

Employment Conditions and Human Rights Policy

(Annex to the Management Manual of STRABAG SE)

Principles

The construction industry is a labour-intensive sector. The standards on employment conditions and the protection of human rights are as different as the countries in which we operate. In addition, supply and value chains in the construction industry are highly detailed and complex, leading to a lack of transparency.

Taking into account the regulations relevant to employment relationships, this policy complements and clarifies the principles of our business ethics, as set out in the Code of Conduct and our existing management practices and systems.

WE SUPPORT



We respect the fundamental principles of the International Labour Organization (ILO) and the United Nations Universal Declaration of Human Rights.

We joined the UN Global Compact in March 2021. This means that we are committed to the [ten universal principles of the UN Global Compact](#) in the areas of human rights, labour standards, environmental protection and anti-corruption. By signing the UN Women's Empowerment Principles, STRABAG also committed itself to the seven principles for the empowerment of women in business and promotes gender equality in the workplace and in society.

Prohibition of discrimination and harassment in employment and occupation

STRABAG has zero tolerance for discrimination of any kind. The STRABAG management and all employees are called upon to refrain from and prevent any kind of discrimination, harassment and reprisals in connection with employment relationships relating to STRABAG. We live solidarity, promote inclusion and diversity and are committed to equal opportunities regardless of skin colour, nationality, ethnic origin, social background, gender, sexual orientation, religion, disability or age.

Prohibition of modern slavery and forced labour, human trafficking and torture

The STRABAG management and all employees are fully committed to the prohibition of slavery, forced labour, human trafficking and torture as defined in the Universal Declaration of Human Rights. No one shall be subjected to slavery or servitude or to cruel, inhuman or degrading treatment or punishment.

Prohibition of child labour

Our management and employees with personnel responsibility are obliged to ensure that the minimum age for employment with STRABAG companies is not below the age of compulsory schooling and in no case below 15 years.

This does not apply to work performed by children and adolescents in general education schools, vocational schools, technical schools or in other training institutions or in an enterprise or by persons who are at least 14 years of age, provided that this work forms an integral part of

- an education or training programme for which a school or training institution has primary responsibility,
- a recognised training programme that is conducted primarily or exclusively in an enterprise,
- a counselling or guidance programme designed to facilitate the choice of an occupation or training programme.

Rights of minorities and indigenous peoples

We respect the culture, way of life and customary law of minorities and indigenous peoples, and in particular recognise their ownership and tenure rights to the lands they traditionally occupy. This includes the rights to use, manage and conserve the natural resources of these habitats.

Unlawful eviction and unlawful deprivation of land

We are committed to the prohibition of forced evictions and the unlawful appropriation of land, forests and waters. We aim to ensure that no violation of this principle occurs in our operations and take this into account when selecting our construction projects.

Occupational health and safety

Health and safety are central concerns and an integral part of our corporate culture. We are committed to maintaining and continuously improving occupational health and safety standards for all our employees, our business partners and other people affected by our activities, including the public.

Recruitment and hiring

Recruitment and hiring of new employees in the STRABAG Group is done legally and in accordance with international human rights and labour standards, in a fair and transparent manner. At the start of their employment, our employees receive a written employment contract in their local language, setting out their main rights and obligations.

Remuneration, working hours, voluntary allowances and home office

Creating and maintaining employment conditions that comply with the core labour standards of the International Labour Organisation (ILO) and the Universal Declaration of Human Rights is a key objective in the values of the STRABAG Group.

Work at STRABAG is performed under fair working conditions. Remuneration for work performed is based on applicable collective agreements or laws and is agreed on an individual contract basis according to qualifications and performance. We also comply with local labour laws (e.g. normal and maximum working hours, entitlement to paid holiday and sick leave). STRABAG promotes the balance between work and private life. The possibility of working from home requires organisational compatibility on the one hand and agreement between disciplinary manager and employee on the other.

Freedom of association and collective bargaining

We respect the principle of freedom of association and free participation in trade unions. Employees participate in employee representative bodies according to local legislation.

Data protection

We respect and protect the privacy and personal rights of our employees and recognise our responsibility for the careful handling of personal or personal-related data in accordance with the General Data Protection Regulation (GDPR). Data protection - particularly the protection of personal data - is a matter of great concern to us.

Contribution to the local economy and community involvement

With our range of construction services, we contribute to infrastructure development and create jobs, including in structurally weak regions.

Community involvement is a management responsibility. We support carefully selected long-term initiatives with humanitarian, social, charitable, educational or cultural objectives, making a tangible contribution to our local environment.

Suppliers, subcontractors and other business partners

We also expect our suppliers, subcontractors, their employees and other business partners to comply with our principles on human rights and employment conditions. This applies in particular to the contents of the Supplier Code, which is binding on all suppliers, subcontractors and other business partners.

We expect appropriate processes and measures to be in place to prevent human rights abuses in our own operations. Suppliers, subcontractors and business partners are required to identify risks along their supply chains and take appropriate preventive and corrective action. When a contract is awarded, contractual clauses are agreed that require compliance with human rights and environmental requirements and provide for sanctions in the event of non-compliance.

Implementation

The principles are implemented in collaboration between Divisions, Central Divisions and Central Staff Divisions through appropriate management systems or policies and procedures. The STRABAG management is called upon to ensure compliance with these principles on human rights and employment conditions by taking appropriate measures within their area of responsibility.

Occupational health and safety

We implement an effective health and safety management system based on ISO 45001 and/or SCC or equivalent. Comprehensive training is derived from the risk assessment and is provided at all levels and for all employees. We also introduce Group-wide workplace health management.

In addition to our own employees, all contractors are required to ensure safety in the workplace.

Our health and safety principles and their implementation are set out in our Health and Safety Policy and apply to all Group employees, including those working for contractors.

Human resource management

The organisational Unit People & Culture Development (P&C DEV) operates on a Group-wide basis and supports Units of the STRABAG SE Group in the areas of People & Culture Development. P&C DEV is responsible for account and workforce planning, employer branding and recruiting, people development including career, potential and performance management, learning & development and organisational development.

We have extensive apprenticeship programmes and in-house apprenticeship academies as well as a trainee programme for bachelor and master graduates. Our STRABAG Group Academy offers internal training opportunities for all salaried and wage employees in the areas of technology, law, business administration, IT, personality and leadership. Employees also attend various mandatory training courses.

Dialogue on development measures is part of a regular exchange between employees and managers - at least once a year as part of the employee performance review.

Employee representation and social dialogue

STRABAG SE has an SE Works Council with various committees, including one for occupational health and safety. Members of the SE Works Council are represented on the Supervisory Board of STRABAG SE. In addition to the SE Works Council, there are also national employee representative bodies in some of the Group countries. More than 95% of our employees are covered by collective labour agreements, and the requirements of the national legislation are complied with in all our subsidiaries.

Social compliance

To manage, implement and develop our human rights strategy, we are progressively implementing a Group-wide social compliance management system, which we aim to continuously improve. Key components of this management system are regular risk analyses and the derivation of appropriate preventive and corrective measures for the business area and the supply chain.

This includes, for example, appropriate contractual provisions, training and sustainability audits, both within the company and with suppliers, subcontractors and business partners.

A core team in Sustainability Management co-ordinates and organises the management system. Operational implementation is carried out in close cooperation with the responsible persons in the relevant Divisions and the corresponding representatives at national level. These include People & Culture Development, Business Compliance, the Central Staff Division Health Safety Wellbeing & Management System, Ombudspersons and Purchasing.

Data protection

STRABAG has a Group-wide data protection guideline which, in order to create a uniformly high level, sets the European Data Protection Regulation (GDPR) as the minimum standard in all Group countries and for all Group companies. If higher data protection requirements are imposed, these must be complied with. STRABAG has established a data protection management system, the implementation of which is ensured by the data protection coordinators. The Directive applies to all types of personal data relating to natural persons and has been specifically designed to protect the data of employees, clients and other business partners.

Whistleblowing system

Violations of the above principles can be reported by employees of the STRABAG Group, as well as by employees of direct and indirect suppliers and third parties, in particular via our online whistleblowing platform or to designated contact persons (ombudspersons). Incoming concerns are first assessed for plausibility. If they are justified, they will be followed up by the relevant regional ombudspersons: Organisational and labour law measures, ranging from warnings to dismissals, are taken by the responsible management to respond appropriately to identified violations.

The information or questions received through this whistleblowing platform will be treated confidentially and will only be disclosed to third parties on a need-to-know basis. Whistleblowers may disclose their identity or remain anonymous. In either case, the whistleblower's identity is protected.

Communication

We ensure that this policy on employment conditions and human rights is distributed appropriately and made available to interested parties and the public. We also ensure that this policy and the associated management systems, processes and guidelines are understood, implemented and maintained at all levels of our organisation and with our business partners. We involve all stakeholders and inform them of the criteria that must be followed in relation to this policy.

STRABAG employees involved in the awarding of contracts are requested to communicate these principles to suppliers, subcontractors and other business partners.

The Management Board