

**ANTI- HARASSMENT AND
ANTI- DISCRIMINATION
POLICY**

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Introduction

PORR is aware of its responsibility towards its employees in all of the countries in which it operates. PORR strives to offer all employees an appreciative, pleasant and welcoming environment that provides them with the opportunity and security to pursue their work with passion. Anti-discrimination, transparency, protection and the well-being of all employees are therefore a top priority at PORR and are adhered to from the application process to daily work and professional development. We are guided by our PORR principles (reliability, shoulder to shoulder, appreciation, passion and pioneering spirit) and our Code of Conduct for employees and business partners. PORR is committed to the principles of the UN Global Compact and the Sustainable Development Goals (SDGs). In addition, within the scope of its business activities, PORR observes the principles and rights laid out in the "International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and its Follow-up" and aligns its due diligence processes with the requirements of the "Guiding Principles on Business and Human Rights" of the United Nations.

This anti-discrimination and anti-harassment policy is valid for all employees in the PORR markets. The policy clearly explains the various forms of discrimination and harassment and sets out PORR's measures to eliminate them. It applies to all companies belonging to PORR AG, their branches, construction sites, as well as to environments that employees visit in the course of their work (e.g., business trips). Furthermore, the policy includes all communication channels, whether personal or digital, through which discrimination or harassment can occur.

Our governance

The responsibility of this policy and the initial handling of reported cases lies with the Group Human Resources department. The Diversity & Inclusion Officer is responsible for the initial review and assessment of reported cases and regular reporting within the company. The Diversity & Inclusion Officer and the local Human Resources and Legal teams in the PORR markets are responsible for the further processing and follow-up of reported suspected cases.

As an international construction company, the PORR Group is confronted with many different legal and contractual frameworks in its markets. Local laws must be taken into account when applying this policy. If such local laws and regulations do not comply with this policy, the local regulations will apply.

Definitions

Discrimination

Discrimination refers to any form of unjust or unfair treatment or denial of equal treatment and equal opportunity. This equal opportunity for (potential) employees includes, but is not limited to, vacation use, employment, job development, performance evaluation, work hours, work location, promotions, reassignments, training opportunities, or salary.

Discrimination includes the following actual, perceived, or not immediately perceivable characteristics. However, it is not limited to these characteristics.

- Age
- Skin colour
- Gender
- Gender identity, -status, or -expression
- Ethnic origin
- Citizenship, immigration status, or ancestry
- Sexual orientation
- Disability or impairments
- Mental health
- Physical health
- Religion
- World view (e.g., political views)
- Family or relationship status
- Social background
- Pregnancy or related health conditions

This list is not complete. It may be expanded by local laws.

Harassment

Harassment describes suggestive, abusive, intimidating or hostile, humiliating verbal or physical behaviour. It is perceived by the affected person as inappropriate, limiting, unwanted or disruptive in the performance of his or her job or in his or her work environment. There are many forms of harassment:

- Violence or threats of violence

- Offensive or intimidating comments or behaviour (e.g., derogatory statements, nicknames, jokes, pranks, or insults)
- Sharing or showing offensive pictures or videos or otherwise posting inappropriate written content
- Nonverbal behaviours (e.g., stalking)
- Explicit verbal sexual comments (e.g., unsolicited invitations with clear (stated) intent, phone calls or letters or e-mails or text messages with sexual innuendos)
- Suggestive remarks related to a person's personal or physical characteristics
- Unwelcome conduct of a sexual nature (e.g., unwanted physical contact, unwanted sexual advances or requests for sexual favours, implying an expectation of reciprocation for hiring, promotion, or job improvement)

This list is not complete. It may be expanded by local laws.

Discrimination and harassment can occur as isolated acts or incidents. However, they can also be a part of a pattern or repeated behaviour. They can occur during the application process, in the workplace or at locations outside PORR facilities in the context of work events.

Reports

Every person within PORR is responsible for creating an open, safe and pleasant working environment. Therefore, PORR expects all employees who witness and/or suffer harassment or discrimination to report it.

If anyone becomes aware of conduct that they believe or suspect to be a violation of this policy, one of the actions listed should be taken immediately:

- Discuss the suspicion/incident with the manager or a trusted person
- Report the suspicion/incident via the PORR AG anti-harassment and anti-discrimination reporting channel
- Contact local works council or local harassment committee, if available

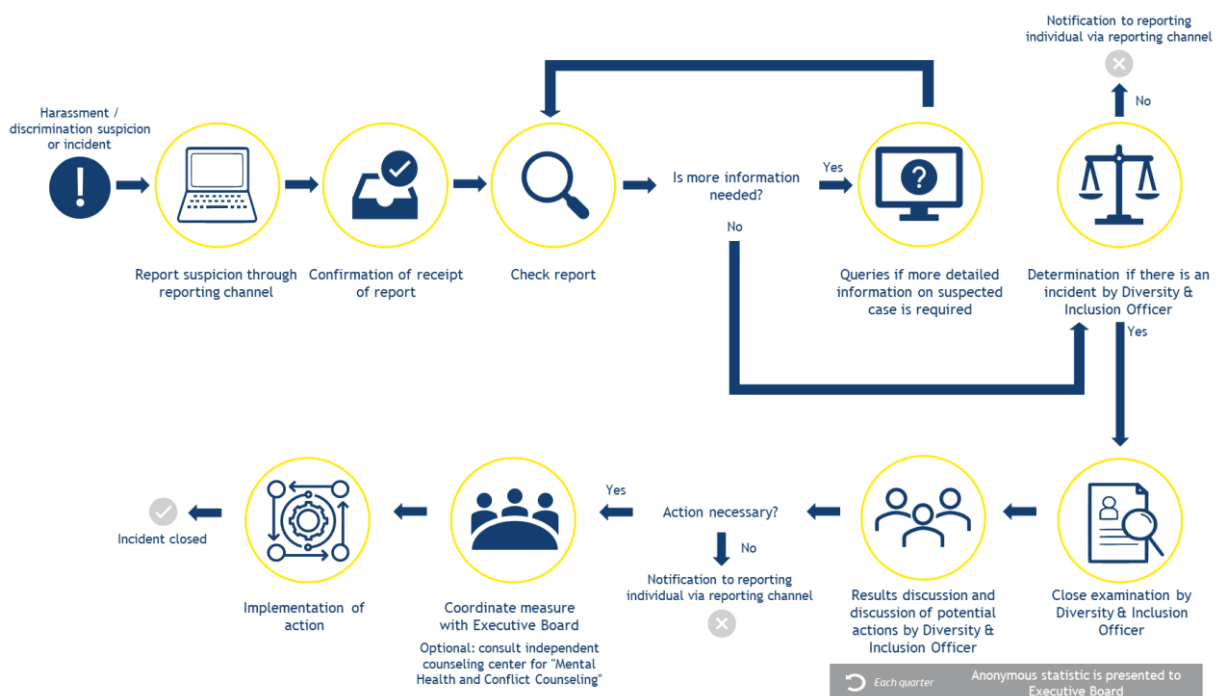
Reporting channel

The aim of this confidential channel is to provide the opportunity to report incidents and suspicions and to guarantee careful and speedy processing. Externally, the reporting channel is [embedded on the PORR website](#) and communicated to stakeholders through common

means such as the sustainability report. Internally, the reporting channel and its availability is anchored in the intranet "PORRtal", which is accessible to all employees.

Confidentiality and process

The [publicly available PORR AG anti-harassment and anti-discrimination reporting channel](#) was implemented in 2023 by the third-party provider CuCoSol GmbH. Reporting parties can submit cases anonymously or share their personal data at their own discretion. Both technically and process-wise, the protection and confidentiality of the reporting individuals and their data is guaranteed. The processing team will treat all reports as confidentially as reasonably possible. Reporting individuals can answer potential queries with anonymized, individually generated login data or process their reporting case in the same way. Information will only be passed on via the system if necessary for the clarification of a case, and even then, only within the strictest limits. Every activity of the Diversity & Inclusion Officer is recorded in the system. These are viewed exclusively for audits. All reports are taken very seriously, as PORR stands for a zero-tolerance policy towards discrimination and harassment. The reporting individual receives an acknowledgement of receipt within a few minutes of the report and feedback on further action within three months (depending on the complexity of the case). If a suspicion is proven, depending on the individual case, consequences under labour law or criminal law will follow for the causing party. The graph below illustrates the process for reviewing reports. Anonymized statistics on reported cases are presented annually in the Annual and Sustainability Report.




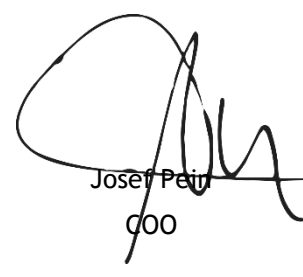
Protection against retaliation

Any PORR employee who reports a well-founded suspicion of a violation or potential violation of this policy is protected from any retaliatory measures. In this regard, it is irrelevant whether the suspicion proves to be true or not. PORR also commits to keeping the identity of those reporting confidential, unless legal disclosure laws require the company to disclose the information to law enforcement authorities. Any PORR AG employee who, on the other hand, retaliates or attempts to retaliate against an individual who has reported or intends to report an incident is subject to disciplinary action. Retaliation includes, for example, exerting pressure or threatening the individual to prevent him or her from reporting an incident or suspicion.

The policy is reviewed on an ongoing basis and updated as required. Further details can be found in the current Annual and Sustainability Report.

We are committed to complying with the Anti-Harassment and Anti-Discrimination Policy and continue to promote a safe and respectful working environment. This is the foundation for PORR's long-term success.

Vienna, 14.12.2023

			
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