

Sustainability Policy

(Annex to the Management Manual of STRABAG SE)

Principles

We are aware of the diverse and long-term effects of our business activities on the environment and people. Therefore, together with all those involved in construction, we see it as our responsibility to ensure a liveable environment for future generations. At the same time, we see strategic opportunities for STRABAG in sustainable business practices. Through innovative construction processes and an expanded range of services, STRABAG can strengthen its market position in the long term.

This Policy summarises the most important principles for sustainable business practices at STRABAG SE and should be read in conjunction with other relevant documents, including the Environmental and Energy Policy, the Employment Conditions and Human Rights Policy and the STRABAG Code of Conduct.

Our understanding of sustainability encompasses environmental, social and corporate governance issues.

Our principles are based on internationally recognised frameworks and guidelines: we are committed to the fundamental principles of **the International Labour Organisation (ILO)** and the **UN Guiding Principles on Business and Human Rights**. We are also committed to the **International Bill of Human Rights**, which includes the Universal Declaration of Human Rights. In addition, we respect the **OECD Guidelines for Multinational Enterprises** on responsible business conduct. As a signatory to the **UN Women's Empowerment Principles**, we are also committed to implementing the seven principles for the advancement of women in business and to actively promoting gender equality in the workplace and in society. We recognise the United Nations **Sustainable Development Goals** and contribute to their achievement within the scope of our influence. As a participant in the **UN Global Compact**, we are committed to the [10 universal principles of the UN Global Compact](#) in the areas of human rights, labour standards, environmental protection and anti-corruption.

Our guiding principles are:

Environment

- We are contributing to the fight against the effects of climate change: to reduce our greenhouse gas emissions, we are pursuing a science-based reduction pathway in accordance with SBTi with short-term targets until 2030. Achieving climate neutrality by 2040 along our entire value chain is our long-term strategic goal.
- We implement the principles of the circular economy. By considering our structures over their entire life cycle, we implement measures along the entire STRABAG value chain. Improved data transparency, particularly with regard to buildings, construction sites and material flows, is central to this.
- We make a holistic contribution to climate and environmental protection and reduce the impact of our business activities on soil, water and biodiversity.

Social

- We build for and with people, thereby creating added value for society.
- We ensure a stable working environment free from discrimination, harassment and reprisals. We are committed to equal opportunities regardless of skin colour, nationality, ethnic origin, migration, gender, sexual orientation, gender identity, political opinion, trade union membership, religion, disability or age.
- We are committed to prohibiting slavery, human trafficking, child labour and torture, both in our own business and throughout the supply chain.
- We are committed to maintaining and continuously improving occupational safety and health standards, promoting health and preventing occupational diseases for all our employees and everyone affected by our activities, including the general public.
- We pursue approaches to recruit, train and value diverse teams. We also establish a comprehensive learning culture for the efficient use of internal knowledge.

STRABAG
SOCIETAS EUROPAEA

- We protect the interests of affected communities, especially residents living near our construction projects and indigenous peoples and promote diverse interactive exchange formats with them or their representatives in order to minimise negative impacts during construction.
- We rely on holistic approaches to promote customer satisfaction and health. Feedback is actively sought through transparent communication channels in order to implement continuous improvements. We are socially committed and support selected cultural projects on a long-term basis.

Responsible corporate governance

- We act in accordance with the law and set standards for ethical behaviour.
- We are committed to transparency in our management and leadership structure and to comprehensible working methods and decision-making and control processes.
- We are committed to the Austrian Corporate Governance Code (ÖCGK).

Implementation

We expect management and all employees of STRABAG SE, as well as our suppliers, subcontractors and other partners, to comply with these guiding principles.

STRABAG SE has established a large number of arrangements to implement these principles and has also implemented them via appropriate management systems. Responsibilities and the implementation of measures are anchored in various Divisions, Central Divisions and Central Staff Divisions. At the highest management level, sustainability/ESG falls within the remit of our CEO.

In order to implement the guiding principles described above, manage measures and measure progress, all Group units are required to further develop the collection and processing of ESG-relevant data in accordance with Group guidelines. STRABAG SE informs its stakeholders about the status of implementation within the framework of its statutory sustainability reporting obligations.

Violations of environmental, social and governance issues can be reported by employees of the STRABAG Group, employees of direct and indirect suppliers and subcontractors, as well as other third parties by telephone or email to designated contact persons (ombudsmen) or, if desired, anonymously via our online whistleblower platform.

The key areas of action for achieving the sustainability principles at STRABAG SE include:

Environment

Pursuing a science-based reduction pathway

STRABAG is implementing a science-based reduction pathway to achieve our climate targets. This pathway identifies the most important areas of action for reducing Scope 1 and 2 emissions as well as Scope 3 emissions. Corresponding measures that contribute to the Scope 1 and 2 areas of action are specified and implemented via sustainability roadmaps. The measures include avoiding or substituting fossil fuels, expanding renewable energies and increasing energy efficiency through new technologies. Progress in implementing these measures is continuously evaluated and reported to management. To reduce our Scope 3 emissions in the upstream and downstream supply chain, we focus primarily on involving customers and suppliers. The advantages of sustainable buildings with low operating emissions should be clearly communicated to our customers (customer engagement), while we raise awareness of decarbonisation among suppliers through partnerships, transparency and innovation (supply chain engagement). The aim is to increase demand for climate-friendly buildings and thus make low-carbon products and services available on a scalable basis.

Promoting the circular economy

The circular economy is promoted throughout the entire life cycle of our buildings, which is why a variety of measures need to be implemented. Through recyclable planning & circular building materials, selective deconstruction & construction in existing buildings, as well as value stream management & high-quality recycling, we want to reduce the consumption of primary raw materials and preserve resources at the highest possible quality level for as long as possible. In order to exploit the potential, we are constantly improving our data basis.

Biodiversity and water management

The protection of water, soil and biodiversity is a key concern for us. We go beyond legal obligations by continuously developing our management systems and raising awareness of nature conservation measures. Our goal is to reduce negative impacts on biodiversity and ecosystems and to make a positive contribution to biodiversity and responsible water management in the long term.

STRABAG
SOCIETAS EUROPAEA

Social

Social compliance management system

To implement our human rights due diligence obligations, a Group-wide Social Compliance Management System is being rolled out and further developed. Key components of this Management System are regular risk analyses and the derivation of appropriate preventive and remedial measures for our own business area and supply chain.

Occupational health and safety

We implement our occupational health and safety obligations through a Group-wide health and safety management system that is based on the requirements of ISO 45001 and is continuously being developed. All employees within the Group and all contracted external companies are obliged to comply with these standards. Key elements include regular risk assessments and the derivation of appropriate prevention and protection measures for our sites and projects. In addition, we rely on training, awareness campaigns and structured monitoring to ensure the highest safety standards and the health of our employees in the long term. We are committed to promoting awareness of mental health and ensuring that our employees receive comprehensive support in the form of appropriate measures when they have psychological concerns.

STRABAG as a top employer

STRABAG relies on a holistic career model to ensure individual development opportunities and offer transparent career paths. We promote diversity and equal opportunities through targeted measures, including group-wide and, where relevant, role-specific training on EDI (Equality, Diversity & Inclusion), and strengthen an inclusive corporate culture. In addition, we systematically monitor the gender pay gap to ensure fair and equal remuneration. STRABAG has set up a work and social fund to support employees who find themselves in serious financial hardship through no fault of their own. We support the well-being of our employees through a wide range of offers such as employee benefits and additional services.

Added value for society

STRABAG makes a contribution to society by implementing infrastructure projects that improve access to education, mobility and utilities. We also support selected cultural and social projects through structured donation and sponsorship programmes. In the area of product safety, we use internal quality management systems, certifications and regular audits to ensure that our structures and services comply with applicable safety and standard requirements.

Governance

Business compliance

To ensure integrity and legal compliance, STRABAG operates a Group-wide Business Compliance Management System based on the international standards ISO 37001 (anti-corruption) and ISO 37301 (compliance management). A key component is a comprehensive, target group-oriented training concept that regularly sensitises all employees to relevant compliance issues. In addition, we carry out continuous risk analyses, internal controls and monitoring measures to ensure compliance with legal requirements and internal guidelines.

Governance structure for sustainability

The governance structure for sustainability in the STRABAG Group involves all relevant decision-making levels and also ensures a transparent flow of information on the company's risks and opportunities. Internal Group committees are responsible for steering the sustainability strategy and monitoring the achievement of targets. This means that measures are initiated, implemented and regularly reviewed in the respective Divisions, Central Divisions and Central Staff Divisions to ensure that sustainability is integrated into all business processes and areas of the Group.

Involvement of external stakeholders

To promote dialogue with external stakeholders, we engage in stakeholder dialogues and participate in discussions. We are actively involved in industry initiatives and associations, thereby strengthening positions that are consistent with our sustainability goals. In addition, we continuously participate in externally audited ESG ratings. These and other measures serve to gather the opinions and expectations of our stakeholders and incorporate them into strategic decision-making processes.

Communication

We ensure that this Policy is distributed as required and made available to interested parties and the public. We ensure that the Policy described here, and the corresponding Management Systems are understood, implemented and maintained at all levels of our organisation and, where necessary, by our suppliers and partners. We involve all stakeholders and inform them about the criteria to be followed in accordance with this Policy.

The Management Board