed by P&C partners and company leaders. Various exchange formats were used to discuss the concept of employee retention, collect feedback, make adjustments and precisely formulate the target for approval by the STRABAG SE Management Board. Employee retention is calculated as the inverse of the turnover rate. In 2025, employee retention reached 6.0 (2024: 5.2), thus achieving the target value of 5.5.

In the face of ongoing demographic trends and changing qualification requirements, STRABAG is working on a variety of actions to further strengthen employee retention and ensure that the Group has sufficient young talent with the best possible qualifications. These actions are not time-bound, as this is a long-term undertaking.

Some of the implemented actions are aimed at increasing the rate of employee appraisal interviews. The Group Directive on People & Culture Development requires an employee appraisal to be conducted at least once a year, including a digital recording and documentation of the interview content. The appraisal interview is an opportunity to give and receive mutual feedback and to show employees prospects for further development and, in

this respect, is an important tool for positively influencing employee retention. An e-learning course on how to properly assess employee skills was launched in 2024 as a way to better prepare our company's leaders for the interview situation. The e-learning course is open to all employees of the Group. As a voluntary course, there is no target rate for completion. By 31 December 2025, the course had been completed by 67.7% (2024: 48.5%) of STRABAG's leadership employees.

An individual development plan is defined during the employee appraisal, which can comprise various actions depending on the further development needs and skills. Examples are traditional training formats, coaching and mentoring, participation in development centres to prepare potential candidates for new roles, and job rotation to gain insights into other fields. Working on the basis of our Strategy 2030, the central division P&C DEV developed a series of P&C focus topics together with the divisions that were then approved by the Management Board. In 2025, an increased target value of 30% to 50% was agreed, to be achieved by 2027. A development plan was in place for around 30% of salaried employees in 2025.

Employees who leave the company of their own accord are offered the possibility to engage in an exit interview. The insights gained from these interviews are also used to derive actions for strategic personnel development. The offboarding process for salaried employees is being gradually digitalised by sending questionnaires to departing staff. This is intended, on the one hand, to increase the response rate and, on the other, to enable evaluations to be carried out in anonymised form. Following a pilot phase in 2025, the process is to be rolled out across the Group in 2026.

Equality, diversity and inclusion (EDI)

In addition to the strategic development of our workforce, we have also identified an **inclusive and diverse working environment** as a material factor for STRABAG's success, incorporating this into our corporate strategy within the action area Inclusive Leadership@STRABAG. We summarise our understanding of diversity under the term Equality, Diversity and Inclusion (EDI).

Our Policy on Employment Conditions and Human Rights calls on STRABAG's management and all employees to combat all forms of discrimination and to promote equal opportunities regardless of skin colour, nationality, ethnic origin, social background, gender, sexual orientation, religion, disability or age.

Implementation of our EDI strategy

A Group-wide EDI Coordinator has been positioned within the central division P&C DEV with responsibility for the implementation and continuous development of the EDI strategy and objectives. An interdisciplinary EDI project team, including a member of the Management Board, meets several times a year to jointly discuss further impulses and measures and to initiate them at the Management Board level. As part of this collaboration, the EDI project team has developed several targets that were approved by the STRABAG SE Management Board as early as 2023:

- **Annual increase of 6% in the percentage of women in management (Management Level 0–2)** by 2030: The aim is to achieve the same percentage of women in management as in the Group as a whole. An increase of 3.6% was achieved in 2025.
- **Gender pay gap of 0** by 2030: The value is determined annually and calculated as an average across all employees in the Group, regardless of their role. The figure is influenced, among other things, by the low percentage of women in technical professions and in management positions, which is common in the industry. For this reason, there are no annual targets for the period up to 2030.
- Mandatory **e-learning course on equality, diversity and inclusion** for all STRABAG employees: In 2025, the e-learning program in place since 2024 was translated into nine additional languages. This established the basis for extending the requirement, which had previously applied exclusively to leadership employees, to all STRABAG employees. The e-learning course has been mandatory for all employees since 1 January 2026. The completion rate for leadership employees as at 31 December 2025 stood at 87.5%.

The EDI team is working on further awareness-raising actions for the structured treatment of the three priority EDI dimensions of gender justice, generational diversity and ethnic diversity. The actions include the increased inclusion and integration of EDI in training courses and in existing processes in human resource development. The Female Leaders@STRABAG

programme was established in 2025 to promote the personal development of female leaders and to strengthen their networking within the Group through targeted mentoring and coaching. The programme will continue to be offered in 2026.

Metrics

Characteristics of own workforce

ESRS S1-6

All employee figures were determined by including all associated Group companies and represent annual average values. The information required to generate the metrics was taken from the HR master data of the ERP system at Group headquarters as well as from organisational entities with other ERP systems through standardised monthly reporting. All employees with a valid employment contract were included.

In 2025, STRABAG employed a total of 88,556 people. Of these, 50,407 were blue-collar (hourly) workers and 38,149 were white-collar (salaried) workers. The number of employees in FTE is 80,211 (in line with the information in the notes to the consolidated financial statements). 3,269 employees (FTE) are attributable to subsidiaries and affiliated companies that are not included in the scope of full consolidation.

Number of employees by gender (head count)

Gender	**2025**	2024
Male	71,030	69,647
Female	17,526	17,236
Other	0	0
Not reported	0	0
Total employees	88,556	86,883

Number of employees by country (head count)

Countries in which the number of employees accounts for at least 10% of the total workforce	**2025**	2024
Germany	38,921	39,013
Austria	13,181	13,002

Countries and regions in which the number of employees accounts for less than 10% of the total workforce	**2025**	2024
Poland	7,273	6,581
Americas	5,451	5,822
Czech Republic	4,839	4,319
Hungary	2,839	2,923
Middle East	2,712	2,082
Romania	2,500	2,212
Slovakia	1,534	1,595
Croatia	1,355	1,356
United Kingdom	1,217	1,472
Serbia	1,146	1,232
Asia	945	1,052
Australia	857	3
Switzerland	843	827
Benelux	767	744
Rest of Europe	696	955
Bulgaria	448	415
Sweden	276	264
Slovenia	251	251
Africa	239	517
Italy	218	195
Denmark	48	51

Number of employees by gender and employment contract (head count)

	Year	Female	Male	Other[1]	Not disclosed	Total
Number of employees	**2025**	17,526	71,030	0	0	88,556
	2024	17,236	69,647	0	0	86,883
Number of permanent employees	**2025**	15,135	62,347	0	0	77,482
	2024	14,726	60,679	0	0	75,405
Number of temporary employees	**2025**	2,391	8,683	0	0	11,074
	2024	2,510	8,968	0	0	11,478
Number of non-guaranteed hours employees	**2025**	n.a.[2]				
	2024	n.a.[2]				

[1] Gender as specified by the employees themselves.

[2] The category is not applicable because all STRABAG employment contracts have a fixed number of working hours.

Departures

Employee turnover	**2025**	2024
Total number of employees who have left the undertaking	6,163	5,862
Rate of employee turnover[1]	8.0	7.8

[1] Calculated as the number of permanent employees leaving the Group (mutual termination, unilateral termination by either employer or employee, dismissal, death, retirement) as a percentage of the total number of permanent employees.

Collective bargaining coverage and social dialogue

ESRS S1-8

A total of 96% of STRABAG employees are covered by a collective bargaining agreement (calculated on a head count basis). The information in the table below remains unchanged from the previous year.

Information about the works council

More information

	Collective Bargaining Coverage		Social Dialogue[2]
Coverage rate	Employees – EEA (for countries with >50 employees representing >10% total employees)	Employees – Non-EEA (estimate for regions with >50 employees representing >10% total employees)[1]	Workplace representation (EEA only) (for countries with >50 employees representing >10% total employees)
0-19%			
20-39%			
40-59%			
60-79%			
80-100%	Germany, Austria		Germany, Austria

[1] The number of employees in the respective non-EEA country accounts for less than 10% of the total workforce, which is why no disclosure is made on collective bargaining coverage in other countries.

[2] The existence and organisation of a works council is heavily dependent on the respective national legislation. In most of the countries in which the Group operates, there are no works councils, only trade unions as a form of employee representation.

Diversity metrics

ESRS S1-9

	Unit	**2025**	2024
Gender distribution			
Women in the Group	head count	17,526	17,236
	%	19.8	19.8
Women in management[1]	head count	173	150
	%	11.8	10.7
Women on the Supervisory Board[2]	head count	4	4
	%	36.4	44.4
Women on the Management Board	head count	0	0
	%	0.0	0.0
Men in the Group	head count	71,030	69,647
	%	80.2	80.2
Men in management[1]	head count	1,295	1,250
	%	88.2	89.3
Men on the Supervisory Board[2]	head count	7	5
	%	63.6	55.6
Men on the Management Board	head count	5	5
	%	100.0	100.0
Age distribution			
< 30 years	head count	15,516	15,359
	%	17.5	17.7
30–50 years	head count	45,536	44,519
	%	51.4	51.2
> 50 years	head count	27,504	27,005
	%	31.1	31.1

[1] Hierarchy levels from business unit management up (corresponds to management levels 0–2 – see graphic representation of the career model in this chapter)

[2] As at 31 December 2025

Adequate wages

ESRS S1-10

All STRABAG employees receive adequate wages in line with applicable benchmarks as stated in ESRS Disclosure Requirement S1-10.

Training and skills development metrics

ESRS S1-13

The different rates for appraisal interviews at STRABAG result from the use of different reference values. While the appraisals for salaried employees are systematically assigned and recorded via internal IT systems (corresponding to the category “For allocated STRABAG employees”), this does not happen automatically for hourly workers due to the limited technical integration of the latter into the IT systems. This results in a different calculation basis for the respective rates cited.

Employee appraisal interviews (calculated on a head count basis)

	Unit	**2025**		2024	
		For all STRABAG employees[1]	For allocated STRABAG employees	For all STRABAG employees[1]	For allocated STRABAG employees
Employees that have participated in regular performance and career development reviews	%	35.2	85.0	32.1	82.6
Percentage of women	%	55.3	86.4	51.5	84.1
Percentage of men	%	30.2	84.5	27.4	82.0

[1] According to ESRS standards. Includes salaried employees and hourly workers.

Training hours (calculated on a head count basis)

	Unit	**2025**	2024
Training hours per employee	number of hours	5.2	5.1
Percentage of women	number of hours	7.5	7.1
Percentage of men	number of hours	4.6	4.6

Health and safety metrics

ESRS S1-14

	Unit	**2025**	2024
People in the own workforce who are covered by the health and safety management system (%)	%	100.0	100.0
Fatalities from work-related accidents among own workforce	number	1	2
Fatalities from work-related accidents among subcontractors	number	4	2
Recordable work-related accidents	number	1,805	1,870
	rate[1]	12.3	13.2
Days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health[2]	number	49,583	51,008

[1] Number of accidents at work per 1 million working hours

[2] The number of days lost includes the day following the accident until the end of the sick leave. Natural deaths are not included in the data.

STRABAG has revised the methodology for determining days lost. Starting with the current reporting year, both weekend days and statutory public holidays are included in the calculation. The days lost reported for the previous year have been recalculated accordingly to ensure comparability between the two financial years.

	2025 (new calculation method)	2024 (new calculation method)	2024 (old calculation method)
Days lost to work-related injuries and fatalities	49,583	51,008	35,286

Remuneration metrics

ESRS S1-16

	Unit	**2025**	2024
Gender pay gap	%	16.3	16.7
Annual total remuneration ratio[1]	factor	49.6	48.5

[1] The factor is calculated from the ratio of the annual total compensation for the highest-paid individual to the median annual total compensation for all employees. The median annual employee compensation was calculated on the basis of the HR master data taken from the ERP system at Group headquarters, taking into account those employees who were employed for at least six months in the calendar year. Compensation was extrapolated into an annual amount for employees who were with the company for less than 12 months in the year and to a full-time amount in the case of part-time employment.

Human rights incidents

ESRS S1-17

	Unit	**2025**	2024
Total number of reported incidents of discrimination, including harassment	number	75[1]	33
Number of complaints, excluding reported cases of discrimination	number	8	14
Total amount of fines, penalties and compensation for damages as a result of the incidents and complaints disclosed above	T€	3	0
Severe human rights incidents connected to the company's own workforce[2]	number	0	0
Indication of how many of the severe human rights incidents are cases of non-respect of the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises	number	0	0
Total amount of fines, penalties and compensation for damages for severe human rights incidents connected to the company's own workforce	T€	0	0

[1] The increased use of the whistleblowing scheme is attributed to improved communication via the intranet, during training sessions and on the website.

[2] Severe human rights incidents include forced labour, human trafficking or child labour.

Workers in the value chain

ESRS 2 SBM-3

STRABAG supports, respects and is committed to the protection of internationally recognised fundamental human rights. As our corporate responsibility extends to all workers in our upstream and downstream value chain, the same principles apply accordingly. STRABAG's value chain is highly complex and characterised by a great diversity of different projects. With construction projects around the world, along with the global sourcing of building materials, our value chain includes a large number of different business partners, suppliers and their workers.

The topic of **social responsibility**, and with it the assumption of responsibility for human rights throughout the value chain, is an integral part of the Group-wide sustainability strategy. The risks, impacts and opportunities identified through the risk analysis and the double materiality assessment feed into strategic considerations. They form a central basis for the strategic direction and the prioritisation of our key action areas from which we derive the three focus topics of our sustainability strategy:

- Our employees
- Human rights along the value chain
- Added value for society

In addition, stakeholder dialogue formats in which we participate or which we organise provide valuable insights and suggestions that may feed into our strategic decisions. The specific influence of individual dialogue formats is difficult to determine, however, as they usually represent only one of several aspects in the decision-making process. Through this approach, new information was obtained in 2025 and contact was established with additional stakeholders. In the coming year, the dialogue with our business partners regarding responsibility along the supply chain will be further strengthened; the effectiveness of exchange formats will be improved and – where possible – made measurable.

For the focus topic "Human rights along the value chain", the Group-wide implementation of the Social Compliance Management System (SCMS), compliance with human rights and the fulfilment of our corporate due diligence obligations have been defined as strategic objectives. To implement these objectives, an action cluster has been developed which includes, among other things, the expansion of the risk analysis to additional Group companies.

Implementation of our due diligence obligations

STRABAG's Social Compliance Management System (SCMS) applies along the entire value chain and is overseen by the Group-wide **Human Rights Officer**. Cooperation with various Group entities is essential for the implementation and Group-wide roll-out of the SCMS. Purchasing is particularly important in this context. Within the purchasing process, supplier management plays a key role in implementing human rights standards along the supply chain and integrating them into the procurement strategy. The definition and subsequent implementation of sustainability requirements and criteria for the purchasing and procurement process are being driven forward within the Group through corresponding projects and the involvement of the purchasing organisation.

As part of our due diligence obligations, we identify and assess actual and potential adverse impacts arising from our business activities along the value chain and commit to preventing, mitigating, minimising, remedying and monitoring them. During **identification of the material impacts**, we consider both the upstream and downstream supply chain as well as different groups of workers along the value chain. This includes, for example, workers employed by other companies who work at our sites as well as workers who are particularly vulnerable to certain risks. As part of the risk assessment, country indices are used in particular to identify workers further down the value chain (tier-n) who work in countries where human rights are not protected by law.

If the risk analysis identifies an increased human rights risk at a supplier or other business partner, the first step is to verify the risk using **questionnaires** sent to the business partners for self-disclosure concerning the identified risks and through **supplier audits**. If the deficiencies are not remedied and the risk is not reduced, the final step is to terminate the business relationship.

The **double materiality assessment** identified the following topics as impacts that STRABAG has on workers in the supply chain: working hours, adequate wages, health and safety (including fatal workplace accidents), child labour and forced labour. No material positive impacts on workers in the value chain were identified. All identified impacts are to be understood as systemic. They occur particularly in countries with inadequate regulations, standards or laws – or, in the case of child and forced labour, primarily in certain industries. Supplier impact on the natural basis for life occurs only in certain cases.

Our **risk assessment by country and sector** indicates the extent to which the impacts affect the groups of persons listed below. The following groups of affected workers are considered particularly relevant:

- employees and workers of subcontractors
- workers engaged on construction sites through recruitment agencies or subcontractors
- workers active in the upstream value chain for STRABAG, especially in the deeper upstream value chain, for example in raw material extraction

Given the wide variety of projects and business areas, a uniform and at the same time precise description of the affected workers is not possible. Our understanding of which groups of persons are exposed to higher risks of harm is to be continuously improved. It is, however, possible to identify which impacts are particularly relevant for these types of workers.

Workers on construction sites who are not employed by STRABAG may potentially be affected by forced labour, inadequate remuneration or violations of occupational safety standards – particularly low-income individuals or workers of subcontractors performing manual and hazardous tasks and facing language barriers. In the upstream supply chain, there are risks of child labour and forced labour, especially in raw material extraction. Such working conditions may have long-term physical, psychological or financial consequences.

In the course of the risk analysis conducted in accordance with the German Supply Chain Due Diligence Act (LkSG), which is based on external, internationally recognised indices and sources, certain regions were identified as having an elevated abstract risk of forced labour. In isolated cases, STRABAG's upstream value chain has touchpoints with these risk-exposed regions and sectors. For example, the abstract risk of forced labour is elevated in certain sectors in Russia, Serbia and Turkey. With regard to the abstract risk of child labour, the analysis indicates an increased risk in one sector in China. For the risk assessment, data from direct suppliers were included beyond the scope of the LkSG. This approach will be gradually expanded in the coming years.

Ongoing review of potential risks

Violations of the prohibition of forced labour may pose a financial risk, for example due to the need to terminate business relationships immediately, which could lead to disruptions in the supply chain. In 2025, there were **no indications or incidents relating to forced labour**, so there are currently no financial effects for STRABAG. However, the risk remains.

The financial risk associated with child labour is no longer assessed as material in 2025. The likelihood of occurrence of both forced and child labour risks is continuously reviewed in the analysis. Due to the significantly lower likelihood of child labour occurring in our supply chains, the potential financial risk is considered not material.

Policies

ESRS S2-1

In addition to its Policy on Employment Conditions and Human Rights, STRABAG has a Supplier Code of Conduct and a Supply Chain Management Policy. These apply to the entire value chain and to the workers engaged within it.

The STRABAG Supplier Code of Conduct serves to communicate our ethical principles to our business partners and, through their signature, to commit them to compliance. In principle, the Supplier Code of Conduct applies to all suppliers and is generally embedded in the General Terms and Conditions. The contents of the Code also form part of sustainability audits. The Supplier Code is part of the Group-wide Ethics and Business Compliance System and as such is subject to control by the Corporate Responsibility Office (Business Compliance Group).

The ethical principles addressed in the Supplier Code of Conduct include respect for universal human rights, ensuring fair working conditions and assuming social responsibility. The Supplier Code of Conduct also makes reference to the whistleblower platform for reporting violations of the defined principles.

This includes compliance with the prohibition of:

- slavery and human trafficking
- child labour
- discrimination and harassment
- violence by security personnel

It also includes compliance with the following topics:

- universal human rights
- freedom of assembly
- rules on occupational safety and health
- fair working hours
- fair pay and benefits
- land-use rights and respect for the rights of local communities
- consideration and avoidance of impacts on consumers and end users
- climate change mitigation
- promotion of a circular economy
- environmental protection and biodiversity
- responsible procurement

The purpose of the **Supply Chain Management Policy** is to disclose STRABAG's procurement and purchasing strategy and to outline the sustainability requirements for the procurement process. The document applies across the entire Group. Procurement is the responsibility of the operational entities, supported by central procurement management. At Group level, committees have also been established to develop and revise (further) standards and strategies – including the contents of the Supply Chain Management Policy – on behalf of the Management Board of STRABAG SE and to plan their implementation. In contrast to the Supplier Code of Conduct, the Supply Chain Management Policy is not communicated to our suppliers, subcontractors or business partners but serves as a framework policy for our purchasing and procurement process. The Supply Chain Management Policy was revised in 2025 to incorporate additional human rights and environmental risks and obligations. These include climate change mitigation, the promotion of a circular economy, environmental protection and biodiversity, and the promotion of responsible procurement. The policy requires compliance with international human rights standards such as the Core Conventions

of the International Labour Organization (ILO) and the UN Universal Declaration of Human Rights, as well as the prohibition of forced labour along the supply chain – whether in procurement or in the manufacture of products. Through this revision, sustainability has been fully integrated into the calculation and purchasing process Minimum requirements and sustainability criteria are defined and embedded in the policy. The overarching objective is to create greater transparency along our supply chain.

Processes for engaging with workers in the value chain and providing remedy

ESRS S2-2, ESRS S2-3

STRABAG whistleblower platform

Find out more

Information about possible incidents and complaints is essential for STRABAG to implement appropriate preventive measures and remedies. The STRABAG whistleblower system is available to all internal employees and external third parties, including external workers, and is anchored as an action within the sustainability strategy. The reports received may feed into strategic considerations for the adaptation of actions to address negative impacts. Annual effectiveness reviews by the Human Rights Officer, along with reviews of all incoming reports, are used to identify possible structural or systemic problems to be addressed strategically over the long term through countermeasures. Use of the system by external whistleblowers is confirmation of its reach. The whistleblower system can be used to report information and incidents and to provide feedback on the system itself. Whistleblower notifications, as well as feedback on the system, can also be sent directly to the ombudspersons and the Human Rights Officer.

In 2025, five tips were received involving workers in the value chain in the categories of “human rights and employment conditions” and “discrimination”.

None of the tips received constituted a serious violation of the law. All reports are also examined for potential structural or systemic problems requiring appropriate action. The full review of reports received in 2025 did not indicate any structural or systemic problems.

Actions and projects

ESRS S2-3; ESRS S2-4

Once we have identified risks, we implement targeted preventive actions and remedies as part of our Social Compliance Management System. The aim is to reduce, prevent and remedy human rights violations to ensure compliance with our Group directives. It is not possible to quantify the financial resources required to implement the individual actions, as these activities are usually ongoing and cross-departmental and are not assigned to a fixed project budget or similar.

The preventive actions include, among other things, appropriate contractual provisions as well as questionnaires, **training measures and sustainability audits** along the supply chain at suppliers, subcontractors and business partners to reduce and prevent negative impacts and risks related to human rights and the environment. This also reduces the likelihood of financial risks occurring – from lost revenue and a decline in brand value to potential criminal consequences.

The selection of suppliers to be audited is risk-based. In 2025, the Social Responsibility Group accompanied audits of direct STRABAG suppliers in Germany and Poland. No serious violations were identified. Recommendations for improvement – primarily proposals for updating or optimising documentation and processes – were communicated to the suppliers. Based on the risk analysis, new risk-based audits are planned. The audits serve to identify possible deficiencies or negative impacts, such as violations of occupational safety and health standards, and to implement or further develop appropriate remedies. Due to the risk-based approach, no specific target has been defined regarding the number of suppliers to be audited. Audits are carried out following the identification of risks or in the event of violations. The objective is therefore not a specific number of audits but a high level of effectiveness and improvements resulting from the audits.

Awareness-raising as key

The overarching topic of human rights is addressed in various training courses, which cover general as well as job-specific content. Training and awareness-raising actions are aimed primarily at employees in purchasing, as they play a key role in deciding on business relationships with suppliers. Buyers from numerous organisational entities and countries are trained through an e-learning course on human rights due diligence obligations – specifically on human rights topics along the supply chain – and are required to complete this training annually. The training content includes legal requirements, information on the Social Compliance Management System and on due diligence obligations, and how to carry out plausibility checks. The e-learning programme is open to all employees throughout the Group in German and English and, since 2025, also in Spanish. A revision is also planned to adapt the e-learning course for employees in cost estimation.

We provide remedy where a violation has occurred and assess each case individually. The **remedy action plan** provides for an immediate process that offers guidance in the event of a violation. Remedies include, first and foremost, putting a stop to the violation, planning the necessary actions and initiatives on a case-by-case basis and, if no other solution can be found, taking further consequences such as disciplinary action and the suspension or termination of the business relationship. Compensation can also be provided. Restitution payments are used on a case-by-case basis, with the amount and scope reviewed and adjusted depending on the incident. A structured, Group-wide documentation of the implemented remedies and compensation payments made does not exist. A full survey is planned for the future.

To ensure the effectiveness of our preventive measures, they are implemented on a risk-related basis. Remedies, on the other hand, are carried out independently of the regions and stakeholder groups affected.

The number of reports received through the STRABAG whistleblowing system serves as an initial indicator of whether the system is being used and whether certain actions may not have had the intended effect. To assess the actual effectiveness of the actions, an annual effectiveness review within the scope of the LkSG is carried out, which also includes the consideration of Group-wide actions. In this review, all relevant actions are qualitatively or quantitatively assessed according to the key elements of the management system (culture, targets, organisation, etc.). This includes examining the type of action involved (e.g. prevention or remedy), the impact target it supports, how the KPI – where applicable – has changed compared with the previous year, whether rights holders were involved, whether sufficient data are available for assessment, whether new responsibilities need to be assigned and whether additional resources are required. Depending on the evaluation, recommendations are subsequently made for adapting the action itself and – where necessary – for improving the evaluation of the action in the future (e.g. through sample checks).

Active exchange with actors in the value chain

By organising and participating in **regular stakeholder dialogue formats**, we aim to actively involve actors from our value chain. These include stakeholders from our own business operations as well as from the value chain and representatives of the public. Through dialogue, we aim to promote active exchange with actors in the value chain such as suppliers, business partners and employee representatives. In 2025, within the framework of a stakeholder format, we obtained feedback from experts and representatives of rights holders on planned actions intended to improve the identification of human rights risks on construction sites. Specifically, the aim is to raise awareness and provide information on indicators of possible human rights violations through various communication tools (e.g. posters) and to communicate recommendations for action on how to deal with them. The objective is that employees on construction sites and affected persons will use reporting channels more frequently, enabling remedy to be provided and increasing transparency regarding human rights risks on construction sites. Feedback was sought in particular on whether the selected indicators are representative, whether the language and approach are suitable for the target group and which additional communication methods could be used to convey the messages. The next stakeholder dialogue will take place in 2026. The views and feedback of participating stakeholders feed into the further consideration and development of the actions.

Another objective that was successfully implemented was maintaining relationships and establishing new contacts with actors along the value chain. In 2025, we participated in several stakeholder dialogues focusing on human rights due diligence obligations in the supply chain. In these informative exchange formats – such as conferences, dialogue series or networking meetings – experiences, approaches, challenges and best practices were shared. The contribution of a wide range of actors – suppliers, clients as well as NGOs and business partners – helped us to improve our understanding of effective actions and the needs of affected persons. Discussions within this group on topics such as the implementation of due diligence obligations in specific sectors (e.g. mining, logistics) or specific contexts (e.g. deeper supply chains, high-risk regions) enabled us to gain additional insights. This was achieved, among other things, through methodological approaches such as the evaluation of audit case studies or workshops on questions such as: “How can communication barriers between companies and suppliers be reduced and partnership-based solutions be found?” The insights gained support the further development of actions in the future. However, no specific actions or changes to our approach that can be attributed to a specific dialogue format have yet been derived.

Targets

ESRS S2-5

For 2025, STRABAG has set itself the target of **implementing the Social Compliance Management System (SCMS) throughout the Group**. To date, the system is being used for a number of companies representing 58% of revenue. At present, the system has not yet been implemented across the entire Group. However, the necessary basis has already been established through the draft of a corresponding Group directive, the adoption of which is planned for 2026. The objective of implementing the Social Compliance Management System across the Group therefore remains in place. After adoption of the Group directive, further steps for programme-level implementation – such as awareness-raising measures – will follow. The precise timetable has yet to be determined.

Through the comprehensive implementation of the Social Compliance Management System, existing Group-wide risk assessments will be deepened in order to identify human rights risks for workers of Tier-1 suppliers and to implement appropriate preventive actions and remedies. In addition, risks in our deeper supply chain are examined on an event-driven basis and preventive actions are implemented on a risk-based basis, with remedies carried out whenever necessary. Cooperation with various Group units ensures implementation in the operational entities of the Group.

The development of the targets lies within the responsibility of the Social Responsibility Group. After development, the targets are communicated to the Steering Committee Sustainability and the Management Board before final approval by the Management Board of STRABAG SE. As these are Group-wide, overarching targets for the implementation of a management system and not for defining its content, workers in the value chain or their representatives were not involved in setting the targets. The Group-wide Human Rights Officer reviews the effectiveness and monitors the achievement of the targets.

Affected communities

ESRS 2 SBM-3

At STRABAG, we view our social responsibility not only as an obligation towards society, but also as an opportunity to have a positive impact on local communities. This includes municipalities and local residents but also indigenous peoples.

The topic of **social responsibility**, and with it the assumption of responsibility towards society and affected communities, was incorporated as an integral part of our Group-wide sustainability strategy during its expansion.

The focus topic "Added value for society" includes as strategic objectives generating positive impacts for society, taking into account our potential negative societal impacts and improving the interaction with, or the inclusion of, affected communities. Implementation includes, among other things, conducting stakeholder dialogue formats, implementing guiding principles for interaction with affected communities and using additional communication tools for stakeholder engagement. The aim is also to create social value, for example through the promotion of social and cultural institutions and the expansion of infrastructure.

The double materiality assessment identified the following topics as impacts that STRABAG has on affected communities: adequate food, water and sanitation, and disputes related to land rights. These impacts can be considered systemic, as impairments of natural livelihoods and land-use conflicts may occur, particularly in countries with low environmental protection standards and insufficient legal frameworks. A resilience analysis was not carried out.

Affected communities were identified as a potentially vulnerable group. Municipalities or communities are understood as groups of people who may be directly or indirectly affected by impacts:

- Local residents in the immediate vicinity of construction projects who are directly affected by the impacts of our activities.
- Affected indigenous peoples and communities located either close to construction projects or further away.

No additional groups of affected communities were identified. A detailed analysis of affected communities with the determination of specific characteristics or respective risk of harm has not yet been carried out. Our construction activities may lead to negative impacts on the health and wellbeing of the population. Negative impacts on local residents, affected indigenous peoples and communities include:

- Impairment of natural livelihoods, including soil, air and water pollution: construction-related changes to existing infrastructure may have potential negative impacts that could endanger food production and the availability of clean drinking water and sanitation facilities, particularly for local residents.
- Land-use conflicts: particularly with regard to indigenous peoples, whose socio-cultural practices are often linked to specific land areas. Changes to or repurposing of these areas may lead to impacts on the cultural and intangible heritage of indigenous peoples.

In the case of forced evictions and land-use conflicts, particularly where indigenous peoples are affected, potential reputational risks and loss of revenue may arise. However, these risks were not assessed as material for the year 2025.

Construction services as added value for communities

Improvements to infrastructure can create positive value for local communities. This includes the construction of transport routes and tunnels, the creation of housing, public buildings and squares, as well as barrier-free construction projects, all of which can promote social interaction and more inclusive access for residents and local communities.

Policies

ESRS S3-1

Policies and documents for download

Find out more

At STRABAG, we assume responsibility for our business activities and for the local communities affected by them. This commitment is described in more detail in our Policy on Employment Conditions and Human Rights, our Code of Conduct and our Supplier Code of Conduct. The Policy on Employment Conditions and Human Rights applies to all affected communities and specifically addresses the rights of minorities, indigenous peoples, communities and individuals who may be affected by wrongful land seizure and unlawful forced eviction. Our policy commits us to respecting local culture and customary rights. We respect the land tenure and property rights of affected communities and advocate for the prohibition of forced evictions and the unlawful appropriation of land, forests and waters.

Processes for engaging with affected communities and providing remedy

ESRS S3-2; ESRS S3-3

The engagement of affected communities or their representatives in our risk and opportunity management does not currently follow a structured process. Depending on the project, interaction takes place in various ways, depending on the construction phase, frequency and specific actions selected. These include analysing stakeholder groups and their needs, providing information through notices, flyers and posters or a dedicated website, as well as engaging in direct dialogue with municipalities, for example through an open construction site day or participation in public consultations. Communities are generally involved directly, although legitimate representatives may also be consulted. The engagement of indigenous peoples also takes place in different ways depending on the project. When engaging and interacting with indigenous peoples, we attach great importance to respecting their culture, way of life and customary rights and commit to free, informed and prior consent. These principles are also set out as an obligation in our Policy on Employment Conditions and Human Rights. In close consultation with the respective client, we seek to consider the engagement of indigenous peoples already during the planning phase. STRABAG attaches great importance to respecting cultural, intellectual, religious and spiritual property, as well as land-use rights, relevant legal and administrative provisions, and national laws concerning the rights of indigenous peoples. Individual Group companies, such as in Canada, have established a community management system responsible, among other things, for involving the affected communities, including indigenous peoples. All processes and actions applicable within a respective project for engaging with affected parties also apply to the engagement with indigenous peoples as an affected community.

To enable a structured process for engaging with local residents and communities, the idea of implementing a guideline as an appropriate measure was validated in 2024 and initial concepts were jointly developed. During further development in 2025, it was decided as a first step to develop guiding principles, which will be adopted in 2026. In a second step, the contents of the guideline will be communicated through various communication tools that allow for more flexible adaptation to different contexts. The guiding principles set out Group-wide recommendations for the engagement process and include principles for transparent and sincere interaction with affected communities, including early involvement of relevant stakeholders, cultural sensitivity and a stakeholder- and dialogue-oriented approach.

In order to incorporate the perspectives of local residents and communities and to anchor elements particularly relevant to affected parties within the guiding principles, the principles were developed in collaboration with internal and external stakeholders. Following exchanges with subject-matter experts – including internal community managers from several countries as well as advisory support from an external NGO – a first version of the guiding principles for engagement with affected communities was prepared and will be adopted across the Group in 2026.

Given the diversity of STRABAG's business activities, the effectiveness of a universal procedure cannot be guaranteed and must be reviewed. Responsibility for incorporating the results of risk and opportunity management into the corporate concept lies with the Corporate Responsibility Office. Responsibility for incorporation at the operational project level depends on the organisational structure of the respective client.

A key component for engaging local communities is the STRABAG whistleblower system as a way to contact STRABAG directly and report possible violations. The whistleblower system is also embedded as an action within the revised sustainability strategy. The reports received may feed into strategic considerations for the adaptation of actions to address negative impacts.

In 2025, 16 tips were received involving affected communities in the categories of "human rights and employment conditions", "discrimination" and the "environment".

No serious legal violations were identified based on the reports received. All reports are also examined for potential structural or systemic problems requiring appropriate action. The full review of reports received in 2025 did not indicate any structural or systemic problems.

Issues or complaints can be reported not only to the designated contact persons but also at any time via the **STRABAG whistleblower platform**. After receiving reports or notifications of violations, appropriate case-specific remedies are initiated. Every report is followed up in order to resolve conflicts amicably wherever possible. Compensation payments and financial redress may also be used as remedial measures on a case-by-case basis and are reviewed and adjusted depending on the incident. The concept of the remedy action plan applies here as well.

Actions and projects

ESRS S3-4

At project level, **numerous actions and processes** are already in place to help us engage with affected communities. These are designed to minimise negative impacts, such as noise or impairment of natural livelihoods, on local residents and other affected communities. Due to the large number of actions, many of which are integrated into daily operations, it is currently not possible to quantify the resources provided for managing material impacts.

Proactive communication with communities

We use several different ways to inform residents and affected communities about our construction projects. Information is communicated, among other things, in the form of flyers, letters or advertisements in local newspapers. Another widely used method is to affix information boards or banners at our construction sites. QR codes and posted notices directly at the construction site are used to provide contact details for relevant contact persons. Dedicated construction site websites are another common way of providing information. To keep residents and members of the local community informed about our construction activities, STRABAG also participates in community dialogues and informational events. An informal option frequently used is the direct exchange between employees and local residents at the construction site. This allows smaller issues to be resolved on the spot, without the need for escalation to a higher level.

In Germany, 188 of our construction projects have been certified by the **German Sustainable Building Council (DGNB)**. The certification covers not only environmental sustainability criteria but also social aspects. Projects receiving DGNB certification are required to involve residents, property owners and local businesses through actions such as construction site visits, digital information displays, informational events, letter distribution, telephone hotlines or personal discussions.

There are no Group-wide requirements specifying which measures must be implemented from which project size onwards. The selection of actions and engagement options depends on the legal context, the location and size of the project, and the level of interaction required with local residents and affected persons. Likewise, the choice of the appropriate engagement format depends on the requirements and organisational structure of the respective client. Certain construction projects, such as the construction of an airport, are subject to legal and regulatory requirements, including the completion of an environmental impact assessment (EIA). An EIA is carried out before a building permit is granted. As part of an impact

assessment, the affected population must be informed in advance about the project. The assessment, including the dissemination of information to the public, is carried out by the competent authority and is the responsibility of the client. An EIA is carried out during the planning and design phase of a project and must be completed before construction begins. The EIA does not prescribe any specific binding actions during the construction phase. The timing of the individual actions described depends on the respective project schedule.

No specific Group-wide actions were implemented in 2025, although individual actions were carried out for the duration of the respective construction projects. To strengthen the respect for the rights of affected communities, guiding principles were developed during the reporting year with the aim of promoting structured and respectful interaction with municipalities, local residents and indigenous peoples. For the development of these principles, existing actions for engagement with affected communities were collected and discussions were held with various internal stakeholders responsible for implementation, such as community managers. The aim was to identify which actions are suitable for Group-wide application and can be recommended. The principles are intended to encourage appropriate conduct towards affected communities, while allowing project-specific decisions as to which measures or processes should be implemented.

To prevent material negative impacts such as forced evictions or land-use conflicts, close coordination and cooperation with clients is necessary. In our Policy on Employment Conditions and Human Rights, we commit across the Group to respecting land-use rights and clearly oppose forced evictions. Should a violation nevertheless occur, we seek open dialogue with those affected or their representatives and involve them, where possible, in discussions with the clients.

Targets

ESRS S3-5

Dialogue with affected communities is essential to fulfilling our social responsibility and mitigating impacts. To promote the engagement with local affected communities or their representatives, we set ourselves the goal of implementing a **Group-wide guideline for engaging local communities and residents** at project level. In 2025, a guideline was developed with the involvement of relevant internal and external stakeholders. As a first step, we derived internal guiding principles to be adopted in 2026. In a second step, the contents of the guideline will be prepared for different communication tools and made available to employees.

The targets and concept for the guideline were communicated to the Steering Committee Sustainability and to the Management Board before final approval by the Management Board of STRABAG SE. The Group-wide Human Rights Officer reviews the effectiveness and monitors the achievement of the targets.

Governance

2025

Business conduct

ESRS SBM-3

STRABAG, having defined the avoidance of corruption and anti-competitive behaviour as a material management responsibility, implemented an **Ethics and Business Compliance System** in 2008 and has been continuously developing the system ever since.

The great diversity of STRABAG's activities, of the countries in which it operates, and of its suppliers and business partners results in a broad spectrum of risks for the company. It is therefore of utmost priority to address and counteract identifiable risks in order to prevent potential supplier defaults due to sanctions legislation and to avoid compliance violations and their consequences, such as fines and reputational damage. A holistic approach is used to identify country-specific risks as measured by the Corruption Perception Index (CPI) as well as risks specific to certain segments and business partners. The results also form the basis for the double materiality assessment that is carried out as part of the sustainability reporting.

Violations of the law must be prevented and incidents addressed with a forward-looking approach in order to uphold STRABAG's ongoing ambition to remain a reliable business partner, contractor and employer. To this end, STRABAG promotes compliant behaviour, ethical conduct and a corporate culture based on partnership and trust through comprehensive ongoing actions. A comprehensive training concept as well as the public whistleblower platform play a central role in this regard.

Group-wide cooperation

As of 1 January 2025, the central staff division Business Compliance & Management Systems was transferred into a new **Corporate Responsibility Office (CRO)**, which was tasked by Group management with implementing the Ethics and Business Compliance System. The head of the Corporate Responsibility Office also serves as Chief Compliance Officer of STRABAG SE and reports directly to the CEO.

The Chief Compliance Officer is supported in his tasks by Business Compliance Officers (BCOs), with another 50 Business Compliance Partners appointed to carry out simplified business partner reviews on a large scale. This system ensures that business compliance is not only managed centrally but is also embedded within the operational entities to address local risks. A strategic function within the Corporate Responsibility Office is carried out by the Business Compliance Committee, which consists of the heads of the central division Contract Management and Legal (CML) and of the central staff division Internal Audit along with the Chief Compliance Officer. The committee reviews proposals developed by the Business Compliance organisation for improving the Business Compliance Management System, investigates suspected cases of serious business compliance violations and ensures cooperation across the Group.

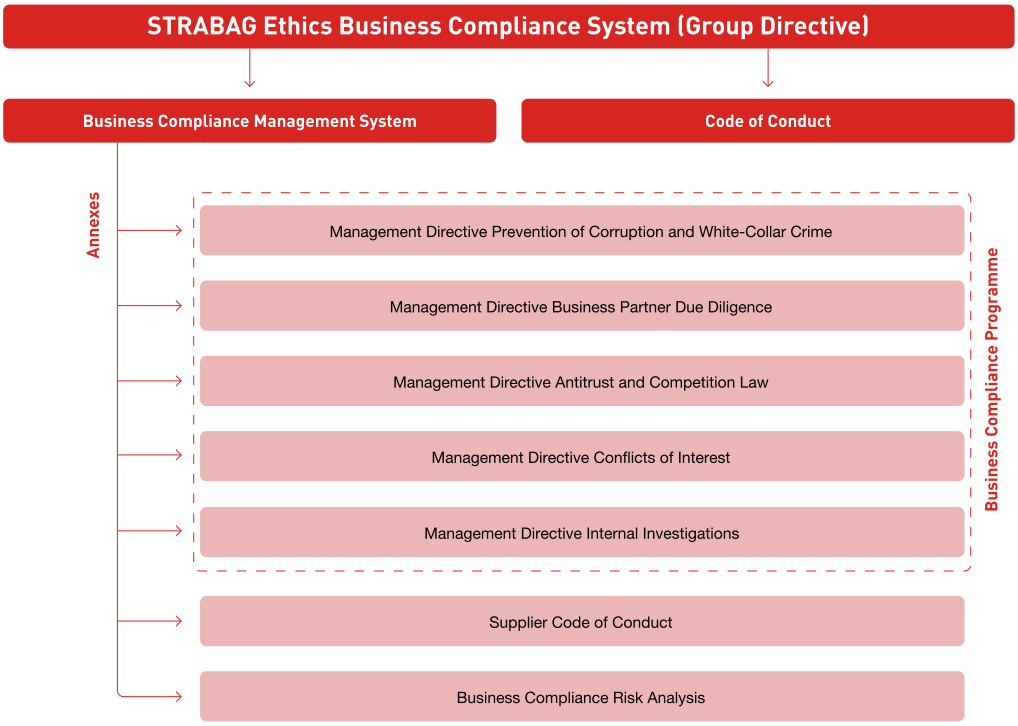
Policies

ESRS G1-1

The Ethics and Business Compliance System is firmly embedded within the company as a Group directive. As such, it has been approved by the Management Board of STRABAG SE. The full Management Board adopts all directives developed by the Corporate Responsibility Office, as well as the Code of Conduct and the Supplier Code of Conduct. Any amendments to these core documents must likewise be approved by the full Management Board.

The Ethics and Business Compliance System consists of the **Business Compliance Management System (BCMS)** and the **Code of Conduct**, which defines the Group's ethical principles. The requirements set out in these documents are binding for all Group employees and are available on the intranet in all Group languages. A comprehensive training concept ensures that the contents are communicated to all employees. The figure below illustrates the structure of the Ethics and Business Compliance System.

STRABAG Ethics and Business Compliance System



The **Code of Conduct** applies to all STRABAG employees and equally considers the interests of other stakeholders such as supervisory and governmental authorities as well as shareholders. The document has been approved by the Management Board of STRABAG SE. The principles set out in the Code of Conduct are specified and defined in detail by the Business Compliance Management System and the BCMS management directives and are continuously monitored, reviewed and further developed by the Corporate Responsibility Office. The document is available on the intranet to all employees in all Group languages and, where legally possible, forms part of the employment contracts. New employees are informed about the contents of the Code of Conduct as part of a mandatory compliance training. The Code of Conduct describes STRABAG's responsibility as a business partner as well as its responsibility towards employees and other stakeholders, based on corporate values such as partnership, trust, solidarity and sustainability. The Code of Conduct also makes reference to the whistleblower platform for reporting violations of the defined principles.

The **STRABAG BCMS** and its implementation across the Group comply with the requirements of ISO 37001 (Anti-Bribery Management Systems) and ISO 37301 (Compliance Management Systems). This also fulfils the key requirements of the UN Convention against Corruption,

which defines best practices for businesses. STRABAG is the **first globally operating Austrian company to have Group-wide certification to ISO 37001 and ISO 37301**.

The STRABAG BCMS is an effective system to prevent business compliance risks such as corruption and bribery. The most important ongoing actions are described in this chapter. As these actions form integral components of the day-to-day business operations, it is not possible to say exactly which financial resources are allocated specifically to these actions.

The management directives serve as an annex to the STRABAG BCMS and define rules of conduct for the entire management and all Group employees. For clarity and practical application, they are divided into several thematic areas.

The management directive on the **prevention of corruption and white-collar crime offences** defines STRABAG's policy on invitations and gifts, donations and sponsorships, as well as interactions with public officials. Together with additional BCMS rules and defined processes for reporting and internal investigations, the directive serves to prevent, detect and address corruption and bribery in order to avoid corrupt behaviour at an early stage, identify risks and respond appropriately.

The management directive on **business partner due diligence** sets out mandatory standards for screening business partners and reviewing business relationships based on the risk analysis. It also defines screening measures that can be carried out independently of a specific business relationship in order to apply an enhanced due diligence standard in individual cases where necessary. The Corporate Responsibility Office also initiates ad hoc actions when required. Following Russia's invasion of Ukraine, the business partner review process was tightened further in March 2022 and a Group communication on sanctions list screening for business partners was sent to all division and central division managers. The policy stipulates that every business partner falling under the relevant parameters must be reviewed by Business Compliance Partners for sanctions list matches prior to contract conclusion.

The management directive on **internal investigations** was updated and put into effect in August 2025. It defines the standardised process for investigating suspected or actual misconduct. A key element of the directive is ensuring that compliance violations are assessed according to uniform principles and addressed with appropriate actions across the Group. Investigations are conducted independently and free from conflicts of interest by qualified personnel. Affected parties are involved in the investigation process in a transparent manner to ensure fair and comprehensible handling. Where violations occur, appropriate actions are recommended, with confidentiality of the results maintained at all times.

The management directive on **antitrust and competition law** describes appropriate conduct, defines review obligations for sensitive business relationships, addresses merger control and, where necessary, provides for the involvement of CML as an independent supervisory body as a way of safeguarding fair competition.

The handling of **conflicts of interest** is regulated in a separate management directive requiring all STRABAG employees to disclose potential conflicts of interest that they may have. In addition to avoiding conflicts of interest, transparent handling of unavoidable conflicts is a key priority as well.

ESRS G1-2

The Supplier Code of Conduct summarises STRABAG's principles of responsible business conduct, compliance with which is also expected from suppliers and subcontractors. These principles cover topics relating to business compliance, human rights, employment conditions, social responsibility, environment and responsible procurement. The Supplier Code of Conduct is generally incorporated into the General Terms and Conditions. Further information on the Supplier Code of Conduct can be found in the chapter Workers in the value chain. STRABAG is currently developing a supplier engagement programme to reduce emissions in our upstream value chain together with our suppliers. In the future, social and environmental sustainability criteria are to be integrated into both project-specific and cross-project supplier evaluations.

ESRS G1-3

Close cooperation exists between several central staff divisions for the implementation and management of the BCMS. The central staff division Internal Audit supports the central staff division Corporate Responsibility Office in enforcing the business compliance rules. Compliance with BCMS requirements is a permanent audit component of the regular compliance and property audits. Outside the regular audit activities, Internal Audit also becomes involved in special audits in coordination with operational entities or the Corporate Responsibility Office to investigate suspected cases of non-compliance.

Suspicious invoices are forwarded to the Business Compliance unit within the Corporate Responsibility Office via a business compliance monitoring process set up by BRVZ in all countries that it administers.

STRABAG whistleblower platform

Find out more

Potential misconduct related to business compliance (suspected corruption, bribery, conflicts of interest and competition law violations), discrimination, human rights and employment conditions, occupational safety and health, environment and data privacy can be reported via the publicly accessible **STRABAG online whistleblower platform** or directly to a contact person within the Group. The whistleblower system is defined in both the BCMS and the Code of Conduct. The platform is accessible to internal and external persons and is available in all Group languages. Employees are informed about the whistleblower platform through the intranet and in training programmes.

The whistleblower system can be used to report information and incidents and to provide feedback on the system itself. Feedback may also be submitted to the ombudspersons or to the Human Rights Officer.

Incoming reports are reviewed by independent case handlers. Ombudspersons responsible for handling cases involving discrimination, human rights and employment conditions conclude an addendum to their employment contracts confirming that in their function as ombudspersons they are not bound by the instructions of their superiors.

The STRABAG whistleblower system meets the standards defined by the Whistleblower Protection Directive (EU) 2019/1937. Compliance by whistleblowers with the legal standards is specified in the management directive on **internal investigations**. Whistleblowers are not responsible for providing evidence to substantiate their claims. A detailed functional description of the whistleblower system and a set of FAQs explain how reports are handled and how maximum protection and anonymity of whistleblowers and affected persons is ensured. All information and data entered into the STRABAG whistleblower platform are encrypted and can only be viewed by the responsible STRABAG case handlers. Case workers are instructed to ensure the protection of whistleblower anonymity through system briefings and ad hoc training sessions. Information on the reported incidents is used and shared only to the extent required for the investigation in line with the need-to-know principle. Every report or complaint relating to business compliance (including but not limited to suspected corruption and bribery, conflicts of interest and competition law violations), discrimination, human rights and employment conditions, occupational safety and health, environment and data privacy is investigated. Within the BCMS, the processes for internal investigations apply uniformly and across topics to all reports in the various categories. Depending on the circumstances, the responsible management will take corrective actions or disciplinary measures – up to and including warnings or termination of employment – to respond appropriately to identified offences and prevent future violations.

The final report contains proposals for actions and, where appropriate, process improvements, including improvements within the Business Compliance Management System itself. Depending on the severity of the violation, the report submitted to the responsible organisational entity, the Management Board and/or the Supervisory Board.

The members of the Management Board are informed about material reports and cases through various reporting processes. This is primarily due to the fact that the whistleblower platform is administered by several specialist departments reporting to different members of the Management Board. As the whistleblower platform is also used by local communities to submit complaints regarding construction sites, incoming reports are also handled directly with the management of the operational entities. The Human Rights Officer conducts an annual review of the effectiveness of the human rights complaints procedure, including an assessment of the functionality and processes of the whistleblower platform. Within the Business Compliance Management System, the Management Board and Supervisory Board are informed annually about significant compliance cases. The report also includes relevant developments and measures for the prevention, detection and handling of violations.

Comprehensive training concept for all employees

Comprehensive employee training of appropriate conduct in day-to-day business dealings, the definition of review obligations in sensitive business relationships, and awareness of the potential consequences of non-compliant behaviour are essential prerequisites for safeguarding fair competition. STRABAG therefore introduced a comprehensive training concept in 2013 to communicate to employees the current directives and processes for combating corruption and anti-competitive behaviour. The training includes in-depth instruction in criminal anti-corruption law, covering offences such as embezzlement, fraud and bribery as well as interacting with public officials. Depending on risk exposure, the training also covers the topics of cartel prohibition, the prohibition on abusing dominant market positions, and merger control under competition law. The training concept is continuously adapted and improved based on feedback from participants and the experience gained from incident management.

All STRABAG employees receive instruction on the rules for safeguarding fair competition immediately upon joining the Group in the form of mandatory e-learning, which must be repeated every two years.

As STRABAG's management (comprising business unit heads, subdivision heads and the heads of the divisions, central divisions and central staff divisions) plays an important role in the prevention of corruption and this group of persons must observe enhanced duties of care, its members are also required to attend special training courses on preventing corruption and competition law violations. Business unit heads and above must complete the basic training upon appointment to their position. In subsequent years, the training content is reinforced at greater depth through refresher courses. Both the initial training and the refresher courses are divided into a general section and a section on competition law. Members of management must complete the refresher courses every three years. As this risk frequently extends to group leaders, an advanced e-learning course for group leaders was introduced in August 2024. This course must be completed every two years.

The training concept, content and target groups are decided by the Management Board and reported to the Supervisory Board. The content is based on the core policy documents, which are likewise approved and reported. The risk areas and topics covered by the training are audited annually by independent auditors as part of the ISO 37001 and ISO 37301 audits, with the Management Board, as the highest governance body, also subject to the audit. Given the Management Board's inherent duty to ensure compliance with both legal and self-imposed standards and to regulate these standards for all employees, no separate training is planned for the full Management Board.

The employee representatives on the Supervisory Board receive periodic training through STRABAG's general training programme. The other members of the Supervisory Board are exclusively persons with many years of experience in executive management or management board functions at renowned companies. In addition, the Supervisory Board possesses legal expertise as well as professional experience in auditing and tax auditing. Each year, one member of the Supervisory Board is audited by external certifiers with regard to the applicable BCMS. For these reasons, separate training for the Supervisory Board has been deemed unnecessary.

Training statistics

	Basic compliance training	Basic cartel law training	Refresher course	Group lead training	Business compliance training
Target group	Management (business unit, subdivision, division, central staff division and central division leads)[1]			Group lead[1]	Employees
Training rates 2025					
Total to be trained	1,511	1,511	1,400	4,232	35,890
Total receiving training	1,431	1,424	1,284	4,041	32,801
Training coverage	95%	94%	92%	95%	91%
Training rates 2024					
Total to be trained	1,444	1,444	1,303	3,779	34,705
Total receiving training	1,345	1,332	981	3,496	31,648
Training coverage	93%	92%	75%	93%	91%
Delivery method and duration					
Classroom training	4 hours	3 hours	4 hours		
Risk-based online training				approx. 40 min	
Online training					approx. 40 min
Frequency					
	After appointment as manager	After appointment as manager	Every three years after completing the basic training	Every two years	Every two years
Topics covered					
Anti-corruption	x		x	x	x
Competition law		x	x	x	x
Management directives	x	x	x	x	x
Incident management	x	x	x	x	

[1] Function-at-risk

In addition to the training courses listed above, 35 **special training courses** were held during the reporting period. Special training courses are offered at the request of local management for all employees who are exposed to an increased risk due to their work. These courses are held irrespective of the employees' hierarchical level.

The Corporate Responsibility Office also supports numerous internal conferences and events presenting general business compliance topics, anonymised incidents and lessons learned.

ESRS G1-4

The German competition authority imposed a fine of € 5.1 million on a STRABAG SE Group company for anti-competitive agreements. The Group company cooperated with the German competition authority under its leniency programme, allowing the proceedings to be concluded by way of settlement. The fine was paid at the beginning of 2025.

In 2006, the Slovak competition authority imposed a fine of € 12.2 million on a subsidiary of STRABAG SE in proceedings concerning anti-competitive agreements. Due to lengthy court proceedings regarding the legality of the ruling and enforcement of the fine, the penalty was not paid until 2025.

In 2024, the total amount of fines paid in connection with the cases reported in STRABAG's 2024 Annual and Sustainability Report amounted to € 3.5 million. These violations were related to anti-competitive collusion.

On 11 March 2026, STRABAG AG (Austria), by means of a settlement, brought to a legally binding close the modification proceedings initiated by the Federal Competition Authority seeking judicial review of the final fine decision of 21 October 2021 for a € 45.37 million penalty. This case was reported in STRABAG's 2022 and 2023 Annual and Sustainability Reports. Following a thorough assessment of the factual and legal situation, the company decided to enter into this settlement by accepting a € 100.63 million increase in the fine to avoid a further lengthy court procedure, thereby bringing the cartel proceedings to a close.

STRABAG is working intensively on the further development of its Business Compliance System and is now the first Austrian company operating internationally to obtain group-wide certification under ISO 37001 and ISO 37301. As part of the continuous improvement of internal processes and compliance actions, STRABAG implemented additional self-cleansing and reorganisation measures alongside the training concept described above. Beyond training, further structural and organisational actions were therefore taken in order to ensure lasting compliance with all relevant legal and ethical standards.

ESRS G1-5

STRABAG is active in various organisations to represent the interests of the construction industry in **dialogue with stakeholders** as a way to contribute to the development of sustainable, innovative and economically viable framework conditions for the industry. This includes membership in major national construction industry associations, such as the Federation of the German Construction Industry (Hauptverband der Deutschen Bauindustrie, HDB) and the Association of Industrial Construction Companies in Austria (Vereinigung Industrieller Bauunternehmungen Österreichs, VIBÖ), as well as regional and/or trade-specific associations.

In 2025, STRABAG once again participated in the **European Forum Alpbach** after publishing a policy paper on the circular economy at the 2024 event. STRABAG also is a member of Stiftung KlimaWirtschaft, a foundation active primarily in Germany to promote corporate climate action. In addition, we have supported the UN Global Compact as a participating organisation since 2021 and are committed to its ten principles in the areas of human rights, labour, environment and climate as well as anti-corruption.

Donations and sponsorships with links to political parties must, in accordance with Group directives, be approved by the full Management Board of STRABAG SE with the involvement of the Corporate Responsibility Office. In 2025, STRABAG made **no direct political donations or sponsorships**. STRABAG SE is registered in the EU Transparency Register under number 472996192561-86.

During the reporting period, no person was appointed to the Management Board or Supervisory Board who had held a comparable position in public administration or at a regulatory authority within the two years prior to their appointment.

The membership fees paid by STRABAG SE are presented below. Membership contributions paid include both compulsory memberships required by law or professional regulation as well as voluntary memberships. The membership contributions made are as follows:

Recipient	Unit	**2025**	2024
Compulsory memberships			
Austrian Federal Economic Chamber (WKÖ)	T€	1,455	1,426
German Chamber of Commerce and Industry (DIHK)	T€	1,174	1,778
Voluntary memberships			
Federation of the German Construction Industry (HDB)	T€	5,041	4,730
German Concrete and Construction Technology Association (DBV)	T€	299	302
Swiss Contractors' Association (SBV)	T€	170	162
Other national construction industry associations and memberships of less than € 150,000 each	T€	352	547
Total membership contributions paid	**T€**	**8,491**	**8,945**

ESRS G1-6

Incoming invoices at STRABAG SE are forwarded via an electronic system or, in exceptional cases, in paper form to the respective cost centre managers, who review them for accuracy, in particular for completeness of the goods and services provided. Following operational approval by at least two persons, the invoice is released for payment in line with the relevant due date and is generally settled by BRVZ's central accounting department in a weekly payment run. Due to the international and heterogeneous nature of the various business fields, no Group-wide requirements or processes exist for avoiding late payments. In the key countries of Germany and Austria, payment is generally made before the (net) due date in order to take advantage of cash discounts.

The average payment period, defined as the period between receipt of the invoice and payment of the invoice, is 21 days, while the median is 16 days.

Given the large number of suppliers in a wide range of different countries, along with the fragmented and heterogeneous nature of the services received, no standardised payment terms exist. Where STRABAG's General Terms and Conditions apply to orders, they provide for a net payment term of 30 days. A total of **89% of payments made are settled within 30 days**. There are no notable differences in payment periods or payment behaviour by type or size of supplier.

As of the reporting date, there were **no** pending proceedings for late payment.

Indicator	Unit	**2025**	2024
Average payment period	days	21	21
Mean payment period	days	16	16
Percentage of payments made within the payment term (30 days)	%	89	90
Pending proceedings for late payment	number	0	0

Appendix B

2025

Appendix B

Disclosure Requirement and related datapoint	Reference
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Sustainability management
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)	Sustainability management
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Sustainability management
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	not applicable
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	not applicable
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv	not applicable
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14	Climate change
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)	not applicable
ESRS E1-4 GHG emission reduction targets paragraph 34	Climate change
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Climate change
ESRS E1-5 Energy consumption and mix paragraph 37	Climate change
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Climate change
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Climate change
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Climate change
ESRS E1-7 GHG removals and carbon credits paragraph 56	Climate change
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66	not applicable (transitional provision)
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)	not applicable (transitional provision)
ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).	not applicable (transitional provision)
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).	not applicable (transitional provision)
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69	not applicable (transitional provision)
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	not material
ESRS E3-1 Water and marine resources paragraph 9	Water and marine resources
ESRS E3-1 Dedicated policy paragraph 13	Water and marine resources
ESRS E3-1 Sustainable oceans and seas paragraph 14	Water and marine resources
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Water and marine resources
ESRS E3-4 Total water consumption in m^3 per net revenue on own operations paragraph 29	Water and marine resources
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Impacts, risks and opportunities
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Impacts, risks and opportunities

Disclosure Requirement and related datapoint	Reference
ESRS 2- IRO 1 - E4 paragraph 16 (c)	Impacts, risks and opportunities
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Biodiversity
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Biodiversity
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Biodiversity
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Circular economy
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Circular economy
ESRS 2 SBM-3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Own workforce
ESRS 2 SBM-3 - S1 Risk of incidents of child labour paragraph 14 (g)	Own workforce
ESRS S1-1 Human rights policy commitments paragraph 20	Our social responsibility
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21	Our social responsibility
ESRS S1-1 Processes and measures for preventing trafficking in human beings paragraph 22	Our social responsibility
ESRS S1-1 Workplace accident prevention policy or management system paragraph 23	Own workforce
ESRS S1-3 Grievance/complaints handling mechanisms paragraph 32 (c)	Own workforce
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Own workforce
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Own workforce
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Own workforce
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Own workforce
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Own workforce
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Own workforce
ESRS 2 SBM-3 – S2 Significant risk of child labour or forced labour in the value chain paragraph 11 (b)	Workers in the value chain
ESRS S2-1 Human rights policy commitments paragraph 17	Our social responsibility
ESRS S2-1 Policies related to value chain workers paragraph 18	Our social responsibility; Workers in the value chain
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Our social responsibility
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19	Our social responsibility
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Workers in the value chain
ESRS S3-1 Human rights policy commitments paragraph 16	Affected communities
ESRS S3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Affected communities
ESRS S3-4 Human rights issues and incidents paragraph 36	Affected communities
ESRS S4-1 Policies related to consumers and end-users paragraph 16	not material
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	not material
ESRS S4-4 Human rights issues and incidents paragraph 35	not material
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Business conduct

Disclosure Requirement and related datapoint	Reference
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	Business conduct
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Business conduct
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Business conduct

We draw attention to the fact that the English translation of this independent assurance report according to section 273 UGB (Austrian Company Code) is presented for the convenience of the reader only and that the German wording is the only legally binding version.

Independent Assurance Report

STRABAG SE
Attn. Management Board Chair
Triglavstraße 9
9500 Villach

We have performed a limited assurance engagement of the consolidated sustainability reporting included in the management report for the Group in the section “Group management report – ESG performance” in the consolidated non-financial statement of STRABAG SE, Villach, for the financial year ended as at 31 December 2025.

Conclusion Based on a Limited Assurance Engagement

Based on the procedures performed and evidence obtained nothing has come to our attention that causes us to believe that the consolidated sustainability reporting included in the management report for the Group in the section “Group management report – ESG performance” does not comply, in all material aspects, with the requirements of Article 29a of the Directive 2013/34/EU, including:

- compliance with the European Sustainability Reporting Standards (hereinafter ESRS) including carrying out the process to identify the information to be reported pursuant to ESRS (hereinafter “Materiality Assessment Process“), and its presentation in disclosure “Double Materiality Assessment”, and
- compliance with the reporting requirements pursuant to Article 8 of the Taxonomy Regulation (EU) 2020/852 (hereinafter EU Taxonomy Regulation).

Basis for Conclusion

We performed our limited assurance engagement in accordance with the legal requirements and the professional standards applicable in Austria with regard to other assurance engagements and additional opinions. The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement; consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under those provisions and standards are further described in the “Auditor’s Responsibilities for the Limited Assurance Engagement of the Consolidated Sustainability Reporting“ section of our report.

We are independent of the Group in accordance with professional requirements and we have fulfilled our other ethical responsibilities in accordance with these requirements.

Our assurance activities are subject to the requirements of KSW-PRL 2022, which essentially corresponds to the requirements pursuant to ISQM 1, applying an extensive quality management system including documented guidelines and processes to adhere to ethical requirements, professional standards as well as applicable legal and regulatory requirements.

We believe that the assurance evidence we have obtained until the date of the independent assurance report is sufficient and appropriate to provide a basis for our opinion by this date.

Other Information

Management is responsible for the other information. The other information comprises the information included in the consolidated financial statements and the management report for the Group and the Annual and Sustainability Report, but does not include the section “Group management report – ESG performance” and our independent assurance report.

Our conclusion on the consolidated sustainability reporting included in the management report for the Group in the section “Group management report – ESG performance” does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our limited assurance engagement of the consolidated sustainability reporting included in the management report for the Group in the section “Group management report – ESG performance” our responsibility is to read the other information identified above and, in doing so, consider whether the other information is materially inconsistent with the consolidated sustainability reporting included in the management report for the Group in the section “Group management report – ESG performance” or our knowledge obtained in the limited assurance engagement, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Management

Management is responsible for the preparation of the consolidated non-financial statement including developing and performing the Materiality Assessment Process pursuant to the applicable requirements and standards. This responsibility includes

- identifying actual and potential impacts as well as risks and opportunities related to sustainability aspects and assessing the materiality of these impacts, risks and opportunities
- preparing the consolidated sustainability reporting included in the management report for the Group in the section “Group management report – ESG performance” complying with the requirements of Article 29a of the Directive 2013/34/EU, including compliance with the ESRS,
- including disclosures in the consolidated non-financial statement in accordance with the EU Taxonomy Regulation as well as
- designing, implementing and maintaining such internal controls as management determines is relevant to enable the preparation of the consolidated sustainability reporting included in the management report for the Group in the section “Group management report – ESG performance” that is free from material misstatements, whether due to fraud or error, and performing the Materiality Assessment Process pursuant to the requirements of the ESRS.

Furthermore, this responsibility includes the selection and application of appropriate methods regarding sustainability reporting as well as making assumptions and estimates on the individual sustainability disclosures appropriate under the given circumstances.

Inherent Limitations for the Preparation of the Sustainability Reporting

Reporting on sustainability aspects according to the ESRS requires using information from the Group’s value chain which is accessible only to a limited extent. Therefore, in its materiality assessment and to calculate key performance indicators disclosed in the sustainability reporting, management has to use data and information from third parties as well as make assumptions and estimates. Thus, such key performance indicators are subject to material uncertainties – as described in section “About this report”.

When reporting on future-oriented information, the Company is required to prepare this future-oriented information based on disclosed assumptions about events that may occur in the future as well as possible future actions by the Group. Actual outcomes are likely to be different since anticipated events frequently do not occur as expected.

When determining disclosures pursuant to the EU Taxonomy Regulation, management faces the challenge of interpreting undefined legal terms, in particular in connection with the fulfilment of the DNSH criteria and the execution of the climate risk and vulnerability assessment according to Appendix A of the Delegated Regulation (EU) 2021/2139. The interpretation of these requirements can vary, especially since the European Commission has not provided a clear stipulation regarding necessity of implementing a climate risk assessment in its communications. These uncertainties can lead to different interpretations regarding the legal compliance of the decisions made and therefore present inherent limitations in the preparation of the consolidated non-financial statement.

For reporting on greenhouse gas emissions, the scientific basis plays a decisive role. However, this may lead to challenges, in particular regarding the determination of emission factors, especially when these factors are required to combine emissions of different gases and describe them in a single unit of measurement such as CO_2 equivalents. Therefore, incomplete scientific knowledge may lead to uncertainties in reporting.

Auditor's Responsibilities for the Assurance Engagement of the Consolidated Sustainability Reporting

Our responsibility is to plan and perform a limited assurance engagement to obtain limited assurance about whether the consolidated sustainability reporting included in the management report for the Group in the section "Group management report – ESG performance" including the comprised Materiality Assessment Process and the reporting pursuant to the EU Taxonomy Regulation is free from material misstatement, whether due to fraud or error, and to issue an independent assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the consolidated non-financial statement.

We exercise professional judgment and maintain professional skepticism throughout the limited assurance engagement.

Our responsibilities include:

- performing risk-based procedures comprising obtaining an understanding of internal controls relevant to this engagement in order to identify disclosures where material misstatements are likely to arise, whether due to fraud or error, but not for the purpose of expressing a conclusion on the effectiveness of the Group's internal controls, and
- developing and performing procedures regarding disclosures in the consolidated sustainability reporting, where material misstatements are likely to arise.

The risks of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of Performed Work

A limited assurance engagement requires performing procedures to gain evidence on the consolidated sustainability reporting included in the management report for the Group in the section "Group management report – ESG performance". The nature, timing and scope of the selected procedures depend on professional judgement including identifying disclosures in the consolidated non-financial statement where material misstatements are likely to arise, whether due to fraud or error.

In our limited assurance engagement regarding the consolidated sustainability reporting in the management report for the Group in the section "Group management report – ESG performance" we proceed as follows:

- We obtain an understanding on the Materiality Assessment Process, especially through: 1) interviews, to understand the information sources used by management; and 2) reviewing the internal process documentation; and

- We evaluate whether the Materiality Assessment Process complies with the ESRS requirements and the process presentation in disclosure “Double Materiality Assessment”, based on the evidence obtained from our procedures performed.
- We evaluate whether all relevant information identified in the Materiality Assessment Process were included in the consolidated non-financial statement.
- We obtain an understanding of the Company’s procedures relevant for the preparation of the consolidated non-financial statement.
- We evaluate whether the structure and presentation of the consolidated sustainability reporting included in the consolidated non-financial statement comply with the ESRS.
- Regarding the linkage with other parts of the corporate reporting and connected information, we compare selected disclosures in the consolidated non-financial statement with the corresponding disclosures in the management report for the Group and the other sections of the management report for the Group.
- We interview relevant employees and perform analytical audit procedures regarding selected disclosures in the consolidated non-financial statement.
- We perform sample-based, result-oriented procedures regarding selected disclosures in the consolidated non-financial statement.
- We obtain evidence on the presented methods regarding the development of estimates and future-oriented information.
- We obtain an understanding of the procedure to identify taxonomy-eligible and taxonomy-aligned economic activities and of the preparation of the corresponding disclosures in the consolidated non-financial statement.

Limited Liability

The limited assurance engagement of the consolidated sustainability reporting included in the management report for the Group in the section “Group management report – ESG performance” is voluntary. According to the agreement, in the event of liability, any contributory negligence on the part of the company subject to a limited assurance engagement, its legal representatives and vicarious agents must be taken into account. Because our report is prepared solely for and on behalf of the client, it does not constitute a basis for any reliance on its contents by third parties. Therefore, no claims of third parties can be derived from it.

Our independent assurance report is issued based on the engagement letter agreed with the Company and is governed by the General Conditions of Contract for the Public Accounting Professions (AAB 2018) enclosed to this report, which also apply towards third parties.

Deviating from item 7 para. 2 AAB 2018, our liability for gross negligence to the Company is limited to half of the liability limit, thus to EUR 6 million, pursuant to section 275 para. 2 UGB (as previously in force) corresponding to the Company’s size criteria based on the size criteria pursuant to section 221 UGB (as previously in force).

Responsible Engagement Partner

Responsible for the proper performance of the limited assurance engagement of the consolidated sustainability reporting is Mr. Gabor Krüpl, Austrian Certified Public Accountant.

Vienna
3 April 2026

PwC Wirtschaftsprüfung GmbH
Gabor Krüpl
Austrian Certified Public Accountant

signed

This report is a translation of the original report in German, which is solely valid. Publication and sharing with third parties of the sustainability reporting included in the management report for the Group in the section “Group management report – ESG performance” together with our independent assurance report is only allowed if the sustainability reporting included in the management report for the Group in the section “Group management report – ESG performance” is identical with the German audited version. This independent assurance report is only applicable to the German and complete consolidated non-financial statement. For deviating versions, the provisions of section 281 para. 2 UGB (as previously in force) apply.