

# Code of Conduct for Business Partners.



**Dear business partners,**

As an international construction company with more than 150 years of experience in the planning, development, and implementation of numerous projects and extensive expertise in all sectors of the construction industry, here at PORR we are well aware of the significant influence we wield. With this in mind, we also take responsibility for the impact of our corporate activities in terms of economic, social, and environmental issues. A way of thinking and acting, planning and working, and communicating and dealing with its partners that, from a legal and moral point of view, is both impeccable and sustainable forms one of PORR's key priorities.

Against this background, it is important to us to define the cooperation with our business partners along the entire value chain according to common values and procedures. This Code of Conduct for Business Partners contains our binding economic, ethical-social, and ecological minimum standards. It is based on the Code of Conduct for our employees and the five PORR principles of reliability, working shoulder to shoulder, appreciation, passion, and pioneering spirit – these form the basis of our PORR corporate culture.

Constructive and fair cooperation sets the foundation for the existence of sustainable and successful business relationships between PORR and its business partners – this requires clear rules with which the parties undertake to comply. This is why we call upon all those working together with PORR or who want to do business with us to comply with the Code of Conduct for Business Partners and to act responsibly, in accordance with both the provisions contained therein and any locally applicable laws and regulations.

Thank you for your support.

Kind regards,

  
**Karl-Heinz Strauss**  
 CEO

## Preface

PORR's reputation has been growing steadily for over 150 years and forms the basis for our long-term and reliable business partnerships. On the one hand, this success is based on our binding guidelines for responsible action, which we have put together in the Code of Conduct for Employees. On the other hand, it is also based on a sustainability-oriented Group-wide strategy and fair business practices. Responsible action and economic success are not polar opposites; on the contrary, they support each other.

PORR is a signatory to the UN Global Compact, the largest initiative for sustainable economic activity in the world. As a result, we have undertaken to comply with the ten principles it contains concerning human rights, labour standards, environmental protection, and anti-corruption. Furthermore, it is important for us that our business objectives are in accordance with the Sustainable Development Goals (SDGs) and international human rights.

Sustainable action and management are essential to our PORR strategy and we want to incorporate our sense of responsibility more closely into our value chain. With this in mind, we also have corresponding requirements for our business partners and their business activities, to the extent that these are related to PORR. These must in turn ensure that our requirements are complied with along the entire supply chain.

In this Code of Conduct for Business Partners, our guide for ethically correct behaviour, we have established expectations of both our business partners and their products and services. The requirements listed therein in terms of economic, social and environmental issues are based on both national and international guidelines such as the UN Global Compact, the Universal Declaration of Human Rights and the Sustainable Development Goals, and on our internal standards and values, such as our five PORR principles and the Code of Conduct for Employees.

Observation of, and adherence to, this Code of Conduct is a top priority at PORR. Non-compliance may lead to an immediate termination of the business relationship or even to a blocking of further orders. In the case of established deviations from the Code of Conduct for Business Partners, we ask you to report this directly via the e-mail address, **[compliance@porr.at](mailto:compliance@porr.at)**.



## Compliance and Anti-corruption

Corruption is not tolerated at PORR under any circumstances. This requires strict observance of specifications relating to compliance and anti-corruption measures, and the continuous testing and certification of compliance guidelines, including those pertaining to the prevention of corruption, money laundering, or the financing of terrorism. We also require this commitment to compliance with statutory regulations and ethical standards from our business partners.

PORR also seeks to combat any form of the granting of advantages in the form of gifts, invitations, or other services. All PORR business partners are strictly forbidden from offering or accepting any such advantages, whether directly or indirectly. This also applies even if only the mere impression of such were to arise or if self-interests were pursued (conflict of interests) which were to stand in contradiction to our corporate values.

### All PORR partner companies guarantee

- compliance with the legal provisions concerning compliance and anti-corruption.
- consideration of the requirements defined in the PORR Compliance Management System.
- to offer or accept neither material nor intangible benefits, by means of which one might seek to positively influence the business relationship.
- fair operational and business practices.
- to avoid potential conflicts of interest.
- the reporting of infringements against statutory provisions.

## Fair Competition

PORR considers the observance of transparent and fair activities in the marketplace to be indispensable. Therefore, illegal practices concerning price-fixing, market allocation, or collusive tendering are not permitted. Collusion and coordinated action with third-party companies, especially competitors, which intend or result in any restriction of competition, are forbidden and will not be tolerated by PORR.

### All PORR partner companies guarantee

- compliance with the regulations of competition law.
- consideration of the requirements defined in the PORR Compliance Management System.
- not to come to any agreements which might restrict free competition.
- not to share sensitive information with competitors.
- not to come to any tender arrangements.



## Human Rights and Working Conditions

As a signatory to the UN Global Compact, PORR recognises international human rights without reservation and expects the same of its business partners. Furthermore, we also ensure that fair labour practices are pursued. This includes, for example, fair wages, non-discrimination, the prevention of child or forced labour, and the freedom of association of employees.

In line with the UN Global Compact, PORR also promotes equal opportunity and equal treatment – irrespective of skin colour, nationality, social or ethnic orientation, any possible disabilities, sexual orientation, political or religious beliefs, family status, gender, or age as a matter of course.

### Supply Chain Due Diligence Act Germany

We are unreservedly committed to respecting human rights and environmental due diligence along the entire supply chain. Our requirements for our business partners in the area of procurement are set out in our Statement of Principles on the Supply Chain Due Diligence Act. You can find the policy statement on our homepage.

#### All PORR partner companies guarantee

- compliance with the labour and human rights provisions and the law on the protection of minors.
- their employees a discrimination-free and appreciative working environment.
- the prevention and punishment of any form of child and forced labour or human trafficking.
- fair working practices relating to wages, working hours, etc.
- freedom of assembly and freedom of movement for employees.

## Occupational Health and Safety

PORR's business partners are called upon to ensure the physical and psychological well-being of their employees. This includes both a safe and healthy working environment and strict adherence to safety provisions.

#### All PORR partner companies guarantee

- compliance with the occupational health and safety regulations.
- consideration of the specifications defined in the PORR Management System for Health and Safety.
- to provide their employees both with appropriate work safety equipment and to implement occupational health and safety training.
- the formation of a safe working environment.
- to ensure a healthy environment and to initiate immediate counter-measures in the event of this not being the case.
- to report any accidents related to PORR projects.



## Quality and Safety

PORR business partners must focus clearly on quality and safety in terms of their service delivery and undertake to fulfil the contractually specified quality requirements. Quality and safety-related risks must be continuously analysed, and corresponding solutions and countermeasures must be drawn up and initiated. While doing so, companies must also examine their own supply chain, and attention must be paid to procuring qualitative products or services that can be used and applied safely.

### All PORR partner companies guarantee

- consideration of the requirements defined in the PORR Management System for Quality.
- the provision of the required quality, safety, and performance.
- the active implementation and support of quality assurance.
- to identify quality and safety-related risks and the effects thereof in the daily workflow and to avoid or reduce such wherever possible.

## Data Protection and Confidentiality

PORR requires its business partners, especially in the service sector, to handle sensitive data, intellectual property, and internal information, such as patents, know-how, and trade secrets, with responsibility. Any use of personal data such as names, photos, health insurance information, etc. must be in accordance with the applicable data protection laws – in particular the EU General Data Protection Regulation (GDPR) and associated national legislations.

### All PORR partner companies guarantee

- to handle all personal data with care and in accordance with the applicable statutory GDPR provisions.
- to protect confidential business information and not to disclose it.
- not to use company information received in error and to notify the sender immediately of the receipt of such information.
- only to store data for the duration of the entire contractual relationship and in accordance with the legal retention and documentation requirements, and any special laws pertaining to labour law.
- to only grant access to persons who need this data directly.



## Company Property

Business partners are responsible for ensuring that company property such as team or office containers and PORR construction equipment is handled in a responsible manner. Unlawful, careless or otherwise inappropriate usage of company property will not be tolerated.

### All PORR partner companies guarantee

- careful and responsible handling of the property supplied by PORR.
- to ensure that any instances of theft are punished.
- not to use PORR company property unlawfully.

## Protection of Habitat

PORR business partners must make a clear commitment to environmental protection and endeavour to act in the most climate-friendly manner possible. Environmental risks must be analysed and appropriate solutions or counter-measures must be developed and introduced. In doing so, the entire supply chain must be analysed in detail. In terms of procurement, environmentally friendly, pollution-free construction products, or services acquired fairly and traded in the sense of responsible sourcing must be taken into account.

### All PORR partner companies guarantee

- to comply with the statutory environmental protection requirements.
- to take into account the requirements defined in the PORR Management System for Environment and Energy.
- to contribute actively to combating climate change.
- to identify environmental risks and effects in daily work processes and, wherever possible, to attempt to prevent or reduce them.
- to operate as resource-efficiently and carefully as possible, to counter the scarcity of raw materials by means of recycling, and to avoid or reduce waste.
- to minimise water consumption and to comply with the statutory standards pertaining to the discharging of waste water.

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