

Canadian Modern Slavery Statement

pursuant to an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff, referred to as Canada's "*Modern Slavery Act*" (the "**Act**") for the year ending 31 December 2023 (the "**Reporting Period**")

INTRODUCTION

This is a statement made by STRABAG Inc., in respect of the Act, as referenced above.

STRABAG Inc. is a corporation incorporated pursuant to the laws of the Province of Ontario. STRABAG Inc. has prepared this statement in consultation with STRABAG SE.

STRABAG SE is a company incorporated in Austria with registered office in Villach and is listed on the Vienna Stock Exchange. STRABAG SE is the holding corporation of the STRABAG Group, including STRABAG Inc. (hereinafter collectively referred to as the "**STRABAG Group**").

REPORTING ENTITY

The reporting entity under this Act for this statement is STRABAG Inc.

STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

STRABAG Group is a leading European-based technology group for construction services. STRABAG Inc. is the Canadian subsidiary of the Austrian company STRABAG AG. STRABAG Inc. has been operating in Canada since 2005 and participates in the construction/infrastructure sector. STRABAG Group services span the entire construction value chain, bringing together people, materials and machinery in the right place and at the right time to deliver complex construction projects on schedule, of the highest quality, and at the best price. This includes services in design, construction, modernisation, and deconstruction.

STRABAG Inc. provides tailor-made construction projects which take into consideration the varying local, provincial and federal requirements, including all legislation, rules and regulations associated with each project. Where possible, STRABAG Inc. utilizes local subcontractors and partners to deliver construction services, including material(s) and product(s). While the majority of STRABAG Inc.'s suppliers are located in North America and Europe, in certain circumstances, material(s) and product(s) may be supplied by entities internationally.

In addition to reporting obligations under the Act, the STRABAG Group has reporting obligations under modern slavery/human rights legislation in the United Kingdom and Australia.

POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

Risks of modern slavery in the construction industry appear to include forced labour, particularly in the manufacture and production of raw materials; poor working conditions and forced or child labour, where materials are sourced from elevated risk geographies known to be associated with these practices; and forced or unpaid work and unsafe working conditions, as low skilled workers can be vulnerable to exploitative practices.

A key area of risk of modern slavery in the operations and supply chains of the STRABAG Group arises from the selection and use of contractual partners and subcontractors in the local regions in which the STRABAG Group operates.

The STRABAG Group, including STRABAG Inc. expects its vendors, subcontractors and their employees, as well as 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. STRABAG Group, including STRABAG Inc. employees, who are involved in the placing of contracts are required to undertake appropriate due diligence checks and make their business partners aware of this principle when signing a contract, being cognisant that the construction sector, as a whole, 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. 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, human trafficking or child labour.

PARTS OF BUSINESS AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR AND CHILD LABOUR AND STEPS TAKEN TO ASSESS AND MANAGE THAT RISK

The STRABAG Group is committed to the prohibition of modern slavery, as defined in the Universal Declaration of Human Rights and forced labour as defined in the Act, both in our supply chains and in any part of our business.

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.

These principles are also found in internal documents prepared and shared with employees at the outset of their respective employment with entities in the STRABAG Group, including STRABAG Inc. Each STRABAG Group employee must reflect the values and principles contained in the STRABAG Group Code of Conduct.

Through this additional mechanism, the STRABAG Group and its management place prohibitions on slavery and human trafficking, and child and forced labour.

The STRABAG Group, including STRABAG Inc., carefully selects our partners and subcontractors within public procurement procedures as their reliability is of the essence. Our management are well trained and educated in selecting the best possible partners for our projects. We oblige our subcontractors and local partners to adhere to the ten principles of the United Nations Global Compact with the Supplier Code of Conduct and require them to comply with all laws including anti-slavery, forced labour, human trafficking and child labour.

Subcontractors and local partners are expected to comply with these principles and STRABAG Group, including STRABAG Inc., employees involved in issuing purchase orders are required to bring these principles to the knowledge of our subcontractors, suppliers, and business partners, accordingly. If an infringement of these principles is identified, STRABAG Group, including STRABAG Inc. management, will work with the affected parties on remediation aiming at continuous improvement, while also considering application of corresponding sanctions, including the termination of the contracts where appropriate. Additionally, the STRABAG Group, including STRABAG Inc., demands certain confirmations from subcontractors before contract conclusions, including their compliance with labour law provisions. All subcontractors are rated in our procurement information system following project execution. This helps us to document any risks concerning social issues, as well as quality or environmental issues.

STRABAG Group, including STRABAG Inc., has also incorporated language in our subcontracts and supplier/vendor terms and conditions to reflect the requirement of our subcontractors, supplier(s)/vendor(s) to comply with our Supplier Code of Conduct, which requires them to comply with all laws including anti-slavery, human trafficking and child and forced labour.

The STRABAG Group has an established whistleblower system where anyone, including but not limited to STRABAG Group employees and employees of companies in our supply chain, have a mechanism for reporting concerns and suspected wrongdoing or dangers at work, including slavery, forced labour and human trafficking violations, without fear of reprisals via our online STRABAG Group-whistleblowing platform or to the STRABAG Group's human rights officer, whose details can be found on the STRABAG Group's intranet platform. These reports are confidential, and the reporting party may do so anonymously. The STRABAG Group also utilises the audit process, undertaken by its internal audit division, to scrutinise the observance and compliance with these principles.

MEASURES TAKEN TO REMEDIATE FORCED LABOUR AND CHILD LABOUR

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

In case of a detected instance of slavery, forced labour, human trafficking, or child labour by business partners or within their supply chain, the STRABAG Group's, including STRABAG Inc., will take all necessary steps to bring about remediation, but management reserves the right to take appropriate measures, including the immediate termination of business relationships.

MEASURES TAKEN TO REMEDIATE LOSS OF INCOME TO MOST VULNERABLE FAMILIES THAT RESULT FROM MEASURES TAKEN TO ELIMINATE USE OF FORCED LABOUR AND CHILD LABOUR

N/A. No issues have come to the STRABAG Group's knowledge.

TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

Immediately following the conclusion of the reporting period individuals employees in STRABAG Inc.'s procurement department participated in training related to the implementation of the Act. STRABAG Inc. continues to explore and will implement training specific to the Act.

HOW ENTITY ASSESSES ITS EFFECTIVENESS IN ENSURING THAT FORCED LABOUR AND CHILD LABOUR IS NOT BEING USED IN ITS BUSINESS AND SUPPLY CHAINS


STRABAG Inc. considers that the mentioned above policies and mechanisms currently in place have been effective in minimising the risks of modern slavery and forced and child labour in its operations and supply chains. This is measured by the number of cases breaching the prohibition of modern slavery that are discovered during the financial year. No cases have been discovered in respect of Canadian operations in 2023.

Furthermore, no violations against the prohibition of modern slavery were identified in 2023 in any of the jurisdictions the affiliates and entities that the STRABAG Group operates in.

PROCESS OF CONSULTATION

STRABAG Inc. has consulted with STRABAG SE to develop this statement, including by engaging with relevant directors and compliance leaders.

This statement was approved by the directors of STRABAG Inc. on the 16th day of May, 2024. This statement has been provided to the Minister of Public Safety and Emergency Preparedness in accordance with section 11(1) of the Act and has been published to STRABAG's website.



Gerhard Urschitz

Director

I have authority to bind STRABAG Inc.



Ingo Sattlegger

Director

I have authority to bind STRABAG Inc.