

We are PORR.

Code of Conduct.

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Dear colleagues,

The construction sector is a people business involving many different ethnicities, cultures, religions and spheres of life. Clear rules governing all involved parties are essential for constructive and fair cooperation. These rules are laid out in this document, the PORR Code of Conduct, and are closely connected to the Principles of PORR.

PORR is a full-service provider with more than 150 years of experience in the planning, development and execution of numerous national and international projects, providing an outstanding calibre of expertise and an excellent reputation across all divisions of the construction sector. The top priorities of legal, ethical and sustainable thought and action, planning and work, communication and management are firmly anchored in our company and its Code of Conduct.

This document, along with the Principles of PORR, serves as a foundation for conduct conforming to the law and to ethical standards. PORR has created clear guidelines for all sectors, within which each department is able to operate safely and exercise individual discretion.

These guidelines apply to all PORRians as well as all external stakeholders with whom we do business, including suppliers, service providers, etc. As a prominent, internationally active construction enterprise, PORR has a great deal of influence. This means the company also has a responsibility to society. For this reason, we require everyone who works for PORR or wishes to do business with the company, but especially our managers performing a role model function, to adhere to this Code of Conduct.

Thank you for your support.

Kind regards,

A handwritten signature in black ink, appearing to read 'K. Strauss', written over a white background.

Karl-Heinz Strauss
CEO

Preface

Current market requirements and the new definition of the Principles of PORR have necessitated a review of the former Code of Ethics, which is now available as the Code of Conduct. This document discusses the most important topics affecting daily work processes more strongly and in greater detail.

The PORR Code of Conduct is a set of guidelines for ethically correct conduct, consistent with the Principles of PORR and applicable to:

- all PORR employees, both white- and blue-collar, as well as all those who act on behalf of PORR.
- all PORR markets and branch offices.
- all PORR subsidiaries.
- all work-related business activities.
- all contact with colleagues, customers, suppliers and all other stakeholders.

PORR is a signatory of the UN Global Compact, the largest initiative for sustainable economic activity in the world. This means the company is committed to actively pursuing the Group-wide implementation of sustainable development goals (SDGs) as well as protecting the basic rights laid down in the Human Rights Charter.

Internally, the PORR Code of Conduct is based on the **five Principles of PORR:**

- Reliability
- Shoulder to shoulder
- Appreciation
- Passion
- Pioneering spirit

These five principles interconnect all PORR employees, and make PORR truly unique. They create a collective corporate culture. The PORR Code of Conduct is a set of guidelines for ethically correct conduct in every business context, and this document is intended to provide a realistic set of guiding principles with strong reference to legal guidelines and specifications.

The three pillars of the Code of Conduct

The PORR Code of Conduct is divided into chapters according to the three pillars of sustainability:

- Economy
- Social
- Environment

Various sub-headings fall under these (for example, Compliance comes under the heading of Economy). Each of these subsections are laid out in the same way. Each section begins with a description of what is understood by the relevant topic heading, followed by a concise explanation of what this means for individual employees.

Observation of and adherence to this Code of Conduct is a top priority at PORR. Every employee must act in compliance with the Code of Conduct. Upon signing an employee agreement, new employees are pledging themselves to uphold the Code of Conduct. Non-compliance will result in specific consequences, which may range from prosecution to dismissal. Every employee is therefore required to notify staff of any deviation from the Code of Conduct immediately via the e-mail address compliance@porr.at.

Our five Principles of PORR



Reliability

Commit – don't command.
Responsibility starts with me.
Rules are not a matter of personal choice.



Shoulder to shoulder

Dare to go beyond your silo.
No lone wolves, please.
Information & knowledge should be shared.



Appreciation

Diversity – definitely.
I am not the centre of the universe.
Fairness is a point of honour to us.



Passion

Working together for the best solution.
No compromises when it comes to construction.
The best minds at PORR.



Pioneering spirit

Always one step ahead.
Entrepreneurs at heart.
Mistakes are a learning opportunity.




Operational Guidelines

Should you find yourself in a situation in which you are unsure to what extent the course of action is ethically questionable or what the correct course of action would be, the flow chart below will help you to arrive at a decision.

4 questions

1	2	3	4
<p>Is the course of action legally justified and are all applicable legal and judicial guidelines being observed?</p>	<p>Does the course of action comply with the Code of Conduct?</p>	<p>Can I present this course of action to my professional and social circle with a clear conscience?</p>	<p>Are you sure that this course of action is appropriate and that any potential media coverage will not reflect badly on either yourself or PORR?</p>

3 answers

		
<p>Yes</p> <p>In this case, the course of action can be continued.</p>	<p>Maybe</p> <p>You should consult your manager or write an e-mail to compliance@porr.at.</p>	<p>No</p> <p>If these criteria are not met, you should cease this course of action.</p>

Economy

Adding value is the foundation of every economic activity within the PORR. Sustainable economic activity is an important element of PORR's strategy and gives the company a clear competitive advantage. The focus in this area is on the efficient engagement of all stakeholders as well as transparent and fair business conduct. Training courses and the Compliance Management System serve to minimise the risk of any infringement of legal provisions. These measures also sustainably secure the reputation of PORR and strengthen the confidence of suppliers, business partners and the authorities in the company.



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Stakeholders

The term “stakeholder” refers to a person or group who have a justifiable interest in a process or the outcome of a process or project.

When selecting business partners (including suppliers, subcontractors and service providers), PORR considers the fundamental principles set out in the Code of Conduct. To ensure consistent compliance across all commercial activities, we depend upon efficient stakeholder engagement. Through both close collaboration with international and local business partners and the payment of taxes and fees, PORR makes an important contribution to economic development in its markets. PORR considers the interests of shareholders and customer satisfaction. These are the most important factors for success in the construction industry. Under the comprehensive definition of quality, PORR includes quality of execution (of the project, product or provided service), adherence to schedules and budgets, flexibility and technical and economic goal achievement, PORR aims to achieve maximum customer satisfaction and usage in all its activities.

Every employee

- nurtures fair, professional and respectful relationships with all stakeholders.
- ensures that the Code of Conduct is observed in every commercial contract.
- considers the concerns of all relevant stakeholders.
- represents the company in setting a good example and promoting the Principles of PORR.

Compliance

The term “compliance” refers to the observance of legal requirements, adherence to regulatory standards and the fulfilment of additional, essential ethical standards and guidelines that are usually generated by the company itself.

PORR is the oldest listed company in Austria, and therefore places particular value on compliance and emission compliance. PORR has a Compliance Management System and individual compliance guidelines, all of which are completely in agreement with the ISO 19600 and ONR 192050 standards. These are regularly checked and certified. The observance of laws, ordinances, guidelines, and work procedures in commercial, labour and social legislation are essential prerequisites for a functional Compliance Management System. This must be actively pursued by employees in order to observe the ethical standards of the company. Compliance training is an essential component of our management system, which is aimed at ensuring that employees act in accordance with the law. As a listed company, PORR is also required to satisfy the terms of the EU Market Abuse Regulation (MAR) and the Stock Exchange Act in the context of its emission compliance guidelines, and to prevent insider trading and market manipulation. To this end, an anonymous whistle-blowing system has been set up.

In addition, PORR is implementing the EU guideline 2015/849 for the prevention of the use of the finance system for the purposes of money laundering or financing terrorism (the Fourth Money Laundering Directive), and the company has implemented a reporting process through which infringements in connection with money laundering or the financing of terrorism can be anonymously reported.

Every employee

- adheres to all relevant legal requirements for the location in question.
- is required to report possible infringements of legal provisions to the management immediately.
- can be assured that their anonymity is completely guaranteed when the correct reporting procedures of the MAR whistle-blower system are followed.



Bribery and Corruption

Corruption is not tolerated at PORR. PORR combats any form of granting advantages in the form of gifts, invitations or other services. All employees are strictly forbidden to offer or accept any such advantages, whether directly or indirectly. Commercial transactions can be influenced in an inadmissible manner by such actions. This also applies if such an effect could possibly arise or where self-interest is involved (conflict of interests), contrary to the interests of the company. Anti-corruption is such an important consideration at PORR that, as the first listed company in Austria, it not only satisfies the requirements of the ISO 37001 standard (anti-corruption management), but also maintains the appropriate certification. PORR is currently the only company in the German-speaking region to maintain such high compliance and anti-corruption standards. In recent years, the PORR has provided anti-corruption training to several thousand employees.

Every employee

- makes a judgement to the best of their ability as to whether a particular offer represents hospitality or a gift, the acceptance of which could affect the business relationship.
- never accepts money or cash equivalents.
- does not offer gifts with the intent of positively influencing a business relationship.
- has a responsibility as a company representative to set an example and to take responsibility for fair business practices.

Fair Competition

The observance of transparent and fair action in the marketplace is indispensable at PORR. Any restriction of free competition or infringement of competition or antitrust legislation is not compatible with the corporate culture or self-image of PORR. Illegal practices in reference to price-fixing, market allocation or collusive tendering are not permitted. Collusion and coordinated behaviour with third-party companies, especially competitors, which intend or result in any restriction of competition, are forbidden and will not be tolerated by PORR. Accordingly, all employees who are or could be affected by this range of topics undertake comprehensive antitrust and competition training courses to clearly explain the dos and don'ts of the matter.

Every employee

- bears responsibility for not making any agreements with competitors which would restrict free competition.
- undertakes not to share sensitive information with competitors.
- shall seek advice if she or he is unsure as to whether a particular action would contradict the practice of free competition.

Social

PORR’s success is largely due to the efforts of our employees. Recognising value includes measures and initiatives aimed at fostering employees’ capabilities and competence. PORR values all its employees and operates as a fair, collaborative employer. Health and safety have the highest priority, and these measures are based on the findings of the materiality analysis. In order to be prepared for future challenges, PORR invests in sustainable staff development measures. These measures also support diversity by developing the potential of each and every employee.



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Human Rights and Working Conditions

As a signatory of the UN Global Compact, PORR recognises international human rights without reservation and ensures that it is not a party to any infringements of human rights. In addition, PORR adheres to local legislative requirements and also to additional stipulations laid down by clients. Particular attention is given to fair working conditions. PORR adheres to standards of fair remuneration based on the principle of equal treatment regardless of gender, places the greatest value on non-discrimination, does not tolerate child or forced labour on its construction sites or within the range of its influence and guarantees its employees freedom of association as well as the right to collective bargaining. The company complies with legislative requirements in this area as well as the ISO 45001 standard. In this context, observation of a minimum employee age of 15 years as well as local regulations is important. In addition, the specific rights and requirements of under-age employees must be observed – for example, individual legislative protective regulations apply in the context of apprentice training.

Every employee

- has the right to be treated with dignity and respect.
- treats other people in their workplace equally with dignity and respect.
- is required to report any infringements in the area of human rights or work practices immediately.
- can communicate freely with management regarding working conditions without fear of reprisal.

Health and Safety

The area of health and safety encompasses the prevention of accidents as well as the establishment of a safe and healthy environment. PORR undertakes to ensure a safe and healthy working environment alongside strict adherence to safety provisions. The company has also instituted a Group-wide campaign entitled Vision Zero. This campaign focuses on many areas, including identifying management responsibilities, recognising and assessing hazards, determining protective regulations and implementing training, online training and other awareness-raising measures. The recognition of dangerous situations and near-accidents also contributes to the prevention or reduction of accidents.

Physical and psychological pressures arising from work or private life can impact the health and well-being of employees at PORR. Changing economic conditions also demand greater flexibility and efficiency from people in completing day-to-day tasks. Operational health promotion is implemented as one element of an integrated quality assurance programme. Measures and activities from the areas of workplace health and safety are systematically anchored to enable process-controlled analysis.

Every employee

- has the right to a safe workplace.
- is responsible not only for their own health and safety, but also for that of their colleagues.
- is obligated to attempt to create a safe and healthy environment and, in the event of contrary situations, to implement measures to re-establish such an environment.
- must inform the relevant management personnel immediately in the event of (near-)accidents or health-compromising situations.



Training and Development

PORR fosters the potential of all employees. Professional development opportunities are provided to help employees recognise and develop their talents and capabilities. PORR offers a diverse and equitable range of training and development opportunities for apprentices as well as other employees, with the aim of promoting lifelong learning. Significant points of emphasis include a collective understanding and associated behaviour regarding customer orientation, environmental and safety awareness and an awareness of social responsibility for our company within society.

Every employee

- accepts responsibility for and actively participates in their own professional development.
- has the right to receive feedback from the appropriate management in support of their professional development, regardless of gender, age, ethnic affiliation, religion, etc.
- is entitled to pursue professional development regardless of gender, age, ethnic affiliation, religion, etc.

Diversity and Equal Opportunity

In the style of the UN Global Compact, PORR promotes equal opportunity and equal treatment – irrespective of skin colour, nationality, social or ethnic status, possible disabilities, sexual orientation, political or religious beliefs, family status, gender or age. The We@PORR diversity initiative was created to integrate the topic of diversity into the corporate culture for the long-term. The aim of this initiative is to ensure equal opportunities and equal treatment for all colleagues at all levels and in all countries. The personal dignity, private affairs and personal rights of all will be respected equally. Discrimination, derogatory treatment or harassment of other people will not be tolerated. Cultural and personal diversity is consciously valued and intentionally supported within PORR. Employees are able to maximise their potential and develop their capabilities and strengths – this contributes not only to the company’s increasing success but also to a more productive and positive corporate culture.

Every employee

- contributes to the creation of a working environment in which everyone feels respected and valued.
- is open to the ideas of others and participates actively in successful teamwork.
- does not engage in discrimination or harassment and will intervene as soon as they become aware of any such behaviour.



Data Protection and Confidentiality

The confidential and responsible handling of personal data is a central component of PORR's corporate culture. On the one hand, this means that all usage of personal data (including birth or health-related data, photos, etc.) must occur in accordance with the applicable data protection regulations – in particular the EU General Data Protection Regulation (GDPR) and associated national legislations. On the other hand, this also involves the protection of knowledge and internal information. PORR operates as an international construction company together with many stakeholders. These operations involve the exchange of ideas, knowledge, opinions, offers and other confidential information that is subject to the obligation of secrecy. The confidential handling of this sensitive data and information is extremely important in reference to the competitiveness of the company and the trust of stakeholders.

Every employee

- can be confident that all personal data will be handled in accordance with the relevant legal specifications, these data will not be stored for longer than necessary, and access to these data will only be granted to persons who absolutely require it.
- who has access to personal data will ensure that this is used only for essential professional purposes.
- undertakes not to pass on confidential information.
- will report the accidental receipt of confidential information immediately to the sender as well as the appropriate management personnel, and will keep this information confidential.

Company Property

Company property may consist of material items, but can also be of an abstract nature. Material company property includes such items as laptops, company phones, company vehicles and construction machinery or tools. Intangible, abstract company property includes patents, knowledge or trade secrets.

Company property and information must be handled in a responsible fashion. It should be used only to assist you in the achievement of your personal professional goals and the general goals of the company. The use of company property or information in an unlawful, careless or otherwise inappropriate manner will not be tolerated.

Every employee

- handles property provided by the company in a careful and responsible manner.
- uses company property for private purposes only by prior arrangement.
- handles internal knowledge with circumspection.



Social Engagement

PORR accepts its social corporate responsibility and focuses its sponsorship and charitable donations on the areas of education and research, society, culture, sport and local causes. This charitable work and sponsorship must be transparent and traceable and may not occur in defiance of the PORR guideline for advertisement, sponsorship, donations and publicity (ISW). This guideline ensures that advertising occurs in a consistent manner. It also ensures that sponsorship measures, together with associated advertising measures and charitable donations, coincide with the specified intended purpose. PORR has its own software tool for the handling of advertisement, sponsorship and donations: the ISW Manager. Planned activities must be approved via this system and be registered in the subsequent layout design. Failure to do so can result in damage to the company’s image, which may have a negative effect on the awarding of contracts as well as recruiting and may adversely affect PORR’s competitiveness.

Every employee

- pays careful attention to the selection of donation and sponsorship activities.
- takes care that appropriate donation and sponsorship provisions are respected and avoids conflicts of interest.
- applies for all sponsorship or donation activities via the ISW Manager.

Environment

The environmental dimension is described in PORR by the term “preserving value”. The responsible management of ecological resources, a commitment to environmental protection and value-oriented actions comprise an important pillar of our sustainability strategy. Particular attention is paid to PORR’s environmental standards. This is apparent in the use of environmentally friendly construction materials and construction methods and constant increases in the proportion of recycled construction materials. Energy performance is improved by the use of alternative power units and energy sources and air pollutant emissions are reduced. Every division is committed to systematically recording environmental pollution and planning and implementing improvements in this area. Compliance with environmental regulations is regularly examined through audits and certification processes.





Protection of Habitat

The company is committed to environmental protection and focuses intensively on research and development in the area of climate protection.

Polluting emissions are reduced through energy efficiency measures, the use of renewable energy sources, the substitution of fossil fuels and support for the development and implementation of sustainable products and services.

PORR considers all aspects of current environmental concerns in its corporate decision-making and the management of its resources and infrastructure. For example, the company is addressing the increasing scarcity of raw materials and associated price rises by promoting resource-efficient usage and recycling.

Environmental risks are moderated, effects are precisely analysed and appropriate solutions or countermeasures are developed and introduced.

To reduce risks in the downstream value-adding chain, we target sustainable procurement through certification verification and knowledge transfer with internal and external stakeholders. Current challenges, particularly in collaboration with local partners, are addressed by efforts to develop processes with the greatest possible impact in the area of environmental protection.

Every employee

- is aware that she or he can actively contribute to the battle against climate change.
- identifies environmental risks and the effects of daily work processes and attempts to prevent or reduce these.
- endeavours to conserve waste, energy, water, materials and other resources and uses these responsibly.
- observes Group-wide guidelines and legal requirements in reference to the use, storage, labelling, transport, disposal and cleaning up of waste materials.

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