



PORR code of ethics

Purpose and scope

This Code of Ethics serves to summarily present the common principles of PORR Group. It is the foundation for all business transactions and decisions and the moral, ethical and legal basis for the correct behaviour of all employees within the group. It is meant to prevent genuine errors of performance and judgment and to promote the values and principles explained below: All PORR employees are expected to observe these values and principles independent of the type of employee relationship, position within the group or the geographic location of the work being performed. The objective is a further development and optimization of this system as it guarantees a continuous improvement in quality, environmental protection and safety of all areas and activities within the framework of the company principles expressed in this code.

1. Compliance with legal regulations

All applicable laws, regulations, directives, standards and customs of the land in which PORR operates are strictly observed and adhered to in all business transactions and decisions.

2. Fair competition

PORR places the highest of priority on transparent and fair conduct on the market. Restrictions of free competition and violations of unfair competition and antitrust laws are incompatible with the company's philosophy and culture and the self-image of PORR.

3. Bribery and corruption

PORR fights any form of corruption, bribery and acceptance of inappropriate gifts. It is strictly forbidden for any employee to directly or indirectly offer or accept benefits likely to or capable of making an impression of illegally influencing business transactions.

4. Observing fundamental rights

PORR does not tolerate any form of discrimination. PORR promotes equal opportunities and equal treatment regardless of colour, nationality, social background, any disabilities, sexual orientation, political or religious beliefs, and sex or age. An individual's dignity, privacy and personal rights will be honoured. Derogative treatment of employees by means of psychological stress, sexual harassment or similar means will not be tolerated.

5. Personnel training and development

An important focal point of PORR is the personnel training and development of employees. The objective is to provide, through mutual understanding and appropriate conduct, a strong foundation for customer orientation, environmental awareness and safety consciousness as well as awareness of our company's social responsibility in society.

6. Community and social commitment

PORR supports a select group of organisations and institutions with humanitarian, social, charitable, educational or cultural objectives.

7. Customer-oriented conduct

PORR's conduct is customer-oriented. PORR's understanding of comprehensive quality connotation refers to the performance quality - of projects, products or services - adherence to schedules, flexibility and technical and economical target achievement. PORR tries to achieve a high degree of customer benefit and customer satisfaction.

8. Risk management

PORR promotes sensitivity for strategic and operative risks through a uniform and transparent risk management that assists in early recognition of said risks. The central objective of conscious risk management is knowledge and control of any risks involved (performance, financial as well as environmental and safety risks).

9. Safety and health

PORR ensures a safe and healthy work environment. To do so requires strict adherence to safety regulations and best practices. A systematic study and a responsible handling of dangerous situations or near accidents at construction sites increase the awareness of employees for safety at work and boost the preventive effect of accident avoidance measures.

10. Environmental protection

PORR considers environmental and social issues in all business decisions and in the management of resources and infrastructures. PORR attempts to minimize environmental stress and to continuously improve environmental protection.

11. Business partner

In selecting a business partner, supplier etc., PORR pays attention to them complying with the principles presented in this Code of Ethics so as to ensure consistent compliance within the group's entire operation.

12. Data protection at PORR

A confidential and responsible approach to personal data is a core component of the PORR corporate culture. First and foremost, this means that any use of personal data conforms to the applicable data protection laws - particularly the EU General Data Protection Regulation (GDPR) and any corresponding national legislation.

13. Compliance in the PORR group

On the basis of our corporate ethics (PORR Code of Ethics) and corporate values (PORR Spirits), the compliance organisation is tasked with implementing internal guidelines (e.g. anti-corruption guidelines) to ensure behaviour that conforms to the law as well as adherence to the Austrian Code of Corporate Governance through the Compliance Management System (PORR CMS).

Here the cooperation between the internal audit, HR and legal departments as well as Group management is a significant factor in guaranteeing the effectiveness of the compliance organisation. Furthermore, as a listed company PORR AG upholds all of the provisions of the Stock Exchange Act, the Compliance Decree for Issuers (CDI 2016) and the Market Abuse Regulation ("MAR") valid in the EU since 3 July 2016. This represents a significant part of the compliance function and organisation.

PORR has

- A Compliance Management System (handbook)
- A Compliance Decree for Issuers as per CDI 2007
- Guidelines to prevent corrupt behaviour
- Other guidelines addressing issues such as antitrust law, checking contracts and business partners, preventing illegal employment of foreigners and social dumping, as well preventing money laundering and financing terrorism,
- An array of other guidelines and work instructions for purchasing, hospitality, donations, bookkeeping etc.
- A new whistleblower system in acc. with MAR Art. 32
- Multi-year training plans for Group employees

All of the compliance guidelines are documented in the IMS and are available in German, English, Polish, Czech, Hungarian and Romanian.

The Compliance Management System is constantly monitored through risk analyses, evaluations and internal audits. Any transgressions are sanctioned and often serve as starting points for improving the system itself.



In 2016/17 PORR has amended its Compliance Management System to comply with the requirements of national and international standards, namely ISO 19600 Compliance Management Systems (international standard), ISO 37001 Anti-Bribery Management Systems (new international standard) and ONR 192050 Compliance Management Systems (Austrian standard).

Vienna, 18 July 2018

A handwritten signature in black ink, appearing to read "K. Strauss".

Karl-Heinz Strauss, CEO

A handwritten signature in black ink, appearing to read "A. Sauer".

Andreas Sauer, CFO

A handwritten signature in black ink, appearing to read "J. Wenkenbach".

J. Johannes Wenkenbach, COO