

STRABAG SE Modern Slavery Statement 2025

Introduction

STRABAG SE is a European-based technology group for construction services, a leader in innovation and financial strength. Our activities span all areas of the construction industry and cover the entire construction value chain. We create added value for our clients by taking an end-to-end view of construction over the entire life cycle – from planning and design to construction, operation and facility management to redevelopment or demolition. In all of our work, we accept responsibility for people and the environment: We are shaping the future of construction and are making significant investments in our portfolio of more than 250 innovation and 400 sustainability projects.

We aim for profitability, but we also intend to create value for people and the planet. In keeping with this aim, our strategy 2030 focuses on three aspects: **People. Planet. Progress.** These are our guideposts pointing us in the right direction.

We build for people and with people. Each project creates added value for our colleagues and for society. The first pillar of our Strategy 2030 – People – focusses on the following core topics:

We are taking an integrated approach to recruiting, training and rewarding our colleagues. We are committed to diversity, firmly convinced that more diverse teams perform better. We are also establishing an overarching learning culture and want to promote the efficient use of internal knowledge.

Our “*More for the Planet*” pillar tackles climate change by improving resource efficiency through circular economy practices and reducing emissions across construction, while building expertise in the energy sector to support the transition to sustainable energy.

“More for Progress,” our third pillar, focuses on technology leadership and expanding value creation across the full construction lifecycle through innovation, data, and integrated services.

Organisation Structure

The entities of STRABAG SE operating in the UK below meet or exceed the annual turnover threshold of £36 million prescribed by Section 54(2) of the Modern Slavery Act 2015 for the financial year 2025:

- STRABAG UK Limited (Company Registration Number 12905017)
- STRABAG AG – UK Branch (Austrian Company Registration Number FN61689w, with UK Company Registration Number FC030275).

The entities of STRABAG SE operating in the UK but do not exceed the annual turnover threshold of £36 million prescribed by Section 54(2) of the Modern Slavery Act 2015 are:

- ED. ZÜBLIN AG – UK Branch (German Company Registration Number HRB110, with UK Company Registration Number FC032600)
- CML Construction Services Limited (Company Registration Number 13076483)

- STRABAG HARP HoldCo GmbH (Austrian Company Registration Number FN 650303d).

(All entities listed above will be addressed as STRABAG UK entities.)

Key Policies Relating to Modern Slavery & Human Trafficking

STRABAG is particularly committed to the core principles of the **International Labour Organisation (ILO)** and to the **UN's Universal Declaration of Human Rights**. As a signatory to the **UN Global Compact**, STRABAG is dedicated to uphold the principles set out therein. The company has also signed the **UN Women's Empowerment Principles**. We believe that these commitments show what is important in our opinion in the construction industry: professional services and harmonious collaboration among the people performing this work together. As a team, we not only achieve our corporate goals but also create an appreciative working atmosphere for our employees. Moreover, we respect and strive to protect the privacy and personality rights of our employees.

Below is a summary of the organisation's operating key policies:

- **Employment Conditions and Human Rights Policy**
- **ISO certification for business compliance: ISO 37001 (Anti-Bribery Management Systems) and ISO 37301 (Compliance Management System)**
- **Code of Conduct**
- **Supplier Code of Conduct**
- **Whistleblower Platform**

The policies apply to all fully consolidated companies of STRABAG SE.

The policies mentioned above are publicly available at [Business Compliance | STRABAG United Kingdom](#), [Business Compliance | STRABAG SE](#) and [Policies and documents | STRABAG SE](#).

Risk Assessment & Management, Due Diligence and Effectiveness

Our Code of Conduct and our Supplier Code of Conduct provide us with the necessary guidelines and harmonised standard at Group level. For all entities of STRABAG SE, its suppliers' and subcontractors' compliance with this Code of Conduct is an essential part of all business relations. In the event of breaches of the principles established in the Supplier Code of Conduct, STRABAG SE entities expect its suppliers and subcontractors to take immediate and appropriate action to avoid similar future breaches sustainably. If STRABAG SE entities determine that a supplier or subcontractor has not taken sufficient measures to avoid breaches of the principles set out in this Code, STRABAG reserves the right to terminate the business relations.

The requirements set out in our Code of Conduct and Supplier Code of Conduct are further refined and supported through the inclusion of Modern Slavery contractual clauses. PQQ processes also represent a key element in which addressing Modern Slavery is essential.

STRABAG UK entities work in ongoing cooperation with the **Immigration Advice Service (IAS)**, a UK-based organisation specialising in immigration law and compliance, to ensure all processes relating to migrant labour meet Home Office requirements. IAS provides expert guidance on right-to-work checks, visa and sponsorship obligations, and record-keeping, advising STRABAG UK Ltd on compliant procedures. This reinforces the entities' commitment that employees are employed in accordance with Home Office guidelines, while strengthening due diligence and avoiding the risk of exploitation or illegal working practices. In case of any doubts, expert advice is sought from IAS to ensure that decisions are fully compliant with current legislation and best practice.

STRABAG SE whistleblower system - All employees are required to report breaches of internationally applicable human rights and applicable laws, as well as environmental breaches via the STRABAG whistleblower system. The STRABAG whistleblower system is also available to suppliers, subcontractors and third parties to report suspected abuse of compliance rules by STRABAG employees. In addition to the traditional reporting channels (reporting to a supervisor, e-mail, anonymous letter, etc.), it is also possible to submit any concerns/suspected compliance violations (also anonymously) via the STRABAG whistleblower platform ([Whistleblower platform | STRABAG SE](#)). Submitting a report will not lead to any reprisals in terms of career, income or development opportunities (bona fide rule). The identity of the whistleblower is under special protection. Subcontractors and suppliers must inform STRABAG of any relevant misconduct against the principles of this Supplier Code of Conduct (if legally permissible without infringing applicable law or binding, legally valid obligations).

STRABAG AG - UK Branch / STRABAG UK limited are audited by Constructionline and Achilles UVDB in relation to our annual Modern Slavery and Human Trafficking Statement and the associated training programmes.

STRABAG UK Limited is a partner in the Built Environment Against Slavery Group of the Supply Chain Sustainability School. A partnership recognised with the Partnership Award at the Unseen Business Awards 2025 due to its work in shifting modern slavery approaches from a compliance-led mindset to proactive, systemic change through better procurement, responsible sourcing, and collaborative supply chain engagement.

Training & Capacity Building

STRABAG UK entities' onboarding training for new starters includes a dedicated Modern Slavery module, providing a strong and comprehensive introduction to the subject. STRABAG UK entities benefit from Immigration Advice Service (IAS), webinars by gaining up-to-date knowledge on changes to immigration laws, Home Office requirements, and best practices in managing migrant labour. These sessions provide practical insights and highlight common compliance risks, helping to identify potential issues early.

As part of our commitment to ethical procurement one of our major projects obtained the **annual CIPS Corporate Ethics Mark in 2025**, which includes a training module addressing

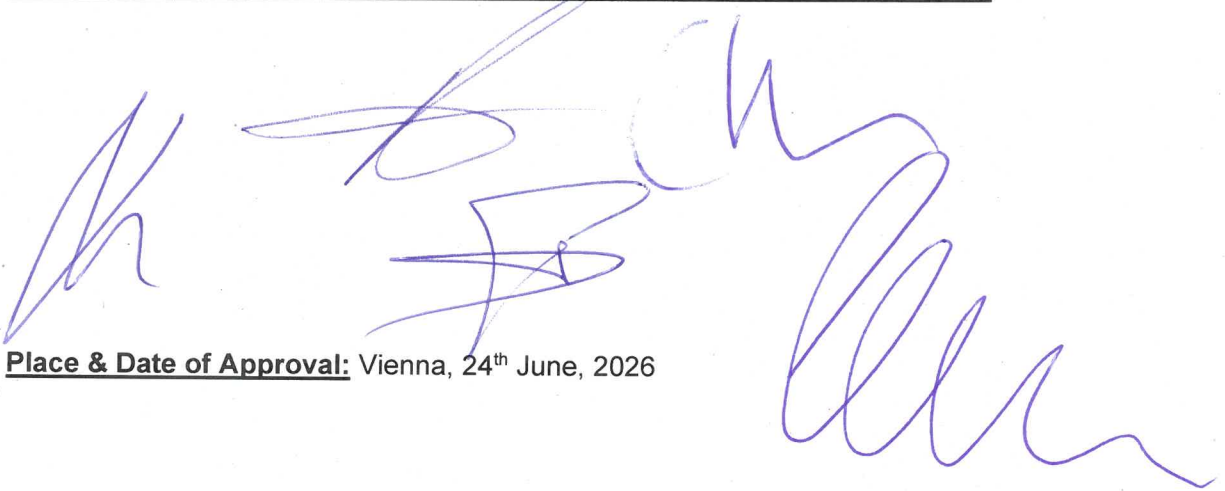
human rights and modern slavery risks in supply chains, forming one of the three core elements of the overall evaluation. The module has supported the awareness of and effective management of these risks for the Procurement and Supply Chain team.

STRABAG UK entities value the work of the **Supply Chain Sustainability School** and will continuously leverage its resources to deliver tailored training for internal teams, while upskilling our supply chain in identifying and managing recognised labour risks, supported by targeted capacity building and knowledge sharing across the built environment sector.

The **Modern Slavery Forum** of the **Supply Chain Sustainability School** has consistently provided a strong platform to engage and share knowledge with not only other construction companies but also a wide range of stakeholders, including community representatives, authorities, and government bodies, enabling continuous learning and the ongoing development of our approaches.

This statement covers the period 1 January 2025 to 31 December 2025 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 STRABAG SE and is published on the STRABAG SE's website.

This statement was approved by the Management Board of STRABAG SE

The image shows several handwritten signatures in blue ink, appearing to be from the Management Board of STRABAG SE. The signatures are stylized and overlapping, covering a significant portion of the page below the approval statement.

Place & Date of Approval: Vienna, 24th June, 2026