

# Human Rights Policy



**PORR**



# Declaration of Principles of PORR AG and its affiliated companies on the human rights strategy

The PORR Code of Conduct is our guideline for ethically correct behavior in accordance with the PORR principles and applies:

- to all PORR staff, employees and professionals as well as those who act on behalf of PORR,
- in all markets and branches of PORR,
- for all affiliated companies of PORR,
- in all work-related and business activities,
- in dealings with colleagues, customers, suppliers and all other stakeholders.

The policy statement on the human rights strategy supplements the PORR Code of Conduct. This is the basis and benchmark for all guidelines and regulations that ensure legally compliant, responsible and ethically impeccable actions within the company.

## Our commitment

As PORR AG and all its affiliated companies to uphold and promote human rights along the entire supply and service chain and follow internationally recognized guidelines.

## Clear commitments, binding rules.

Compliance with human rights in particular is the responsibility of companies, especially when they operate internationally. We are convinced that compliance with human rights must be ensured along the entire supply and service chain.

To reduce the risk of non-transparency and violation of human rights-related or environmental obligations at our own sites and also within the entire supply and service chain, we have committed ourselves to a whole set of principles. Our approaches are reflected in the Human Rights Policy, the PORR Principles and the Code of Conduct for employees and business partners. We are also committed to the principles of the UN Global Compact and to fulfilling the SDGs.

We base our policy statement on the human rights strategy on the

- ten principles of the UN Global Compact,
- Universal Declaration of Human Rights,
- four fundamental principles and rights at work of the International Labor Organization,
- OECD Guidelines for Multinational Enterprises,
- UN Guiding Principles on Business and Human Rights,
- United Nations Sustainable Development Goals.

PORR AG continuously carries out risk analyses in order to identify, evaluate and address human rights and environmental risks at an early stage and to take countermeasures. If our employees responsible for the risk analysis anticipates a significantly changed or significantly expanded risk situation in the supply and service chain, the risk analysis is also carried out on an ad hoc basis. The results of the risk analysis are communicated internally to the procurement department and the board of directors.



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With the ISO 45001 management system, human rights aspects are integrated into the organizational processes and checked. The implementation of the above-mentioned guidelines is checked by means of annual update checks. Selective supplier selection and evaluation as well as random checks of the business locations by the compliance department further ensure the implementation of the measures. Any misconduct in the supply and service chain is recorded and evaluated in the supplier management system and, depending on the severity, can have negative consequences for the company concerned (see consequences of violations).

## Scope of application

The scope of this policy statement extends to all our employees in all areas of the company. On the basis of this policy statement, we commit all employees to behave with integrity and in compliance with the law towards colleagues, contractual partners and third parties.

We expect our business partners to ensure that they, too, comply with applicable laws in supply and service chains, including international agreements on human rights and environmental protection. Business partners must pass on their commitment to respect human rights to their business partners so that they also act ethically and with integrity.

## Appeals and grievance mechanism

In order to highlight human rights and environmental risks and violations of human rights or environmental obligations, we have established a corporate grievance mechanism. The grievance procedure provides the opportunity to evaluate, modify, discontinue and/or correct the business activity.

Our employees are encouraged to report suspected violations of this Human Rights Policy Statement through the newly established grievance procedure. In case of uncertainty about suspected violations, the Chief Compliance Officer or any Compliance Officer in our markets may also be informed.

Business partners or third parties can report alleged violations of this human rights policy statement using the complaints procedure at

<https://whbs.porr.at>

under the button "Reporting channel along the supply chain".

The complaints procedure is set up in such a way that it also allows people to point out human rights or environmental risks as well as violations of human rights-related or environmental obligations that have arisen due to the economic actions of an indirect supplier. The notices drawn up can be viewed and communicated with the Compliance Department - completely anonymously if desired.

## Consequences of violences

In the event of reports of violations and breaches of a human rights-related or environmental obligation in our business or at a direct supplier, cross-functional teams - consisting of Compliance department and Procurement department - design countermeasures to immediately prevent, stop or minimize the extent of the violation.

In the event of serious violations or lack of remediation by the immediate supplier, the business relationship may be terminated. Whether civil and criminal action is taken depends on how, with what intensity and under what circumstances a person has violated this Human Rights Policy Statement. In the case of legal violations, we reserve the right to refer the matter to the appropriate authorities for further action.



## Documentation and reporting

In order to fulfill due diligence obligations, the Compliance department reports annually to the Executive Board and the Supervisory Board:

- Whether any human rights risks or violations of a human rights duty have been identified, and if so, which ones
- what we have done to fulfil our due diligence obligations,
- how we assess the impact and effectiveness of the measures taken; and
- what conclusions we draw from the assessment for future actions and the process as a whole.

## Final statement

The policy statement on the human rights strategy of PORR AG and its affiliated companies was issued on December 20<sup>th</sup>, 2023.