

**UK Modern Slavery Act 2015**  
**Statement pursuant to Section 54 for 2023**

STRABAG SE, with registered office in Villach, Austria, is the holding corporation of the STRABAG Group (hereinafter referred to as the “**STRABAG Group**”). As one of the leading European-based technology groups for construction services the STRABAG Group operates worldwide in almost all segments of the construction industry. This statement is made in conformance with Section 54(1) of the Modern Slavery Act 2015 and sets out the steps the STRABAG Group and its subsidiaries have taken to ensure that slavery and human trafficking is not taking place in its business or any part of its supply chain.

This statement applies to all STRABAG Group entities operating in the United Kingdom, being:

- STRABAG UK Limited (Company Registration Number 12905017)
- STRABAG AG – UK Branch (Austrian Company Registration Number FN61689w, with UK Company Registration Number FC030275)
- ED. ZÜBLIN AG – UK Branch (German Company Registration Number HRB110, with UK Company Registration Number FC032600)
- ZÜBLIN Timber GMBH – UK Branch (German Company Registration Number HRB28092 with UK Company Registration Number FC036020)
- CML Construction Services Limited (Company Registration Number 13076483)

An essential part of the STRABAG Group’s success depends on the trust of all our stakeholders. The Code of Conduct obliges all employees within the STRABAG Group to responsible behaviour in accordance with the law and to fair relations with all our business partners.

The STRABAG Group is part of the UN Global Compact. Therewith we have committed ourselves to complying with the Ten Principles of the UN Global Compact in the areas of human rights (including but not limited to the prohibition of slavery and child labour), labour, environment, and anti-corruption.

The STRABAG Group is dedicated to the prohibition of modern slavery and human trafficking in its entirety as defined by the Universal Declaration of Human Rights, according to which no one may be forced into slavery or serfdom and all forms of slavery and human trafficking are prohibited. This principle is anchored in the STRABAG Group’s Code of Conduct and is valid worldwide for all of its affiliated and subsidiary entities. Furthermore, the STRABAG Group’s management manual extends to include an policy on employment conditions and human rights.

The STRABAG Group expects its vendors, subcontractors and their employees, as well as other contractual partners to comply with the prohibition of modern slavery and human trafficking. The STRABAG Group employees who are involved in the placing of contracts are required to undertake appropriate due diligence checks and to make their business partners aware of this principle when placing a contract, being cognisant that the construction sector is among the highest culpable sectors for labour exploitation and that this is partly due to its heavy reliance on outsourcing and engaging multiple levels of the supply chain.

The STRABAG Group expects its vendors, subcontractors and other contractual partners to implement appropriate measures to ensure that modern slavery and human trafficking do not take place within their scope or supply chain. These expectations are outlined in the STRABAG Group's Supplier Code of Conduct, which applies worldwide to all of the STRABAG Group's supply chain.

The STRABAG Group will not knowingly support and/or do business with any suppliers who are involved in any forms of slavery.

In case of a detected violation against the prohibition of modern slavery and human trafficking by business partners or within their supply chain, the STRABAG Group's management reserves the right to take appropriate measures, including the immediate termination of business relationships.

The STRABAG Group encourages its employees to report violations against the prohibition of modern slavery and human trafficking. For this purpose, the STRABAG Group's employees, but also third parties, can approach the contact persons of the STRABAG Group's Business Compliance organisation for the STRABAG Group's whistle-blower system (ombudsmen and ombudswomen) or report any misconduct (even anonymously) via our online STRABAG Group-whistleblowing platform or directly to the STRABAG Group's human rights officer, whose details can be found on the STRABAG Group's, intranet platform, STRANET.

The STRABAG Group's Internal Audit department is encouraged to question the acceptance of and compliance with the prohibition of modern slavery and human trafficking within the scope of its regular compliance audits and to report violations to the management.

No violations against the prohibition of modern slavery and human trafficking were identified in 2023 in any of the jurisdictions the affiliates and entities that the STRABAG Group operates in.

This statement covers the period 1 January 2023 to 31 December 2023 and has been published in accordance with Section 54(1) of the Modern Slavery Act 2015; and has been approved by the Management Board of the STRABAG Group and is published on the STRABAG Group's website.

This statement was examined and approved by the Management Board of STRABAG on 26<sup>th</sup> February 2024.

Vienna, 26<sup>th</sup> February 2024

**STRABAG SE**  
The Management Board

