

B.5 Non-financial Group declaration

B.5.1 General disclosures

Basis for preparation

This non-financial Group declaration from Bilfinger SE relates to financial year 2024. In terms of structure and content, the declaration follows the provisions of the German Commercial Code (HGB) and the corresponding formulation of the German Accounting Standards (DRS 20). It meets the content requirements pursuant to Section 315c in conjunction with Sections 289c to 289e HGB and of Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council of June 18, 2020, on establishing a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (*EU Taxonomy Regulation*). The Group declaration is combined with the reporting of Bilfinger SE.

Given the heterogeneity of existing frameworks, the use of a specific recognized framework was dispensed with in the interest of focused reporting.

This non-financial Group declaration was prepared in accordance with the European Sustainability Reporting Standards (ESRS) in consideration of the fact that the Corporate Sustainability Reporting Directive (CSRD) has not yet been implemented in German law.

In the current reporting year, we have based our reporting on the ESRS in the following areas:

- Structure of reporting in accordance with the standards identified as material and the disclosure requirements they contain
- Performance of the materiality analysis taking into account the double materiality
- Incorporation of the due diligence processes used in the company
- Explanation of concepts, measures and targets in connection with the material sustainability matters
- Collection and reporting of key figures, unless indicated otherwise

An overview of the disclosures in accordance with the ESRS and those reported and omitted can be found in Chapter [*IRO-2 Disclosure requirements in ESRS covered by the undertaking's non-financial Group declaration*](#).

This non-financial Group declaration describes the concepts applied by Bilfinger for the aspects of environmental matters, employee matters, social matters, respect for human rights and combating corruption and bribery required by Sections 315d and 289c of the German Commercial Code (HGB). A reference to the chapters of this non-financial Group declaration can be found in the index at the end of the report.

No material risks have been identified that arise from our business activities and relationships or from our products and services that are highly likely to have serious negative impacts on sustainability matters and would therefore be reportable under Section 289c (3) Nos. 3 and 4 of the German Commercial Code (HGB). Reporting can be expected to be carried out in accordance with the ESRS from the coming financial year onward, provided that the CSRD has been enacted in German law by that time.

In some places in this non-financial Group declaration, we refer to further information in the Annual Report or on our website, for example. References in the combined management report and the remuneration report prepared in accordance with the requirements of Section 162 of the German Stock Corporation Act (AktG) are part of the non-financial Group declaration. All refer-

ences to places outside the combined management report, in the declaration of corporate governance with corporate governance report and the remuneration report serve to provide more detailed information than the disclosures presented here, but are not part of the non-financial Group declaration and are therefore unaudited.

The information in this non-financial Group declaration was not subjected to the statutory audit in accordance with Section 316 ff HGB, but instead was audited in a separate assignment for the purpose of obtaining limited assurance.

BP-1 – General basis for preparation of non-financial Group declarations

This non-financial Group declaration was prepared on a consolidated basis for the Bilfinger Group. The scopes of consolidation in accordance with IFRS 10 and Directive (EU) 2023/2772 for the consolidated financial statements, the combined management report and the non-financial Group declaration are identical.

In addition to our own activities, this non-financial Group declaration also covers the Bilfinger Group's upstream and downstream value chain.

The materiality analysis carried out for the 2024 financial year, which the contents of the non-financial Group declaration are based on, included the upstream and downstream value chain in addition to the company's own business activities.

The concepts, measures and targets relating to the sustainability issues classified as material also concern the upstream and downstream value chain. However, due to our business model as a service provider for the process industry, our ability to influence some sustainability matters in the downstream value chain is sometimes limited or non-existent. This limits the extent to which the downstream value chain is included in our concepts, measures and objectives.

Data related to the upstream and downstream value chain in particular is included to a greater extent in the key figures on environmental information.

This is how we measure the share of revenue of our sustainable industrial services provided in the downstream value chain. The basis for determining this data is a detailed analysis of customer contracts by system type and trade. This classification is also the basis for data collection for reporting in accordance with Article 8 of Regulation (EU) 2020/852 (Taxonomy Regulation). We divide the revenues of sustainable industrial services according to their efficiency in order to enhance the efficiency and sustainability of our customers into defined categories. More detailed information can be found in Chapter [*B.5.2 Industrial services to enhance efficiency and sustainability*](#).

The determination of emissions data in accordance with GHG Scope 3 is based on the inclusion of data on the upstream and downstream value chain. In the upstream supply chain, this includes data on purchased goods and services, capital goods, activities related to fuels and energy (which are not included in Scopes 1 and 2), upstream transportation and distribution as well as waste generation at supplier facilities. In the downstream value chain, this primarily relates to the use and further processing of products sold, their end-of-life treatment and downstream transportation and distribution. More detailed information can be found in Chapter [*E1-6 Gross GHG emissions of categories Scope 1, 2 and 3 as well as total GHG emissions*](#).

In the governance information, data on cases of corruption and bribery may also relate to the upstream or downstream value chain, provided they are in connection with our suppliers or customers. To report on our payment behavior toward our suppliers, we include data on required payment terms in our upstream supply chain. More detailed information can be found in Chapter [*G1 Corporate governance*](#).

Bilfinger has not made use of the options explained under ESRS 1, Section 7.7 to omit certain information relating to intellectual property, expertise or the results of innovations in this non-

financial Group declaration. Bilfinger has also not made use of the provision in Article 19a (3) and Article 29a (3) of Directive 2013/34/EU, which allows exemptions from the requirement to disclose imminent developments or matters under negotiation.

BP-2 – Disclosures in relation to specific circumstances

In this non-financial Group declaration, we provide information on the specific circumstances of the preparation of the report and present it together with the associated information. In principle, we apply the following time intervals defined in ESRS 1, section 6.4:

- short-term: 1 year (reporting period defined in the financial statements)
- medium-term: 2 to 5 years
- long-term: more than 5 years

Should these time horizons differ in individual cases, this is reported directly together with the relevant disclosure.

Reported metrics may include upstream and/or downstream value chain data estimated from indirect sources or other estimations. Such information is provided alongside the disclosures to which it refers.

Sources of estimations and possible uncertainties in the results are also reported together with the information to which they relate.

Changes in the preparation or presentation of sustainability information compared to a previous reporting period are also reported together with the disclosures to which they relate. This also applies to errors in reporting in prior reporting periods, insofar as the respective information is based on the same systematic basis as that used in this non-financial Group declaration.

This non-financial Group declaration also includes reporting in accordance with *Article 8 of Regulation EU 2020/852 (Taxonomy Regulation)*. Its inclusion is specified in accordance with *ESRS 1, Appendix D*. The content of the Chapter follows the legal provisions of the Taxonomy Regulation.

The following disclosure requirements as stipulated by the ESRS have been incorporated in this non-financial Group declaration on the basis of qualified references:

General disclosures

- GOV-1 – The role of the administrative, management and supervisory bodies
- Section 22.a.,b. by reference to the remuneration report required under Directive 2007/36/EC of the European Parliament and of the Council
- Section 23 by reference to the declaration of corporate governance with the corporate governance report
- GOV-3 – Integration of sustainability-related performance in incentive schemes by means of reference to the remuneration report required by Directive 2007/36/EC of the European Parliament and of the Council
- GOV-5 – Risk management and internal controls over sustainability reporting, Section 36.b, by reference to Chapter [B.3.1 Risk management](#) of the combined management report
- SBM-1 – Strategy, business model and value chain
 - Section 40.a.i by reference to Chapter [B.1.3 Strategy and targets](#)

- Section 40.a.ii by reference to Chapters [B.1.4 Organization](#), [B.2.1.2 Factors influencing business performance](#) and [B.2.2 Results of operations](#)
- Section 40.a.iii by reference to Chapter [B.2.6 Employees](#)
- Section 40.b by reference to Chapter [B.2.2 Results of operations](#)
- Section 42 by reference to Chapters [B.1.1 Business model](#) and [B.1.3 Strategy and targets](#)
- Section 42.a by reference to Chapter [B.2.4 Financial position, investments](#)

of the combined management report

- SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model
 - Section 48.f by reference to Chapters [B.3.3 Overall assessment of the risk situation](#) and [B.3.6 Overall assessment of the opportunity situation](#) of the combined management report

Environmental information

- GOV-3 – Integration of sustainability-related performance in incentive schemes, item 13, by way of a reference to the remuneration report required by Directive 2007/36/EC of the European Parliament and of the Council
- E1-6 – Gross Scopes 1, 2, 3 and total GHG emissions, Section 47, value of revenue by reference to Chapter [B.2.2 Results of operations](#) in the combined management report

Governance

GOV-1 – The role of the administrative, management and supervisory bodies

Bilfinger SE, a European stock corporation headquartered in Germany, has a dual management and control structure consisting of the executive bodies Executive Board and Supervisory Board. The third body is the Annual General Meeting, which according to the law is primarily responsible for fundamental decisions (which will not be discussed further below).

In the course of implementing corporate governance, Bilfinger follows the recognized standards of the German Corporate Governance Code (GCGC). The Executive Board and Supervisory Board issue an annual declaration of compliance with regard to the application of the recommendations of the GCGC. The declaration of compliance and the GCGC together with additional more detailed information on the duties and responsibilities of the boards of the company are presented in Chapter [A.4 Declaration of corporate governance with corporate governance report](#) of the Annual Report.

Responsibility for dealing with material impacts, risks and opportunities lies with the Executive Board as the highest responsible body. The Supervisory Board is involved in key aspects in accordance with its supervisory and advisory function.

While the Executive Board is responsible for managing the business of the company and the Group, the Supervisory Board supervises it and has personnel authority over the members of the Executive Board. The two committees work in close cooperation for the benefit and in the interest of the company. Monitoring by the Supervisory Board also covers the environmental, social and governance (ESG) sustainability matters as well as the corresponding reporting. In addition to legal provisions and the Articles of Association, the Supervisory Board has adopted rules of procedure which set out, among other things, the tasks, items that require approval as well as other requirements for Supervisory Board members, together with the formalities for preparing, convening and

holding meetings and adopting resolutions. These are reviewed regularly and were last updated in the 2022 financial year and are available on the Bilfinger SE website. The Supervisory Board has established various committees in order to ensure more efficient operations. More detailed information on the committees can be found in Chapter *A.4 Declaration of corporate governance with corporate governance report* of the Annual Report. The Supervisory Board has assigned the supervision and preparation of the topic of sustainability with regard to ESG to the committees (the Audit Committee in particular) responsible for the corresponding (financial) topic areas, with the general and ultimate responsibility for this remaining unchanged with the Supervisory Board.

The Executive Board also takes ESG sustainability matters into account when managing the business and independently managing the company and the Group in the interests of the company. The full Executive Board is responsible for sustainability. The Executive Board has established specific committees to implement and ensure corporate governance in the company and the Group. This includes, in particular, the Group Executive Management (GEM), the Bilfinger Risk Committee (BRC), the Safety Council, the Compliance Review Board, the Independent Allegation Management Committee (IAMC) and the Disciplinary Committee (DC).

The Executive Board regularly takes ESG sustainability matters into account when managing the business and independently managing the company and the Group in the interests of the company and also gains access to expertise and skills in this area, in particular through the specific committees set up to implement and ensure corporate governance in the company and the Group. In addition, the Executive Board monitors current developments in the area of ESG and corresponding reporting through its participation in internal training (e.g. compliance training, CSRD update). The CFO is also responsible for supervising the “Introduction of CSRD Reporting” project.

The Supervisory Board is responsible for appointing, supervising and advising the members of the Executive Board. This also includes providing advice on sustainability matters. The Strategy Committee and Supervisory Board receive regular reports from the Executive Board on the Group-wide sustainability strategy and the status of its implementation. The Supervisory Board and the Audit Committee also deal with sustainability reporting, which in addition to reporting on non-financial issues in the management report also includes the non-financial Group declaration. The Supervisory Board also receives information on new developments and the status of implementation. Given the expertise available on the Supervisory Board with respect to sustainability issues that are important for the company, the Supervisory Board is in a position to monitor how environmental and social sustainability are taken into account in the company’s strategic orientation and corporate planning. Targeted further training measures in this area are supported and promoted by Bilfinger. In particular, the Chairman of the Audit Committee, Mr. Frank Lutz, as well as Dr. Roland Busch and Dr. Silke Maurer have fundamental knowledge and experience in the field of sustainability reporting and the auditing of such reporting. Specifically:

- **Environmental:** The Chairman of the Supervisory Board, Dr. Eckhard Cordes, and the Supervisory Board members Rainer Knerler and Frank Lutz have specialist knowledge and expertise in some areas of the sustainability topic of environmental protection. Supervisory Board member Dr. Silke Maurer also has wide-ranging expertise and specific knowledge in this area.

- **Social:** The Chairman of the Supervisory Board, Dr. Eckhard Cordes, and the Supervisory Board members Agnieszka Othman (formerly Al-Selwi), Werner Brandstetter, Dr. Roland Busch, Rainer Knerler and Jörg Sommer have specialist knowledge or expertise in certain areas of the sustainability topic of social issues. The Deputy Chairman of the Supervisory Board, Mr. Stephan Brückner, and the Supervisory Board members Vanessa Barth, Frank Lutz, Dr. Silke Maurer and Dr. Bettina Volkens also have wide-ranging expertise and specific knowledge in this area.
- **Governance:** Supervisory Board members Agnieszka Othman (formerly Al-Selwi), Werner Brandstetter, Rainer Knerler, Robert Schuchna and Jörg Sommer have expertise or knowledge in certain areas of the sustainability topic of governance. The Chairman of the Supervisory Board, Dr. Eckhard Cordes, and the Deputy Chairman of the Supervisory Board, Mr. Stephan Brückner, and the Supervisory Board members Vanessa Barth, Dr. Roland Busch, Frank Lutz, Dr. Silke Maurer and Dr. Bettina Volkens also have wide-ranging expertise and specific knowledge in this area.
- **Reporting:** Supervisory Board member Robert Schuchna has expertise and knowledge in some areas of reporting and auditing ESG and sustainability issues. Supervisory Board members Vanessa Barth, Dr. Roland Busch, Frank Lutz and Dr. Silke Maurer also have wide-ranging expertise and specific knowledge in this area.

The expertise is based on the self-disclosure or self-assessment of the individual Supervisory Board members, in particular with validation of their professional experience / career and participation in corresponding further training measures and training courses, some of which are also carried out internally at Bilfinger. As part of the annual survey, also in connection with the preparation of the qualification matrix, information on mandates, knowledge, skills and experience in the area of ESG / sustainability as well as training and further education measures completed in the past financial year, especially in the area of ESG / sustainability, is requested in addition to ensuring that CVs are up to date. The CVs of the Supervisory Board members are published on the company's website and are updated annually.

The Executive Board consists of two members, the Chief Executive Officer (CEO) and the Chief Financial Officer (CFO). In accordance with Article 8 of the Articles of Association of Bilfinger SE, the Supervisory Board consists of 12 members with equal representation.

Of the 12 members serving on the Supervisory Board in the reporting year, the following six members are employee representatives: Stephan Brückner, Agnieszka Othman (formerly Al-Selwi), Vanessa Barth, Werner Brandstetter (until December 31, 2024), Evert Doornbos (from January 1, 2025), Rainer Knerler and Jörg Sommer. The employee representatives are appointed by the SE Works Council.

Dr. Schulz and Mr. Jäkel have been on the Executive Board of Bilfinger SE since 2022 and Mr. Jäkel has been with the company since 1989. The Executive Board therefore has extensive experience that is relevant to the sectors, products and geographical locations of Bilfinger SE. This experience is reinforced by the expertise of the members of the GEM, which advises the Executive Board.

More detailed information on the composition of the Supervisory Board and its committees as well as on the length of service of its members can be found in Chapter *D.4 Boards of the company*. The CVs of current members of the Supervisory Board are also available on the company's website under <https://www.bilfinger.com/en/about-us/management/supervisory-board/>. It can thus be seen from this information on the members that the Supervisory Board has a diverse composition.

In their entirety, members of the Supervisory Board have different educational levels, professional and socio-economic backgrounds as well as geographic presences. More than the required two members of the Supervisory Board have professional experience in an international environment and particular knowledge and experience in finance and business administration. In particular, the Chairman of the Audit Committee, Mr. Frank Lutz, and Dr. Roland Busch meet the requirements for special knowledge and experience in the fields of accounting and auditing, internal control procedures and sustainability reporting and their review within the meaning of Section 100 (5) of the German Stock Corporation Act (AktG). At least four members have detailed knowledge and experience with Bilfinger itself. All shareholder representatives have special experience from management positions in industrial or service companies. In addition, at least five shareholder representatives are experienced in the management or monitoring of another medium-sized or large company.

- **Gender:** While the Executive Board consisted of two members and two men in the past financial year, 33 percent of the Supervisory Board in the past financial year consisted of women (four women, eight men) – distributed between shareholder and employee representatives (two women and four men each). The average ratio of female to male members is therefore 1/3 to 2/3. Both the target set by the Supervisory Board in February 2024 for the proportion of women on the Executive Board (0 percent for an Executive Board consisting of two members and at least 30 percent, i.e. one woman, for an Executive Board consisting of three members) and the statutory minimum quota of 30 percent women and men on the Supervisory Board, broken down into shareholder and employee representatives, have therefore been met.
- **Nationality:** Both members of the Executive Board are German nationals. Of the Supervisory Board members, 75 percent are German nationals (nine members), 8 percent have another nationality in addition to German (one member with German and Swiss nationality) and 17 percent do not have German nationality (two members with Polish or Austrian (until December 31, 2024) / Dutch (from January 1, 2025) nationality).

Of the 12 members of the Supervisory Board, 83 percent are independent representatives (10 members).

Responsibility for dealing with impacts, risks and opportunities in connection with sustainability matters lies with the Executive Board as the highest responsible body. The Supervisory Board is involved in key aspects in accordance with its supervisory and advisory function. Monitoring by the Supervisory Board also covers the sustainability matters environmental, social and governance, as well as the corresponding concepts and the reporting. The Executive Board remuneration system that has been in effect since January 1, 2024, takes ESG targets into account in both the performance criteria for the STI and LTI. This information includes the remuneration report prepared in accordance with the requirements of Section 162 of the German Stock Corporation Act (AktG) in the version of the Act on the Implementation of the Second Shareholders' Rights Directive of December 12, 2019 (Federal Law Gazette Part I 2019, No. 50 of December 19, 2019; 'ARUG II'). This document is an integral part of this non-financial Group declaration.

The Executive Board and Supervisory Board fulfill their duty of care to monitor, manage and supervise impacts, risks and opportunities as part of Bilfinger's governance. The relevant processes are explained in Chapters [GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies](#) and [GOV-4 Statement on due diligence](#).

Both bodies take into account both the material impact and the financial materiality of sustainability matters. The perspective of dual materiality is particularly important in the materiality analysis. More detailed information is included in *Chapter IRO-1 Description of the process to identify and assess material impacts, risks and opportunities*.

It is the responsibility of the Executive Board to validate and formally resolve the impacts, risks and opportunities identified and assessed in accordance with the principle of double materiality. The result is then discussed by the Audit Committee and the Supervisory Board.

The Executive Board has established specific committees to implement and ensure corporate governance in the company and the Group. These include in particular the GEM, the BRC, the Safety Council, the CRB, the IAMC and the DC.

With regard to sustainability issues, the Strategy Committee and Supervisory Board receive regular reports from the Executive Board on the Group-wide sustainability strategy and the status of its implementation. The Supervisory Board and the Audit Committee also deal with sustainability reporting, which in addition to reporting on non-financial issues in the management report also includes the non-financial Group declaration. The Supervisory Board also receives information on new developments and the status of implementation.

GEM: The GEM advises and supports the Executive Board on operational and strategic issues relating to the Group selected by the Executive Board, although the GEM has no authority of its own to issue instructions or pass resolutions. In addition to the Executive Board, the GEM comprises the heads of the three segments (Engineering & Maintenance Europe, Engineering & Maintenance International, Technologies), the heads of the Group Functions Products & Innovation, HR & HSEQ and Procurement. The GEM meets at least once a month with the participation of the Executive Board.

BRC: The BRC convenes at least every six months, with the CFO in attendance, and advises the Executive Board on matters such as risk assessment. It is made up of the CFO and selected heads of Group Functions. The BRC supports the design of an effective and pragmatic risk management system, the monitoring of general risk developments and promotes risk awareness and risk culture within the Group. The assessment of non-financial risks to society and the environment that could arise from Bilfinger's activities is also carried out on at least an annual basis as part of the BRC. The BRC thus contributes to general quality assurance as well as to the identification, treatment and reporting of significant Group risks.

Safety Council: The Safety Council is the responsibility of the Executive Board member responsible for HSEQ and is the exploratory and decision-making body for Bilfinger HSEQ issues. The Executive Board member responsible for HSEQ chairs the Safety Council. Other members include the Head of Group HR & HSEQ as well as the Presidents of the individual regions. The Safety Council meets monthly and decides on all Group-wide HSEQ issues. The Safety Council makes a significant contribution to the implementation of HSEQ objectives throughout the Group.

CRB: The CRB manages and monitors the organization and implementation of the compliance management system. It is comprised of the full Executive Board as well as selected heads of the Group Functions and convenes, when necessary, under the chairmanship of the Chief Compliance Officer (CCO). The CRB has a central role in ensuring the effectiveness of the compliance management system.

IAMC: The IAMC is made up of the General Counsel (Deputy Chairman), the Chief Compliance Officer and the heads and representatives of the Group Functions / Corporate Functions Group Audit, Group HR & HSEQ and Group Tax and convenes when necessary, but at least once a month. Under the chairmanship of the Director Group Investigations, the committee controls and monitors the conduct of internal investigations into possible serious violations of our Code of Conduct.

The IAMC also advises on necessary responses to identified violations including process changes, control activities and disciplinary measures. The Director Group Investigations informs the Executive Board and Audit Committee by means of quarterly reports at the respective meetings.

DC: The DC convenes on an ad-hoc basis – when a case has been presented by the IAMC – to consult on disciplinary measures for employees in connection with a violation of the Bilfinger Code of Conduct. The DC is chaired by the Head of Group HR & HSEQ. The committee also includes the General Counsel / CCO and the Head of Labor Law / Co-Determination as permanent members as well as the direct superior of the business unit in which the matter to be assessed took place and/or the Presidents of the relevant segment or the relevant region / Business Line as alternating members.

The Strategy Committee, Audit Committee and Supervisory Board receive regular reports from the Executive Board on sustainability issues.

Responsibility for dealing with impacts, risks and opportunities, including the associated controls and processes, lies with the Executive Board as the highest responsible body. The Executive Board has established specific committees to implement and ensure corporate governance (including the controls and processes for management of the impacts, risks and opportunities) in the company and the Group. These include in particular the GEM, the BRC, the Safety Council, the CRB, the IAMC and the DC (see above). If a member of the Executive Board is not a member of the respective committee, reporting is made to the Executive Board or, in some cases, to the Audit Committee on the topics dealt with in the respective committee, as described above.

The administrative, management and supervisory bodies and the Executive Board monitor the setting of targets in relation to material impacts, risks and opportunities and the progress made in achieving these targets by obtaining, on a regular basis from the established committees, reports as described above. Where relevant, these topics can also be dealt with by the responsible departmental or full Executive Board or Supervisory Board or a Supervisory Board committee (the Audit Committee and Strategy Committee in particular) (including any allocation of tasks and implementation deadlines).

The expertise is based on the self-disclosure or self-assessment of the individual Supervisory Board members, in particular with validation of their professional experience / career and participation in corresponding further training measures and training courses, some of which are also carried out internally at the company. The CVs of the Supervisory Board members are published on the company's website and are updated annually. As part of the annual mandate survey of the Executive Board and Supervisory Board, a survey is conducted of other relevant knowledge, skills and experience, particularly in the area of ESG / sustainability. Supervisory Board members are also surveyed regarding the training and further education measures completed in the financial year in the ESG area. The competencies of the Supervisory Board members are presented in a qualification matrix in Chapter [A.4 Declaration of corporate governance with corporate governance report](#). The disclosures included there are an integral part of this non-financial Group declaration.

As such, the Executive Board and Supervisory Board have fundamental sustainability-related expertise. The many years of professional experience of the Executive Board and Supervisory Board go hand in hand with the specialist knowledge of ESG sustainability matters that they have acquired. The specific committees set up within the Group also ensure access to specialist knowledge and skills in this area. Finally, the committees also have access to experts or training courses if required.

The skills and expertise enable the assessment of the material impacts, risks and opportunities of the company and are therefore, by their very nature, inextricably linked. The Executive Board also takes ESG sustainability matters into account when managing the business and managing the

company and the Group in the interests of the company, and the Supervisory Board in turn pays particular attention to ESG issues in its monitoring.

GOV-2 – Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies

The Executive Board, Audit Committee and Supervisory Board are informed at least twice a year (meetings in fall and spring) by Group Investor Relations about material impacts, risks and opportunities, the implementation of due diligence in the area of sustainability and the results and effectiveness of the policies, measures, metrics and targets adopted.

In addition, the Executive Board, Supervisory Board and GEM are regularly informed about all sustainability and corporate governance matters relevant to Bilfinger at their meetings:

- The Executive Board is informed about current HR & HSEQ topics at every meeting and deals with the corporate governance report in each reporting year. The potential impacts, risks and opportunities are taken into account when making Executive Board resolutions on important transactions and risk management. Depending on the case, these decisions may also lead to compromises in terms of impact, risks and opportunities.
- In addition to the corporate governance report, the Supervisory Board also dealt with the following sustainability issues in particular during the reporting year: strategy and functional organization, targets for the share of women in the company and emissions. Like the Executive Board, the Supervisory Board considers impacts, risks and opportunities when monitoring the company strategy.
- The GEM, as an advisory body to the Executive Board, is also informed about current HR & HSEQ topics as standard at every meeting and also dealt with the following sustainability issues during the reporting year: strategy and functional organization, CSRD sustainability policies, CSDDD (Corporate Sustainability Due Diligence Directive).

The meeting documents for the Executive Board, Audit Committee, Strategy Committee and Supervisory Board generally take into account the impacts, risks and opportunities in monitoring the company strategy, its decisions on important transactions and its risk management and are discussed accordingly at the meeting. Compromises in connection with these impacts, risks and opportunities are of course taken into account.

More detailed information on the material impacts, risks and opportunities addressed by the administrative, management and supervisory bodies or their responsible committees during the reporting period can be found in the Chapters *SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model* and *IRO-2 Disclosure requirements in ESRS covered by the undertaking’s non-financial Group declaration*.

GOV-3 – Integration of sustainability-related performance in incentive schemes

The performance criteria of both the STI and the LTI take ESG targets into account. For further information on the inclusion of sustainability-related benefits in incentive systems, please refer to the remuneration report for the Executive Board and Supervisory Board to be prepared in accordance with the provisions of Section 162 AktG. The section described there is an integral part of this non-financial Group declaration and is published simultaneously with the non-financial Group declaration on the company’s website at <https://www.bilfinger.com/en/investors/corporate-governance/remuneration-executive-and-supervisory-boards/>.

GOV-4 - Statement on due diligence

Bilfinger’s administrative, management and supervisory bodies exercise due diligence with regard to the potential and actual negative impacts of the company’s activities in the upstream and downstream value chain as part of its corporate governance. This continuous process is subject to the requirements that Bilfinger must fulfill as a European stock corporation (SE – Societas Europaea) in accordance with national legislation and the German Corporate Governance Code. This duty of care takes into account the strategy, business model, activities, business relationships, operating, procurement and sales activities of the company.

The core elements of due diligence are described in the following chapters of this non-financial Group declaration:

Core elements of due diligence	Paragraphs in the non-financial Group declaration
a) Integration of due diligence into governance, strategy and business model	<ul style="list-style-type: none"> i. ESRS 2 GOV-2: Information and sustainability issues addressed by the company’s administrative, management and supervisory bodies ii. ESRS 2 GOV-3: Integration of sustainability-related performance in incentive schemes iii. ESRS 2 SBM-3: Material impacts, risks and opportunities and their interaction with strategy and business model
b) Involvement of affected stakeholders in all key due diligence steps	<ul style="list-style-type: none"> i. ESRS 2 GOV-2 ii. ESRS 2 SBM-2: Interests and positions of stakeholders iii. ESRS 2 IRO-1 iv. ESRS 2 MDR-P v. Topic-related ESRS: Consideration of the different phases and purposes of inclusion
c) Identification and assessment of negative impacts from regulated emissions trading schemes (in %)	<ul style="list-style-type: none"> i. ESRS 2 IRO-1 (including application requirements related to specific sustainability matters in the relevant ESRS) ii. ESRS 2 SBM-3
d) Measures to counter these negative impacts	<ul style="list-style-type: none"> ESRS 2 MDR-A ii. Topic-related ESRS: Consideration of the range of measures, including transition plans, to address the impacts
e) Monitoring the effectiveness of these efforts and communication	<ul style="list-style-type: none"> i. ESRS 2 MDR-M ii. ESRS 2 MDR-T iii. Topic-related ESRS: in relation to metrics and targets

GOV-5 – Risk management and internal controls over sustainability reporting

All specialist topics and processes classified throughout the Group as requiring regulation are governed by binding Group policies and standard operating procedures (SOPs). In each case, local requirements must be taken into account. In exceptional cases, deviations are possible after appropriate approval. Responsibility for the governance of Group policies and SOPs lies with the Group Functions and Corporate Functions. The Group policies and SOPs are regularly updated.

Bilfinger’s sustainability reporting is subject to the internal Group Policy on Sustainability Reporting. This means that sustainability reporting is fully integrated into Bilfinger governance and thus into the Group’s risk management system and internal control system. Further explanations

can be found in Chapter *GOV-1 The role of the administrative, management and supervisory bodies* and *B.3.1 Risk management*.

The Group Policy on Sustainability Reporting regulates the process of preparing sustainability reporting and defines the corresponding responsibilities. Overall responsibility for sustainability reporting lies with Group Investor Relations as part of the preparation of the combined management report for the Annual Report.

The content and form of sustainability reporting are derived from the applicable statutory requirements and regulations. Group Investor Relations coordinates and manages the preparation of the individual chapters in consultation with the Group units and Group Functions or Corporate Functions responsible for the content of the respective sustainability topics.

The SOP Energy and Emissions-Related Key Figures in GHG Scopes 1 and 2 is directly assigned to the Group Policy on Sustainability Reporting. Corresponding SOPs are currently being developed for the other key sustainability topics.

In addition, other SOPs that are assigned to other Group policies are relevant for sustainability reporting. These include the SOP Reporting on EU Taxonomy and the SOP Revenue from Sustainable Services, which are assigned to the Group Policy on Financial Reporting. Aspects of the SOP Administration and Use of the HSEQ Management Software ACTIVE or the SOP Operational Processes Risk Management are also relevant for sustainability reporting.

The Group's SOPs form the basis of the internal control system (ICS). Specific control measures are defined for the individual SOPs, which are implemented and tracked centrally by Group Internal Control Systems.

Sustainability reporting, like the entire Annual Report, is prepared on an integrated software platform, on the basis of which the ESEF (European Single Electronic Format) compliant publication required by law can be carried out in the foreseeable future.

The approach to risk assessment and the method for prioritizing risks are included in the correspondingly marked information in Chapter *B.3.1 Risk Management* of the combined management report. They are an integral part of this non-financial Group declaration.

The most significant risk with regard to sustainability reporting is that Bilfinger might fail to fulfill its legal reporting obligations, or that it might do so only insufficiently. The principles of relevance, completeness, consistency, transparency and accuracy set out in the Group Policy on Sustainability Reporting apply to the collection and reporting of all sustainability reporting content in the Annual Report in accordance with the applicable legal and regulatory requirements. The following minimum requirements are specified in the Group Policy on Sustainability Reporting as mitigation strategies for the risk of incorrect or incomplete reporting:

Description of the collection processes

Collection content and processes must be clearly defined. This also applies to data collection periods, milestones and, in particular, the respective responsibilities.

Control of the collection processes

The content collected must be reviewed at least in accordance with the dual control principle and suitable plausibility checks must also be carried out.

Documentation of the process steps

In order to comprehensively document the collection processes, it is necessary to document the process steps for the collection and control of content completely and conscientiously. The relevant evidence is made available to the examiner at the beginning of the examination or at a later request.

The corresponding processes and the embedding of the respective risks in the internal control system (ICS) are defined in detail in the SOPs for this Group policy.

The material risks identified when determining the data on energy consumption and climate-damaging emissions and data on the company's own workforce were:

- Incompleteness of the data included
- Insufficient data quality
- Improper approval

To counteract these risks, clearly defined control mechanisms have been established in the Group's ICS both at the level of the business units as well as at the regional and Group level.

The results of the risk assessment and internal controls relating to the sustainability reporting process are taken into account by the responsible internal functions when preparing the sustainability reporting. Specific processes are defined in their respective SOPs, which are intended to ensure correct regulatory reporting on the key sustainability matters of the Group.

Sustainability reporting takes place within the processes for preparing the annual and consolidated financial statements. The results of the data collection processes and the application of the internal control and risk management system with regard to the accounting process are discussed and approved in connection with the preparation and adoption of the annual financial statements in the corresponding meetings of the Executive Board, Audit Committee and Supervisory Board.

Strategy

SBM-1 – Strategy, business model and value chain

Bilfinger grouped its portfolio of services into nine defined product centers in the reporting year. They constitute the core elements of the general corporate strategy, which seeks to enhance the efficiency and sustainability of customers. There were no significant changes to the service portfolio in the reporting period, such as new products or services, or services / products withdrawn from the market. The product centers and the groups of products and services that they offer are presented in detail in Chapter [B.1.3 Strategy and targets](#). These disclosures are an integral part of this non-financial Group declaration.

Bilfinger delivers its services in two service lines: Engineering & Maintenance as well as Technologies. The company is primarily active in the regions Europe, North America and Middle East. Process industry customers come primarily from the sectors energy, chemicals & petrochemicals, pharma & biopharma and oil & gas. There were no changes in the reporting period.

The organization of the Group and reporting in accordance with IFRS 8 are divided into the reporting segments *Engineering & Maintenance Europe*, *Engineering & Maintenance International* and *Technologies*. Information on the structure of the segments can be found in the correspondingly marked sections in Chapter [B.1.4 Organization](#). This also applies to information on the markets and customer groups in the Chapters [B.2.1.2 Factors influencing business development](#) and [B.2.2 Results of operations](#). They are an integral part of this non-financial Group declaration.

The number of employees by geographical area can be found in Chapter [B.2.6 Employees](#). The information there is an integral part of this non-financial Group declaration.

We report on Bilfinger Group revenue in Chapter [B.2.2 Results of operations](#). The information provided there is an integral part of this non-financial Group declaration. Our products and services are not subject to any prohibitions in our markets. Bilfinger does not generate revenue from the exploration, extraction, production, manufacturing, processing, storage, refining or distribution, including transportation, storage and trading of fossil fuels. Nevertheless, the Group provides some of the services described above for companies in the oil and gas industry and is therefore part of the upstream value chain in these sectors.

Bilfinger is also not active in chemicals production. Activities covered by section 20.2 of Annex I to Regulation (EC) No 1893/2006 are not carried out. The company does, however, provide some of the services described above for companies in the chemical and petrochemical industries and is therefore also part of the upstream value chain in these sectors.

Bilfinger is not active in the field of controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) or in the cultivation and production of tobacco, nor are any services provided in the upstream value chain of these industries.

Bilfinger's sustainability goals, which are outlined as more detailed information in Chapter [MDR-T Tracking effectiveness of policies and actions through targets](#), are closely related to the customers, the company's own workforce and in the value chain, the Group's suppliers and capital market actors as the key stakeholders of the Bilfinger Group. The relationships with these stakeholders are presented as more detailed information in Chapter [SBM-2 Interests and views of stakeholders](#).

Particularly important sustainability goals relate to climate change. The groups of products and services with which Bilfinger pursues these goals are bundled in product centers, which are described in detail in Chapter [B.1 Bilfinger Group](#). They are focused particularly on the customer categories in the industry sectors energy, chemicals & petrochemicals, pharmaceuticals & biopharma, and oil & gas as the largest customer groups of the Bilfinger Group. The focus is on Europe, North America and the Middle East, the geographic areas in which we operate. We want to be number one for our customers in these areas when it comes to enhancing the efficiency and sustainability of their plants. Increasing awareness of climate change and the ensuing energy transition in many industrialized countries are generating substantial opportunities for Bilfinger to exert influence here. Given the socially and politically mandated energy transition and climate protection measures in all key stages of the value chain, they are all facing fundamental innovative leaps. Further information, including the corresponding key figures, can be found in Chapter [B.5.2. Industrial services to enhance efficiency and sustainability](#).

Sustainability is a key component of our corporate strategy. We have been carrying out regular materiality analyses for years in order to determine the key areas of action for our company's sustainability efforts. The results determine the content of our business policy in the areas of environmental, social and governance.

They relate in particular to

- climate change,
- our own workforce,
- the workforce in our value chain, and
- business conduct.

The most important challenges in the future and the planned solutions or projects that are relevant for sustainability reporting relate in particular to climate change. The core of our strategic posi-

tioning is to be the number one partner for our customers when it comes to enhancing the efficiency and sustainability of their plants. This vision forms the basis of our business model and is a central component of the strategic levers for *positioning* our Group and continuously improving the *operational excellence* of our services for our customers. The most important challenge in this context is the marketing of our offers. Our concept is to bundle our services in defined *product centers*, which are described as more detailed information in Chapter [B.1 Bilfinger Group](#).

Bilfinger has its registered office in Germany, an exemption from the disclosure of the required information pursuant to Article 18, Paragraph 1, Sub-point (a) of Directive 2013/34/EU is therefore not permitted.

Bilfinger's business model as a service provider for the process industry and the associated key activities are presented in Chapters [B.1.1 Business model](#) and [B.1.3 Strategy and targets](#). The information there is an integral part of this non-financial Group declaration.

The main components of the Bilfinger Group's cost of sales are personnel and material expenses. Bilfinger provides its services both through self-delivery and through the use of subcontractors. This means that the company's own employees and those in the upstream value chain play a key role in the success of the company. The personnel costs for subcontractors are higher than the costs for the materials purchased to provide the service, such as insulation material or metal parts. This is due to Bilfinger's business model as a service provider. More detailed information on developments in the reporting year can be found in Chapter [B.2.2 Results of operations](#).

Bilfinger has established supplier management concepts to ensure the supply of materials required for the provision of services and to manage the associated impacts, opportunities and risks. More detailed information on measures relating to the selection and onboarding of new suppliers, the continuous risk analysis of the supplier pool, the structure of supplier contracts and the monitoring of compliance with agreed standards, including any consequences of non-compliance, are presented in Chapters [G1-2 Management of relationships with suppliers](#), [G1-6 Payment practices](#) and [S2 Workers in the value chain](#).

Investments in property, plant and equipment are of very minor importance for Bilfinger given its business model as a service provider. Their development in the reporting year is described in Chapter [B.2.4 Financial position – Investments](#). The information there is an integral part of this non-financial Group declaration.

Bilfinger's business success also depends on constantly offering its customers innovative solutions for their requirements. Due to the services provided by Bilfinger, research and development play a relatively minor role compared to manufacturing companies or companies in the IT sector. Innovation projects pursued in the reporting year and the expenses incurred are presented as more detailed information in Chapter [B.2.7 Innovation](#).

As a service provider for the process industry, Bilfinger provides its customers with the services described above, primarily in the energy, chemicals & petrochemicals, pharma & biopharma and oil & gas industries in Europe, North America and the Middle East. The basis is either longer-term framework and service contracts or project contracts. The desired result is to enhance the efficiency and sustainability of customers' production plants.

As a listed stock corporation and in addition to the goal of continuous value enhancement, Bilfinger pursues a dividend policy that allows investors to participate appropriately in the company's success. This calls, depending on the foreseeable medium-term development of the company, for a distribution of between 40 and 60 percent of adjusted net profit and continuous dividend growth.

Bilfinger offers its own employees secure jobs commensurate with their respective skills and with performance-related pay. Compliance with social standards, the granting of comprehensive

employee rights, equal treatment and protection against discrimination are among the company's most important values. Bilfinger is also committed to ensuring these values are in place in its supply chain.

As a service provider, Bilfinger is part of the upstream value chain of its customers in the process industry. This item is explained above. Bilfinger's influence on sustainability matters in its downstream value chain is limited to environmental matters to enhance the efficiency and sustainability of its customers. Any further influence is limited because the company generally provides its services to the customer at an early stage of their value chain. Since the process industry itself generally supplies basic and preliminary products for further processing, Bilfinger's business activities have no influence on the products ultimately used by end consumers.

SBM-2 – Interests and views of stakeholders

Bilfinger's key stakeholders are determined by the company's business model as a service provider for the process industry. We engage with our stakeholders – customers, employees, suppliers and the capital market – primarily through the target group-oriented communication channels described below and maintain an ongoing dialog to the greatest extent possible. The organization of their involvement is described below.

Customers

Our customers in our markets in Europe, North America and the Middle East are primarily active in the energy, chemicals & petrochemicals, pharma & biopharma and oil & gas industries. In order to best meet their requirements for enhancing the efficiency and sustainability of their plants, we need to know exactly what their needs are. Continuous dialog is therefore essential.

As a maintenance service provider, Bilfinger employees are usually on-site at customer plants on a daily basis. This naturally results in a very close exchange of ideas and information.

In addition, customer involvement is systematic at various levels. Each Group company implements appropriate measures as part of the established quality management system in accordance with the requirements of ISO 9001:2015. In this regard, structured customer satisfaction surveys have been conducted regularly among all Group customers since 2024. Our customers are surveyed at least once a year or after completion of a project about the jointly implemented solutions to enhance efficiency and sustainability as well as about the particularly high occupational safety requirements in our customer industries. A Net Promoter Score is also determined. The reference standard used internationally by companies to measure customer satisfaction provides information on the extent to which our customers would recommend our services to others.

Employees

As a result of Bilfinger's business model, employees play a key role in the company's long-term success. Our business model as an industrial services provider is characterized by the availability, skills and value orientation of our employees.

The continuous exchange of ideas and information with employees is organized on numerous institutionalized levels. First and foremost, this includes constructive dialog with employee representative bodies, which is regulated by law in almost all countries in which Bilfinger operates. Employee interests and perspectives are incorporated into the company's strategy through works councils in the individual Group units via the European Works Council and the Group Works Council.

In addition to the institutional level, Bilfinger has established dialog structures that involve individual employees. Among the most important tools in this regard are annual employee appraisals. They are based on standardized guidelines that help everyone involved articulate their interests, reflect on the goals achieved and define structured development measures.

The safety of all employees is of particular importance to Bilfinger. No employee's health shall be adversely affected by his or her work. The company therefore engages in intensive communication on occupational safety issues. The objective is to utilize the experience of employees in this area, to integrate their suggestions, but also to maintain and further improve awareness of the particular importance of occupational safety at a high level.

In order to obtain information about employee satisfaction, a so-called *Pulse Check* has been carried out since 2024. All employees receive a quarterly invitation to take part in a digitalized survey. The short anonymous survey focuses on corporate strategy and other changing topics such as sustainability, training and development, innovation, digitalization and occupational safety. Employees are also asked whether they would recommend Bilfinger as an employer (Employee Net Promoter Score).

Suppliers

With their services and materials supplied in the upstream value chain, our suppliers make an important contribution to meeting our customers' requirements and thus to the long-term success of our company. It is therefore in Bilfinger's interest to ensure compliance with applicable human rights and labor law standards in the value chain for all employees.

We take account of the interests and viewpoints of the people employed in our upstream supply chain in order to facilitate a trusting and reliable cooperation with our suppliers. These relate in particular to

- workplace safety,
- fair working conditions,
- combating discrimination,
- the right to organize and collective bargaining,
- compliance with applicable data protection laws, and
- implementation of these requirements also for subcontractors in the downstream value chain.

This takes into account the important role our suppliers and subcontractors play in our business model and as part of our Group strategy on positioning and the operational excellence of the services we provide to our customers. These two strategic levers of our Group strategy are explained in more detail in Chapter *SBM-1 Strategy, business model and value chain*.

We are in close contact with our suppliers as part of our daily collaboration. Institutionalized mechanisms for their integration are, however, much less pronounced than in the case of the company's own workforce. Interests in our upstream value chain with regard to working conditions, equal treatment and equal opportunities as well as labor-related rights are anchored in our Code of Conduct for Suppliers and in our Statement of Principles on Human Rights. The measures for implementation in our value chain are explained in Chapters *MDR-P Policies adopted to manage material sustainability matters* and *MDR-A Measures and resources in relation to material sustainability matters*.

Capital market

As a listed stock corporation, Bilfinger has an obligation to its investors to ensure the long-term successful development of the company. The interests and viewpoints of capital market participants are therefore given particular consideration in the Group's strategy and business model.

Bilfinger is in a continuous dialog with investors and analysts. We regularly inform the capital market about current business developments as part of our quarterly reporting and provide a comprehensive overview of the corporate strategy at an annual Capital Markets Day. The Executive Board also participates in capital market conferences, roadshows and one-on-one meetings, which together add up to hundreds of individual contacts with a large number of capital market actors every year.

At the company's Annual General Meeting, at which more than half of the company's share capital is regularly represented, investors in Bilfinger represent their interests and positions to company management. Shareholders also elect half of the members of the Supervisory Board of Bilfinger SE, which advises and monitors the Executive Board in its management of the company. More detailed information can be found in Chapter [*GOV 1 – The role of the administrative, management and supervisory bodies.*](#)

We are also in regular contact with our lenders. The representatives of our core banks meet with the Executive Board at least once a year for a personal exchange of ideas and information and are also informed about Bilfinger's current development in the course of quarterly reporting and at the Capital Markets Day.

The dialog with our key stakeholder groups – customers, employees, suppliers and the capital market – serves the purpose of taking their interests and viewpoints into account in a meaningful way in our strategy and business model. It is our objective to meet this requirement as best we can as part of our duty of care. Further information on this can be found in Chapter [*GOV 4 – Statement on due diligence.*](#)

The interests and viewpoints of our most important stakeholders can be reflected in our strategy and business model in different ways and are taken into account accordingly. They were analyzed in detail in the materiality analysis 2024. More detailed information on this process is explained in detail in Chapter [*IRO-1 Description of the process to identify and assess material impacts, risks and opportunities.*](#) The analysis of company-specific impacts, risks and opportunities is dealt with on a regular basis as part of the duty of care in Bilfinger's administrative, management and supervisory bodies.

Customers

Our business model and strategy are aligned with the interests and viewpoints of our customers. The requirements for enhancing the efficiency and sustainability of their systems form the core of our goal to be the number one provider for this task from our customers' perspective.

Increasing awareness of climate change and the ensuing energy transition in many industrialized countries are opening up attractive market opportunities in Europe, North America and the Middle East for us as a leading industrial services provider. This is made all the more relevant by the fact that a large share of our customers operate in energy-intensive industries such as energy, chemicals & petrochemicals, pharmaceuticals & biopharmaceuticals, and oil & gas. Given the measures required for the energy transition and climate protection, some of these industries are currently undergoing fundamental innovation processes in all key stages of the value chain. Our customers must enhance the performance of their plants, secure their future energy supply and significantly reduce their carbon footprint in the process.

Our Group portfolio brings together services that contribute to increased efficiency and sustainability in various customer segments. We thus address the imminent decarbonization of energy-intensive production, transport and processing operations and enhance energy efficiency at all stages of the customer value chain. Low-carbon energy generation and the reduction of energy consumption and emissions represent the key tasks in this regard.

We take account of the importance of our customers' interests and points of view by collecting specific key figures for this purpose, which we report on in this non-financial Group declaration as company-specific information in Chapter [B.5.2 Industrial services to enhance efficiency and sustainability](#).

Employees

The main interests and viewpoints of our employees relate in particular to

- working hours,
- adequate remuneration,
- freedom of association, the existence of works councils and the rights of employees to information, consultation and participation,
- collective bargaining, including the share of employees covered by collective bargaining agreements,
- health and occupational safety,
- training and skills development,
- measures against violence and harassment in the workplace, and
- diversity.

We report in detail on the consideration of these interests and viewpoints in our strategy and business model in Chapter [S1 Own workforce](#).

There is a particular focus on the training and development of our employees. In this way, we intend to open up personal development prospects for them while at the same time maintaining and further strengthening the competitiveness of our Group. For this reason, we have significantly intensified our efforts in training and further education and have been investing at least 0.5 percent of Group revenue in this area every year since 2024.

We also consider the health and safety of all employees to be an important strategic task and take appropriate measures to this end.

Suppliers

We take account of the interests and viewpoints of the people employed in our upstream supply chain in order to facilitate a trusting and reliable cooperation with our suppliers. These relate in particular to

- workplace safety,
- fair working conditions,
- combating discrimination,
- the right to organize and collective bargaining,
- compliance with applicable data protection laws, and

- the implementation of these requirements also for subcontractors in the downstream value chain.

The framework conditions are set out in the Bilfinger Code of Conduct for Suppliers and in the Bilfinger Statement of Principles on Human Rights. Bilfinger reviews compliance with the requirements in its upstream value chain with systematic supplier audits.

Capital market

The interests and viewpoints of investors, analysts and lenders are geared toward the sustainable successful development of Bilfinger and are therefore fully aligned with the objectives of our corporate strategy. We take into account the specific requirements of the capital market through a balanced capital allocation. This includes a transparent dividend policy, targeted investments in organic and inorganic growth, a needs-based approach to capital measures and the goal of achieving and securing an investment grade credit rating.

In line with the requirements of the capital market, we report regularly and transparently on our current business performance and the Group's key sustainability matters using meaningful data as a basis.

Our strategy is geared toward the goal of sustainably successful business development. The interests and viewpoints of the most important stakeholders are taken into account as part of the due diligence process. The information provided to the administrative, management and supervisory bodies with regard to the sustainability-related impacts of our corporate activities is explained accordingly in the Chapters *GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies* and *GOV-4 Statement on due diligence*.

Incorporating the interests and viewpoints of stakeholders is an ongoing process and as such is not subject to a fixed timeframe. This can lead to the adjustment of individual strategy elements. Specific effects on the relationship with stakeholders cannot be predicted.

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

As a result of the materiality analysis, significant impacts, risks and opportunities for Bilfinger were identified for the sustainability topics of climate change, own workforce, workforce in the value chain, governance and the company-specific topic of sustainable industrial services to enhance efficiency and sustainability.

Climate change

CLIMATE CHANGE: IMPACTS

Subtopic	48.a Impact	48.a Relevance	48.a Value chain	48.c iii. Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.c.iii Impact on people and the environment	48.c.ii. and iv Linking the impacts to the business model and strategy	48.h ESRS disclosure requirement
Climate change mitigation and adaptation	CO ₂ e emissions from the purchase of goods and services (Scope 3 upstream) and from the use of the goods and services supplied (Scope 3 downstream)	actual	upstream and downstream	short-term	Growing importance of CO ₂ e emissions in relation to suppliers Central importance for the content of the service offering for our customers	Consideration of CO ₂ e emissions in the procurement process Optimization of the goods delivered and services provided with regard to CO ₂ e emissions in coordination with the customer	Reduction of CO ₂ e emissions	Core element of business model and strategy: Enhancing the efficiency and sustainability of customers' plants	DR related to ESRS 2 GOV-1 E1-1 DR related to ESRS 2 SMB-3 DR related to ESRS 2 IRO-1 E1-2 E1-3 E1-4 E1-5 E1-6 E1-7 E1-8 E1-9
Energy	Consumption of non-renewable energy in our own business activities, through purchased goods and services and through the use of our supplied goods and services	actual	Own business activities, upstream and downstream	long-term	Growing importance of energy consumption and the energy mix in relation to suppliers Growing importance of energy consumption and the energy mix in our own business activities Central importance for the content of the service offering for our customers	Consideration of energy consumption and the energy mix in the procurement process Increasing replacement of non-renewable energies with renewable energies in our business activities Optimization of the goods delivered and services provided with regard to CO ₂ e emissions in coordination with the customer	Reduction of CO ₂ e emissions	Core element of business model and strategy: Enhancing the efficiency and sustainability of customers' plants	DR related to ESRS 2 SBM-3 DR related to ESRS 2 IRO-1 E1-2 E1-3 E1-4 E1-5 E1-9

CLIMATE CHANGE: RISKS

Subtopic	48.a Risk	48.a Value chain	Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.h ESRS disclosure requirement
Climate change adaptation	The decline in the activities of customers in carbon-intensive industries is resulting in lower demand for our goods and services in certain areas	downstream	long-term			DR related to ESRS 2 SMB-3 DR related to ESRS 2 IRO-1 E1-2 E1-3 E1-4 E1-9

CLIMATE CHANGE: OPPORTUNITIES

Subtopic	48.a Opportunity	48.a Value chain	Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.h ESRS disclosure requirement
Climate change adapta- tion	Material opportunities in connection with climate change adaptation are of central importance for the business model and strategy and are therefore reported as a company-specific topic 'industrial services to en- hance efficiency and sustain- ability'		downstream			

Climate change adaptation

In connection with climate change adaptation, there is a financial risk in the upstream value chain that customers in carbon-related industries will reduce their activities. In the long term, this could lead to lower demand for our services in certain areas.

Climate change mitigation

The CO₂e emissions generated in connection with our business activities in the upstream and downstream value chain (Scope 3 upstream and downstream) have a short-term, actual, negative impact on climate protection. These are caused on the one hand primarily by the goods and services we purchase and on the other hand by the products and services we sell to our customers.

Our services have an actual positive impact on the downstream value chain. Our objective in this regard is to increase the efficiency and sustainability of our customers and thus make a contribution to reducing CO₂e emissions. These positive impacts occur in the short, medium and long term. Given the importance of this key aspect for Bilfinger, we report on this as a company-specific topic in Chapter [B.5.2 Industrial services to enhance efficiency and sustainability](#).

Energy

The consumption of non-renewable energy in our upstream and downstream value chain and in our own business activities has an actual long-term negative impact on people and the environment.

By contrast, we want our business activities to contribute to a reduction in our customers' energy consumption. In the long term, this results in actual positive impacts in the downstream value chain. Further information can also be found in Chapter [B.5.2 Industrial services to enhance efficiency and sustainability](#).

Industrial services to enhance efficiency and sustainability

**COMPANY-SPECIFIC TOPIC:
INDUSTRIAL SERVICES TO ENHANCE EFFICIENCY AND SUSTAINABILITY: IMPACTS**

Subtopic	48.a Impact	48.a Relevance	48.a Value chain	48.c.iii. Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.c.i. Impact on people and the environment	48.c.ii. and iv. Linking the effects to the business model and strategy	48.h ESRS disclosure requirement
n/a	(+) positive Reducing customers' CO ₂ e emissions and energy consumption with our services	actual	downstream	short-term medium-term long-term	Reducing CO ₂ e emissions and energy consumption is at the heart of the company's strategy to enhance customer efficiency and sustainability	Bundling of services in product centers Standardization of the services offered Optimization of own operational excellence Positioning in the Group's markets	Contribution to climate change mitigation Contribution to economic success and thus to working conditions for own workforce and workers in the value chain	Core of the business model and strategy	n/a

INDUSTRIAL SERVICES TO ENHANCE EFFICIENCY AND SUSTAINABILITY: RISKS

Subtopic	48.a Risk	48.a Value chain	48.c.iii. Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.h ESRS disclosure requirement
	No significant risks have been identified regarding the company-specific topic of industrial services to enhance efficiency and sustainability.					

INDUSTRIAL SERVICES TO ENHANCE EFFICIENCY AND SUSTAINABILITY: OPPORTUNITIES

Subtopic	48.a Opportunity	48.a Value chain	48.c.iii. Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.h ESRS disclosure requirement
n/a	Reducing customers' CO ₂ e emissions and energy consumption with our services	actual	downstream	Reducing CO ₂ e-emissions and energy consumption is at the heart of the company's strategy to enhance customer efficiency and sustainability	Bundling of services in product centers Standardization of the services offered Optimization of own operational excellence Positioning in the Group's markets	n/a

Energy efficiency in the customer value chain

The requirements for efficiency and climate change adaptation lead to increased demand for our goods and services from our customers. This results in medium- and long-term financial opportunities that impact both the upstream and downstream value chains as well as the company's own business activities.

The current and expected influence of all material impacts, risks and opportunities on our business model, value chain, strategy and decision-making, as well as the way in which Bilfinger responds to this influence, are presented as more detailed information in Chapters [MDR-P Policies adopted to manage material sustainability matters](#), [MRD-A Actions and resources in relation to material sustainability matters](#), [MDR-M Metrics in relation to material sustainability matters](#) and [MDR-T Tracking effectiveness of policies and actions through targets](#).

Own workforce

OWN WORKFORCE: IMPACTS

Subtopic	48.b Impact	48.a Relevance	48.a Value chain	48.c iii. Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.c.ii Impact on people and the environment	48.c.ii and iv Linking the impacts to the business model and strategy	48.h ESRS disclosure requirement
Working conditions	Efficient planning can increase productivity and reduce injuries and error rates. Attractive, flexible workplaces increase employer attractiveness	actual	Own business activity	short term	High productivity and low error rates are particularly important for the business model and strategy as a service provider	Clear definition of work processes for tasks in a functional organization Reasonable working hours and adequate remuneration Training and further education Occupational safety programs	Employee satisfaction and motivation, health and safety	Self-image as a service provider whose success depends heavily on the quality of its employees Measurement and control of important parameters to promote employee performance	S1-1 S1-2 S1-3 S1-4 S1-5 S1-6 S1-7 S1-17 ESRS 1 par. 11
Working conditions	Understaffing and poor planning can lead to an overworked workforce, dissatisfaction, high turnover rates or difficulties attracting new talent	actual	Own business activity	short term	High productivity and low error rates are particularly important for the business model and strategy as a service provider	Clear definition of work processes for tasks in a functional organization Reasonable working hours and adequate remuneration Training and further education Occupational safety programs	Employee satisfaction and motivation, health and safety	Self-image as a service provider whose success depends heavily on the quality of its employees Measurement and control of important parameters to promote employee performance	S1-1 S1-2 S1-3 S1-4 S1-5 S1-6 S1-7 S1-17 ESRS 1 par. 11
Equal treatment and equal opportunities for all and diversity	Promotion of a non-discriminatory working environment, including preventive measures and zero tolerance for misconduct	actual	Own business activity	short term	Culture of integrity as the basis for all business processes and for personal interaction	Comprehensive and established compliance system based on the prevent-detect-respond model	Freedom to develop in the workplace without restrictions due to discrimination	Speak-up culture Clearly defined processes for dealing with suspected cases and violations (zero tolerance)	S1-1 S1-2 S1-3 S1-4 S1-5 S1-6 S1-7 S1-9 S1-17
Measures against violence and harassment in the workplace and diversity	Anonymous whistleblower hotline and anonymous investigation of complaints	actual	Own business activity	short term	Culture of integrity as the basis for all business processes and for personal interaction	Comprehensive and established compliance system based on the prevent-detect-respond model	Freely accessible possibility for all employees to point out possible grievances without fear of sanctions	Speak-up culture Clearly defined processes for dealing with suspected cases and violations (zero tolerance)	S1-1 S1-2 S1-3 S1-4 S1-5 S1-6 S1-7 S1-17 ESRS 1 par. 11

OWN WORKFORCE: RISKS

Subtopic	48.a Risk	48a Value chain	48.c.iii Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.h ESRS disclosure requirement
Working conditions	Understaffing and poor planning can reduce productivity and excessive workloads or inadequate wages can lead to lower motivation and higher absenteeism and turnover rates	Own business activity	medium-term	High productivity and low error rates are particularly important for the business model and strategy as a service provider	Clear definition of work processes for tasks in a functional organization Reasonable working hours and adequate remuneration Training and further education Occupational safety programs	S1-1 S1-2 S1-3 S1-4 S1-5 S1-6 S1-7 S1-17 ESRS 1 par. 11
Further training and skills development	Lack of qualification with regard to market and technology requirements could jeopardize competitive advantage	Own business activity	medium-term	High, market-oriented qualification is of particular importance for the business model and strategy as a service provider	Investment of at least 0.5 percent of Group revenue in comprehensive training and education programs	S1-1 S1-2 S1-3 S1-4 S1-5 S1-6 S1-7 S1-13 S1-17

OWN WORKFORCE: OPPORTUNITIES

Subtopic	48.a Opportunity	48.a Value chain	48.c.iii Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.h ESRS disclosure requirement
Working conditions	Efficient planning, attractive, flexible working hours and competitive, adequate wages help to increase productivity, reduce injuries and error rates, attract and retain qualified employees, lower turnover rates and reduce recruitment costs	Own business activity	medium-term	High productivity and low error rates are particularly important for the business model and strategy as a service provider	Clear definition of work processes for tasks in a functional organization Reasonable working hours and adequate remuneration Training and further education	S1-1 S1-2 S1-3 S1-4 S1-5 S1-6 S1-7 S1-17 ESRS 1 par. 11
Health and safety	Dedicated health and safety management including awareness campaigns and training	Own business activity	medium-term	Compliance with high occupational safety standards is an essential prerequisite for working in customer industries	Comprehensive occupational safety programs	S1-1 S1-2 S1-3 S1-4 S1-5 S1-6 S1-7 S1-14 S1-17
Further training and skills development	Employee development through training increases employee satisfaction and loyalty to the company, ensuring a competitive advantage	Own business activity	medium-term	High, market-oriented qualification is of particular importance for the business model and strategy as a service provider	Investment of at least 0.5 percent of Group revenue in comprehensive training and education programs	S1-1 S1-2 S1-3 S1-4 S1-5 S1-6 S1-7 S1-13 S1-17
Equal treatment and equal opportunity for all, as well as diversity and measures against violence and harassment in the workplace	Promotion of a non-discriminatory work environment including prevention training, an anonymous whistleblower hotline and anonymous investigation of complaints as well as a zero-tolerance policy for misconduct	actual	Own business activity	Culture of integrity as the basis for all business processes and for personal interaction	Speak-up culture Clearly defined processes for dealing with suspected cases and violations (zero tolerance)	S1-1 S1-2 S1-3 S1-4 S1-5 S1-6 S1-7 S1-17 ESRS 1 par. 11

All impacts, risks and opportunities in connection with our own workforce relate to our own business activities.

Working conditions

Working hours

Bilfinger also applies all legal, regulatory and collective bargaining standards when it comes to compliance with working hours.

Understaffing and poor planning can, however, lead to an overworked workforce and reduce productivity. In addition, excessive workloads and irregular working hours can lead to dissatisfaction among the company's own employees and thus to increased fluctuation rates or difficulties in attracting new talent. These actual, short-term negative impacts generate corresponding financial risks in the medium term.

On the other hand, efficient planning of working times increases productivity and reduces error rates, which in turn leads to greater occupational safety. These short-term actual positive impacts are associated with medium-term financial opportunities for the company.

Offering attractive, flexible working hours increases the attractiveness of Bilfinger as an employer, has a positive impact on the company's own workforce and opens up financial opportunities in the medium term.

Adequate remuneration

Appropriate remuneration is closely associated with compliance with working hours. Some of the material impacts, risks and opportunities mentioned above may therefore also arise in connection with this sustainability matter.

Inadequate wages could also potentially result in reduced motivation, lack of attention and higher absenteeism. The company's reputation among current employees and applicants can be severely damaged by the payment of inadequate wages. The consequences are short-term negative impacts combined with a medium-term financial risk for the company.

Competitive, fair wages on the other hand help to attract and retain qualified employees, lower fluctuation rates and reduce recruitment costs. Furthermore, adequate wages correlate with higher employee productivity and better overall company performance. This has an actual positive impact on the company's own workforce in the short term and brings financial opportunities for Bilfinger in the medium term.

Freedom of association, existence of works councils and employees' rights to information, consultation and co-determination

Bilfinger complies with all national requirements applicable in its regions as they relate to the formation of trade unions and works councils and the interaction with them. This also applies to collective bargaining and compliance with collective bargaining agreements – with actual short-term positive impacts on the company's workforce.

Health and safety

Dedicated health management, including aspects of physical and mental health, and comprehensive occupational safety management are of great importance to Bilfinger due to its activities in industries with strict safety requirements. Information campaigns and training with the objective of avoiding as many work-related accidents as possible, as well as transparent internal and external communication regarding occupational safety incidents that have occurred, have an actual positive impact on employees in the short term and bring significant opportunities for Bilfinger in the medium term.

Potential negative impacts may arise in the short term for employees working for clients with a potentially less robust and sophisticated health and safety environment. This may result in a financial risk for Bilfinger that arises in the downstream value chain.

Equal treatment and equal opportunities for all

Further training and skills development

Employee development in the company through further training and skill development increases their satisfaction and loyalty to the company. This has an actual positive impact in the short term. The resulting increased ability to meet the growing demands of its customers will generate medium-term financial opportunities for Bilfinger.

On the other hand, failure to adapt the skills of the company's workforce to changing market and technological requirements could potentially jeopardize our competitive position. This would have a negative impact on employees in the short term and would bring about a significant financial risk for the company in the medium term.

Measures against violence and harassment in the workplace

Bilfinger pursues a consistent zero-tolerance policy with regard to violence and harassment in the workplace. An anonymous whistleblower system has been established for reporting suspected cases; complaints are investigated anonymously and a targeted training program has been established to prevent misconduct. In the short term, this will have an actual positive impact on Bilfinger employees.

Diversity

Promoting a non-discriminatory work environment, implementing a zero-tolerance policy for misconduct and conducting appropriate prevention training has a positive short-term impact on the company's own workforce. In addition, Bilfinger fulfills the statutory obligation to set gender quotas and report publicly on their achievement. The consequences are actual short-term positive impacts for the company's own workforce and medium-term financial opportunities for the company itself.

Workers in the value chain

WORKERS IN THE VALUE CHAIN: IMPACTS

Subtopic	48.a Impact	48.a Relevance	48.a Value chain	48.a.iii. Time horizon	48.a Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.c.ii Impact on people and the environment	48.c.ii and iv Linking the impacts to the business model and strategy	48.h ESRS disclosure requirement
Working conditions, equal treatment and equal opportunity for all and other employment-related rights	Consistent compliance with applicable laws and regulations as well as generally-recognized corporate social responsibility standards is an indispensable prerequisite for cooperation with suppliers.	actual	upstream	short-term medium-term long-term	Strategy and business model are highly dependent on purchased services and goods.	Working exclusively with suppliers who comply with applicable laws and regulations as well as generally-recognized standards regarding working conditions, equal treatment and equal opportunities and other labor-related rights. Suspension of cooperation with suppliers if there are sufficiently concrete grounds for suspicion	Implementation of applicable laws and regulations and generally accepted standards regarding personal working conditions, equal opportunity and other labor-related rights for workers in the value chain to the greatest extent possible	Self-image as a service provider whose success depends heavily on the quality of employees in the value chain Clearly defined processes for dealing with suspected cases and violations (zero tolerance)	S2-1 S2-2 S2-3 S2-4 S2-5 ESRS 1 par. 11
Health and safety	Workers in the value chain who work directly for us at our sites are fully integrated into the health and safety procedures and system of our own workforce	actual	upstream	short-term medium-term long-term	Compliance with high occupational safety standards is an essential prerequisite for working in customer industries	Comprehensive occupational safety programs, including for employees in the value chain who work directly for us at our sites	Health and safety of the workforce	Compliance with strict occupational safety standards throughout the value chain	S2-1 S2-2 S2-3 S2-4 S2-5 ESRS 1 par. 11

WORKERS IN THE VALUE CHAIN: RISKS

Subtopic	48.a Risk	48.a Value chain	48.c.iii. Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.h ESRS disclosure requirement
	No significant risks were identified with regard to workers in the value chain.					

WORKERS IN THE VALUE CHAIN: OPPORTUNITIES

Subtopic	48.a Opportunity	48 a) Value chain	48.c.iii Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.h ESRS disclosure requirement
Working conditions, equal treatment and equal opportunity for all and other employment-related rights	Consistent compliance with applicable laws and regulations as well as generally-recognized corporate social responsibility standards is an indispensable prerequisite for cooperation with suppliers.	upstream	medium-term long-term	Strategy and business model are highly dependent on purchased services and goods.	Working exclusively with suppliers who comply with applicable laws and regulations as well as generally-recognized standards regarding working conditions, equal treatment and equal opportunities and other labor-related rights. Suspension of cooperation with suppliers if there are sufficiently concrete grounds for suspicion	S2-1 S2-2 S2-3 S2-4 S2-5 ESRS 1 par. 11
Further training and skills development	Training and qualification of subcontractors in occupational safety issues	upstream	medium-term long-term	High, market-oriented qualification is of particular importance for the business model and strategy as a service provider	Comprehensive occupational safety programs	S2-1 S2-2 S2-3 S2-4 S2-5 ESRS 1 par. 11

All impacts, risks and opportunities associated with the workforce in the value chain relate to the upstream value chain.

Bilfinger has a comprehensive Code of Conduct, is committed to its Statement of Principles on Human Rights and provides clear guidelines for the implementation of this content in its upstream value chain in its Code of Conduct for Suppliers. The closely integrated compliance system works to ensure that the requirements are implemented and violations are punished.

In view of the requirement to consistently comply with applicable laws and regulations as well as generally recognized standards of social responsibility, the materiality analysis identified actual positive impacts on the workforce in the upstream value chain for numerous sustainability topics, which have an impact in the short, medium and long term. This is associated with significant medium- and long-term financial opportunities for the company.

Working conditions

Significant positive impacts, which also result in significant financial opportunities for Bilfinger, arise in relation to the working conditions of employees in our upstream value chain. They relate in particular to secure employment, working hours, adequate remuneration and the opportunity for social dialog.

Bilfinger’s commitment to freedom of association, including the existence of works councils, and the right to collective bargaining also has a positive impact on working conditions.

The fundamental importance that Bilfinger attaches to occupational health and safety also has a significant positive impact on workers in the upstream value chain. Employees of our subcontractors, who often work directly at our sites, are fully integrated into the occupational safety system of our own workforce. Cooperation with suppliers is suspended in the event of sufficiently concrete suspicions of occupational safety violations.

Equal treatment and equal opportunities for all

Further training and skills development are an important tool for Bilfinger to secure its future. The training and qualification of employees at subcontractors by Bilfinger, especially as they relate to occupational safety matters, have a significant positive impact on the short-, medium- and long-term personal safety of employees in our value chain. This also generates significant economic opportunities for Bilfinger in the medium and long term.

Consistent action against violence and harassment in the workplace, including upstream in the value chain, also has a positive impact on the situation of workers in the value chain.

Other work-related rights

The prohibition of child labor and forced labor is just as essential for Bilfinger as living conditions in appropriate accommodations and with safe access to clean water and sanitary facilities. The clear guidelines that Bilfinger sets for this in its upstream value chain are associated with significant positive impacts. Here too, cooperation with suppliers is suspended in the event of sufficiently concrete suspicions of violations.

Governance

GOVERNANCE: IMPACTS

Subtopic	48.a Impact	48.a Relevance	48.a Value chain	48.c.iii Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.c.ii Impact on people and the environment	48.c.ii and iv Linking the impacts to the business model and strategy	48.h ESRS disclosure requirement
Corporate culture and corruption and bribery	An appropriate culture of integrity and the consistent fight against bribery and corruption protect us and our business partners	actual	Upstream Own business activity Downstream	short-term medium-term long-term	The application of the business model and strategy with customers is only possible with a corporate culture characterized by integrity that offers all sides protection against bribery and corruption	Comprehensive and established compliance system based on the prevent-detect-respond model as a key prerequisite for implementing the culture of integrity	Fair competition for all business partners	Clearly defined processes for dealing with suspected cases and violations (zero tolerance)	G1-1 G1-3 G1-41
Protection of whistleblowers	Whistleblower system offers comprehensive protection against possible sanctions	potentially	Upstream Own business activity Downstream	short-term medium-term long-term	The application of the business model and strategy is only possible with a corporate culture characterized by integrity. Whistleblowers of suspected cases are protected	Secure, publicly accessible, anonymous whistleblower system if desired,	Compliance with comprehensive whistleblower regulations gives those affected the opportunity to assert their rights.	Clearly defined processes for dealing with suspected cases and violations (zero tolerance)	G1-1
Management of relationships with suppliers, including payment practices	Fair payment terms for all suppliers	actual	Upstream Own business activity	short-term medium-term long-term	Compliance with fair payment terms toward suppliers is an important condition for the economic success of both parties.	Application of standard payment terms for all suppliers regardless of their size	Contribution to the economic security of suppliers and the safe employment of the workers employed there	Fulfillment of customer requirements as a service provider only possible through high-quality services provided jointly with suppliers	G1-1 G1-2 G1-6

GOVERNANCE: RISKS

Subtopic	48.a Risk	48.a Value chain	Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.h ESRS disclosure requirement
	No significant risks were identified with regard to corporate governance.					

GOVERNANCE: OPPORTUNITIES

Subtopic	48.a Opportunity	48.a Value chain	48.c.iii Time horizon	48.b Influence on business model and strategy	48.b Dealing with the influence on the business model and strategy	48.h ESRS disclosure requirement
Corporate culture and corruption and bribery	An appropriate culture of integrity and the consistent fight against bribery and corruption protects us and our business partners	actual	Upstream Own business activity Downstream	short-term medium-term long-term	Comprehensive and established compliance system based on the prevent - detect - respond model as a key prerequisite for implementing the culture of integrity	G1-1 G1-3 G1-41
Protection of whistleblowers	Compliance with whistleblower regulations can help those affected to assert their rights	potentially	Upstream Own business activity Downstream	short-term medium-term long-term	Secure, publicly accessible, anonymous whistleblower system if desired,	G1-1
Management of relationships with suppliers, including payment practices	Compliance with fair payment terms with our suppliers ensures the economic success of both parties	actual	Upstream Own business activity	short-term medium-term long-term	Application of standard payment terms for all suppliers regardless of their size	G1-1 G1-2 G1-6

Corporate culture

Bilfinger has an established culture of integrity and works continuously to develop this further. The associated actual positive impacts occur in the short term and affect both the company’s own business activities and the upstream and downstream value chain. This generates financial opportunities that have a medium- and long-term impact and also affect the entire value chain.

Protection of whistleblowers

The protection of whistleblowers who report suspected cases plays an important role in Bilfinger’s culture of integrity. There are clear rules on dealing with persons and information, compliance with which can allow affected individuals to assert their rights. This can potentially have short-, medium- and long-term positive impacts on the company’s own business activities and the upstream and downstream value chain.

Management of relationships with suppliers, including payment practices

Compliance with fair payment terms toward our suppliers is an important condition for the economic success of both parties. The regulations established for this purpose by mutual agreement take into account the interests of Bilfinger and its suppliers – with actual positive impacts in the upstream value chain and for the company’s own business activities. They occur in the short, medium and long term.

Corruption and bribery

Our stringent anti-bribery and anti-corruption program safeguards our company’s commercial success and leverages actual financial opportunities across our company’s value chain. It also has a positive impact on our business partners by protecting them from economic losses. Both effects have short-, medium- and long-term impacts.

Appropriate preventive measures such as targeted training and comprehensive risk management are decisive factors in our culture of integrity. They actually have a positive impact on our own business activities and the upstream and downstream value chain in the short, medium and long term.

By contrast, failure to diligently implement and maintain a comprehensive compliance management system to prevent bribery and corruption at points throughout the organization's business activities and in the upstream and downstream value chain can lead to potential negative impacts that can have short-, medium- and long-term impacts.

The current financial impact of the material risks and opportunities on the Group's financial position, financial performance and cash flows is closely related to Bilfinger's strategic focus, which is to enhance the efficiency and sustainability of its customers through its operating activities. This results in the financial effects described in Chapter [B.2.2 Results of operations](#) as additional information with regard to orders received, revenue and EBITA, as well as the financial position and cash flows presented in Chapter [B.2.4 Financial position](#) as additional information.

From today's perspective, there are no material risks and opportunities that pose a significant risk of a material adjustment to the carrying amounts of the assets and liabilities reported in the associated financial statements in the next reporting period.

Bilfinger continuously assesses the resilience of its strategy and business model on an ongoing basis with regard to the main negative effects and financial risks as well as its ability to exploit its main opportunities. This is carried out as part of the duty of care of the administrative, management and supervisory bodies and, in particular, through the application of the Group-wide risk and opportunity management system. Bilfinger's ability to manage its material impacts and risks is demonstrated in Chapter [B.3.3 General assessment of the risk situation](#). The ability to exploit significant opportunities is presented in Chapter [B.3.6 General assessment of the opportunities situation](#). Both disclosures are an integral part of this non-financial Group declaration.

The materiality analysis was carried out for the first time in 2024 in accordance with the detailed requirements in [ESRS 1 Section 3 – Double materiality as a basis for the disclosure of sustainability information](#). The significantly more detailed assessment of impacts, risks and opportunities compared to the previous year did not result in any changes to the sustainability issues classified as material in the previous year's materiality analysis.

All material impacts, risks and opportunities described in detail above are subject to ESRS disclosure requirements.

As described under the sustainability topic climate change, our activities have an actual positive impact on the downstream value chain. Our objective in this regard is to increase the efficiency and sustainability of our customers and thus make a contribution to reducing energy consumption and CO₂e emissions. Given the importance of this key aspect, we report on these developments in this non-financial Group declaration as a company-specific topic in Chapter [B.5.2 Industrial services to enhance efficiency and sustainability](#).

Impact, risk and opportunity management

Disclosures on the materiality assessment process

IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities

To determine the impacts, risks and opportunities and to analyze their materiality, Bilfinger conducted an analysis in 2024 that takes into account the dimensions of dual materiality: the materiality of the impacts and the financial materiality. Both dimensions can be interrelated, and any interactions were taken into account in the analysis. This is based on the assumption that sustainability-related impacts can be or can become financially material if it can be reasonably assumed that they will influence the company's financial position, results of operations, cash flows, access to funds or cost of capital in the short, medium or long term. Impacts were recognized regardless of whether or not they are financially material.

When identifying and analyzing impacts, risks and opportunities in the value chain, we focused on areas in which impacts, risks and opportunities are considered likely due to our business model. We also looked into how our business model is influenced by dependencies on the availability of natural, human and social resources.

In the first step of the materiality analysis, a total of 170 impacts, opportunities and risks were identified for all topics, sub-topics and sub-companies listed in ESRS 2, AR 16, as well as for company-specific sustainability topics. In a second step, we assessed these in terms of their materiality for Bilfinger. A rating scale of 1 to 5 was used to determine which impacts, risks and opportunities are material and which sustainability matters are material for this sustainability statement. In this assessment, 1 is the lowest and 5 the highest value.

Impacts, risks and opportunities that are ranked in the top 20 percent for the Group as a whole are considered material.

The assessment criteria are identical to the criteria used in Group risk management and also take into account the requirements defined in ESRS 2, 3.4 and 3.5 for determining both the materiality of the impact and financial materiality.

In order to reflect the importance of the stakeholders, the assessment was conducted by a stakeholder panel representing the most important stakeholders in our Group. The customer group was represented by the Presidents of the Group operating segments Engineering & Maintenance Europe, Engineering & Maintenance International, Technologies and Other Operations as well as the Chief Products & Innovation Officer. The Chief Human Resources Officer and a representative of the Group Works Council were on the panel representing the company's own employees. The suppliers were represented by the Chief Procurement Officer and the capital market by the Senior Vice President Investor Relations. All panel members are in continuous contact with their respective target groups and are therefore in a particularly good position to assess the impacts, risks and opportunities of the company's activities from the perspective of individual stakeholders. Overall, the Stakeholder Panel assessed 68 impacts, risks and opportunities as material for the Bilfinger Group.

In the third step, Group Executive Management and the Executive Board validated the previous steps and the results. Finally, the Executive Board decided on the impacts, risks and opportunities for Bilfinger in accordance with the principle of double materiality, which are laid out in this non-financial Group declaration.

The identification, assessment, prioritization and monitoring of the impacts of Bilfinger's business activities on people and the environment are carried out as part of due diligence. The relevant processes for this are described in Chapter [*GOV-4 Statement on due diligence*](#) and in greater detail in Chapters [*GOV-1 The role of the administrative, management and supervisory bodies*](#), [*GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies*](#) and [*GOV-3 Integration of sustainability-related performance in incentive schemes*](#).

The process for determining the material impact focuses on Bilfinger's specific business activities and business relationships in its Engineering & Maintenance Europe, Engineering & Maintenance International, Technologies and Other Operations business segments and relates to the Europe, North America and Middle East regions.

Impacts in which Bilfinger is involved through its own activities or business relationships are also taken into account.

The involvement and consultation of affected stakeholders is explained in Chapter [*SBM-2 Interests and views of stakeholders*](#).

The process for determining material impacts systematically distinguishes between positive and negative impacts as well as actual and potential impacts. The following parameters were rated on a scale of 1 to 5 with specific, qualitative and quantitative values and threshold values:

In the event of actual negative impacts

- Severity of the impact
- Scope of the impact
- Number of people affected and/or geographical scope of the impact
- Immutability of the impact
- Duration of the impact

In the event of potential negative impacts

- Severity of the impact
- Scope of the impact
- Number of people affected and/or geographical scope of the impact
- Immutability of the impact
- Duration of the impact
- Likelihood of occurrence of the impact

In the event of actual positive impacts

- Extent of the impact
- Scope of the impact
- Number of people affected and/or geographical scope of the impact

In the event of potential positive impacts

- Extent of the impact
- Scope of the impact
- Number of people affected and/or geographical scope of the impact
- Likelihood of occurrence of the impact

In the entire process, short, medium and long-term time horizons were defined and both our own business activities, including our products and services and business relationships in the upstream and downstream value chain, were considered.

The impacts of the company's activities and the interdependencies with the risks and opportunities are considered in an integrated approach as part of the materiality analysis. Company-specific impacts and their financial materiality are assessed in directly consecutive steps.

Impacts that are ranked in the top 20 percent for the Group as a whole are considered material.

The materiality of financial risks is assessed based on the question of the extent to which they have or could reasonably be expected to have a material financial impact on Bilfinger's financial position, business performance, cash flows or access to financing or the cost of capital. The qualitative and quantitative thresholds used in the process for determining the material financial risks and the assessment criteria applied on a scale of 1 to 5 correspond to Group-wide risk management. This also applies to the data sources used and the level of detail of specific assumptions. The procedure is explained in detail in Chapter [B.3.1 Risk management](#) as additional information. Sustainability-related risks are thus included in Bilfinger's general management process. They are divided into short, medium and long-term time horizons as well as the company's own business activities and the upstream and downstream value chain are considered.

Risks that are ranked in the top 20 percent for the Group as a whole are considered material.

Sustainability risks are treated on an equal footing with the Group's other risks. The instruments used for evaluation, the decision-making processes and the internal control procedures are essentially the same as those of the general risk management process, which is explained in Chapter [B.3.1 Risk management](#) as additional information.

The identification, assessment and handling of material impacts and sustainability risks are fully incorporated into the assessment of the general risk profile. This is summarized for additional information in Chapter [B.3.3 General assessment of the risk situation](#).

The identification, evaluation and management of opportunities are also based on the premise of the extent to which they have or could reasonably be expected to have a material financial impact on Bilfinger's financial position, economic performance, cash flows or access to funds or the cost of capital.

The qualitative and quantitative thresholds used in the process for determining the material financial opportunities and the assessment criteria applied on a scale of 1 to 5 correspond to Group-wide opportunities management. This also applies to the data sources used and the level of detail of specific assumptions. The procedure is explained in detail in Chapter [B.3.4 Opportunities management](#). Sustainability-related opportunities are thus included in Bilfinger's general management process. They are divided into short, medium and long-term time horizons as well as the company's own business activities and the upstream and downstream value chain are considered.

Opportunities that are ranked in the top 20 percent for the Group as a whole are considered material.

Bilfinger conducted the 2024 materiality analysis in accordance with the requirements of the European Sustainability Reporting Standards.

In 2025, Bilfinger intends to review whether a completely new materiality analysis will be required. This would be the case, for example, in the event of a significant change in the business model, the acquisition or sale of significant activities or significant changes in economic, political, social or other framework conditions. If these parameters remain stable, the results obtained in 2024 would be validated in any case.

IRO-2 – Disclosure Requirements in ESRS covered by the undertaking's non-financial Group declaration

In this non-financial Group declaration, environmental, employee, social, human rights, anti-corruption and bribery matters are reported on the basis of the results of the materiality analysis, in line with the structure of the ESRS. Reporting is carried out in the indicated sections of the material disclosure requirements.

ESRS 2 – General disclosures

BP-1 – General basis for preparation of non-financial Group declaration > Section 3-5

BP-2 – Disclosures in relation to specific circumstances > Section 3-18

GOV-1 – The role of the administrative, management and supervisory bodies > Section 19-23

GOV-2 – Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies > Section 24-26

GOV-3 – Integration of sustainability-related performance in incentive schemes
> Section 27-29

GOV-4 – Statement on due diligence > Section 30-33

GOV-5 – Risk management and internal controls over sustainability reporting > Section 34-37

SBM-1 – Strategy, business model and value chain > Section 38-42

SBM-2 – Interests and views of stakeholders > Section 43-45

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model > Section 46-50

Section 48 is reported in accordance with ESRS. The material impacts, risks and opportunities and the data points contained in item 48a.-h. are described in aggregated form.

IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities
> Section 51-53

IRO-2 – Disclosure requirements in ESRS covered by the undertaking’s non-financial Group declaration > Section 54-62

MDR-P – Policies adopted to manage material sustainability matters > Section 63-65

MDR-A – Actions and resources in relation to material sustainability matters, metrics and targets
> Section 66-72

MDR-M – Metrics in relation to material sustainability matters > Section 73-77

MDR-T – Tracking effectiveness of policies and actions through targets > Section 78-81

E1 Climate change

GOV-3 – Integration of sustainability-related performance in incentive schemes > Section 13

E1-1 – Transition plan for climate change mitigation > Section 14-17

SBM – 3 Material impacts, risks and opportunities and their interaction with strategy and business model > Section 18-19

IRO -1 – Description of the process to identify and assess material impacts, risks and opportunities > Section 20-21

Section 20.a-c is reported on in accordance with ESRS. There is no reporting on the assessment of impacts, risks and opportunities based on individual climate scenarios. This also applies to climate-related physical risks in the company's own operations and in both the upstream and downstream value chains, to gross transition risks or opportunities, and to the assessment of the extent to which the company's assets and operations may be vulnerable to these climate-related hazards in terms of the emergence of physical gross risks.

E1-2 – Policies related to climate change mitigation and adaptation > Section 22-25

E1-3 – Actions and resources in relation to climate change policies > Section 26-29

Section 29.b is reported in accordance with ESRS. No quantitative information is provided on expected future GHG emission reductions.

E1-4 – Targets related to climate change mitigation and adaptation > Section 30-34

Section 34.f is reported in accordance with ESRS. No quantitative information is provided on expected future GHG emission reductions.

E1-5 – Energy consumption and mix > Section 35-43

E1-6 – Gross Scopes 1, 2, 3 and total GHG emissions > Section 45-55

E1-7 – Greenhouse gas extraction and greenhouse gas emission reduction projects financed through carbon credits is not included in this non-financial Group declaration.

E1-8 – Internal carbon pricing is not included in this non-financial Group declaration.

E1-9 – Expected financial effects of material physical and transition risks and potential climate-related opportunities is not included in this non-financial Group declaration.

Company-specific topic:

Industrial services to enhance efficiency and sustainability

Revenue from industrial services to enhance efficiency and sustainability

S1 Own workforce

SBM-2 – Interests and views of stakeholders > Section 12

SBM – 3 Material impacts, risks and opportunities and their interaction with strategy and business model > Section 13-16

S1-1 – Policies related to own workforce > Section 17-24

S1-2 – Processes for engaging with own workforce and workers' representatives about impacts > Section 25-29

S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns > Section 30-34

S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions > Section 35-43

S1-5 – Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities > Section 44-47

S1-6 – Characteristics of the undertaking's own workforce > Section 48-52

S1-7 – Characteristics of non-employees in the undertaking's own workforce is not included in this non-financial Group declaration.

S1-8 – Collective bargaining coverage and social dialogue > Section 58-63

S1-9 – Diversity metrics > Section 64-66

S1-10 – Adequate wages > Section 67-71

S1-11 – Social protection is not included in this non-financial Group declaration

S1-12 – Persons with disabilities > Section 77-80

S1-13 – Training and skills development metrics is not included in this non-financial Group declaration.

S1-14 – Health and safety metrics > Section 86-90

S1-15 – Work-life balance metrics is not included in this non-financial Group declaration.

S1-16 – Remuneration metrics (pay gap and total remuneration) > Section 95-99

S1-17 – Incidents, complaints and severe human rights impacts > Section 100-104
Section 103.b is reported as follows: No quantitative information is provided on the number of discrimination complaints.

S2 Workers in the value chain

SBM-2 Interests and views of stakeholders > Section 9

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model > Section 10-13

S2-1 – Policies related to value chain workers > Section 14-19

S2-2 – Processes for engaging with value chain workers about impacts > Section 20-24

S2-3 – Processes to remediate negative impacts and channels for value chain workers to raise concerns > Section 25-29

S2-4 – Taking action on material impacts on workers in the value chain, and approaches to managing material risks and pursuing material opportunities related to workers in the value chain, and the effectiveness of those actions > Section 30-38

S2-5 – Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities > Section 39-42

G1 Governance

GOV-1 – The role of the administrative, management and supervisory bodies > Section 5

IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities
> Section 6

G1-1 – Business conduct policies and corporate culture > Section 7-11

G1-2 – Management of relationships with suppliers > Section 12-15

G1-3 – Prevention and detection of corruption and bribery > Section 16-21

G1-4 – Cases of corruption or bribery > Section 22-26

G1-6 – Payment practices > Section 31-33

Section 33.b is reported in accordance with ESRs. No distinction is made between major suppliers and small and medium-sized suppliers when reporting the average time in days for Bilfinger to settle an invoice from the start of the contractual or statutory payment period or when describing the standard payment terms in days. This also applies to the percentage of payments for which these standard terms are applied.

EU legislation listed in Annex B of ESRs 2, which may result in further disclosure requirements for this non-financial Group declaration, is not relevant for Bilfinger and is therefore not material.

In addition, the materiality analysis results in disclosure requirements and associated data points that are classified as material for the company. The following overview shows where they can be found in this non-financial Group declaration.

LIST OF DATA POINTS IN GENERAL AND TOPIC-RELATED STANDARDS RESULTING FROM OTHER EU LEGISLATION

Disclosure Requirement and related datapoint	SFDR reference ¹	Pillar 3 reference ²	Benchmark regulation reference ³	EU Climate Law reference ⁴	Material	Not material
ESRS 2 GOV-1 Board's gender diversity Section 21 (d)	Indicator 13 in Annex 1 Table 1		Commission Delegated Regulation (EU) 2020/1816 ⁽⁵⁾ , Annex II		Section 21.b	
ESRS 2 GOV-1 Percentage of board members who are independent, Section 21(e)			Commission Delegated Regulation (EU) 2020/1816, Annex II		Section 21.e	
ESRS 2 GOV-4 Statement on due diligence Section 30	Indicator 10 in Annex 1 Table 3				Section 30	
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities Section 40 (d) i	Indicator number 4 Table 1 of Annex 1	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 ⁽⁶⁾ , Table 1: Qualitative information on environmental risks, and Table 2: Qualitative information on social risks	Commission Delegated Regulation (EU) 2020/1816, Annex II			X
ESRS 2 SBM-1 Involvement in activities related to chemical production Section 40 (d) ii	Indicator number 9 Table 2 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II			X
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco Section 40 (d) iv	Indicator number 14 Table 1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II			X
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco Section 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II			X
ESRS E1-1 Transition plan to achieve climate neutrality by 2050 Section 14				Regulation (EU) 2021/1119, Article 2(1)	Section 14	
ESRS E1-1 Undertakings excluded from Paris-aligned benchmarks Section 16(g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12(1)(d) to (g) and Article 12(2)			X
ESRS E1-4 GHG emission reduction targets Section 34	Indicator 4 in Annex 1 Table 2	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6		Section 34	

Disclosure Requirement and related datapoint	SFDR reference ¹	Pillar 3 reference ²	Benchmark regulation reference ³	EU Climate Law reference ⁴	Material	Not material
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) Section 38	Indicator number 5 Table 1 and indicator number 5 Table 2 of Annex 1					X
ESRS E1-5 Energy consumption and mix Section 37	Indicator 5 in Annex 1 Table 1				Section 37	
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors Sections 40 to 43	Indicator number 6 Table 1 of Annex 1					X
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions Section 44	Indicators number 1 and 2 Table 1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)		Section 44	
ESRS E1-6 Gross GHG emissions intensity sections 53 to 55	Indicator number 3 Table 1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		Section 53-55	
ESRS E1-7 GHG removals and carbon credits Section 56				Regulation (EU) 2021/1119, Article 2(1)		X
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks Section 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Reporting omitted in the reporting year	
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk Section 66 (a) ESRS E1-9 Location of significant assets at material physical risk Section 66 (c)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, sections 46 and 47; Template 5: Banking book – Climate change physical risk: Exposures subject to physical risk.			Reporting omitted in the reporting year	X
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes Section 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, section 34; Template 2: Banking book – Climate change transition risk: Loans collateralized by immovable property - Energy efficiency of the collateral			Reporting omitted in the reporting year	

Disclosure Requirement and related datapoint	SFDR reference ¹	Pillar 3 reference ²	Benchmark regulation reference ³	EU Climate Law reference ⁴	Material	Not material
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities Section 69			Commission Delegated Regulation (EU) 2020/1818, Annex II		Reporting omitted in the reporting year	
ESRS E2-4 Amount of each pollutant listed in Annex II of the EPRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, section 28	Indicator number 8 Table 1 of Annex 1 Indicator number 2 Table 2 of Annex 1 Indicator number 1 Table 2 of Annex 1 Indicator number 3 Table 2 of Annex 1					X
ESRS E3-1 Water and marine resources Section 13	Indicator number 7 Table 2 of Annex 1					X
ESRS E3-1 Dedicated policy Section 13	Indicator number 8 Table 2 of Annex 1					X
ESRS E3-1 Sustainable oceans and seas Section 14	Indicator number 12 Table 2 of Annex 1					X
ESRS E3-4 Total water recycled and reused Section 28 (c)	Indicator number 6.2 Table 2 of Annex 1					X
ESRS E3-4 Total water consumption in m ³ per net revenue on own operations Section 29	Indicator number 6.1 Table 2 of Annex 1					X
ESRS 2 - SBM-3 - E4 (16) (a) (i)	Indicator number 7 Table 1 of Annex 1					X
ESRS 2 - SBM-3 - E4 Section 16 (b)	Indicator number 10 Table 2 of Annex 1					X
ESRS 2 - SBM-3 - E4 Section 16 (c)	Indicator number 14 Table 2 of Annex 1					X
ESRS E4-2 Sustainable land / agriculture practices or policies section 24 (b)	Indicator number 11 Table 2 of Annex 1					X
ESRS E4-2 Sustainable oceans / seas practices or policies section 24 (c)	Indicator number 12 Table 2 of Annex 1					X
ESRS E4-2 Policies to address deforestation Section 24 (d)	Indicator number 15 Table 2 of Annex 1					X
ESRS E5-5 Non-recycled waste Section 37(d)	Indicator number 13 Table 2 of Annex 1					X
ESRS E5-5 Hazardous waste and radioactive waste Section 39	Indicator number 9 Table 1 of Annex 1					X
ESRS 2 SBM3 - S1 Risk of incidents of forced labor Section 14 (f)	Indicator number 13 Table 3 of Annex I					X

Disclosure Requirement and related datapoint	SFDR reference ¹	Pillar 3 reference ²	Benchmark regulation reference ³	EU Climate Law reference ⁴	Material	Not material
ESRS 2 SBM3 - S1 Risk of incidents of child labor section 14 (g)	Indicator number 12 Table 3 of Annex I					X
ESRS S1-1 Human rights policy commitments section 20	Indicator number 9 Table 3 and Indicator number 11 Table 1 of Annex I				Section 20	
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organization Conventions 1 to 8, Section 21			Commission Delegated Regulation (EU) 2020/1816, Annex II			X
ESRS S1-1 Processes and measures for preventing trafficking in human beings Section 22	Indicator number 11 Table 3 of Annex I					X
ESRS S1-1 Workplace accident prevention policy or management system Section 23	Indicator number 1 Table 3 of Annex I				Section 23	
ESRS - S1 Grievance/complaints handling mechanisms Section 32 (c)	Indicator number 5 Table 3 of Annex I				Section 32.c	
ESRS S1-14 Number of fatalities and number and rate of work-related accidents Section 88 (b) and (c)	Indicator number 2 Table 3 of Annex I		Commission Delegated Regulation (EU) 2020/1816, Annex II		Section 88.b, c	
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness Section 88 (e)	Indicator number 3 Table 3 of Annex I				Section 88.e	
ESRS S1-16 Unadjusted gender pay gap Section 97 (a)	Indicator number 12 Table 1 of Annex I		Commission Delegated Regulation (EU) 2020/1816, Annex II			X
ESRS S1-16 Excessive CEO pay ratio Section 97 (b)	Indicator number 8 Table 3 of Annex I					X
ESRS S1-17 Incidents of discrimination Section 103 (a)	Indicator number 7 Table 3 of Annex I				Section 103.a	
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Section 104 (a)	Indicator number 10 Table 1 and Indicator number 14 Table 3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/ 1818 Art 12 (1)			X
ESRS 2 SBM3 - S2 Significant risk of child labor or forced labor in the value chain Section 11 (b)	Indicator number 12 and number 13 Table 3 of Annex I					X
ESRS S2-1 Human rights policy commitments Section 17	Indicator number 9 Table 3 of Annex 1 and indicator number 11 Table 1 of Annex 1					X

Disclosure Requirement and related datapoint	SFDR reference ¹	Pillar 3 reference ²	Benchmark regulation reference ³	EU Climate Law reference ⁴	Material	Not material
ESRS S2-1 Policies related to value chain workers Section 18	Indicators number 11 and 4 Table 3 of Annex 1				Section 18	
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines Section 18	Indicator number 10 Table 1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/ 1818 Art 12 (1)			X
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, Section 19			Commission Delegated Regulation (EU) 2020/1816, Annex II			X
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain Section 36	Indicator number 14 Table 3 of Annex 1					X
ESRS S3-1 Human rights policy commitments Section 16	Indicator number 9 Table 3 of Annex 1 and indicator number 11 Table 1 of Annex 1					X
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines Section 17	Indicator number 10 Table 1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/ 1818 Art 12 (1)			X
ESRS S3-4 Problems and incidents related to human rights Section 36	Indicator number 14 Table 3 of Annex 1					X
ESRS S4-1 Policies in connection with consumers and end-users Section 16	Indicator number 9 Table 3 of Annex 1 and indicator number 11 Table 1 of Annex 1					X
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines Section 17	Indicator number 10 Table 1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/ 1818 Art 12 (1)			X
ESRS S4-4 Human rights issues and incidents section 35	Indicator number 14 Table 3 of Annex 1					X
ESRS G1-1 United Nations Convention against Corruption section 10(b)	Indicator number 15 Table 3 of Annex 1					X
ESRS G1-1 Protection of whistleblowers Section 10 (d)	Indicator number 6 Table 3 of Annex 1				Section 10.d	
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws Section 24 (a)	Indicator number 17 Table 3 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		Section 24.a	

Disclosure Requirement and related datapoint	SFDR reference ¹	Pillar 3 reference ²	Benchmark regulation reference ³	EU Climate Law reference ⁴	Material	Not material
ESRS G1-4 Standards on anti-corruption and anti-bribery Section 24(b)	Indicator number 16 Table 3 of Annex 1				Section 24.b	

1 Regulation (EU) 2019/2088 of the European Parliament and of the Council of November 27, 2019 on sustainability-related disclosures in the financial services sector (OJ L 317, 9.12.2019, p. 1).
 2 Regulation (EU) No 575/2013 of the European Parliament and of the Council of June 26, 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation) (OJ L 176, 27.6.2013, p. 1).
 3 Regulation (EU) 2016/1011 of the European Parliament and of the Council of June 8, 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).
 4 Regulation (EU) 2021/1119 of the European Parliament and of the Council of June 30, 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ("European Climate Law") (OJ L 243, 9.7.2021, p. 1).
 5 Commission Delegated Regulation (EU) 2020/1816 of July 17, 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council as regards the explanation in the benchmark statement of how environmental, social and governance factors are taken into account in the individual benchmarks that are made available and published (OJ L 406, 3.12.2020, p. 1).
 6 Commission Implementing Regulation (EU) 2022/2453 of November 30, 2022 amending the implementing technical standards with regard to the disclosure of environmental, social and governance risks laid down in Implementing Regulation (EU) 2021/637 (OJ L 324, 19.12.2022, p. 1).
 7 Commission Delegated Regulation (EU) 2020/1818 of July 17, 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council with regard to minimum standards for EU reference levels for climate-induced change and for Paris-aligned EU reference levels (OJ L 406, 3.12.2020, p. 17).

According to the results of the double materiality analysis, the topic-related ESRS E1 Climate change with all its sub-topics is a material sustainability matter for Bilfinger. ESRS S1 Own workforce, ESRS S2 Workforce in the value chain and ESRS G1 Business conduct were also classified as fully or predominantly material in the materiality analysis as shown above.

The following topic-related ESRSs were assessed as not material following a detailed evaluation of the specific impacts, risks and opportunities for Bilfinger and are therefore not the subject of this non-financial Group declaration:

ESRS E2 Pollution

As a service provider for the process industry, Bilfinger does not provide its services at its own production sites, but predominantly at customer sites. As a general rule, the responsibility and the applicable reporting obligations for handling hazardous substances do not lie with Bilfinger, but are attributable to the business activities of its customers.

The quantitative information defined in ESRS E-2 Pollution generally refers to standards that are anchored in applicable environmental legislation. These relate in particular to air, water and ground pollution, the classification, labeling and packaging of chemicals or the registration, evaluation, authorization and restriction of chemicals. These legal frameworks are not material to Bilfinger's business activities.

ESRS E3 Water and marine resources

The services provided by Bilfinger as part of its business activities do not require a disproportionately high use of water resources and are therefore not classified as water-intensive. This also applies to materials procured and substances used.

Neither in its own business activities nor in its supply chain does Bilfinger use marine resources to any significant extent or is dependent on them to any significant extent. The company's supply chain as a service provider is not susceptible to flooding or extreme weather events compared to certain manufacturing companies. If Bilfinger operates at its customers' offshore, coastal or river locations, the risk of damage, for example due to flooding or extreme weather events, affects the customer location.

ESRS E4 Biodiversity and ecosystems

Disclosure requirements described in ESRS E4 relate explicitly to the reporting entity's own locations. As a service provider for the process industry, Bilfinger does not provide its services at its own production sites, but predominantly at customer sites.

Bilfinger's own locations are essentially office locations. These have no significant impact on endangered species. Corresponding national and international regulations are not relevant to Bilfinger's business activities. As a rule, the Group's own sites do not have any impact on biodiversity-sensitive areas; designated cultural or nature conservation areas are not affected by the sites. Consultation with affected communities is therefore not relevant for Bilfinger.

ESRS E5 Resource use and circular economy

In contrast to manufacturing companies, Bilfinger processes relatively small quantities of resources as a service provider for the process industry.

Of the areas considered particularly relevant in ESRS E5 – batteries, vehicles, packaging, plastics, textiles, construction and buildings – only the procurement (resource inflow) of metals in connection with assembly activities is relevant for Bilfinger.

The proportion of hazardous waste in waste disposal (resource outflow) is also low. It also accounts for only a small proportion of the already comparatively small total amount of waste. Costs or fees for the disposal of hazardous substances are negligible.

Bilfinger's business activities do not depend on the use of hazardous substances where there is a risk that they may no longer be used in the future. The many comprehensive regulations on the circular economy, particularly with regard to plastics or chemicals, are not of material importance for Bilfinger's day-to-day business activities.

ESRS S3 Affected communities

As a service provider for the process industry, Bilfinger does not provide its services at its own production sites, but predominantly at customer sites.

Due to its role in the value chain, Bilfinger has no influence on the impact of its customers' locations on affected communities. This applies to all disclosure requirements defined in ESRS S3, including local cultural and political rights, ensuring adequate food, water supply and sanitation or threats to indigenous communities.

Bilfinger's own office locations have no material impact on affected communities with regard to the criteria set out in the standard. Given the relatively low purchasing volume for materials, this also applies to Bilfinger's supply chain.

ESRS S4 Consumers and end users

Due to Bilfinger's position at a very early stage of the process industry value chain, the company's business activities have limited connection to and no influence on the impact of the end products ultimately produced on the consumer. It is therefore not possible for Bilfinger to identify impacts, risks and opportunities in relation to this group.

Bilfinger has determined the material information in this non-financial Group declaration on the basis of the materiality analysis of company-specific impacts, risks and opportunities carried out in 2024, the approach and process of which are based on the requirements formulated in ESRS 2, 3.3, 3.4 and 3.5.

Sustainability matters identified in the materiality analysis that meet the criteria for either impact materiality or financial materiality or both are the subject of reporting in this non-financial

Group declaration. The material sustainability matters are presented in the respective topic-related chapter or as an additional company-specific disclosure if the material sustainability matter is not covered by a topic-related standard or by sufficient granularity.

Information is provided when its significance is relevant to the matter it presents or explains or supports decision-making by the primary users of the non-financial Group declaration. This also applies in particular for users of general purpose financial reporting. This applies equally to the needs of users whose main interest is in information about the impact of the company's activities.

When providing information on policies, measures and targets, the information is reported in accordance with the disclosure requirements of the topic-based ESRS and in accordance with the corresponding minimum disclosure requirements under ESRS 2. Metrics are also reported in accordance with the specified information for the corresponding disclosure requirement.

Minimum disclosure requirement on policies and actions

MDR-P – Policies adopted to manage material sustainability matters

Bilfinger has policies for managing the sustainability matters classified as material. These relate to

- climate change,
- own workforce,
- workers in the value chain, and
- governance.

The information reported in this and the following chapters on the minimum disclosure requirements is therefore structured according to these material sustainability topics.

Climate change

The concepts applied in the context of climate change concern

- climate change mitigation,
- climate change adaptation, and
- the reduction of energy consumption.

The most important content of the policies is the strategic target of our business model to maximize the positive impact of our business activities on climate change. With our range of services for our customers, which is explained in detail in Chapter [*SBM-1 Strategy, business model and value chain*](#), we seek to make important contributions to reducing climate-damaging emissions, creating structures and processes to adapt to changing climatic conditions and making production processes as energy-efficient as possible.

In order to minimize the negative impact of our business activities on climate change, we are committed to reducing greenhouse gas emissions and energy consumption in our own activities and in our supply chain.

The general objectives are to reduce climate-damaging emissions, create structures and processes to adapt to changing climatic conditions and to make production processes for Bilfinger's customers as energy-efficient as possible. The increased use of climate-friendly energy sources is particularly important here.

The material impacts, risks or opportunities to which the concepts relate are systematically presented in Chapter [SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model](#).

Climate change policies are monitored by means of defined targets and by measuring progress toward these targets. Information on this can be found in Chapter [MDR-T Tracking effectiveness of policies and actions through targets](#).

The scope of our policies in connection with climate change covers our own business activities as well as the upstream and downstream value chain. In the course of these efforts, we assess the positive or negative impacts of our activities and the resulting opportunities and risks for our company. This is done in particular from the perspective of the most important stakeholders: customers, employees, suppliers and the capital market.

The objectives and measures as well as the defined processes for measurement and control are implemented by all units in the Bilfinger Group in accordance with the principle of operational control.

Own workforce

The policies applied in connection with the company's own workforce relate to the sustainability topics classified as material:

- Working hours
- Adequate remuneration
- Freedom of association, existence of works councils and employees' rights to information, consultation and co-determination
- Collective bargaining, including the share of employees covered by collective bargaining agreements
- Health and occupational safety
- Training and skills development
- Measures against violence and harassment in the workplace
- Diversity

The main content of the policies applied is based on the general objective of consistently applying legal and regulatory requirements and recognized standards with regard to these topics. The policies are based on the central role of our company's workforce in the success of our business model. As an industrial services provider, Bilfinger depends on the availability, skills, expertise and value orientation of all employees. Our policies therefore focus in particular on the highest possible level of qualification and motivation, compliance with the highest standards of occupational safety, continuous training, optimum staff availability and a compliance culture characterized by integrity as a positive differentiator. The concepts are described in Chapter [S1-1 – Policies related to own workforce](#).

The material impacts, risks or opportunities to which the concepts relate are systematically presented in Chapter [SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model](#).

Policies related to the company's own workforce are monitored by means of defined targets and by measuring progress toward these targets. Information on this can be found in Chapter [MDR-T Tracking effectiveness of policies and actions through targets](#).

The scope of our policies in connection with our company's workforce includes our own business activities. In the course of these efforts, we assess the positive or negative impacts of our activities and the resulting opportunities and risks for our company. This is done in particular from the perspective of the most important stakeholders: customers, employees, suppliers and the capital market.

The objectives and measures as well as the defined processes for measurement and control are implemented by all units in the Bilfinger Group in accordance with the principle of operational control. Local adaptations due to existing country-specific laws and regulations are possible.

Workers in the value chain

The policies applied in connection with workers in the value chain relate to the sustainability topics classified as material:

- Secure employment
- Working hours
- Adequate remuneration
- Social dialog
- Freedom of association, existence of works councils and employees' rights to information, consultation and co-determination
- Collective bargaining, including the share of employees covered by collective bargaining agreements
- Health and occupational safety
- Training and skills development
- Measures against violence and harassment in the workplace
- Child labor
- Adequate accommodation
- Water and sanitary facilities

The policies for protecting workers in the value chain from labor and human rights violations are defined in the Group's Code of Conduct, the Supplier Code of Conduct based on the German Supply Chain Due Diligence Act (LkSG), and Bilfinger's Statement of Principles on Human Rights. The main content of the policies applied is based on the general objective of consistently applying legal and regulatory requirements and recognized standards.

In its Declaration of Principles, Bilfinger commits itself to the United Nations' human rights principles. In addition, the requirements of the UN Global Compact apply, and Bilfinger is committed to complying with them as a member. To ensure that these requirements are met, Bilfinger has a comprehensive compliance management system. It covers all areas of business activity and is designed to prevent compliance violations by taking preventative measures, identifying misconduct of any kind at an early stage and reacting quickly and consistently with remedial measures in the event of confirmed violations. The measures resulting from its implementation, including a secure and anonymous whistleblower system, are described in Chapter [G1-3 Prevention and detection of corruption and bribery](#).

Because a large share of our business is dependent on purchased services, workers in the value chain are of key importance. It is in Bilfinger's interest to ensure compliance with applicable human rights and labor law standards in the value chain for all employees. The most important contents of the policies therefore relate to aspects of working conditions, including secure employment, regular working hours, adequate remuneration, freedom of association and health and safety at work. There are also aspects of equal treatment and equal opportunities, in particular gender equality and equal pay for work of equal value, measures against violence and harassment in the workplace and diversity. Other labor-related rights include, most importantly, the prohibition of child labor and forced labor.

Among other things, Bilfinger calls on its suppliers to take responsibility for basic values in the areas of environmental, social and governance sustainability and to uphold their due diligence obligations along their own supply chain. All suppliers are therefore required to commit to compliance with the Code of Conduct for Suppliers and the principles contained in the Statement of Principles on Human Rights, to apply comparable standards in their conduct and to guarantee these throughout their own value chain. The Supplier Code of Conduct is an integral part of all contracts between Bilfinger and its subcontractors.

Subcontractors must also:

- comply with local laws and regulations regarding wages and relevant collective bargaining agreements for all personnel as well as the standards applicable in the respective industries with regard to working conditions.
- comply with their obligations to pay the local statutory minimum wage, social security, pension and employers' liability insurance contributions and, where necessary, comply with the provisions of the local Posted Workers Act for all employees.
- comply with these regulations for the entire value chain when commissioning further subcontractors.

The material impacts, risks or opportunities to which the concepts relate are systematically presented in Chapter [*SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model*](#).

Policies related to workers in the value chain are monitored by means of defined targets and by measuring progress toward these targets. Information on this can be found in Chapter [*MDR-T Tracking effectiveness of policies and actions through targets*](#).

The scope of our policies in connection with workers in the value chain includes our own business activities as well as the upstream and downstream value chain. This covers all workers in Bilfinger's value chain, in particular

- workers who perform outsourced services at Bilfinger sites,
- workers of contracted suppliers who work on the supplier's premises according to the supplier's working methods,
- workers from equipment suppliers who regularly operate or maintain supplier equipment at a Bilfinger site, and
- workers in the extraction of raw materials that are used in Bilfinger's services and products.

In the course of these efforts, we assess the positive or negative impacts of our activities and the resulting opportunities and risks for our company. This is done in particular from the perspective of the most important stakeholders: customers, employees, suppliers and the capital market.

The objectives and measures as well as the defined processes for measurement and control are implemented by all units in the Bilfinger Group in accordance with the principle of operational control.

Business conduct

The policies applied in connection with business conduct relate to the sustainability topics classified as material:

- Corporate ethics and culture
- Prevention and detection of corruption and bribery
- Existence of a secure whistleblower protection system
- Management of relationships with suppliers, including ensuring fair payment practices toward suppliers

The most important policies relate to the general objective of ensuring corporate governance characterized by integrity, fairness, transparency and appreciation. They are presented in Chapter [*G1-1 – Corporate culture and business conduct policies*](#). Bilfinger has adopted a mission statement that makes these matters a central guideline for management and employees. Together with the Code of Conduct and the Statement of Principles on Human Rights, it represents the central document within the company's culture of integrity. These documents form the basis of corporate governance.

To prevent corruption, Bilfinger has a comprehensive compliance management system that includes prevention, detection and reaction to violations of the rules. In this context, it regulates the whistleblower protection system that has long been established at Bilfinger.

When managing relationships with suppliers, uniform regulations with standard payment terms apply, which do not differentiate between larger suppliers and small and medium-sized suppliers. This means that small and medium-sized suppliers cannot be systematically or deliberately discriminated against because of their size.

The material impacts, risks or opportunities to which the associated policies relate are systematically presented in Chapter [*SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model*](#).

Business conduct policies are monitored by means of defined targets and by measuring progress toward these targets. Information on this can be found in Chapter [*MDR-T Tracking effectiveness of policies and actions through targets*](#).

The scope of our policies in connection with business conduct covers our own business activities as well as the upstream and downstream value chain. In the course of these efforts, we assess the positive or negative impacts of our activities and the resulting opportunities and risks for our company. This is done in particular from the perspective of the most important stakeholders: customers, employees, suppliers and the capital market.

The objectives and measures as well as the defined processes for measurement and control are implemented by all units in the Bilfinger Group in accordance with the principle of operational control.

The highest authority responsible for implementing the concepts relating to climate change, the company's own workforce, the workforce in the value chain and business conduct is the Executive Board of Bilfinger SE. The Supervisory Board is involved in key aspects in accordance with its supervisory and advisory function.

MDR-A – Actions and resources in relation to material sustainability matters

Climate change

The measures taken in the reporting year with regard to climate change relate to

- increasing the efficiency and sustainability of our customers, and
- reducing CO₂e emissions caused by our own business activities.

The expected results are a reduction in energy consumption through enhanced efficiency, increased use of non-fossil energies and thus a reduction in climate-damaging CO₂e emissions.

Enhancing the efficiency and sustainability of our customers

An important starting point for enhancing the efficiency and sustainability of our customers is the increased standardization and bundling of the Group's individual service areas. To this end, services were bundled into product centers in the reporting year. Their task is to develop products that meet a uniform set of standards and that will be offered by the operating companies in all of the Group's markets.

These measures affect all geographies and are geared toward the interest group of our customers in the downstream value chain.

Reduction of our own CO₂e emissions caused by our business activities

The measures to reduce CO₂e emissions caused by our own business activities are aimed at reducing our own energy consumption and gradually replacing the use of fossil fuels with renewable or low CO₂e energy sources.

The combination of various measures includes a shift from purchased electricity to renewable sources, gradually replacing combustion vehicles with electric vehicles as well as installing photovoltaic systems and initiating energy efficiency initiatives at our sites. The specific measures required to reduce CO₂e emissions directly caused by Bilfinger are recorded in a structured manner at segment level.

These measures will have an impact on our business throughout the world. By measuring our Scope 1, 2 and 3 GHG emissions in 2024, we plan to involve our stakeholders – customers and suppliers in our value chain – in our decarbonization efforts.

The measures to enhance the efficiency and sustainability of our customers are a continuous part of our operating activities and are therefore subject to short-, medium- and long-term time horizons. The measures to reduce the CO₂e emissions caused by our own business activities are also of a continuous nature with short-, medium- and long-term time horizons.

Own workforce

The measures taken in the reporting year with regard to the company's own workforce relate to

- working hours,
- adequate remuneration,
- freedom of association, the existence of works councils and the rights of employees to information, consultation and participation,

- collective bargaining, including the proportion of employees covered by collective bargaining agreements,
- occupational health and safety,
- training and skills development,
- measures against violence and harassment in the workplace, and
- diversity.

The expected results are highly qualified and motivated employees, adherence to the highest standards of occupational safety, continuous training, optimum staff availability and a compliance culture characterized by integrity. This is complemented by Group-wide compliance with legal and regulatory requirements and recognized standards.

Health and occupational safety

Bilfinger promotes a strong safety culture. Bilfinger counters potential risks in the area of occupational safety with far-reaching quality and process management. This starts with the operating units, which are responsible for the process as well as the quality of their services. Through system requirements and targets and internal audits, they work toward the continued development of quality standards. To ensure the success of these efforts, external audits are carried out at Bilfinger companies, leading to certification in accordance with the ISO EN 9001, ISO EN 14001 and ISO EN 45001 standards.

Global and local safety campaigns and targeted communication contribute to the safety culture and strengthen awareness of potential safety risks. The occupational safety management measures at Bilfinger are set out in the Group Policy on Health, Safety, Environment and Quality (HSEQ).

Training, skills development, talent development and succession planning

Bilfinger counters risks that may arise from a lack of young talent, fluctuation, a lack of qualifications or changes in the workforce due to demographic developments with targeted employee development and measures.

Bilfinger education GmbH, which was founded at the end of 2023, began its work in the reporting year and will make a decisive contribution to securing qualified young talent in the long term. It plays a key strategic role in the networking of training in Germany, ensuring the optimal preparation of trainees for the requirements of the changing world of work and positioning Bilfinger as an attractive training company on the labor market. The company serves as a model for the future organization of vocational training in other Bilfinger regions.

The further training of our existing workforce plays a major role in our human resources efforts. The most important HR management measures include an annual performance appraisal, sound training and development planning as well as salary reviews over the course of a financial year. The annual employee appraisals are based on standardized guidelines that help everyone involved reflect on the goals achieved and define structured development measures. Salaried employees also set individual goals for the year ahead. The systems for managing the annual performance and development cycle are largely digitalized.

To develop and retain internal talent at Group level, we have established various training and development programs for high-potential employees and management levels 2 to 4 below the Executive Board.

As part of the annual talent review, the potential of salaried employees is evaluated and calibrated. Structured interviews are used to identify potential successors for key positions, thus supporting long-term succession planning. The talent review process is carried out in cooperation among supervisors and local Human Resources departments together with Group Human Resources and the Executive Board.

The Group Policy on Recruiting, Onboarding and Personnel Development describes the responsibilities and minimum standards in this area.

Working hours

Measures with regard to working hours are based on the commitment to complying with all relevant legal and administrative requirements relating to human rights, health, safety, environment and quality standards.

Bilfinger employs its staff in accordance with the standards of the International Labor Organization (ILO). In this regard, we comply with all local/collective bargaining agreements on limiting overtime, night and weekend work and on the appropriate planning of throughput times that have been agreed with the relevant local social partners. Wherever possible, we endeavor to offer flexible working time arrangements. This is documented in corresponding local company agreements.

Adequate remuneration

The majority of Bilfinger's employees are covered by collective bargaining agreements. The payment of adequate wages is therefore part of the collective bargaining provisions. Bilfinger complies with existing local laws on the statutory minimum wage.

Diversity

In order to promote a variety of perspectives in our company and create a positive working environment for all employees, we take measures to ensure a diverse and inclusive working environment.

The *Charta der Vielfalt e.V.* is an initiative that aims to promote diversity in companies and institutions through voluntary commitment. As a participating company, we are committed to promoting equal opportunities and a non-discriminatory working environment. The Charter is based on the following principles: Recognition and appreciation of diversity, promotion of equal opportunity, culture of appreciation, diversity in leadership, transparency and communication of diversity, equity and inclusion (*DEI*) and diversity in personnel development.

At our international locations, we comply with all applicable legal regulations in this area. We seek to ensure that employees of all genders have the same rights and that discrimination on the basis of gender is unacceptable.

We promote equal opportunity through a clear commitment to anti-discrimination and are committed to filling vacancies with as diverse a field of applicants as possible. There is a clear set of rules for filling key positions. This includes shortlisting at least one female candidate and setting up mixed-gender interview teams. Succession planning for key positions is mandatory. At least one female candidate must be identified as a potential successor for each key position.

Measures against violence and harassment in the workplace

Bilfinger does not tolerate human rights violations in the workplace. The existing compliance management system outlines the applicable objectives, processes and measures. The system prevents negative impacts caused by the violation of human rights. Possible incidents are systematically investigated and violations are punished. The corresponding measures, including channels for reporting violations, are set out in the Group Policy on Code of Conduct Violations & Investigations.

The measures described above affect all geographies. They are, as a matter of course, focused on the interest group of the company's employees and therefore on the company's own business activities within the value chain.

All measures are an ongoing part of our business activities and are therefore subject to a short-, medium- and long-term time horizon.

Workers in the value chain

The measures taken in the reporting year with regard to workers in the value chain relate to

- implementation of the Statement of Principles on Human Rights in the value chain,
- selection process and onboarding of new suppliers,
- continuous risk analysis of the supplier pool, and
- review of compliance with agreed standards and any consequences.

The expected results are the protection of workers in the value chain from labor and human rights violations. In this context, the measures taken serve to comply with legal and regulatory requirements as well as recognized standards.

Implementation of the Statement of Principles on Human Rights in the value chain

The measures to protect workers in the value chain from labor and human rights violations are defined in Group-wide regulations. These include, in particular, the Group's Code of Conduct, the Code of Conduct for Suppliers based on the German Supply Chain Due Diligence Act (LkSG) and the Bilfinger Statement of Principles on Human Rights.

Bilfinger operates almost exclusively in regions where compliance with human rights and employee rights is largely guaranteed by law. Generally speaking, the same standards apply to both workers in the value chain and the company's own workforce.

As part of the application of the German Supply Chain Due Diligence Act, Bilfinger carries out a risk analysis in its supply chains in order to identify and monitor human rights and environmental risks in its own business area and at its direct suppliers. The risk analysis is carried out once a year and on an ad-hoc basis if a significantly changed or significantly expanded risk situation arises in the supply chain. This may be the case when new orders are received, new products are launched or a new business segment is entered. Details are laid out in the Statement of Principles on Human Rights.

In order to ensure that the requirements are met to as great an extent as possible, measures for implementation in the supply chain are of particular importance.

Selection process and onboarding of new suppliers

Anyone wishing to become a Bilfinger supplier must accept our Supplier Code of Conduct. Potential suppliers are required to first register on our central supplier platform and undergo an extensive

two-stage application process. Information must be provided on numerous topics, including corporate governance and ethics, service portfolio, working conditions, human rights, the environment and other sustainability matters.

Among other things, the platform requests necessary licenses and certificates as well as information on subcontractors and safety standards, and addresses measures for environmental protection, insurance and working time models. The responses are then checked by product group experts at Bilfinger. Only after this check is the supplier's master data made available for further processes such as orders and invoices within the Group.

We also carry out a risk-based business partner due diligence process (Third Party Due Diligence, TPDD) when initiating or before entering into a legal transaction. We monitor the intended business relationship for possible warning signals. Depending on the risk level, external TPDD partners and various approval bodies up to and including the Executive Board are involved in this process alongside the potential supplier. The reason for the intensive review is that Bilfinger can also be held liable for the conduct of third parties if they act on behalf of the company.

Continuous risk analysis of the supplier pool

As part of a continuous review process, supplier data from Bilfinger's internal ERP systems is made available on a designated external platform for review according to environmental, social and governance criteria. This involves a standardized, multi-stage risk analysis, at the end of which high-risk suppliers are identified. It comprises the steps of an abstract country and sector-specific risk analysis, a concrete risk analysis involving the supplier's questionnaire and an impact analysis.

In addition to the external risk analysis of the supplier pool, active suppliers are continuously reviewed internally on our Group-internal supplier platform. Here, standardized and specific questionnaires can be created for internal evaluations by the departments responsible for the supplier within the Group.

Each transaction is compared with the Group's internal supplier blacklist (Critical Accounts List). If a supplier is listed there, no order can be placed. In addition to the risk analysis, the whistleblower system, which is accessible internally and externally and can be used worldwide, offers all those associated with Bilfinger the opportunity to report violations or suspected cases. This means that our own employees as well as employees of suppliers and customers can contact us anonymously through the Bilfinger website.

Review of compliance with agreed standards and any consequences

Compliance with agreed standards is monitored by means of the continuous risk analysis described above. In addition, targeted audits can be carried out on site in individual cases.

If the supplier's behavior does not meet the agreed standards, the supplier is blocked using the Group's Critical Accounts List. The mechanisms defined in our Group Policy on Blocking Suppliers apply here.

If there are indications of violations, a supplier can only be unblocked and commissioned again after a new review and approval by Group Compliance once the original reason for exclusion has been removed.

The measures described above affect all geographies. They are of course focused on the interest group of workers in the value chain. Due to our business model as a service provider, we pay particular attention to the upstream value chain of our company. The customers for our services are generally international corporations in the process industry, which themselves have high standards for compliance with human and employee rights. In the event of suspected violations, Bilfinger uses the systems in place there to protect employees in its downstream supply chain.

All measures are an ongoing part of our business activities and are therefore subject to a short-, medium- and long-term time horizon.

Business conduct

The measures taken in the reporting year with regard to business conduct relate to

- corporate ethics and culture,
- prevention and detection of corruption and bribery,
- existence of a secure whistleblower protection system, and
- management of relationships with suppliers, including ensuring fair payment practices toward suppliers.

The expected results are corporate ethics and a culture characterized by the integrity of all employees and business partners and the consistent handling of violations of the ban on corruption and bribery. This includes avoidance through preventive measures, the earliest possible detection of misconduct of any kind and the rapid and consistent implementation of remedial measures in the event of confirmed violations. In this context, the unrestricted functionality of a secure whistleblowing system for receiving, documenting and processing suspicious cases is another expected result of the measures implemented. Fair treatment of our suppliers, regardless of their size, is also an expected result of our measures.

Corporate ethics and culture

Bilfinger follows the generally recognized principles of responsible corporate governance. To this end, we have adopted a mission statement that makes integrity a central guideline for management and employees. The measures for maintaining a culture of integrity are anchored in our compliance management system, which seeks to prevent misconduct through preventive measures, identify violations as early as possible and respond quickly and consistently to confirmed violations. The rules of conduct set out in the mission statement and the Code of Conduct are regularly the subject of the systematic training program that we conduct as part of our compliance management system.

Prevention and detection of corruption and bribery

When planning, implementing, evaluating and improving our compliance management system, we are guided by the national and international laws and standards that are relevant for Bilfinger. The compliance management system is certified in accordance with DIN ISO 37301.

The measures taken within the Bilfinger Group to prevent and detect corruption and bribery are defined in detail in the internal Group Policy on Compliance and Anti-Corruption. Associated standard operating procedures govern the third-party due diligence process that is mandatory for all business partners with an increased risk of bribery and corruption, the requirements for the documentation of gifts, entertainment events and hospitality, and the principles and rules in connection with sponsorship and donations.

The annual performance appraisal includes an integrity factor as part of the incentive system for managers. Compliance matters are also taken into account in the annual performance appraisals of employees, insofar as this is necessary due to their activities.

Existence of a secure whistleblower protection system

Bilfinger maintains a whistleblower system for receiving, documenting and processing suspicious cases. Employees and external parties can report possible misconduct by Bilfinger employees or business partners confidentially – anonymously if desired – in writing or by telephone. The whistleblower system is operated by an independent service provider, is available 24 hours a day, 365 days a year and is available in several languages.

One important measure is the special protection afforded to whistleblowers against reprisals. Any form of reprisal, discrimination or other retaliation against a person who reports a suspected incident in good faith will itself lead to an internal investigation.

Reported suspected cases are investigated without exception, proven misconduct is sanctioned and remedial and process improvement measures are taken to prevent or at least impede similar misconduct in the future.

All internal investigations are conducted strictly in accordance with the general principles of confidentiality, objectivity, independence, consistency and avoidance of conflicts of interest. Criteria are also defined for Group-relevant and non-Group-relevant allegations, according to which serious suspicious cases are handled by Group Investigations and less serious suspicious cases by Group Compliance. Allegations that are not relevant at Group level are dealt with under the responsibility of the management of the local subsidiary. These cases are reported on a dedicated platform so that developments can also be followed from a Group perspective.

Management of relationships with suppliers, including ensuring fair payment practices toward suppliers

The management of relationships with our suppliers is explained in detail above. In particular, the selection process and onboarding of new suppliers, continuous risk analysis of the supplier pool, design of supplier contracts and review of compliance with agreed standards, including any consequences, are described there.

The measures described affect all geographies and relate not only to their own business activities, but also to the upstream and downstream value chain. They are geared toward the interest groups of our customers, employees and suppliers. By contributing to the overall success of the company, they also take into account the interests of the capital market players.

All measures are an ongoing part of our business activities and are therefore subject to a short-, medium- and long-term time horizon.

Metrics and targets

MDR-M – Metrics in relation to material sustainability matters

Climate change

We use the following metrics to assess performance and effectiveness in relation to material impacts, risks or opportunities associated with climate change:

Enhancing the efficiency and sustainability of our customers

We measure the policy described for enhancing the efficiency and sustainability of our customers and the success of the measures described by the share of revenue in the following categories in euros. These metrics are determined on a company-specific basis.

The method is based on the assumption that certain services contribute more to enhancing efficiency and sustainability in our downstream value chain than others. We have therefore divided our services into four categories:

- Category A primarily includes revenue in systems directly related to the energy transition, which have the strongest effect. Here we consider, for example, systems that provide or use non-fossil energy sources to reduce climate-damaging emissions. This includes, for example, revenue from the expansion of hydrogen infrastructure or nuclear power.
- Category B includes among other things, services for the maintenance and modernization of plants not included in category A with the objective of more energy-efficient plant use with the same or higher capacity utilization.
- Category C includes services to support the activities in categories A and B. These include, for example, services in industrial scaffolding, which serve as a prerequisite for the installation of insulation in plant types that do not fall under category A. Engineering, maintenance or the installation of electrical, instrumentation and control technology to increase the efficiency of plants outside category A are also taken into account here. This also includes a large share of the activities carried out in the mobility infrastructure and metal processing sectors.
- Activities that do not contribute to enhancing efficiency and sustainability are assigned to category D.

A detailed analysis of customer contracts by plant type and trade forms the basis for determining the revenue from increasing the efficiency and sustainability of our customers. In addition, we collect and report the information in accordance with European Regulation (EU) 2019/2088 (EU Taxonomy Regulation). The share of revenue for both figures is calculated on the basis of the same data.

The collection and control of both disclosures are governed by the internal Group Policy on *Financial Reporting* and specific standard operating procedures.

Reduction of GHG emissions caused by our business activities

We measure the concept described for reducing greenhouse gas (GHG) emissions caused by our business activities and the success of the measures described using the metrics defined in ESRS E1 Climate change.

Direct emissions (Scope 1) from the use of fuels for heating and cooling buildings, powering vehicles and machines, as well as volatile gases that escape over time from cooling units, and emissions from the use of electricity, steam, heat and cooling that the company has purchased or obtained (Scope 2) are determined in accordance with the Greenhouse Gas Protocol (GHG Protocol). The collection and monitoring of key figures for energy and GHG emissions in accordance with GHG Protocol Scopes 1 and 2 is regulated by an internal Group Policy on Sustainability Reporting and a corresponding SOP for energy and emissions.

In a first step, the GHG Scope 3 emissions are collected primarily by using a centralized approach, which can also include extrapolations and estimates. In order to improve data quality and enable a shift toward lower GHG emissions, measurement will be gradually switched to measured primary data as far as possible in future.

The key figures are not validated by an external body other than the one responsible for quality assurance.

Own workforce

We use metrics that are determined within our Group-wide human resources data management system to assess performance and effectiveness in relation to material impacts, risks or opportunities associated with climate. They are subject to a data-based survey; no significant assumptions are made in this context.

In doing so, we follow the metrics defined in the ESRS S1 Own workforce standard, insofar as they have been classified as material for us. This applies to the following metrics:

Health and occupational safety

- Number of fatalities as a result of work-related accidents (for own employees and employees at Bilfinger locations)
- Number of days lost due to work-related injuries and fatalities due to work-related accidents, work-related illnesses and fatalities due to illnesses within the company's own workforce
- Percentage of Bilfinger employees covered by the HSEQ management system

Training and skills development

- Expenditure on training and further education measures as a percentage of annual revenue

Diversity, gender equality and equal pay for equal work

- Gender distribution as a percentage at the top management level (Executive Board, management level 1, management level 2)
- Distribution of employees by gender
- Share of female employees
- Distribution of employees by country
- Employees by type of contract, broken down by gender (number of persons)
- Employees by type of contract, broken down by region (number of persons)
- Distribution between industrial employees and administrative employees (percent)
- Share of employees with temporary contracts
- Share of part-time employees and average full-time equivalents for part-time employees
- Share of on-call workers in Germany (number of persons and percent)
- Resignations (number of persons) and fluctuation (percent)
- Fluctuation
- Distribution of employees by age group as a percentage (<30 years, 30-50 years, > 50 years)
- Difference between the average pay of female and male employees, expressed as a percentage of the average pay of male employees
- Annual total remuneration ratio of the highest-paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual)

Collective bargaining coverage and social dialog

- Percentage of employees covered by collective bargaining agreements

- Percentage of employees covered by collective bargaining agreements in countries in the European Economic Area where Bilfinger has more than 10 percent of its total number of employees
- Percentage of employees covered by collective bargaining agreements, broken down by region, outside the European Economic Area, where Bilfinger has more than 10 percent of its total number of employees
- Percentage of employees covered by employee representatives, in the European Economic Area, where Bilfinger has more than 10 percent of its total number of employees

Measures against violence and harassment in the workplace

- Total number of incidents of discrimination (including harassment) reported during the reporting period
- Total amount of fines, sanctions and compensation payments relating to cases of discrimination (including harassment)
- Number of serious incidents of violations of human rights
- Total amount of fines, sanctions and compensation payments relating to serious human rights incidents

The metrics reported in connection with the company's own workforce are subject to an external audit by the auditor PwC as part of the Annual Report.

Workers in the value chain

The assessment of performance and effectiveness in relation to material impacts, risks or opportunities associated with the workforce in the value chain is not based on quantitative indicators in accordance with the disclosure requirements defined in the ESRS E2 Workers in the value chain standard.

Business conduct

We orient ourselves toward the disclosure requirements defined in ESRS G1 Business conduct to assess performance and effectiveness in relation to material impacts, risks or opportunities associated with business conduct. Quantitative indicators are not provided for all sustainability matters classified as material.

Corporate ethics and culture

In accordance with the defined disclosure requirements, the assessment of performance and effectiveness with regard to material impacts, risks or opportunities in connection with corporate ethics and culture is not based on quantitative metrics.

Prevention and detection of corruption and bribery

The policy explained for the prevention and detection of corruption and bribery and the success of the measures described are measured using metrics that are determined within our Group-wide compliance management system. They are subject to a data-based survey; no significant assumptions are made in this context. To measure and monitor the effectiveness of the compliance management system, we record

- the number of persons trained in compliance-related questions and

- the number of convictions and the amount of fines for violations of corruption and bribery regulations.

Should public legal proceedings arise in connection with corruption and bribery, Bilfinger reports transparently on their content and, in the event of court rulings, on their outcome within the legally possible framework.

The metrics are not validated by anyone other than the external quality assurance body.

Existence of a secure whistleblower protection system

In accordance with the defined disclosure requirements, the assessment of performance and effectiveness with regard to material impacts, risks or opportunities in connection with the existence of a secure whistleblower protection system is not based on quantitative metrics. Nevertheless, all reported Group-relevant allegations are recorded and documented internally in the whistleblower system.

Management of relationships with suppliers, including ensuring fair payment practices toward suppliers

We measure the described policy for managing relationships with suppliers, including ensuring fair payment practices toward suppliers, using metrics that are determined within our ERP system, which has been introduced in the majority of Group companies. The following reported metrics are subject to a data-based survey; no significant assumptions are made in this context:

- Average number of days required to settle an invoice from the start of the contractual or statutory payment period, regardless of the size of the supplier
- Description of the standard payment terms in days that apply to all categories of suppliers, regardless of their size
- Percentage of payments made where standard payment terms were applied

Should public legal proceedings arise in connection with late payment, we report on the number of such proceedings within the legally possible framework.

The metrics reported in connection with the management of relationships with suppliers are subject to an external audit by the auditor PwC as part of the Annual Report.

MDR-T – Tracking effectiveness of policies and actions through targets

Climate change

The targets set for the sustainability matter of climate change relate to the areas of action described in Chapter *MDR-P Policies adopted to manage material sustainability matters* enhancing the efficiency and sustainability of our customers and reducing the GHG emissions caused by our own business activities.

Enhancing the efficiency and sustainability of our customers

In view of the varying degrees to which our services contribute to increasing the efficiency and sustainability of our customers and the measurement of the categories (A-D) presented in Chapter *MDR-M Metrics in relation to material sustainability matters*, we have set the goal of increasing the proportion of higher-value services. Sections of our offering that do not contribute to enhancing efficiency and sustainability will no longer be part of our range of services in the medium to long term and will be replaced by growth in areas relevant to efficiency and sustainability.

Reduction of GHG emissions caused by our own business activities

For the GHG emissions caused by our own activities, we set a combined GHG emissions reduction target in 2023 for Scopes 1 and 2 that provides for a 50 percent reduction by 2030 compared to the base year 2021.

Furthermore, in 2023, we made a commitment to the Science Based Targets initiative (SBTi) to set short- and long-term company-wide emissions reductions targets for Scopes 1, 2 and 3 in line with the SBTi's science-based net-zero target. The targets will be submitted to the SBTi for review in April 2025:

- We aim to achieve net-zero status in line with the SBTi by 2050 at the latest. This includes both short- and long-term targets for Scopes 1, 2 and 3 GHG emissions.
- The short- and long-term targets for Scope 3 have not yet been finalized, as the first-time accounting of the full Scope 3 GHG emissions inventory will not be carried out until this financial year.
- As a long-term goal, we are aiming for a reduction of at least 90 percent in total GHG emissions by 2050 at the latest, in line with the SBTi's net-zero standard.
- For unavoidable residual emissions, the remaining GHG emissions will be neutralized through the sustainable and credible support of nature- and technology-based carbon storage projects.

The objectives described above are directly related to the objectives of the policies with regard to climate change. The objective of increasing the proportion of revenue generated by our services in those categories that contribute as much as possible to enhancing the efficiency and sustainability of our customers is a relative goal in relation to the distribution of our revenue in euros in the individual categories.

The objective of reducing the climate-damaging emissions caused by our own activities includes the relative and absolute targets described above, measured in kilowatt hours of energy consumed and GHG emissions in accordance with the Greenhouse Gas Protocol.

The scope of the objective to increase the share of sales of our services in the higher-value categories to enhance efficiency and sustainability for our customers includes our own activities as well as the downstream value chain in the geographical regions in which we operate. The reduction of climate-damaging GHG emissions in GHG Scopes 1, 2 and 3 relates to the company's own activities as well as the upstream and downstream value chain.

Increasing the share of revenue with the strongest possible contributions to enhancing efficiency and sustainability is a consecutive goal from year to year. Progress is measured accordingly.

When it comes to reducing our own GHG emissions as well as those of the upstream and downstream value chains, baseline years and baseline values are defined as part of the target definition for the SBTi submission, which is scheduled for April 2025. This also applies to the time periods and any milestones or interim goals.

The methods and significant assumptions of the objectives set in connection with climate change are described in Chapter *MDR-A Actions and resources in relation to material sustainability matters*.

Bilfinger's climate change objectives are based on the scientific knowledge that climate change is caused and accelerated by climate-damaging GHG emissions. The reduction plan for climate-damaging emissions to be submitted to the SBTi will be based on scientifically sound findings.

The viewpoints and perspectives of stakeholders identified in the dialog with stakeholders were included in the definition of climate change objectives. Details are described in Chapter [SBM-2 Interests and views of stakeholders](#).

No changes were made in the reporting year with regard to the targets set in connection with climate change, the corresponding metrics, the underlying measurement methods, significant assumptions, restrictions, sources or data collection procedures.

Performance against the stated targets is monitored by measuring the performance indicators in Chapters [B.5.2 Industrial services to enhance efficiency and sustainability](#), [E1-3 Actions and resources in relation to climate change policies](#), [E1-5 Energy consumption and energy mix](#) and [E1-6 Gross GHG emissions of categories Scope 1, 2 and 3 as well as total GHG emissions](#). There are no particular trends in the company's performance. The analysis of significant changes in terms of achieving the target are described in greater detail in Chapter [E1-6 Gross Scopes 1, 2, 3 and total GHG emissions](#).

Own workforce

The objectives set for the sustainability matter own workforce relate to occupational safety as well as training and development.

Occupational safety

The physical well-being of all our employees is our top priority. It is our goal to be a leader in occupational safety in our industrial sector. Our *zero is possible* aspiration serves as a guideline for continuously improving occupational safety in all areas and preventing as many occupational accidents as possible.

We have been measuring this for many years using the lost time injury frequency (LTIF) metric established in our operational business environment, which measures the number of working days lost due to accidents per million working hours, and total recordable incident frequency (TRIF), which records reportable incidents per million working hours. Our international customers, and therefore also we, consider both of these details to be relevant. Because they are not subject to the disclosure requirements set out in the ESRS, these metrics are not reported in this non-financial Group declaration.

Training and development

In order to maintain and further strengthen the Group's competitiveness, we make targeted investments of at least 0.5 percent of Group revenue per year in the training and further education of Bilfinger employees. To this end, since 2024, we have been using a quarter of the savings generated by the efficiency program implemented until the end of 2023 in addition to the existing expenditures. This metric is also not subject to the disclosure requirements set out in the ESRS and is therefore not reported in this non-financial Group declaration.

The objectives described above are directly related to the objectives of the policies with regard to our own workforce. Both objectives are relative objectives, one relating to the number and impact of occupational accidents and the other relating to the proportion of Group revenue spent on training and development in euros. The scope of the occupational safety objective primarily covers our own activities. To the extent that we can influence this, the goal of the highest possible occupational safety is also pursued in the upstream and downstream value chain. However, this is not the subject of measurement and tracking using metrics. The expenditures for training and further education as a percentage of Group revenue relate to the company's own business activities.

The metrics LTIF and TRIF refer to the values achieved during a reporting year; progress is considered in a year-on-year comparison. The baseline value and baseline year are therefore the previous year. This also applies to the share of annual expenditure on training and development of at least 0.5 percent of Group revenue. Progress is measured accordingly.

Methods and possible assumptions for defining the goal of the highest possible occupational safety standards are described in Chapter *MDR-A Actions and resources in relation to material sustainability matters*. The percentage share of expenditures for training and further education is derived from the commercial calculation of the baseline values.

The points of view and perspectives of identified in the dialog with the stakeholders were included in the definition of the stated objectives. This takes place in particular within the framework of cooperation with the works councils of the individual companies, the European Works Council and the Group Works Council of Bilfinger SE

No changes were made in the reporting year with regard to the targets set in connection with own workers, the corresponding metrics, the underlying measurement methods, significant assumptions, restrictions, sources or data collection procedures.

Performance against the stated objectives is monitored and reviewed by measuring the aforementioned metrics. Progress is in line with original planning. There are no particular trends or significant changes in the company's performance.

Business conduct and workforce in the value chain

Bilfinger's main sustainability goal in the area of business conduct relates to cooperation with our suppliers and, in particular, the workforce in the value chain. The goal is to audit as many direct suppliers as possible. The number of supplier audits conducted in 2024 (1,599) will be exceeded by at least 10 percent in 2025.

The objective described above is directly related to the objectives of the policy with regard to the workforce in the value chain. The target number of risk-based audits is an absolute target. The scope of the target relates to the upstream value chain. The metric refers to the value achieved during a reporting year; progress is viewed in a year-on-year comparison. The baseline value and baseline year are therefore the previous year. Progress is measured accordingly.

The methods and possible assumptions for setting the target are based on the content described in Chapter *MDR-A Actions and resources in relation to material sustainability matters*.

The viewpoints and perspectives of stakeholders identified in the dialog with stakeholders were included in the definition of objectives related to workers in the value chain. Details are described in Chapter *SBM-2 Interests and views of stakeholders*.

No changes were made in the reporting year with regard to the targets set in connection with own workers, the corresponding metrics, the underlying measurement methods, significant assumptions, restrictions, sources or data collection procedures.

Because the objective set in previous years of a risk-based annual review of at least 600 direct suppliers has been significantly exceeded in recent years, the number has now been increased to at least 3,000 suppliers.

Performance against the stated objectives is monitored and reviewed by measuring the aforementioned metrics. Progress is in line with original planning. There are no particular trends or significant changes in the company's performance.

B.5.2 Environmental information

Company-specific information:

Industrial services to enhance efficiency and sustainability

For Bilfinger as a service provider, customers are the focus of business activities. The relationship with our customers and their satisfaction with the work that we do are of utmost importance for our business development. We are integrated into their value-added processes as a strategic partner.

Concept

Increasing awareness of climate change and the ensuing energy transition in many industrialized countries are opening up attractive market opportunities in Europe, North America and the Middle East for Bilfinger as a leading industrial services provider. This is all the more true given that a major share of our customers are active in energy-intensive industries. The chemical & petrochemical, energy, oil & gas as well as pharma & biopharma industries are the Bilfinger Group's largest customer groups. Given the measures required for the energy transition and climate protection, some of these industries are currently undergoing fundamental innovation processes in all key stages of the value chain. Our customers have the task of enhancing their plants, securing their future energy supply and significantly reducing their carbon footprint in the process.

The objective of the Group's activities is to enhance the efficiency and sustainability of customers in the process industry and to establish Bilfinger as the number one partner in this market. This vision forms the basis of our business model and is at the core of our Group's strategic direction.

With our portfolio of services, we accompany and drive forward the imminent decarbonization of energy-intensive production, transport and processing operations and help to increase energy efficiency at all stages of the customer value chain. Low-carbon energy generation and the reduction of energy consumption and emissions are key here.

Our Group's portfolio includes services that are making an important contribution to increasing efficiency and sustainability in a range of customer segments. The system introduced through the EU Taxonomy (see following Chapter) to categorize and define sustainable economic activities continues to focus on manufacturing companies. With these criteria, we can only illustrate our services to a limited degree. We have therefore introduced a system for categorizing sustainability services for our internal management and external communication that is based on the EU Taxonomy Regulation and adapted to our service portfolio.

Revenue with industrial services to enhance efficiency and sustainability

This system is based on a detailed analysis of sales from our customer contracts divided by plant type and trade.

REVENUE FROM INDUSTRIAL SERVICES TO ENHANCE EFFICIENCY AND SUSTAINABILITY

	2024		2023	
€ million				
Nuclear energy	204.7		157.6	
Battery production	43.1		86.2	
District heating and waste heat	67.7		73.1	
Hydropower	51.0		50.7	
Waste recycling and wastewater treatment	38.7		24.0	
Hydrogen	16.3		5.5	
Carbon capture and storage	43.6		0.7	
Other	118.8		80.1	
Category A	583.8	11.6%	478.0	10.7%
Energy efficiency	288.3		261.1	
Category B	288.3	5.7%	261.1	5.8%
Total categories A + B	872.1		739.1	
Category C	3,788.8	75.2%	3,386.8	75.5%
Category D	376.6	7.5%	359.7	8.0%
Total revenue	5,037.5		4,485.6	

Our goal is to grow revenue in the sustainability categories A and B. We believe that revenue from our customers' investments in plants directly related to the energy transition and our ongoing activities in these plants make the greatest contribution to the energy transition and are therefore assigned to category A. Services for nuclear power plants are also included here. This category takes into account the majority of the trades that are carried out as part of the respective order. Revenue in category A increased in 2024 to €583.8 million (previous year: €478.0 million). This corresponds to 11.6 percent of our revenue and an increase of 22.1 percent over the prior year.

Category B includes activities for the maintenance and modernization of plants not included in A with the objective of more energy-efficient plant use with the same or higher capacity utilization. These generated revenue of €288.3 million (previous year: €261.1 million). This corresponds to an increase of 10.4 percent. The share of total revenue thus remains nearly the same.

The largest share in this category is accounted for by optimizing the temperature insulation of industrial plants. Overall, revenue in categories A and B increased in the reporting year to €872.1 million (previous year: €739.1 million). The share of these activities in total Group revenue (currently: 17.3 percent, previous year: 16.5 percent) is expected to increase further in the future.

In addition, Bilfinger provides extensive services in category C to support the activities in categories A and B. These include, for example, services in industrial scaffolding, which serve as a prerequisite for the installation of insulation in plant types that do not fall under category A. Engineering, maintenance or the installation of electrical, instrumentation and control technology (EI&C) outside category A are also taken into account here. This, however, also includes a large share of the activities carried out in the mobility infrastructure and metal processing sectors. Revenue that has not yet been categorized is also assigned to this category. In the reporting year, this relates in particular to Stork revenue of €203.0 million that has not yet been fully integrated into the categorization process of sustainable services. Revenue in category C amounted to €3,788.8 million in the reporting year (previous year: €3,386.8 million).

In addition, activities in coal-fired power plants and oil-fired power plants are assigned to category D; they represent activities in connection with so-called “lock-in” effects. There is also revenue from employee leasing that was not included in category A. These activities generated revenue totaling €376.6 million in the reporting year (previous year: €359.7 million). This corresponds to 7.5 percent of our revenue (previous year: 8.0 percent).

Information in accordance with Article 8 of the EU Taxonomy Regulation

Article 8 EU Taxonomy Regulation

The EU Taxonomy Regulation is a key component of the European Commission’s action plan to direct capital flows to sustainable economic activities. It serves as a generally valid classification system for ecologically sustainable economic activities.

Using this classification system, companies present the shares of Group revenue, capital expenditures (CapEx) and operating expenditures (OpEx) associated with taxonomy-eligible and taxonomy-aligned economic activities. A taxonomy-eligible economic activity is an economic activity that is described in the relevant legal acts, regardless of whether this economic activity meets the specified technical assessment criteria. An economic activity that is not described in the Delegated Acts supplementing the EU Taxonomy Regulation is not classified as taxonomy-eligible. Taxonomy-eligible economic activities can be reviewed against six defined environmental objectives. According to Article 1 of the Delegated Act on Article 8 of the EU Taxonomy Regulation, an economic activity is taxonomy-aligned if the criteria set out in Article 3 of the EU Taxonomy Regulation are met:

- It makes a significant contribution to at least one of the six defined environmental objectives.
- It does not lead to significant harm to one or more of the six environmental objectives.
- The executing company complies with the so-called minimum safeguards.

Accounting and calculation of the key figures

The key figures presented in accordance with the Delegated Act on Article 8 of the EU Taxonomy Regulation are based on the consolidated financial statements of Bilfinger SE in accordance with International Financial Reporting Standards (IFRSs) as adopted by the EU and the additional requirements of German commercial law pursuant to Section 315e (1) of the German Commercial Code (HGB).

The determination of the key figures in accordance with the EU Taxonomy Regulation is carried out using an allocation of the customer’s plant type and the activities performed by Bilfinger to the customer contracts. Contracts were subsequently classified in accordance with their economic activity and compared with those in the Delegated Acts on climate-related objectives and other environmental objectives. For those taxonomy-eligible activities for which a review of taxonomy alignment was to be conducted in the reporting year, an assessment was made of the criteria for substantial contribution to an environmental objective and for no significant harm to the other environmental objectives.

Compliance with the minimum safeguards

In accordance with Article 3(c) of the EU Taxonomy Regulation, an economic activity can only be classified as sustainable if the company performing the activity implements procedures that ensure compliance with the minimum safeguards laid out in Article 18(1) of the EU Taxonomy Regulation. This specifically involves compliance with the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, including the principles and rights from the eight fundamental conventions laid out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and from the International Bill of Human Rights.

With the reference in Article 18 of the EU Taxonomy Regulation to the UN Guiding Principles on Business and Human Rights (UNGPR), a six-step process (Guide Steps) must be implemented, the so-called Process of Human Rights Due Diligence (HRDD). Bilfinger expresses its clear commitment to upholding human rights in accordance with *Guide Step 1* pursuant to Article 18 of the EU Taxonomy Regulation in the *Statement of Principles on Human Rights*, our *Code of Conduct* as well as in the *Bilfinger Policy on Sustainability*. These governance documents regulate the human rights-related principles applicable to all employees and suppliers at Bilfinger and define the human rights-related and environmental expectations of the Group's employees and suppliers.

The declaration of principles also describes the human rights and environmental risks that are a priority for the company and the procedures Bilfinger uses to fulfill its obligations under the German Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains (Supply Chain Due Diligence Act – LkSG). The comprehensive concept for implementing the due diligence obligations under the LkSG is presented in Chapter [S2 Workers in the supply chain](#).

Bilfinger meets *Guide Step 2* through annually recurring and event-driven risk analyses as part of the company's risk management to comply with the due diligence obligations under Section 4 LkSG. In the course of risk analyses, human rights and environmental risks are identified in the company's own business area and at its direct suppliers. The aim is to gain knowledge of the human rights and environmental risks in the company's own business areas and in the supply chain and to prioritize them for further processing. Specifically, this means identifying, preventing, minimizing or eliminating human rights risks or environmental risks or violations. Secondly, the results of the risk analysis are of central importance to the fundamental strategic and operational direction and the practical implementation of risk management and the individual due diligence processes. If risks or even human rights or environmental violations are identified, Bilfinger defines appropriate remedial measures and implements *Guide Step 3*.

The Group Human Rights Officer of Bilfinger SE, who is responsible for monitoring risk management and the HRDD, together with the stakeholders involved, including those from Group Compliance and Group Audit, monitor the implementation of mitigating measures (see *Guide Step 4*), which are designed and implemented by the respective responsible departments in the event of human rights-related risks or violations. With regard to internal and external communication of the human rights due diligence process as defined in *Guide Step 5*, we are obligated under the German Supply Chain Due Diligence Act to publish the Statement of Principles on Human Rights. This obligation has been in place since January 1, 2023.

With the help of the so-called *confidential reporting line*, Bilfinger's complaint process and whistleblower system, employees as well as third parties can anonymously report information on possible compliance violations, also as this information relates to human rights-related risks or violations (*Guide Step 6*). The rules of procedure for the whistleblower system and complaints process are publicly available on the Bilfinger website. They provide whistleblowers with information on the scope of application of the process, the channels through which information or complaints

can be entered into the process, and how the complaints process works. The process rules also outline who the contact persons are for whistleblowers, and how Bilfinger ensures effective protection against discrimination or punishment on the basis of a complaint.

Counteracting corruption and bribery is a central component of our compliance management system. The comprehensive concept is presented in Chapter [G1-3 Prevention and detection of corruption and bribery](#).

Bilfinger is committed to fair competition. For performance-oriented companies like ours, distortions of competition have only detrimental effects. Our clients choose us because of the high quality of our products and services and because we offer them at competitive prices. It is therefore imperative for Bilfinger and its employees to comply with all applicable provisions of competition law and other related regulations and to understand the mechanisms of competition law as a legal framework for conducting our business on a daily basis. With our Group Policy on Competition, we pursue the goal of achieving and maintaining vigorous competition in a free market environment for the entire Bilfinger Group through the establishment of a corresponding corporate culture. The Group policy as well as more specific guidelines provide our employees with assistance when it comes to preventing, detecting and remedying any infringements of competition law. Annual risk analyses and continuous training courses that address all risks relating to competition law in our business activities are of particular importance in our compliance management system to ensure fair competition. These courses are recurring and mandatory for the relevant groups of employees.

Bilfinger sees its role as a participant in the global economic system not only as an opportunity, but also as an obligation to comply with ethical principles. Bilfinger therefore operates in a global context as a responsible taxpayer. Compliance with all laws, regulations as well as reporting and disclosure rules in all relevant jurisdictions is an absolute top priority for Bilfinger and its employees. In this context, tax governance and tax compliance are key elements of corporate management and supervision. Any infringement is strictly forbidden. An integral part of Bilfinger's tax strategy are tax risk management and tax compliance management. Bilfinger monitors and governs its main tax risks through the application of suitable measures (for example, risk management, tax management, implementation of a tax compliance management system). In 2024, neither companies of the Bilfinger Group nor individual employees were convicted of violating human rights, anti-corruption laws, competition or tax law in the course of their work at Bilfinger.

Bilfinger also deals with the topics of board gender diversity and the gender pay gap. The concept as well as current key figures and targets set for board gender diversity are presented in Chapter [A.4 Declaration of corporate governance with corporate governance report](#). Equal pay for work of equal value with regard to gender equality is analyzed within the framework of the so-called gender pay gap. Relevant reporting is provided in Chapter [S1-16 Remuneration metrics](#).

Taxonomy-eligible and taxonomy-aligned revenue

Total revenue of €5,037.5 million (previous year: €4,485.6 million) corresponds to the revenue in the consolidated income statement. Total revenue from taxonomy-eligible economic activities in the reporting year amounted to €301.8 million (previous year: €313.2 million). This corresponds to a total share of revenue amounting to 6 percent (previous year: 7 percent).

Revenue from taxonomy-eligible economic activities is the external revenue generated in the reporting year that belongs to customer contracts classified as taxonomy-eligible.

The economic activities of the Bilfinger Group as an industrial services provider in the process industry can only be allocated to the economic activities mentioned in the Delegated Acts on a smaller scale and designated as taxonomy-eligible. The reason for this is that the requirements of the EU Taxonomy are primarily geared toward manufacturing and industrial companies and thus

take the specific circumstances and business models of service companies into account to only a limited extent. Bilfinger's material taxonomy-eligible economic activities are described in the following tables and related explanations.

Revenue from taxonomy-aligned economic activities in the reporting year amounted to €0 million (previous year: €0 million). The share of revenue from taxonomy-aligned activities thus amounted to 0 percent (previous year: 0 percent) of Group revenue. We are working with our customers to improve the availability of information for future verification.

PROPORTION OF REVENUE / TOTAL REVENUE	Taxonomy-aligned per objective	Taxonomy-eligible per objective
in %		
CCM	0.0	5.9
CCA	0.0	0.0
WTR	0.0	0.1
CE	0.0	1.6
PPC	0.0	0.0
BIO	0.0	0.0

CCM 4.5 Electricity generation from hydropower: construction or operation of electricity generation facilities that produce electricity from hydropower

In the reporting year, Bilfinger generated taxonomy-eligible revenue of €25.2 million (prior year: €36.6 million) or 0.5 percent (previous year: 0.8 percent) of Group revenue from the construction of power plants to generate electricity from hydropower. This mainly involves special piping in hydropower plants in the Engineering & Maintenance Europe segment, especially in Germany, Austria and Switzerland. Of the taxonomy-eligible revenue in this area, none can be classified as taxonomy-aligned, among other things because they are not run-of-river power plants without artificial reservoirs, which could qualify as taxonomy-aligned with regard to the substantial contribution to climate change mitigation.

CCM 4.27 Construction and safe operation of new nuclear power plants for the generation of electricity or heat

In the reporting year, Bilfinger was involved in the construction of a number of new nuclear power plants in Europe, in particular Hinkley Point C and Sizewell C in the United Kingdom as well as Olkiluoto-3 in Finland. In the year under review, taxonomy-eligible revenue generated from these activities amounted to €40.1 million (previous year: €87.3 million) or 0.8 percent (previous year: 1.9 percent) of total revenue. The requirements of Activity 4.27 include the criterion that the construction permit for the new nuclear power plant in question is granted by the competent authorities of an EU member state. Proof of conformity could not be provided in this case, because the location is outside the EU and because the relevant documentation could not be accessed.

CCM 6.14 Infrastructure for rail transport

In the reporting year, Bilfinger generated €28.9 million (previous year: €18.4 million) or 0.6 percent (previous year: 0.4 percent) of Group revenue from the construction of infrastructure for rail transport. The majority of this revenue was generated in the USA, in particular through the barrier-free conversion of platforms and stations. Both the criteria relating to the substantial contribution to climate change mitigation and the criteria for causing no significant harm to other environmental objectives contain references to European regulations, the comparability of which with US guidelines has not been sufficiently clarified for the reporting year.

CCM 7.1 Construction of new buildings

€31.4 million (previous year: €29.2 million) in taxonomy-eligible revenue, or 0.6 percent (previous year: 0.7 percent) of Group revenue, was generated from the construction of new buildings, primarily in the Engineering & Maintenance International segment in the USA. This revenue was not recognized as taxonomy-aligned because the relevant criteria for taxonomy-eligible activities in

the construction of new buildings include numerous references to European directives, the comparability of which with corresponding US regulations has not been sufficiently clarified for the reporting year.

CCM 7.2 Renovation of existing buildings

In the reporting year, Bilfinger generated €43.9 million (previous year: €64.8 million), or 0.9 percent (previous year: 1.4 percent) of Group revenue, from building renovations, in particular in the Engineering & Maintenance International segment in the USA. As is the case with new buildings, revenue from renovations cannot currently be reported as taxonomy-aligned due to the unclear comparability of the regulations.

CCM 7.3 Installation, maintenance and repair of energy-efficiency equipment

In the reporting year, Bilfinger was active in the installation, maintenance and repair of energy-efficiency equipment in the amount of €38.9 million (previous year: €35.6 million) in taxonomy-eligible revenue, or 0.8 percent (previous year: 0.8 percent) of Group revenue in the installation, maintenance and repair of energy-efficient equipment. This work included insulation work on buildings as well as the installation, maintenance and repair of heating, ventilation and air conditioning systems. Most of this taxonomy-eligible revenue was generated in the Engineering & Maintenance International reporting segment in the USA and the Middle East and to a lesser extent in the Engineering & Maintenance Europe segment. Due to the non-comparability of the EU regulations mentioned in the criteria for substantial contribution to climate change mitigation and the standards applicable in North America and the Middle East, these revenues could not be reported as taxonomy-aligned.

Taxonomy-eligible and taxonomy-aligned capital expenditures (CapEx)

At Bilfinger, the denominator of the CapEx KPI comprises investments in property, plant and equipment (see Chapter [C.6 – Notes to the consolidated financial statements – 16 Property, plant and equipment](#)) and intangible assets (see Chapter [C.6 – Notes to the consolidated financial statements – Accounting policies – Intangible assets](#)), as well as capitalization of right-of-use assets from leases (see Chapter [C.6 – Notes to the consolidated financial statements – 17 Leases](#)), and amounts to €112.6 million in the reporting year (previous year: €103 million).

The numerator of the CapEx KPI was calculated based on investments in land and buildings (activity CCM 7.1), solar installations (activity CCM 7.6), vehicles (activity CCM 3.3) and electric charging points (activity CCM 6.15) amounting to €44.4 million (previous year: €40 million). The remaining CapEx was allocated to the corresponding activities on a pro-rata basis using revenue-related allocation keys. The CapEx for taxonomy-eligible economic activities calculated pro-rata in this way amounted to €4.1 million (previous year: €4 million) in the reporting year.

The total of both components constitutes the taxonomy-eligible CapEx of €48.5 million (previous year: 44 million) or 43.1 percent (previous year: 43 percent) of total capital expenditures.

To calculate the amount of taxonomy-aligned capital expenditures in the reporting year, the total CapEx after deduction of capital expenditures in production from taxonomy-eligible activities amounting to €68.2 million (previous year: €63 million) was multiplied by the taxonomy-aligned share of revenue of 0 percent. This also results in a taxonomy-aligned CapEx of €0 million or 0 percent of the total CapEx. Investments in production from taxonomy-aligned economic activities require verification that the goods in question were produced in accordance with the EU Taxonomy. For this purpose, Bilfinger relies on information from suppliers, which could not be sufficiently verified in the reporting year.

REVENUE FY 2024: TEMPLATE 3 TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (NUMERATOR)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
Line							
1.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
2.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
3.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
4.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
5.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
6.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
7.	Amount and proportion of other Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
8.	Total amount and proportion of Taxonomy-aligned economic activities in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0

REVENUE FY 2024: TEMPLATE 4 TAXONOMY-ELIGIBLE BUT NOT TAXONOMY-ALIGNED ECONOMIC ACTIVITIES		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
Line							
1.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
2.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	40.1	0.8	40.1	0.8	0.0	0.0
3.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
4.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
5.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3.8	0.1	3.8	0.1	0.0	0.0
6.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1.4	0.0	1.4	0.0	0.0	0.0
7.	Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	250.2	5.0	250.2	5.0	0.0	0.0
8.	Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the denominator of the applicable KPI	295.4	5.9	295.4	5.9	0.0	0.0

**REVENUE FY 2024: TEMPLATE 5
TAXONOMY-NON-ELIGIBLE ECONOMIC ACTIVITIES**

Line		Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0
7.	Amount and proportion of other Taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	4,735.6	94.0
8.	Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the applicable KPI	4,735.6	94.0

**CAPEX FY 2024: TEMPLATE 1
NUCLEAR AND FOSSIL GAS RELATED ACTIVITIES**

Line		
Nuclear energy related activities		
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat / cool and power generation facilities using fossil gaseous fuels.	Yes
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat / cool using fossil gaseous fuels.	Yes

CAPEX FY 2024: TEMPLATE 4 TAXONOMY-ELIGIBLE BUT NOT TAXONOMY-ALIGNED ECONOMIC ACTIVITIES		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
Line							
1.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
2.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.5	0.5	0.5	0.5	0.0	0.0
3.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
4.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
5.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
6.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
7.	Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	47.9	42.5	47.9	42.5	0.0	0.0
8.	Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the denominator of the applicable KPI	48.4	43.0	48.4	43.0	0.0	0.0

CAPEX FY 2024: TEMPLATE 5 TAXONOMY-NON-ELIGIBLE ECONOMIC ACTIVITIES		Amount	%
Line			
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0
7.	Amount and proportion of other Taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	64.1	56.9
8.	Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the applicable KPI	64.1	56.9

OPEX FY 2024: TEMPLATE 3 TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (NUMERATOR)		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
Line							
1.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
2.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
3.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
4.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
5.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
6.	Amount and proportion of Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
7.	Amount and proportion of other Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
8.	Total amount and proportion of Taxonomy-aligned economic activities in the numerator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0

OPEX FY 2024: TEMPLATE 4 TAXONOMY-ELIGIBLE BUT NOT TAXONOMY-ALIGNED ECONOMIC ACTIVITIES		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
Line							
1.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
2.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
3.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
4.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
5.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
6.	Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
7.	Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
8.	Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0

**OPEX FY 2024: TEMPLATE 5
TAXONOMY-NON-ELIGIBLE ECONOMIC ACTIVITIES**

Line		Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is Taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0.0	0
7.	Amount and proportion of other Taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	133.7	100
8.	Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the applicable KPI	133.7	100

E1 Climate change

General disclosures: Governance

GOV-3 – Integration of sustainability-related performance in incentive schemes

For the remuneration of the current members of the Executive Board of Bilfinger SE, the Supervisory Board has defined a performance assessment for the Long-Term Incentive (LTI) tranche for the performance period 2024-2026 based on the targets set in the disclosure requirement [E1-4 Targets related to climate change mitigation and adaptation](#). It takes into account the three-year development of CO₂e Scopes 1 and 2 (cumulative), measured based on the intensity of kg CO₂e/T € revenue. The intensity in the base year 2023 is 10.49 kg CO₂e/T €. The target is a 20 percent improvement compared to 2023.

The Supervisory Board advises and supports the Executive Board in achieving its sustainability targets. Remuneration of the Supervisory Board members does not include any sustainability targets.

As stated in Chapter [GOV-3 Integration of sustainability-related performance in incentive schemes](#), further detailed information on the integration of sustainability-related performance into incentive schemes is provided in the remuneration report for the Executive Board and Supervisory Board, which was prepared in accordance with the requirements of Section 162 of the German Stock Corporation Act (AktG) in the version of the Act on the implementation of the Second Shareholders' Rights Directive of December 12, 2019 (Federal Law Gazette Part I 2019, No. 50 of December 19, 2019; "ARUG II"). It forms an integral part of this non-financial Group declaration. It is published at the same time as the aforementioned non-financial Group declaration and is also audited accordingly by the auditor. The remuneration report is published on the company's website at <https://www.bilfinger.com/en/investors/corporate-governance/remuneration-executive-and-supervisory-boards/>.

General disclosures: Strategy

E1-1 – Transition plan for climate change mitigation

Bilfinger does not yet have a formal transition plan for climate change mitigation, but we are currently working on developing such a plan.

In addition to measuring Scopes 1 and 2 GHG emissions, we aim to establish a robust, system-based Scope 3 carbon accounting, involving stakeholders in our value chain, to ensure accurate and transparent tracking of our decisions and ambitions.

On this basis, we intend to submit short- and long-term climate change mitigation targets for Scopes 1 to 3 GHG emissions to the Science Based Targets initiative (SBTi) for review and validation. To achieve our decarbonization targets and effectively implement the necessary measures, we are analyzing our operational processes and involving relevant stakeholders from both the upstream and downstream value chain.

These measures will enable us to effectively pursue our decarbonization targets in both the short and long term.

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

In the materiality analysis carried out in 2024, climate-related impacts, risks and opportunities in relation to Bilfinger's strategy and business model were analyzed in detail in accordance with the system presented in Chapter *IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities*. The results are presented in Chapter *SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model*.

In addition to the time horizons relevant to this non-financial Group declaration, short-term (5-10 years) and long-term (until 2050) time horizons were also considered based on the methodology of the SBTi.

In the context of adaptation to climate change, the climate-related transition risk that customers in carbon-related industries may reduce their activities in the downstream value chain was classified as material. In the long term, this could lead to lower demand for Bilfinger's services in the oil and gas industry. In the reporting year, the share of sales in this area was around 20 percent.

In its special report (The Oil and Gas Industry in Net Zero Transitions; 2024) on the World Energy Outlook, the International Energy Agency (IEA) examined three scenarios specifically for the oil and gas industry regarding the future share of fossil fuels in global energy consumption in the context of climate change.

In the least ambitious scenario ("Stated Policies Scenario"), demand for fossil fuels is assumed to increase by around 6 percent by 2030 and by 1 percent by 2050. The "Announced Pledges Scenario" (APS) assumes that governments and companies fully implement their climate commitments, leading to a reduction in demand for fossil fuels by around 4 percent by 2030 and around 43 percent by 2050. In the most ambitious scenario, "Net Zero Emissions by 2050" (NZE), demand for oil and gas falls by 20 percent by 2030 and by 75 percent by 2050. Therefore, the decline in demand for our oil and gas services is not expected to be abrupt, but rather gradual and moderate over a period of several years.

At the same time, climate change adaptation offers significant opportunities for Bilfinger's business model. The energy-intensive chemical and petrochemical, energy, and pharmaceutical and biopharmaceutical industries are converting their production processes to the use of climate-friendly energy in the short, medium and long term. Bilfinger generated around 55 percent of its revenue in these industries in the financial year 2024. For Bilfinger, the ongoing decarbonization of production processes is already resulting in increasing demand for services to enhance the efficiency and sustainability of customer plants. The available scenarios indicate that this trend will continue and intensify in the future. The focus is not only on increasing use of renewable energies, but also, for example, on the expansion of hydrogen infrastructure or nuclear energy in many countries. The resulting higher demand for Bilfinger's services will more than compensate for any potential long-term weakness in demand from the oil and gas industry.

No climate-related physical risks were classified as material in the materiality analysis. This is primarily due to the fact that Bilfinger's performance as a service provider at customer plants does not rely significantly on physical location factors.

The resilience of Bilfinger's strategy and business model was assessed on the basis of the scenario developed by the IEA (NZE), which assumes the sharpest decline in the share of fossil fuels in global energy consumption. Despite this, Bilfinger's strategy and business model demonstrate a high resilience to the risk of a long-term decline in demand in the oil and gas industry.

No significant high-risk assets were identified. Consequently, these will not be taken into account when investment decisions are being made.

As demonstrated by materiality analysis, the opportunities resulting from climate change outweigh the corresponding risks for Bilfinger. This is outlined in further detail in Chapter *Industrial services to enhance efficiency and sustainability*, which is a company-specific topic and is reported on in this non-financial Group declaration.

General disclosures: Impact, risk and opportunity management

IRO-1 – Description of the processes to identify and assess material climate-related impacts, risks and opportunities

The procedures for identifying and assessing climate-related impacts, risks and opportunities are described in detail in Chapter *IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities*.

In accordance with the Disclosure Requirement ESRS E1-6, we analyzed the impact of our company on climate change and the procedure for determining and assessing the total GHG emissions (Scopes 1 to 3) of our company. When assessing and determining the climate impact of Bilfinger's business activities, actual sources of GHG emissions were considered within the scope of our own activities and along the value chain.

When analyzing and assessing climate-related physical risks, the extent to which they have or could reasonably be expected to have a material financial impact on Bilfinger's financial position, business performance, cash flows or access to financing or the cost of capital was taken into account.

The qualitative and quantitative thresholds used in the process for determining the main climate-related risks and the assessment criteria applied correspond to the Group-wide risk management system. This system is explained as additional information in Chapter *B.3.1 Risk management*. Climate-related risks are therefore included in Bilfinger's general management process.

Short-, medium- and long-term time horizons were defined for the processes of identifying and assessing climate-related impacts, risks and opportunities. Both our own business activities, including our products and services, and business relationships in the upstream and downstream value chain were considered.

As a service provider, Bilfinger has few significant physical assets compared to manufacturing companies. Therefore, no assessment of these assets was carried out in relation to the emergence of gross physical risks that may be susceptible to climate-related hazards. Nevertheless, we recognize the relevance of climate-related risks and have implemented procedures to identify and assess such risks in our services. Further information on the identification and evaluation can be found in Chapter *B.3.1 Risk management*.

In view of the material climate-related transition risk identified in relation to climate change adaptation, three scenarios were assessed in terms of climate-related transition risks and opportunities: The IEA's "Stated Policies Scenario", which corresponds to a high-emissions scenario, the "Announced Pledges Scenario", which exceeds the 1.5°C global warming limit, and the "Net Zero

Emissions by 2050 Scenario”, which corresponds to a 1.5°C scenario (see Chapter [SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model](#)).

E1-2 – Policies related to climate change mitigation and adaptation

Bilfinger’s policies on climate change mitigation and adaptation are described in detail in Chapter [MDR-P Policies adopted to manage material sustainability matters](#), together with the policies on other material sustainability topics.

The relevant policies relate to the sustainability aspects considered in the materiality analysis: climate change mitigation, climate change adaptation and energy.

When considering the impact of our own activities on climate change, we take into account our own business activities as well as the upstream and downstream value chain. The concepts implemented in this context are described in detail in Chapters [E1-5 Energy consumption and energy mix](#) and [E1-6 Gross Scopes 1, 2, 3 and total GHG emissions](#).

The use of climate-friendly energy, i.e. renewable and nuclear energy sources, is a key component of the reduction initiatives pursued in the reporting year for Scope 1 and Scope 2 GHG emissions in accordance with the GHG Protocol. These are explained in more detail in chapter [E1-3 Actions and resources in relation to climate change policies](#).

E1-3 – Actions and resources in relation to climate change policies

Actions and resources associated with the policies described in Chapters [MDR-P Policies adopted to manage material sustainability matters](#) and [E1-2 Policies related to climate change mitigation and adaptation](#) relate to increasing the efficiency and sustainability of our customers and reducing GHG emissions caused by our business activities. They are explained in greater detail in Chapter [MDR-A Actions and resources in relation to material sustainability matters](#). We apply the guidelines of the GHG Protocol to our emissions accounting. For more information, see Chapter [MDR-M Metrics in relation to material sustainability matters](#).

The most important actions that were implemented in 2024 include the conversion of the framework contract for electricity to 100 percent green electricity in the relevant buildings of the affiliated legal entities.

The following examples from the Germany/Austria/Switzerland region can be cited as further actions:

- Installation of PV systems completed in 2023
- Switch to e-mobility for vehicle fleet (ongoing)

Nature-based solutions, such as the protection, sustainable management and restoration of natural and modified ecosystems, were not applied as part of the actions taken and implemented in the financial year.

The aim of these actions is to reduce our Scope 1 and Scope 2 GHG emissions by 50 percent by 2030 compared to the base year 2021, thereby making a positive contribution to climate change mitigation. However, as we are still in the early stages of implementation, it is not yet possible to track emissions at the level of the individual actions. To enable this in the future, we plan to set up appropriate systems and processes in the coming year to ensure regular monitoring and evaluation of our climate change actions.

We are committed to being transparent about our progress and will provide information on the results of our actions and the progress we have made in future reports.

Although the actions taken in the reporting year and the initiatives planned for the future are associated with certain expenses, the financial resources budgeted for investments (CapEx) and operating costs (OpEx) are not classified as significant. These investments are strategically oriented and should have a positive long-term impact on our sustainability goals and the efficiency of our operating processes. We are confident that the expenses incurred are in proportion to the expected benefits and will thus make a valuable contribution to the development of our business.

Metrics and targets

E1-4 – Targets related to climate change mitigation and adaptation

In view of the varying degrees to which our services contribute to increasing the efficiency and sustainability of our customers and the measurement of the categories (A-D) presented in Chapter *MDR-M Metrics in relation to material sustainability matters*, we aim to increase the proportion of higher-value services. In the medium to long term, we want to phase out parts of our offering that do not contribute to enhancing efficiency and sustainability. Instead, we will be focusing on growth in efficiency- and sustainability-related areas.

Information on short- and long-term GHG emission reduction targets in connection with climate change mitigation and adaptation can be found in Chapter *MDR-T Tracking effectiveness of policies and actions through targets*.

As part of the sustainability incentive matters, the remuneration of the Executive Board also includes components related to climate change. These are explained in detail in Chapter *ESRS E2 – GOV-3 Integration of sustainability-related performance in incentive schemes*. Further information can also be found in the remuneration report for financial year 2024, which is available on the Bilfinger website at www.bilfinger.com.

In 2021, Bilfinger emitted 59,373 t CO₂e in Scopes 1 and 2 location-based GHG emissions. This value was defined as the baseline for the market-based target. In addition, the segment Other Operations was not included in the emissions calculation in 2021 due to strategic considerations related to the divestment of parts of the segment. In the current financial year, the segment Other Operations has been included in accordance with the reporting standard. The value for Scope 1 and Scope 2 GHG emissions for the base year 2021, including Other Operations, is therefore 62,154 t CO₂e. We aim to ensure that our Scope 1 and Scope 2 GHG emissions in the financial year 2030 do not exceed 50 percent of our baseline emissions in 2021.

The combined GHG emission target set (taking into account the greenhouse gases carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFC), sulfur hexafluoride (SF₆) and nitrogen trifluoride (NF₃)) is an absolute reduction target excluding CO₂e credits or avoided emissions or reduction of greenhouse gases. All legal entities are included in the target definition within the defined reporting limits and report uniformly in accordance with the same criteria. The target is based on the aggregated data. Based on our baseline emissions in 2021, of which 60 percent are Scope 1 and 40 percent Scope 2 GHG emissions, we assume a similar trend for each Scope up to our 2030 target.

In line with the requirements of the SBTi, companies must reduce their greenhouse gas emissions by 42 percent by 2030 to be in line with the goals of the Paris Agreement. Bilfinger has set a combined Scopes 1 and 2 GHG emissions reduction target of 50 percent by 2030 compared to the base year 2021. Scope 3 emissions are not yet included in this target. By measuring our Scope 3 emissions for the first time in the financial year, we aim to align our existing GHG emission reduction target with the goals of the Paris Agreement – to limit global warming to a maximum of 1.5°C above pre-industrial levels. External factors such as temperature anomalies had no significant impact on the company's energy consumption or GHG emissions in 2021. Bilfinger was also not significantly affected by economic fluctuations in 2021. Consequently, no three-year average was

applied for the base year 2021. As part of the critical assumptions for setting our combined Scope 1 and Scope 2 GHG emissions reduction target, we have considered future developments in regulatory matters and new technologies. On this basis, we assume a reduction in our emissions from mobile and stationary combustion as well as a reduction resulting from a switch to climate-friendly electricity.

Since the database of emissions for the entire value chain is being analyzed for the first time in the financial year, further reduction targets, particularly for Scope 3, are being developed in 2025.

The individual actions that contribute to the decarbonization levers for achieving the combined Scope 1 and Scope 2 GHG emissions reduction target were developed in the relevant segments over the course of the financial year.

An important step in this process has been the switch to low-emission energy sources, in particular the conversion of electricity contracts to renewable energy. We have converted relevant contracts for properties in Germany. In addition, the feasibility of solar power systems has been assessed at various locations in Germany and several systems have been installed to generate and use solar power. Another aspect is the switch from conventional diesel fuel to bio-based fuel HVO100 (“hydrogenated vegetable oil”) for our vehicle fleet and machines.

The second lever for reducing our direct emissions is to improve the energy efficiency in machinery and buildings. This includes insulation, optimization of heating and cooling systems and the use of more efficient machinery.

The third major lever is the electrification of our vehicle fleet, which will be phased in gradually over the course of the next few years. To this end, the procurement guidelines for vehicles were amended during the financial year to include the relevant specifications.

The overall quantitative contribution to achieving the combined Scope 1 and Scope 2 GHG emissions reduction target by 2030 has not yet been estimated due to the early stage of the project. We expect the introduction of new technologies to play a role in achieving our GHG emission reduction targets in the future. This cannot be quantified in more detail at the moment either. Relevant environmental, social, technological, market and political developments are implicitly considered, but have not been identified in a separate climate scenario analysis.

E1-5 – Energy consumption and mix

ENERGY CONSUMPTION AND SHARE BY ENERGY SOURCE	2024	2023
Total fossil energy consumption (MWh)	202,860	187,603
Share of fossil sources in total energy consumption (%)	89.71	90.29
Consumption from nuclear sources (MWh)	826	1,345
Share of consumption from nuclear sources in total energy consumption	0.37	0.65
Total renewable energy consumption (MWh)	22,432	18,823
Fuel consumption for renewable sources ¹	2,460	0
Consumption of electricity, heat, steam and cooling from renewable sources (MWh)	18,578	18,020
Consumption of self-generated non-fuel renewable energy (MWh)	1,394	803
Share of renewable sources in total energy consumption (%)	9.92	9.06
Total energy consumption (MWh)	226,119	207,771

¹ Including biomass (also comprising industrial and municipal waste of biologic origin, biogas, hydrogen from renewable sources, etc.)

In the 2024 financial year, the segment Other Operations is included as part of the fully consolidated companies in the calculation of the metrics for energy and emissions. Therefore, figures of the previous year have been supplemented with the value of Other Operations to ensure a consistent basis for comparison. Due to strategic considerations related to the divestment of parts of the segment Other Operations, this segment has not been included in the Group-wide data collection. The energy consumption of Other Operations is therefore estimated using economic extrapolation. In 2023, Other Operations accounted for 3.7 percent of Group revenue, which is used to calculate the comparable energy consumption. The table shows the adjusted values for the reference year 2023.

For the 2024 financial year, Other Operations accounted for 3.2 percent of Group revenue. The same extrapolation method as in 2023 has been used to calculate energy consumption.

In the 2024 financial year, the total energy consumption and the consumption of fossil fuels increased, which is due to the acquisition of companies from the Stork Group and the associated energy consumption. At the same time, total consumption from nuclear sources decreased.

Positively, the overall consumption of renewable energy increased. This is particularly due to the conversion of the electricity framework contract to 100 percent green electricity in relevant buildings under Bilfinger's operational control. This action has a positive impact on a number of legal entities and properties. In addition, fuel consumption from renewable sources has increased, attributable to the use of HVO100 in the fleet and in machinery. Finally, the increase in in-house electricity production led to an increase in consumption from our own solar systems.

In the reporting period, Bilfinger generated 1,812 MWh of energy from installed solar systems (previous year: 1,169 MWh). Of this, 77 percent was used for the company's own needs, while 23 percent was supplied to the electricity grid.

Bilfinger does not generate or sell energy from fossil or nuclear sources.

The consumption of different energy sources is determined for each source in a standardized base unit. Factors published by the UK Department for the Environment, Food & Rural Affairs (DEFRA) are used to calculate the heating value of energy sources that are combusted.

The energy is calculated using the following formula:

$$\text{Indicators (base unit)} \times \text{heating value (MWh/base unit)} = \text{energy (MWh)}$$

In the case of utility suppliers not billing according to the calendar – for example if the annual bill was not yet available – data for 2024 were completed on the basis of the figures for the previous year. Alternatively, the last quarter was calculated from the average of the previous quarters. In the case of flat-rate rents, the average consumption per square meter in the Group was used for the calculation.

E1-6 – Gross Scopes 1, 2, 3 and total GHG emissions

The methods, key assumptions and emission factors used to calculate or measure our GHG emissions are listed in the Chapter [Guidelines for the calculation of GHG emissions](#).

TOTAL GHG EMISSIONS SCOPES 1, 2 AND 3	Retrospective				Milestones and target years			
	2021 (base year)	2023	2024	% N / N-1	2025	2030 (target year)	2050	Annual % target / Base year
Scope 1 greenhouse gas emissions								
Scope 1 gross GHG emissions (t CO ₂ e)	37,276	33,855	35,828	6%	n.a.	n.a.	n.a.	n.a.
Percentage of Scope 1 greenhouse gas emissions from regulated emissions trading schemes (in %)	0	0	0	0%	n.a.	n.a.	n.a.	n.a.
Scope 2 Greenhouse gas emissions								
Location-based Scope 2 gross GHG emissions (t CO ₂ e)	24,878	10,771	13,052	21%	n.a.	n.a.	n.a.	n.a.
Market-based Scope 2 gross GHG emissions (t CO ₂ e)	n.a.	13,215	15,416	17%	n.a.	n.a.	n.a.	n.a.
Significant Scope 3 greenhouse gas emissions								
Total indirect Scope 3 gross GHG emissions (t CO ₂ e)	n.a.	n.a.	1,700,538	n.a.	n.a.	n.a.	n.a.	n.a.
3.1 Purchased goods & services	n.a.	770,729	775,929	1%	n.a.	n.a.	n.a.	n.a.
3.2 Capital goods	n.a.	31,757	38,149	20%	n.a.	n.a.	n.a.	n.a.
3.7 Employee commuting	n.a.	82,105	90,192	10%	n.a.	n.a.	n.a.	n.a.
3.11 Use of sold products ¹	n.a.	n.a.	796,268	n.a.	n.a.	n.a.	n.a.	n.a.
Total GHG emissions								
Total GHG emissions (location-based) (tCO ₂ e)	n.a.	n.a.	1,749,418	n.a.	n.a.	n.a.	n.a.	n.a.
Total GHG emissions (market-based) (tCO ₂ e)	n.a.	n.a.	1,751,782	n.a.	n.a.	n.a.	n.a.	n.a.

1 In the financial year, the optionally reported indirect emissions from the use of sold products (Scope 3.11) amounted to 171,987 tCO₂e.

The increase in Scopes 1 and 2 GHG emissions is largely due to the growth of the company.

The acquisition of parts of the Stork Group led to an increase in the consumption of our fleet (increase in mobile combustion – Scope 1). There has also been an increase in natural gas consumption, which is attributable to the operation of systems and heating in newly added properties (stationary combustion – machinery and heating – Scope 1).

As part of our business activities, we often work on site at our customers' premises and also rent properties from location management companies. In these cases, we often pay gross rents that include service charges. This makes it difficult to prepare individual consumption bills, which are, however, crucial for our market-based reporting, as they state the contract-specific emission factors of the contracts. For some of Stork's properties that were integrated into the Scope 2 GHG inventory as a result of the acquisition, only the residual factor could be used due to a lack of evidence of the contract-specific emission factors in accordance with the GHG Protocol. This residual factor is often higher than the average factor used in the location-based calculation method. This residual factor summarizes the average emissions in the mix of all non-renewable energy sources per European country and is published annually by the AIB (Association of Issuing Bodies). The same applies to properties whose emissions were also calculated using residual mix assumptions due to a change of electricity provider, which led to an increase in market-based Scope 2 GHG emissions.

We are committed to reducing our overall GHG emissions and will continue to work on decarbonizing our vehicle fleet and other initiatives to reduce direct emissions at our properties. We will continue to work closely with our landlords, customers and energy suppliers to ensure the purchase and verification of electricity consumption from renewable energy sources including contract-specific emission factors.

Bilfinger is not affected by the ETCS market and has not purchased any carbon certificates.

A complete Scope 3 inventory of the upstream and downstream value chain was calculated for the first time in the financial year. Scope 3 GHG emissions are significantly influenced by two categories: “Purchased goods and services” (Scope 3.1) and “Use of sold products” (Scope 3.11).

Only the upstream Scope 3 categories are comparable with the previous year. Scope 3 GHG emissions from “Purchased goods and services” (Scope 3.1) increased only slightly compared to the previous year. Scope 3 GHG emissions from “Capital goods” (Scope 3.2) increased by 20 percent. This is due to the update of the CEDA emission factors in the reporting year (see Chapter *Guidelines for the calculation of GHG emissions*).

Due to the changes in methodology presented below, emissions from “Employee commuting” (Scope 3.7) increased by 10 percent.

The biogenic CO₂ emissions from combustion or biological decomposition of biomass, not included in our reporting scope and reported separately, amounted to 2,805 metric tons of CO₂ (from consumption based on Scope 1), 2,438 metric tons of CO₂ (from consumption based on Scope 2) and 143,363 metric tons of CO₂ (from consumption based on Scope 3.11) in the reporting year.

The following table shows the GHG intensity based on net revenue for Scopes 1, 2 and 3:

GHG INTENSITY PER NET SALES REVENUE	2024	2023	%
	Total GHG emissions (location-based) per net sales revenue (t CO ₂ e/€ million)	347.28	n.a.
Total GHG emissions (market-based) per net sales revenue (t CO ₂ e/€ million)	347.75	n.a.	n.a.

In addition, the GHG intensity for Scopes 1 and 2 is reported in relation to net revenue. In the financial year, this was 10.17 t CO₂e/€ million (previous year: 10.49 t CO₂e/million €).

The conversion values of the Intergovernmental Panel on Climate Change (IPCC 2013-climate change-GWP 100a-(kg CO₂-Eq) per 1 unit of reference product) are used to convert greenhouse gases into CO₂ equivalents.

Organizational boundaries

The organizational boundaries for reporting were defined in accordance with the GHG Protocol methodology. This means that GHG reporting is carried out for all fully consolidated companies. There are no associated companies or companies in which Bilfinger is invested, joint ventures or non-consolidated subsidiaries over which Bilfinger has operational control.

Operational boundaries

Direct GHG emissions originate from sources that belong to the Bilfinger Group or that are directly controlled by Bilfinger as part of an IFRS 16-relevant lease agreement. The additional properties and the GHG-relevant activities associated with the acquisition of the new units (formerly Stork) will be fully allocated to the Group from the moment of their respective initial consolidation in 2024.

Because the segment Other Operations is reported as part of the fully consolidated companies in Scopes 1 and 2 in the financial year, the prior-year figures are supplemented by the value of Other Operations for comparison purposes. See Chapter *E1-5 Energy consumption and mix*. Different values are used for the extrapolation of the Scope 3 categories depending on the calculation

method. In the reporting year, Other Operations accounted for 3.2 percent of Group revenue for the calculation of GHG emissions.

Guidelines for calculation – Scope 1

Scope 1 GHG emissions include direct emissions from the following activities: combustion of natural gas, oil and other substances for heating properties, emissions of hydrofluorocarbons (HFCs) from the use of air conditioning systems in properties and the combustion of non-renewable fuels such as diesel, petrol or liquefied petroleum gas (LPG) and biofuels such as HVO100 (hydrogenated vegetable oil) in vehicles and machinery owned or leased in accordance with IFRS 16.

The emission factors used are uniform throughout the Group. The freely available emission factors come from DEFRA (United Kingdom Department for Environment, Food & Rural Affairs) (as of 2024).

Guidelines for calculation – Scope 2

Scope 2 GHG emissions include those from the use of electricity in properties, the fleet and machinery as well as the use of district heating, steam, cooling and industrial waste heat.

The share of consumption from low-carbon electricity and district heating contracts, bundled with attributes for energy generation, is 33 percent. No contractual instruments that are not bundled with energy attributes were purchased or sold in the reporting year.

Guidelines for calculation – Scope 3

The calculation of Scope 3 GHG emissions follows the requirements of the GHG Protocol for the corporate value chain (Scope 3) (version from 2011).

The total Scope 3 GHG emissions, based on the 15 categories of the GHG Protocol, were reviewed for their relevance to Bilfinger's business model. The categories "Downstream transportation and distribution" (Scope 3.9), "Processing of sold products" (Scope 3.10) and "Franchises" (Scope 3.14) were not considered relevant. The following categories were assessed as not material based on the level of calculated GHG emissions and other criteria such as associated transition risks and opportunities and stakeholder views: "Fuel and energy-related activities (not included in Scope 1 or Scope 2)" (Scope 3.3), "Upstream transportation and distribution" (Scope 3.4), "Waste generated in operations" (Scope 3.5), "Business travel" (Scope 3.6), "Upstream leased assets" (Scope 3.8), "End-of-life treatment of sold products" (3.12), "Downstream leased assets" (Scope 3.13), and "Investments" (Scope 3.15).

The identification of the significant Scope 3 categories was calculated primarily based on financial expenditures. For this purpose, data from accounting and financial systems are used.

The calculation of Scope 3 GHG emissions requires country-specific as well as industry-specific emission factors. The Comprehensive Environmental Data Archive (CEDA) database from Watershed (as of September 2024) was used.

For entities that use accounting systems other than the Group's primary accounting system, Scope 3 GHG emissions have been extrapolated. The values determined within the primary accounting system are used to calculate an average emission factor. The different country allocations are taken into account. The calculation is based on economic allocation or extrapolation based on the number of employees.

27 percent of Scope 3 GHG emissions from the "Use of sold products" (Scope 3.11) were calculated using primary data from a representative supplier.

The relevance of the significant Scope 3 categories for Bilfinger is reviewed every three years.

The material Scope 3 categories are described in greater detail below.

Scope 3.1 Purchased goods & services

GHG emissions associated with the production and transportation process of purchased goods and services are calculated on an expenditure basis in the category of the same name. It includes expenditures to external suppliers for the provision of goods and services purchased by Bilfinger in the course of its business activities. This includes parts of the cost of sales, for example in the form of materials cost including expenses for subcontractors, employee training or other external services, as well as expenses for current assets, for example inventories in the form of protective clothing and tools or restocking for material use at customer sites. This category is very relevant in the overall Scope 3 GHG emissions inventory.

Scope 3.2 Capital goods

The category “Capital goods” (Scope 3.2) comprises long-term assets that are capitalized in the balance sheet at the time when they become usable by the Group. To avoid double counting over the years and to ensure the calculation is not overlapping with the category “Purchased goods and services” (Scope 3.1), the production and transportation emissions for these goods are included in the GHG accounting once in the year of acquisition. This category is relevant, the amount of emissions in this category may vary from year to year, depending on the level of new investments in the respective financial year.

Scope 3.7 Employee commuting

The category “Employee commuting” (Scope 3.7) includes indirect GHG emissions caused by regular commuting from the employees’ place of residence to their primary place of work. The average data method is used for the calculation. The average values are based on benchmark studies. The average emissions values per employee in the service sector for this category were determined by an external consultancy. The resulting factor was 2.78 t CO₂e (previous year: 2.78 t CO₂e) per full-time equivalent (FTE). In the context of CSRD, the number of employees (headcount) was reported in the financial year in Chapter [S1-6 Characteristics of the undertaking’s employees](#) instead of FTEs. Therefore, in this chapter, headcounts are also calculated for the category Scope 3.7 Employee commuting and multiplied by the same emission factor as in the previous year. For better comparability, the previous year’s headcount has been expanded to include the share of interns, working students and temporary employees.

Scope 3.11 Use of sold products

This category includes Scope 3 GHG emissions caused by the use of products purchased by Bilfinger and sold to customers or installed in the downstream value chain up to the end of the product life cycle. One example is the energy consumed when mechanical drives are used in customer plants. The GHG Protocol Scope 3 standard divides emissions from the use of products sold into direct and indirect emissions. We calculate the total emissions from the use of products sold and report the direct emissions in table “Total GHG emissions Scopes 1, 2 and 3”. Indirect emissions are reported in the respective footnote.

Scope 3.11 emissions are determined by analyzing those purchased goods that consume energy. The corresponding expenses are converted into average energy consumption and extrapolated to the relevant legal units and affected G/L accounts. The values are then multiplied by location-specific emission factors from the IEA (as of 2023) in accordance with the GHG Protocol. This category is very relevant to Bilfinger’s business model.

Guideline for the calculation – outside of Scopes 1–3

Biogenic CO₂ emissions from the combustion or biodegradation of biomass are reported separately from the Scope 2 GHG emissions, but include emissions of other types (e.g. CH₄ and N₂O). Biogenic CO₂ emissions relate to the consumption of gasoline, diesel, and HVO (mobile and stationary combustion), the consumption of electricity and district heating in the properties and electricity in electric vehicles. In addition, biogenic CO₂ emissions from the Scope 3 category "Use of sold products" (Scope 3.11) are included in the calculation.

The following emissions factor databases are used to calculate emissions: DEFRA (2024) for mobile and stationary combustion as well as AIB (2021), ecoinvent (v3.9.1) and IEA (2023) for electricity and district heating.

Guideline for the calculation – greenhouse gas intensity based on net sales revenue

The greenhouse gas intensity is stated in the unit t CO₂e in relation to the value reported as net revenue in the consolidated financial statements in Chapter [B.2.2 Results of operations](#). The information there is thus an integral part of this non-financial Group declaration. The currency unit is millions of euros. Because Scope 3 GHG emissions were not yet reported in the previous year, no comparative figures are available.

The GHG intensity metric in relation to Scopes 1 and 2 relative to net revenue is determined on a market-based basis.

B.5.3 Social information

Own workforce

Strategy

SBM-2 – Interests and views of stakeholders

The interests, views and rights of the company's own workforce, including respect for human rights, are incorporated into Bilfinger's strategy and business model. Details are described in Chapter [SBM-2 Interests and views of stakeholders](#).

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

The material actual and potential impacts on Bilfinger's own workforce are closely linked to Bilfinger's strategy and business model. They are described in Chapter [SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model](#). Given the importance of its own workforce for Bilfinger as an industrial services provider, the company strategy and business model are influenced by them and are adjusted accordingly when necessary.

The relationship between the material risks and opportunities arising from the impacts and dependencies in connection with the company's own workforce is also shown in the presentation in Chapter [SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model](#).

Everyone who is part of the company's workforce who may be affected by material impacts is covered by the disclosures made in accordance with ESRs 2. The information on the company's own workforce relates to the company's own activities. Information on the main impacts of the company's activities is provided in Chapter [S2 Workers in the value chain](#).

The impacts of the company's activities classified as material in the materiality analysis relate to the company's own employees with whom a direct employment relationship exists. Self-employed workers, employees of subcontractors or persons provided by third-party contractors are considered workers in the value chain. The impacts of the company's activities on this group are described in detail in Chapters [S2-1 Concepts related to value chain workers](#), [S2-2 Processes for engaging value chain workers about impacts](#), [S2-3 Processes to remediate negative impacts and](#)

channels for value chain workers to raise concerns, and S2-4 Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions.

In the materiality analysis, no widespread or systemic negative impacts from Bilfinger's business activities on its own workforce were classified as material. Bilfinger does not operate in countries or regions where, for example, child labor or forced labor is widespread or systemic.

Thanks to the company's tremendous efforts in the area of occupational safety, it counteracts individual incidents such as serious work-related accidents. Potential negative impacts may, however, arise for employees working for clients with a potentially less robust and sophisticated health and safety environment.

In the area of working hours, understaffing and poor planning can lead to an overworked workforce and reduce productivity. In addition, excessive workloads and irregular working hours can lead to dissatisfaction among the company's own employees and thus to increased fluctuation rates. This can have a negative impact on the company's own workforce.

Appropriate remuneration is closely associated with compliance with working hours. Inadequate wages can potentially result in reduced motivation, lack of attention and higher absenteeism. The company's reputation among current employees and applicants can be severely damaged by the payment of inadequate wages.

Bilfinger complies with all legal, statutory and collective bargaining requirements as they relate to working conditions, equal treatment and equal opportunities as well as other labor-related rights, including the prohibition of both child labor and forced labor. Bilfinger has also established further standards in its Code of Conduct and in its Statement of Principles on Human Rights. This has had a significant positive impact on the company's own workforce. These additional standards are described in detail in Chapter SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model.

The materiality analysis identified significant financial risks and opportunities with regard to working conditions, equal treatment and equal opportunities arising from the effects and dependencies in connection with the company's own workforce.

Excessive workloads and irregular working hours can lead to dissatisfaction and increased fluctuation rates and thus to financial risks.

Lack of attention, reduced motivation and absenteeism due to inadequate wages can potentially be associated with a medium-term financial risk for the company.

Dedicated health and occupational safety management make a significant contribution to the well-being of the company's own workforce and generate significant opportunities for Bilfinger in the medium term.

Employee development in the company through further training and skill development can help to increase their satisfaction and loyalty to the company. This can result in improved performance.

Promoting a non-discriminatory work environment, implementing a zero-tolerance policy for misconduct and conducting appropriate prevention training has a positive short-term impact on the company's own workforce. The consequences are actual short-term positive impacts for the company's own workforce and medium-term financial opportunities for the company itself.

There are currently no identifiable significant negative impacts on the company's own workforce that may result from the transition plans to reduce the negative impact of the company's activities on the environment and to achieve more environmentally friendly and climate-neutral activities. By contrast, the strategic alignment of the business model to enhance the efficiency and sustainability of Bilfinger's customers has a positive impact on employees, particularly in terms of job security.

Bilfinger does not operate in countries or regions where, for example, child labor or forced labor is widespread or systemic. There is thus no significant risk of incidents of forced labor.

As part of its materiality analysis, Bilfinger also assessed the extent to which people with certain characteristics, for example with regard to their gender, age or ethnic origin, and those who work in a certain environment or carry out certain activities, could be more at risk from material impacts of the company's activities. No such persons or groups of persons could be identified.

The risks and opportunities assessed as significant that arise from the effects on and dependencies of persons among the company's own employees relate to all of the company's employees.

Impact, risk and opportunity management

S1-1 – Policies related to own workforce

Minimum standards for human resources work within the Bilfinger Group, including the operating model, are described in the Group Policy on Minimum Standards in Human Resources Management. There are also detailed policies relating to assignments abroad, recruiting, onboarding and personnel development, temporary workers and SOPs on ghost employees and short-term incentives.

The Bilfinger Statement of Principles on Human Rights, adopted by the Executive Board in December 2022, is binding throughout the Group and is available on the Bilfinger website in German and English. It regulates the human rights-related principles applicable to all employees and suppliers at Bilfinger and describes how our core processes for ensuring globally applicable human rights consider the interests and rights of all those who may be affected by the Bilfinger business model. The declaration defines the human rights and environmental expectations of the Group's employees and suppliers, describes the human rights and environmental risks that are a priority for the company and the procedures Bilfinger uses to fulfill its obligations under the German Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains (Supply Chain Due Diligence Act – LkSG). The declaration of principles forms the basis of governance for risk management for compliance with human rights and environmental due diligence obligations in accordance with Section 4 LkSG, which is fully integrated into Bilfinger's compliance management system and in all relevant business processes through appropriate measures. The main features of the compliance management system are described in Chapter [G1-3 Prevention and detection of corruption and bribery](#). Bilfinger is committed to ensuring that the principles defined in our Code of Conduct for Bilfinger employees, our Code of Conduct for Suppliers and our Statement of Principles on Human Rights are applied to all workers throughout the Bilfinger value chain. They form the framework for our responsibility toward workers throughout our value chain and illustrate our commitment to protecting human rights. Bilfinger has integrated the measures that the company applies to integrate its human rights and environmental due diligence obligations into the existing compliance management system.

Bilfinger is expressly committed to the principles of the Universal Declaration of Human Rights of the United Nations and the UN Global Compact Initiative. The Bilfinger Statement of Principles on Human Rights takes up individual key aspects of the ILO Declaration on Fundamental Principles and Rights at Work and the provisions of the OECD Guidelines for Multinational Enterprises. Overall, the telos of the Bilfinger Statement of Principles on Human Rights is to be interpreted analogously to those of the ILO and OECD provisions.

For us, respect for employee rights is an important component of human rights. This position is based in particular on our commitment to Principles 3 to 6 of the UN Global Compact Initiative, which apply throughout the Group. They relate to employees' rights to freedom of association and collective bargaining, the elimination of all forms of forced labor and child labor, and the elimination of discrimination with respect to employment and occupation. The rights of employees to

freedom of association and collective bargaining are expressed – depending on local legislation – in the company’s employee representative bodies or the trade union. These bodies endeavor to uphold employee rights, including through the application of collective bargaining agreements. Bilfinger’s management maintains a regular and constructive dialog with employee representatives.

In accordance with the Statement of Principles on Human Rights adopted in 2022, Bilfinger requires employees and suppliers to fully recognize the following core principles:

- All people have the right to be treated with dignity, fairness and respect.
- We respect the fundamental freedoms and human rights of our employees, business partners and the communities in which we live and work.
- We do not tolerate any form of discrimination, harassment or physical violence, nor do we tolerate any form of child, forced or compulsory labor.
- We provide an environment that promotes diversity and inclusion, and monitor and enforce compliance with human rights throughout the value chain.
- We protect the environment by ensuring sustainable business practices.
- We do not make any compromises when it comes to integrity, human rights or health and safety.

With its risk management for compliance with human rights and environmental due diligence obligations in the company’s supply chains, Bilfinger pursues the goal of minimizing human rights and environmental risks or ending violations. It is based on the established prevent-detect-respond model, which ensures preventive measures, early risk detection and consistent action in the event of breaches. This model is closely linked to all business processes. Regular Executive Board meetings and reporting ensure transparency and control. Employees are empowered to identify and address risks independently through training and communication at a global level. A global whistleblower system, the confidential reporting line (CRL), allows employees and third parties to report human rights and environmental violations anonymously. The system protects the identity of whistleblowers and ensures that complaints are responded to without reprisals. Information is systematically checked, documented and processed in consultation with the whistleblowers. Bilfinger reports regularly on its activities in the area of human rights, including information received and measures taken (see also Chapter [S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns](#)).

In its Statement of Principles on Human Rights, Bilfinger explicitly declares that its actions are in line with the United Nations Guiding Principles on Business and Human Rights and other internationally recognized standards. Because Bilfinger’s Statement of Principles on Human Rights forms the basis for all other guidelines, the above also applies to these.

In its Statement of Principles on Human Rights, Bilfinger explicitly positions itself against human trafficking, forced labor and child labor and demands the same of its own employees and all business partners.

Occupational safety topics are regulated in the Group Policy on Health, Safety, Environment and Quality (HSEQ) and in the SOPs on HSEQ Management, Corporate HSEQ Audit Program, Leadership & Workers Involvement, Health & Safety Standards for safe work, HSEQ Incidents & Classification Rules, Administration and Use of the HSEQ Management Software ACTIVE. These policies and SOPs are embedded in the general governance framework provided by our corporate man-

agement and are supplemented by specific policies on compliance issues such as Conflict of Interest, Code of Conduct Violation & Investigations as well as the SOPs Compliance Reviews during Hiring and Promotion Process and Allegation Management & Compliance Investigation. In addition, HSEQ and sustainability policies are also relevant for Bilfinger employees.

The Statement of Principles on Human Rights explicitly states that Bilfinger rejects discrimination in all its forms. The risk management system described above, including the established whistleblower system, enables Bilfinger to rigorously track and, if necessary, punish discrimination. Specific promotion of equality, diversity and inclusion is implemented at the local level. Bilfinger therefore has no explicit policies on this topic.

Bilfinger advocates for the promotion of equal opportunity and equal treatment of employees regardless of origin, religion, marital status, abilities and personality and education, skin color, race, nationality, ethnicity, political affiliation, social background, disability, sexual identity and orientation, marital status or age. This is explicitly described in the Statement of Principles on Human Rights.

A specific political commitment to inclusion or affirmative action for members of groups at particular risk in our workforce may be dictated by local law. Bilfinger always complies with local law. The regulations are reviewed at the level of the individual company and implemented wherever necessary. There is no central control in this regard. Because these are local requirements, there are no global Group policies in this regard.

S1-2 – Processes for engaging with own workforce and workers' representatives about impacts

Our process for employee engagement includes employee representatives at all levels, including our Supervisory Board with equal representation. With regard to the company employee representatives, particular mention should be made of the Group Works Council, whose area of responsibility extends to the German Group companies on the basis of the German Works Constitution Act (Sections 54 et seq. BetrVG), and the European Works Council, which is responsible for all companies in the European Union (EU), the European Economic Area (EEA), Switzerland and the United Kingdom. As described above, Bilfinger is committed to freedom of association in its Statement of Principles on Human Rights. We strictly adhere to national labor laws, especially where these stipulate codetermination rights for employee representatives.

Communication and involvement of employees take place at local entity level. This includes informing employees about strategic or business decisions and obtaining their input where necessary. In 2023, the BilfingerIN app was introduced as a global communications tool with the goal of reaching all employees, both white-collar and blue-collar. Employees can access important local, regional and global information directly on their smartphones. The content is available in 17 different languages. The app is not merely a one-way communication tool – employees can also respond to messages and chat with the team while keeping personal and business information secure. By 2024, almost 16,900 employees (approximately 52 percent) had registered in the app.

Thomas Schulz, Bilfinger CEO, is currently also Labor Director. The Labor Director is the member of the Executive Board responsible for personnel and social matters.

Since the fourth quarter of 2024, a voluntary global *Pulse Check* has been carried out on a quarterly basis to review employee satisfaction and understanding of the Group strategy and to identify opportunities for improvement.

Our future steps include improving employee engagement and ensuring that employee feedback is taken into account in decision-making processes, particularly through the *Pulse Check*.

S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns

Bilfinger's Code of Conduct, together with our Statement of Principles on Human Rights, forms the general framework and our zero-tolerance policy with regard to discrimination, harassment, corruption and bribery. This framework is further detailed in Group policies such as the Group Policy on Compliance, the Group Policy on Anti-Corruption, the SOP Third Party Due Diligence, the SOP Gifts, Entertainment and Hospitality, the SOP Sponsoring & Donations, the Group Policy Sanctions, Embargoes and Export Control, the Group Policy on Code of Conduct Violations & Investigations, the SOP Allegation Management & Compliance Investigations and the Group Policy on Conflicts of Interest.

The general description of Bilfinger's position with regard to human rights can be found in Chapter *S1-1 Policies related to own workforce*. We report specific evaluations of reported cases of human rights violations in Chapter *S1-17 Incidents, complaints and severe human rights impacts*.

The global Bilfinger complaints procedure or whistleblower system (confidential reporting line – CRL) is designed in such a way that employees and workers in the value chain as well as third parties can report fundamental violations of applicable law, the Bilfinger Code of Conduct, internal Group policies, the Bilfinger Statement of Principles on Human Rights or human rights and environmental risks as well as violations of human rights-related or environmental due diligence obligations. Such reports may relate to the economic activities of Bilfinger in its own business area or to the economic activities of a direct or indirect supplier. In addition, employees can contact their line manager, the HR department or the compliance managers with complaints and these will then forward the information discreetly to the departments responsible for the investigation.

The complaints procedure is provided by an external service provider and is individually adapted to Bilfinger's needs and designed in accordance with the criteria of Section 8 LkSG. It is accessible to potentially disadvantaged persons; the confidentiality of identity is maintained and it ensures effective protection against discrimination or punishment on the basis of a complaint.

Relevant information is documented and confirmed to the person providing the information. The persons entrusted by Bilfinger with conducting the process will, to whatever extent possible, discuss the facts of the case with the whistleblowers. The persons entrusted with conducting the proceedings shall act impartially. These persons act independently, are not bound by instructions and are obligated to maintain confidentiality.

The effectiveness of the process is reviewed at least once a year and on an ad-hoc basis if Bilfinger anticipates a significant change or significant increase in the risk situation in its own business area or at direct suppliers. Information on how to make use of the complaints procedure is publicly available.

The rules of procedure for the whistleblower system and complaints process, which are publicly available on the Bilfinger website, provide whistleblowers with information on the scope of application of the process. Information is also available on the channels through which information or complaints can be entered into the process, how the complaints process works, who the contact persons are for whistleblowers, and how Bilfinger ensures effective protection against discrimination or punishment on the basis of a complaint. An integrity survey has been conducted annually since 2024, in which employees are also asked whether they are aware of the complaint mechanisms.

S1-4 – Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

The description of the action plans and resources to manage material impacts, risks, and opportunities related to the company's own workforce can be found in Chapter [MDR-A Actions and resources in relation to material sustainability matters](#).

Bilfinger counteracts the negative impacts described in Chapter [SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model](#), which may be caused, for example, by insufficiently qualified employees or a shortage of skilled workers and the resulting additional burden on existing employees, with effective personnel planning and a modern working environment. Bilfinger complies with all local and collective bargaining agreements on limiting overtime, night and weekend work and on the appropriate planning of throughput times that have been agreed with the relevant local social partners. Wherever possible, Bilfinger endeavors to offer flexible working time arrangements. This is documented in corresponding local company agreements.

Another aspect of collective agreements is the standards for secure employment, including statutory notice periods, codetermined staff reductions and the provision of social protection. Here, too, Bilfinger complies with all local and collective regulations on dismissal policy, on limiting the extension of fixed-term contracts and on social protection by the employer in the absence of state protection, as agreed with the respective local social partners.

Bilfinger counteracts potential negative effects such as demotivation due to inadequate wages and salaries, as the majority of employees are covered by collective bargaining agreements (see also Chapter [S1-8 Collective bargaining coverage and social dialogue](#)). The payment of adequate wages is therefore part of the collective agreement provisions. Bilfinger complies with existing local laws on the statutory minimum wage and endeavors to pay all employees adequate wages. Further information can be found in Chapter [S1-10 Adequate wages](#).

As a people company, we focus on the skills, abilities and personal characteristics of the individual employee. Only through continuous training can we ensure the long-term sustainability of our company. Overall, we counter risks that may arise from a lack of young talent, fluctuation, a lack of qualifications or changes in the workforce due to demographic developments with a variety of employee development and diversity measures.

In October 2023, Bilfinger education GmbH was established as a central training center in Germany. This unit plays a strategic role in the training of future talent and plans call for it to become a model for vocational training in other Bilfinger regions. In addition, the development of our employees remains a priority. Important HR tools such as annual performance appraisals, structured development plans and salary reviews ensure that employee development is in line with the company's objectives.

Bilfinger offers relevant and regular training and development opportunities to ensure that employees have the necessary professional skills and knowledge and can develop within the Group.

Bilfinger provides (future) managers with the opportunity to participate in development programs to strengthen their skills and promote their professional development. At regional level, Bilfinger also offers "Leadership Camps" to promote an integrative management style among managers. The Group Talent department is driving our learning and development strategy with central programs and digital training formats such as the "Learning Days" – a multi-day event with webinars on the topics of personal development, IT, digitalization and project management.

Setting clear goals and providing regular feedback as well as annual appraisal meetings are ways of assessing individual performance and aligning individual goals with company goals. Targeted development measures and incentive systems are aimed at retaining employees in the long term. A strong annual performance appraisal process, individually tailored training opportunities and performance-related remuneration systems are implemented at Bilfinger.

Bilfinger is committed to a diverse and inclusive work environment to promote perspectives and create a positive work environment for all employees. The Charta der Vielfalt e.V. is an initiative that aims to promote diversity in companies and institutions through voluntary commitment. As a participating company, Bilfinger is committed to promoting equal opportunities and a non-discriminatory working environment. The Charter is based on the following principles: recognition and appreciation of diversity, promotion of equal opportunity, culture of appreciation, diversity in leadership, transparency and communication of diversity, equity and inclusion (DEI) and diversity in personnel development.

Bilfinger complies with all applicable legal regulations in this area at its international locations. Bilfinger ensures that employees of all genders have the same rights. Discrimination on the basis of gender is not tolerated. In this area, Bilfinger seeks to increase the proportion of women in management and reduce the pay gap between men and women. In addition, we have introduced inclusive hiring practices that require interview panels consisting of both women and men to reduce unconscious bias.

The highest standards of occupational safety are our license to operate. In addition to meeting customer requirements, ensuring health and safety in the workplace is an integral part of our corporate culture and is promoted on a daily basis. We make no compromises when it comes to health and safety in the workplace.

Bilfinger promotes a strong safety culture. These efforts include training, awareness programs and commitment at all levels of the organization. Bilfinger counters potential risks in the area of occupational safety with far-reaching quality and process management. It starts with the operating units, which are responsible for the process as well as the quality of their services. Through system requirements and targets and internal audits, they work toward the continued development of quality standards.

Global and local safety campaigns and targeted communication strengthen the safety culture and raise awareness of potential safety risks. An important measure for raising awareness regarding topics of occupational safety is our safety program Safety Works! including the safety campaigns that were developed in this context. In 2024, numerous target group-oriented campaigns were once again carried out in individual Group companies.

The commitment of executives all the way up to the members of the Executive Board is a key building block for ongoing improvements in occupational safety. For example, it is the responsibility of managers throughout the Group to regularly carry out a number of safety walks, depending on their area of responsibility, to address risks and hazards, to make employees aware of occupational safety issues and to document their inspections.

Bilfinger promotes equal opportunity through a clear commitment to anti-discrimination and is committed to filling vacancies with as diverse a field of applicants as possible. There are rules for filling key positions. This includes shortlisting at least one female candidate and setting up mixed-gender interview panels. Succession planning for key Bilfinger positions is mandatory. At least one female candidate must be identified as a potential successor for each key position. In the case of management trainee positions, investments in the training and further education of existing employees contribute to the promotion and development of specialists within the company.

To ensure the strictest occupational safety standards, external audits are carried out at Bilfinger companies, leading to certification in accordance with the ISO EN 9001, ISO EN 14001 and ISO EN 45001 standards, as well as the Safety Certificate Contractors Petrochemical (SCCP) standard.

In order to recognize outstanding safety initiatives in the Group and publicize them within the company, the Executive Board presents annual Safety Awards. The Group-wide award is designed to motivate employees and managers to make a strong commitment to safe working conditions and to maintaining the health of all employees.

The findings from safety walks, for example, may be recorded on the go, as the walks are progressing, and will then be directly input into the central HSEQ software.

Workplace safety is the subject of the HSEQ quarterly report that is submitted to the Executive Board. Particularly serious accidents are reported immediately to the Executive Board. It is informed on an ongoing basis regarding their analysis as well as necessary corrective measures.

In times of skills shortages, Bilfinger's top priority is the satisfaction and well-being of his employees. To this end, the procedures for ensuring occupational safety, the current training and development opportunities and the zero-tolerance policy with regard to discrimination are regularly reviewed. This is intended to ensure that Bilfinger continues to be perceived as an attractive employer and that the appropriate specialist personnel is available.

Bilfinger's business model as an industrial services provider is based on the availability, competence and expertise as well as the value orientation of its employees. The well-being of our employees is therefore of utmost importance to us. To improve the working conditions of our employees, we focus on the measures described above.

Bilfinger is not aware of any negative practices – also not including in relation to procurement, sales and data use – that have or contribute to a significant negative impact on the company's workforce. In the context of data storage, use and processing, Bilfinger also complies with the requirements of the European General Data Protection Regulation with regard to the company's employees.

Tracking the effectiveness of strategies and measures through targets is explained in Chapter *MDR-T Tracking effectiveness of policies and actions through targets*.

Bilfinger has dedicated employees both in global management functions and at the local level who take care of topics such as HSEQ and training and further education (see the information on the subject matter experts in Chapter *S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities*). In addition, as described in Chapter *SBM-2 Interests and views of stakeholders*, at least 0.5 percent of Group revenue will be invested in training and development measures every year from 2024.

Metrics and targets

S1-5 – Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities

In addition to the information in Chapter *MDR-T Tracking effectiveness of policies and actions through targets* for occupational safety and investment in training and development, Bilfinger has defined clear objectives and strategies for workforce management. For us as an industrial services provider, our employees are our most important asset. For this reason, one of our main objectives is to ensure the safety and well-being of our employees. No employee's health shall be adversely affected by his or her work.

Safe work processes, the implementation of target group-oriented occupational safety campaigns and the reporting of key performance indicators on occupational safety are often an important prerequisite for the awarding of contracts by customers. Bilfinger therefore undertakes a considerable amount of effort to meet the high requirements in its day-to-day work.

In order to avoid incidents in the area of occupational safety to the greatest possible extent, our aspiration is "zero is possible", meaning that the rate of work-related injuries and working time lost due to work-related injuries should be reduced as far as possible. Bilfinger collects meaningful metrics on occupational safety which are then used to measure the degree of target achievement.

As an industrial services provider, Bilfinger's business model is highly dependent on the skills, expertise and values of its employees. A core element of our business strategy is the continuous

development and training of our employees in order to maintain competitiveness and promote growth.

Bilfinger's personnel development strategy focuses on the areas of talent management, remuneration as well as training and continuing education. In the recent past, a major focus has been on combating the shortage of skilled workers. From 2024, at least 0.5 percent of annual revenue will be invested in employee training and development, particularly in the areas of technical skills, leadership, sales and project management.

Targets to close the newly calculated gender pay gap are furthering the cause of equality and the integration of women and men at Bilfinger. They are also helping to increase the proportion of women in management positions and thus to enhance the diversity of our workforce. In addition, targets such as gender quotas of 20 percent at the first management level below the Executive Board and 25 percent at the second management level below the Executive Board by 2026 will help us to achieve these goals.

We listen to feedback from our employees regarding corporate culture, working environment and development opportunities by conducting and analyzing a quarterly employee survey from the fourth quarter of 2024. We report on this in Chapter [S1-2 Processes for engaging with own workforce and workers' representatives about impacts.](#)

Group HR is responsible for the strategic management and global governance of our own workforce. The measures described above are implemented in close cooperation with the regional HR managers and subject matter experts (SME). The regional HR & HSEQ departments implement the Group strategy for HR & HSEQ in relation to their own workforce and formulate regional measures.

Bilfinger is structured as a functional organization. In accordance with the target operating model of the HR & HSEQ function, regional SMEs are established for the central topics of compensation & benefits and talent, education & training in order to enable the consistent development and implementation of all centrally planned targets, measures and concepts.

The status of implementation is monitored and reviewed

- as part of the regular dialog between the CEO and the Chief HR & HSEQ Officer,
- as part of the regular dialog between Group HR & HSEQ and the regional HR & HSEQ Directors, and
- as part of the regular dialog between the regional HR and HSEQ directors and the HR business partners.

S1-6 – Characteristics of the undertaking's employees

We report the number of employees at the end of the reporting period (number of persons on December 31 of the calendar year). In our previous Annual Report, the number of employees included permanent employees and trainees. However, in order to cover all employees including temporary workers so that the key figures in Chapters [S1-6 Characteristics of the undertaking's employees](#) and [S1-9 Diversity metrics](#) could be reported, we expanded the previous criteria by including interns, working students and temporary employees. One reason for the significant growth in our own workforce compared to 2023 is the acquisition of parts of the Stork Group (2,646 employees).

Gender

Our employees can choose whether they indicate their gender as female, male, other or not at all.

The proportion of female employees averages 11 percent (previous year: 11 percent) and is relatively constant in all regions. This is due to the nature of our business: We are an international industrial services provider for the process industry, operating at our customers' plants and sites. 63 percent of our employees are industrial workers, 37 percent are salaried employees.

The proportion of female employees is also influenced by the local cultural and educational context.

EMPLOYEE HEADCOUNT BY GENDER	Headcount – As of Dec. 31, 2024
Male	28,946
Female	3,412
Other	3
Not reported	82
Total employees	32,443

Breakdown of permanent / temporary employees

Worldwide, 10.5 percent of all employees have a temporary contract.

This proportion is higher in regions where we carry out seasonal or project-related activities for our customers that require a temporary increase in our workforce.

Breakdown of full-time / part-time employees

Worldwide, 5.6 percent of all employees work part-time with an average of 0.74 full-time equivalents.

We offer our employees part-time work to support their work-life balance, depending on their personal circumstances. The proportion of part-time employees is also influenced by the local cultural and educational context. The number of employees by type of contract, broken down by gender, can be seen in the following table.

HEAD COUNT BY CONTRACT TYPE, BROKEN DOWN BY GENDER	Reporting period as of Dec. 31, 2024				
	Female	Male	Other*	Not disclosed	Total
Number of employees	3,412	28,946	3	82	32,443
Number of permanent employees	3,176	25,793	2	63	29,034
Number of temporary employees	236	3,153	1	19	3,409
Number of non-guaranteed hours employees	1	10	0	0	11
Number of full-time employees	2,645	27,909	3	80	30,637
Number of part-time employees	767	1,037	0	2	1,806

*Gender as disclosed by the employees themselves

The number of employees in the countries in which at least 50 employees and 10 percent of the total workforce are employed is shown in the following table.

BREAKDOWN OF EMPLOYEES BY COUNTRY (NUMBER OF EMPLOYEES)	Headcount as of Dec. 31, 2024
Germany	6,215
Poland	4,317
Netherlands	3,414
United Kingdom	3,337

Bilfinger employs 11 on-call employees in Germany (0.18 percent). These are employment contracts that provide a certain degree of flexibility, particularly at the request of employees (mainly pensioners who still wish to work part-time). In each case, a maximum working time is included that the employees would like to work per week / month.

Leavers and turnover

Turnover is calculated as the number of departures per year / average number of employees per year. The average number of employees is the average number of employees at the end of the quarter over the four quarters of the year.

LEAVERS AND TURNOVER	Reporting period as of Dec. 31, 2024
Number of leavers (head count)	7,862
Turnover (%)	25.0%

Because Bilfinger's business is seasonal and project-based, in certain regions (e.g. North America and the UK) some employees join and leave the company several times over the course of a year. Every departure is taken into account in the fluctuation, even if it is the same employee. As a result, the fluctuation in these regions (for example United Kingdom 44 percent) is higher than in Germany (17 percent).

Further representative information on key figures relating to employees can be found in Chapter [B.2.6 Employees](#).

**HEAD COUNT BY CONTRACT TYPE,
BROKEN DOWN BY REGION (NUMBER OF EMPLOYEES)**

Reporting period
as of
Dec. 31, 2024

	E&M Germany Austria Switzerland	E&M Belgium Netherlands	E&M United Kingdom	EM Eastern Europe	E&M Nordics	Techno- logies	Corpo- rate	E&M North America	E&M Middle East	Other Opera- tions	Total
Number of employees	6,691	4,597	3,384	4,879	3,451	1,751	576	2,055	4,319	740	32,443
Number of permanent employees	6,222	4,422	3,002	3,666	3,271	1,612	540	2,046	3,627	626	29,034
Number of temporary employees	469	175	382	1,213	180	139	36	9	692	114	3,409
Number of non-guaranteed hours employees	11	0	0	0	0	0	0	0	0	0	11
Number of full-time employees	6,098	3,886	3,321	4,762	3,385	1,658	484	2,040	4,263	740	30,637
Number of part-time employees	593	711	63	117	66	93	92	15	56	0	1,806

S1-8 – Collective bargaining coverage and social dialogue

A total of 68 percent of our global workforce is covered by collective bargaining agreements.

The percentage of coverage by collective bargaining agreements in the three countries of the European Economic Area in which there are more than 10 percent of our total number of employees and outside the European Economic Area is shown in the table below.

The percentage of employees covered by employee representatives (social dialog) in the three countries of the European Economic Area where more than 10 percent of our total number of employees are located is shown in the table below.

	Collective bargaining coverage		Social dialogue
	Employees – EEA countries ¹	Employees – Non-EEA regions ¹	Workplace representation (EEA countries only) ¹
Coverage rate			
0-19 %		Middle East	
20-39 %			
40-59 %			
60-79 %	Poland	United Kingdom	
80-100 %	Germany, Netherlands		Germany, Netherlands, Poland

¹ countries/regions with >50 employees, representing >10% of total employees

Since 2010, Bilfinger has had an agreement with its employees regarding representation through a European Works Council.

S1-9 – Diversity metrics

Gender distribution by number and percentage at the top management level can be found in the following table. Bilfinger defines the top management level as the first and second management levels below the Executive Board.

GENDER DISTRIBUTION AT TOP MANAGEMENT	As of Dec. 31, 2024		
	Female	Male	Total
Number of employees (head count) at the first management level	7	26	33
Number of employees (head count) at the second management level	21	98	119
% of total number of employees at the first management level	21%	79%	100%
% of total number of employees at the second management level	18%	82%	100%

A breakdown of employees by age group can be found in the following table.

AGE DISTRIBUTION OF EMPLOYEES	Under 30	30-50	Over 50	Total
	years old	years old	years old	
Number of employees	5,714	15,902	10,827	32,443
% of total number of employees	18%	49%	33%	100%

S1-10 – Adequate wages

The Bilfinger Group is committed to paying all employees in the respective countries an adequate salary. When analyzing adequate remuneration, we take into account base salaries, other guaranteed payments, guaranteed bonuses and other regular benefits. We systematically review and adjust the salaries of our employees once a year on the basis of local data. For the vast majority of our workforce, which consists of industrial workers, salaries are subject to review and adjustment through collective bargaining agreements. We have set an annual salary round for the rest of our workforce, which consists of salaried employees.

All of our employees receive adequate remuneration in line with the applicable reference values.

The following table shows the coverage with appropriate wages as a percentage of the active workforce:

COVERAGE WITH ADEQUATE WAGES	In % of active	Total active
	headcount	headcount
Global workforce	100%	32,443
Workforce in EEA countries	100%	21,635
Workforce outside EEA countries	100%	10,808

S1-14 – Health and safety metrics

At Bilfinger, all employees are covered by the health and safety management system. As part of Bilfinger Matrix certification, 40 companies with 135 locations have been certified pursuant to the occupational health and safety standard DIN EN ISO 45001 and eight companies with 33 locations have been certified pursuant to the Safety Certificate Contractors Petrochemical (SCCP) standard.

Regular internal audits are carried out at the Group companies. A total of 14 Group companies in Germany, Austria, France, Poland, Denmark, Norway, Finland, the United Kingdom, North America, Bahrain and Qatar were audited internally in the reporting year. In addition to these internal audits, there are further external audits, including by certifiers, authorities or customers.

Unfortunately, there were two fatal work-related accidents in 2024. At the time of these accidents, these employees were on loan to a third party and were therefore not subject to Bilfinger's direct influence on occupational safety measures and are therefore not included in our statistics. The accidents are being investigated in close cooperation between Bilfinger and the customer. The investigation had not been completed at the time of reporting.

HEALTH AND SAFETY METRICS

	2024
Number of fatalities as a result of work-related injuries	0
Number of recordable work-related accidents	22
Rate of recordable work-related accidents*	0.32
Number of days lost to work-related injuries and fatalities from work-related accidents	1,225

* Respective number of cases divided by the number of total hours worked by the company's own workforce and multiplied by 1,000,000

The occupational safety standards developed centrally are expressed in Group-wide uniform policies and standard operating procedures (SOPs). Responsibility for compliance with these policies and SOPs lies with the managers of the local operating units, who also take into account the relevant local laws, regulations, customer requirements and working conditions. Health and Safety Committees have been established in the Group's units in accordance with legal and internal Group requirements. This approach means that all Bilfinger employees are covered by the health and safety management system.

S1-16 – Remuneration metrics (pay gap and total remuneration)

The Bilfinger Group has set the goal of paying all employees fairly and adequately, regardless of organizational level, gender, age, nationality or sexual orientation. The data definitions contained in the ESRS were used to determine both the gender pay gap and the annual total remuneration ratio. We take into account the base salary, the fixed and guaranteed salaries and allowances, the variable target remuneration (short-term incentive – STI, additional bonus, etc.), the long-term incentive (LTI) and other regular benefits. Both analyses are carried out at country and at Group level.

All of our employees' salary components are systematically reviewed once a year on the basis of local data. For the vast majority of our workforce, which consists of industrial workers, salaries are subject to review and adjustment through collective bargaining agreements. We have set an annual salary round for the rest of our workforce, which consists of salaried employees. We strive for fair and adequate remuneration for all our employees within the respective countries.

The following table shows the global gender pay gap, defined as the difference between the average pay level of female and male employees, expressed as a percentage of the average pay level of male employees:

GENDER PAY GAP

	2024
Global pay gap in %	7

The following table shows the ratio between the remuneration of the CEO and the median employee (excluding the highest-paid individual) to provide insight into the company's salary structure.

REMUNERATION RATIO

	2024
Global ratio for total remuneration of highest earning individual vs. average total remuneration of all employees excl. highest earning individual	55

In addition to the base remuneration and STI, the CEO receives a conditional allocation of shares (LTI). These conditionally allocated shares will not be transferred before 2028. The plan rules do not provide for a pro-rata allocation of shares in the event of premature departure.

S1-17 – Incidents, complaints and severe human rights impacts

At present, Bilfinger can only report on the total number of incidents of discrimination, including harassment, reported during the reporting period. In 2024, the systems were adapted to allow a differentiated reporting in the future.

We did not receive any complaints about OECD national contact points for multinational enterprises. Bilfinger did not pay any fines or compensation nor were we subject to any sanctions in the reporting period as a result of work-related incidents and/or complaints relating to human rights. No sanctions against Bilfinger employees were initiated in this regard during the reporting period.

INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

	2024
Total number of incidents of discrimination, including harassment	42
Indications of violation	n.a.
Total amount of fines, penalties, and compensation for damages	0

Bilfinger is not aware of any serious incidents of human rights violations, in particular with regard to the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises. No fines or compensation payments were made in this connection. The company and its employees were also not subject to any sanctions in this regard.

S2 – Workers in the value chain

Strategy

We are committed to ensuring that the principles defined our Code of Conduct, our Code of Conduct for Suppliers and our Statement of Principles on Human Rights are applied to all workers in our value chain. We have systematically established measures to achieve this objective.

SBM-2 – Interests and views of stakeholders

Bilfinger's strategy and business model incorporate the interests, viewpoints and rights of workers in the value chain, including respect for human rights. Details are provided in Chapter [*SBM-2 Interests and views of stakeholders*](#).

SBM-3 – Impacts, risks and opportunities and their interaction with strategy and business model

The actual impacts of Bilfinger's business activities on workers in the value chain were identified and assessed for materiality as part of the materiality analysis against the background of Bilfinger's strategy and business model. The process is explained in Chapter [*IRO-1 Description of the process to identify and assess material impacts, risks and opportunities*](#).

The impacts identified and assessed in the materiality analysis are of course closely linked to Bilfinger's business model and strategy. Bilfinger's business model involves the use of external services, and labor in the value chain was therefore deemed material.

In view of the requirement to consistently comply with applicable laws and regulations as well as generally recognized standards of social responsibility, the materiality analysis identified actual exclusively positive impacts on the workforce in the upstream value chain for numerous sustainability topics, which have an impact in the short, medium and long term. This is associated with significant medium- and long-term financial opportunities for the company.

Working conditions

Significant, exclusively positive impacts, which also result in significant financial opportunities for Bilfinger, arise in relation to the working conditions of employees in our upstream value chain. They relate in particular to secure employment, working hours, adequate remuneration and the opportunity for social dialog.

Bilfinger's commitment to freedom of association, including the existence of works councils, and the right to collective bargaining also has a positive impact on working conditions.

The fundamental importance that Bilfinger attaches to occupational health and safety also has a significant positive impact on workers in the upstream value chain. Employees of our subcontractors, who often work directly at our sites, are fully integrated into the occupational safety system of our own workforce. Cooperation with suppliers is suspended in the event of sufficiently concrete suspicions of occupational safety violations.

Equal treatment and equal opportunities for all

As an industrial services provider, Bilfinger is a people-focused organization. The well-being of our employees, the employees of our direct and indirect suppliers in the Bilfinger supply chain, and employees of our business partners and customers is therefore our top priority. We expect not only our employees but also our supply chain to fully comply with the fundamental principles defined in our Statement of Principles on Human Rights: everyone has an equal right to be treated with dignity, fairness and respect.

Consistent action against violence and harassment in the workplace, including upstream in the value chain, also has a positive impact on the situation of workers in the value chain.

Other work-related rights

The prohibition of child labor and forced labor is just as essential for Bilfinger as living conditions in appropriate accommodations and with safe access to clean water and sanitary facilities. The clear guidelines that Bilfinger sets for this in its upstream value chain are associated with significant positive impacts. Here too, cooperation with suppliers is suspended in the event of sufficiently concrete suspicions of violations.

The Bilfinger compliance management system, designed in the sense of the prevent-detect-respond model, is therefore conceptualized in such a way that negative impacts can be prevented, for example through HSEQ audits, supplier assessments, third-party audits and complaints made through the Bilfinger whistleblower system.

If Bilfinger determines that there are potential or actual negative impacts on the interests, views and, in particular, the rights of employees in the value chain, appropriate remedial measures defined in the response approach of the compliance management system are implemented. If, on the other hand, there are impacts that are qualified to systematically influence the company's strategy and business model as well as to contribute to their adaptation, it is determined – depending on the degree and scope of the impacts – which measures are suitable to take account of the impacts.

Bilfinger is in continuous dialog with its key stakeholders to identify potential and actual negative and positive impacts on workers in the value chain. The organization of their involvement is explained in Chapter [*SBM-2 Interests and views of stakeholders*](#).

With regard to the relationship between the material opportunities arising from the impacts and dependencies in connection with workers in the value chain and the Bilfinger strategy and business model, there are no findings of an imbalance resulting in an exposed risk disposition for workers in the value chain. Bilfinger's strategy and business model are designed to promote opportunities arising from the impacts and dependencies associated with workers in the value chain.

All workers in the value chain who are likely to be exposed to material impacts, including impacts related to our own operations and our value chain, as well as those related to our products or services and our business relationships, are covered by the disclosures required under ESRS 2.

The impacts on workers in the value chain identified and assessed in the materiality analysis, including impacts related to our own operations and those of our products or services and business relationships, relate to the following types of workers:

- workers who work at the Bilfinger site but are not part of the company's own workforce, i.e. not self-employed workers or workers provided by third-party companies that are primarily active in the placement and leasing of workers,
- workers working for entities in Bilfinger's upstream value chain (e.g., those involved in the extraction of metals or minerals or harvesting of commodities, in refining, manufacturing or other forms of processing),
- workers working for entities in Bilfinger's downstream value chain (e.g., those involved in the activities of logistics or distribution providers, franchisees, retailers),
- workers working in the operations of a joint venture or special purpose vehicle involving Bilfinger, and
- workers who (within the prior categories or additionally) are particularly vulnerable to negative impacts whether due to their inherent characteristics or to the particular context.

With regard to geographical areas, at country level or other levels, or the extraction of required raw materials, no significant risk of child labor or forced labor has been identified in relation to

workers in Bilfinger's value chain. Of the impacts identified in the materiality analysis, no negative impacts were classified as material.

The positive impacts classified as material relate to working conditions, equal treatment and equal opportunities for all, as well as other labor-related rights, including in particular protection against child labor and forced labor. They are described above and in Chapter [*SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model.*](#)

In its upstream value chain, Bilfinger is firmly committed to ensuring that applicable laws and regulations as well as generally recognized standards of social responsibility are consistently complied with. This is monitored with the help of Bilfinger's compliance management system and the processes that are embedded in it. The resulting positive impacts, as outcomes of preventative compliance measures, corresponding appropriateness and effectiveness tests and regular risk analyses, lead to material opportunities and particularly affect competitive advantages due to partnerships with subcontractors in the upstream value chain that are based on integrity and in which compliance risks are significantly minimized.

Among the most important types of workers in the value chain described above, Bilfinger does not consider any workers with certain characteristics, in a certain environment or with certain activities to be more vulnerable than others to the negative impacts of the company's activities.

In our day-to-day business and the application of our compliance management system, no irregularities have come to light with regard to the particular vulnerability of individual groups.

Likewise, risks and opportunities arising from the impacts and dependencies associated with workers in the value chain could not be identified.

Impact, risk and opportunity management

S2-1 – Policies related to value chain workers

The institutional basis for upholding human rights and environmental due diligence obligations is the Group's governance system, which is explained in detail in Chapter [*GOV-1 The role of the administrative, management and supervisory bodies.*](#)

With its Code of Conduct, the Code of Conduct for Suppliers, the Declaration of Principles on Respect for Human Rights and a large number of Group policies designed to ensure business conduct with integrity, Bilfinger has established a set of rules for identifying, assessing, managing and improving material impacts on its own workforce and workers in the value chain. In addition, there are policies that cover significant risks or opportunities in connection with workers in the value chain.

The policies for managing the material impacts on workers in the value chain and the associated material risks and opportunities are presented in Chapter [*MDR-P Policies adopted to manage material sustainability matters.*](#) They relate in particular to the Group-wide content of the Code of Conduct, the Code of Conduct for Suppliers and the Statement of Principles on Human Rights.

In the Statement of Principles on Human Rights, which serves as a central governance document for identifying, assessing and managing significant impacts, risks and opportunities – particularly with regard to respect for human rights –, Bilfinger, as an active member of the United Nations Global Compact Initiative, is committed to the Universal Declaration of Human Rights of the United Nations.

Bilfinger deliberately makes no distinction between its own employees and those in the value chain or even certain groups, because the protection of human rights and their value and importance is not dependent on groups or individuals.

Our Code of Conduct forms the basis for all activities relating to acting with integrity. It applies throughout the Group and is publicly available on our website in German and English. There are 18 different language versions available for internal Group-wide use. The Code of Conduct defines

the principles and values regarding how we work with our employees and external persons and organizations. It applies to all business conduct and activities of our managers and employees – regardless of where they work and what they do.

Together with the Statement of Principles on Human Rights, it makes up the framework of our responsibility toward civil society and the environment and outlines our commitment to protecting human rights, including employee rights.

As an industrial services provider, Bilfinger is deeply committed to its employees. The well-being of those employed by our direct and indirect suppliers in the value chain as well as employees of our business partners and customers is therefore also a top priority. Guided by our values and convictions and in accordance with internationally recognized standards of conduct, we never compromise on human rights. We strive to act in accordance with the Universal Declaration of Human Rights of the United Nations and the United Nations Global Compact Initiative wherever we operate. Because human rights can be impacted by environmental damage, Bilfinger clearly acknowledges its responsibility to protect the environment.

We do not tolerate any violations of our Code of Conduct or the Statement of Principles on Human Rights. If a violation is suspected or if one occurs, employees are requested to report such a violation immediately. Bilfinger has a dedicated department for receiving and investigating possible violations. It focuses on the confidential and objective investigation of allegations relevant to the Group and is therefore a core element of the Bilfinger compliance management system and the zero-tolerance principle with regard to compliance violations.

Bilfinger expects its employees and partners in the value chain to fully commit to the following core principles on respect for human rights:

- All people have the right to be treated with dignity, fairness and respect.
- We respect the fundamental freedoms and human rights of our employees, business partners and the communities in which we live and work.
- We do not tolerate any form of discrimination, harassment or physical violence, nor do we tolerate any form of child, forced or compulsory labor.
- We provide an environment that promotes diversity and inclusion, and monitor and enforce compliance with human rights throughout the value chain.
- We protect the environment by ensuring sustainable business practices.
- We do not make any compromises when it comes to integrity, human rights or health and safety.

Bilfinger expects all employees and suppliers in the value chain to assume responsibility for the values and measures listed below and to consistently align their actions with these measures:

Forced labor

Child labor

- No employment for workers under the age of 15
- For heavy labor in accordance with the ILO Agreement 182, no workers under the age of 18 may be employed.

Respect and non-discrimination

- Promote equal opportunity and treatment of employees regardless of origin, religion, marital status, abilities and personality and education, skin color, nationality, ethnicity, political affiliation, social background, disability, sexual identity and orientation or age
- No tolerance for psychological abuse, sexual harassment or discrimination through gestures, language and physical contact that is sexual, coercive, threatening, abusive or exploitative

Health and safety

- Maintain safe working conditions
- Provide training on health and safety issues
- Conduct and document audits as part of occupational health and safety management systems

Employee rights

- For us, respect for employee rights is an important component of human rights. This position is based in particular on our commitment to Principles 3 to 6 of the UN Global Compact Initiative, which apply throughout the Group. They relate to employees' rights to freedom of association and collective bargaining, the elimination of all forms of forced labor and child labor, and the elimination of discrimination with respect to employment and occupation.
- Compliance with global working time regulations
- Compliance with all wage and compensation laws worldwide, meaning fair compensation for workers
- Act in accordance with applicable legal requirements when assigning personnel across borders, particularly with regard to minimum wages

Freedom of association

- The rights of employees to freedom of association and collective bargaining are expressed – depending on local laws – in the company's employee representative bodies or the trade union. These bodies endeavor to uphold employee rights, including through the conclusion of works agreements or collective bargaining agreements. Bilfinger's management maintains a regular and constructive dialog with employee representatives.
- Recognition of the right of workers to form or join trade unions and to bargain collectively
- No discrimination against or preferential treatment of members of employee representatives or trade unions

Environmental protection

- Put particular importance on climate protection and contribute to the reduction of greenhouse gases
- Strengthen environmentally sustainable economic activities
- Raise awareness of climate change and the need to accelerate the launch of global energy transition initiatives

Complaints procedure

- Establish a protected procedure for reporting possible violations of human rights principles
- Identify and manage risks
- Provide a structured response to incidents with processes put in place to create remedies for violations.

Bilfinger maintains a continuous dialog in order to be able to adequately take into account the interests of its employees, workers in the value chain and those who may be directly impacted in a protected legal position by the economic activities of Bilfinger or a company in the Bilfinger value chain.

Integration of interest groups

Bilfinger uses various communication channels and dialog platforms to actively and continuously address the interests and concerns of own employees and those in the value chain. This is achieved, among other methods, through the exchange of information and ideas with customers. Even before and during the initiation of a project, Bilfinger is in contact with customers regarding compliance measures to ensure business integrity, particularly with regard to safeguarding human rights. During the execution of a project, regular meetings with representatives of the various trades ensure that the local implementation of defined risk management processes is adhered to, while at the same time allowing local requirements and interests of Bilfinger's own workforce as well as those of suppliers to be added wherever necessary.

Complaints mechanisms & communication platforms

Bilfinger has established transparent and accessible grievance mechanisms so that all affected parties can express their interests, concerns and complaints. These mechanisms provide an anonymous and secure method to report violations of the Bilfinger Declaration of Principles on Respect for Human Rights, the Bilfinger Code of Conduct or other Bilfinger policies. Various reporting channels are available for this purpose, including hotlines, online forms and direct contact persons. Examples of local measures include suggestion and complaint boxes at workplaces. Both our own employees and external employees can submit suggestions for improvement or complaints. This enables Bilfinger management, particularly at remote locations, to get in touch with employees who sometimes do not have access to digital processes or cannot generally be reached through meetings or training measures at the local subsidiaries.

Exchange regarding training courses

Bilfinger conducts extensive training and awareness-raising programs to ensure that all those involved understand the risks and their impact on human rights and the environment. This includes regular training for all employees on human rights and environmental standards. These training courses include modules on the latest regulatory requirements, best practices and specific case studies that demonstrate real-life scenarios and solutions. On-site training is always designed in such a way that an active exchange of ideas and information can take place, thus providing employees with an opportunity to express their interests to the training staff from the specialist departments.

If Bilfinger discovers that in its own business unit or at a direct supplier a violation of human rights or environmental obligations has occurred or is imminent, appropriate remedial action is taken without delay to prevent, eliminate or minimize the extent of the violation.

Whistleblowers can report a possible violation anonymously if they wish. They are protected from retaliation at all times. Each reported allegation is taken seriously, classified as relevant or

not relevant to the Group after an initial assessment and categorization and, if applicable, investigated.

If an allegation is substantiated or measures are deemed necessary, appropriate remedial steps are defined and followed up regardless of the outcome of the investigation. This can include disciplinary measures, process adjustments or additional training. If a violation has been committed by a supplier, development measures may be initiated or, if remediation and development are not effective, the supplier relationship can be terminated. If cases and remedial measures are relevant, these are communicated to the Executive Board on a quarterly basis through compliance quarterly reports.

The Bilfinger Code of Conduct, the Code of Conduct for Suppliers and the Declaration of Principles on Respect for Human Rights explicitly address the issues of human trafficking, forced labor and child labor.

Within the scope of our commitment to following the principles in the Bilfinger Code of Conduct, our Code of Conduct for Suppliers also stipulates that our suppliers comply with standards comparable to the Bilfinger Code of Conduct in their business practices and also to promote them throughout their own value chain. They are contractually obligated to do so. The regulations in our Code of Conduct and in our Code of Conduct for Suppliers are in line with the standards of the International Labor Organization (ILO), which has defined fundamental rights and principles.

The Bilfinger Code of Conduct for Suppliers outlines the following provisions with regard to safeguarding these rights:

- Provide safe workplaces that meet international labor standards
- Ensure fair working conditions and refrain from any form of unethical or illegal working conditions (for example, harassment or physical violence, any form of slavery, servitude and forced or compulsory labor, including but not limited to child labor)
- No discrimination against employees on the basis of ethnicity, gender, sexual orientation, religion, ideology, disability or age
- Guaranteed right to organize and collective bargaining and to provide employees with written employment contracts in accordance with local legislation
- Ensure wages, working hours, vacations and absences of employees and contracted external subcontractors are in accordance with applicable law and/or contracts
- Compliance with all applicable data protection laws
- Comply with laws and standards in the area of conflict minerals and inform Bilfinger in advance of any sourcing of such materials

In addition, environmental and climate protection can also have an impact on the workers in the value chain. Bilfinger suppliers are therefore required to

- conduct their operations safely and minimize the environmental impact of their business activities,
- operate in a manner that conserves resources,
- follow all applicable environmental laws and permits, and
- communicate GHG emissions and targets determined as required.

Suppliers also undertake not only to observe the due diligence obligations in value chains themselves, but also to guarantee the standards expected of them throughout their value chain. This includes:

- Observing due diligence obligations arising from national and international laws relating to value chains
- Ensuring compliance with human rights and fair working conditions throughout the value chain
- Requiring their own suppliers and subcontractors to comply with the principles set out in this supplier declaration
- Systematically incorporating these obligations into their business relationships and following up on their implementation

The concepts pursued by Bilfinger to protect the human rights of its own workforce and workers in the value chain are in line with internationally recognized standards including the United Nations Guiding Principles on Business and Human Rights. These are taken into account during the risk analysis in the company's own business area in accordance with Section 5 of the German Supply Chain Due Diligence Act (LkSG). This process uses, among other things, the implementation aids listed in Annex II of the Federal Office of Economics and Export Control's handout *Identifying, weighting and prioritizing risks* to identify human rights and environmental risks. Our risk analyses in accordance with the LkSG, as elementary measures in risk management with regard to workers in the value chain and our own employees, are designed accordingly in such a way that, among other things, the United Nations Guiding Principles on Business and Human Rights are appropriately reflected. If it is of value in the abstract risk assessment, the Cato Institute's Human Freedom Index and the Freedom House Index are also used for individual case decisions.

No cases of non-compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work or the OECD Guidelines for Multinational Enterprises involving workers in the value chain were reported for the upstream or downstream value chain. Significant changes to purchasing regulations in the reporting period related in particular to the integration of sustainability, supply chain due diligence, working conditions and the environment in both the Procurement Guideline and the Code of Conduct for Suppliers. At Bilfinger, new or amended guidelines are available in the Group-wide Governance Portal. A regular circular from the Executive Board provides additional information on these topics. Regulations relevant to purchasing, in particular the Code of Conduct for Suppliers, are publicly accessible on the website and during ordering processes. We also refer there to our Statement of Principles on Human Rights.

S2-2 – Processes for engaging with value chain workers about impacts

General procedures for the involvement of workers and their representatives in the value chain in relation to actual and potential impacts, for example through direct representation of interests, similar to works councils for their own employees, are not currently established. We examine whether and to what extent current laws provide us with suitable and proportionate ways and means to conduct such an exercise.

Workers in the value chain, as well as the company's own employees, do however have access to communication tools and channels. These include the Bilfinger whistleblower system, which is described in Chapter [G1-3 Prevention and detection of corruption and bribery](#). This notwithstanding

ing, the involvement of external workers takes place in direct exchange with the respective commercial or technical contact person or project management. The highest-ranking management role with operational responsibility in this context is the local management.

Currently, there is no general cooperation procedure specifically for workers in the value chain.

S2-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns

No negative impacts from business activities were classified as material in the materiality analysis.

The global Bilfinger complaints procedure or whistleblower system (confidential reporting line – CRL) is designed in such a way that employees and workers in the value chain as well as third parties can report fundamental violations of applicable law, the Bilfinger Code of Conduct, internal Group policies, the Bilfinger Statement of Principles on Human Rights or human rights and environmental risks as well as violations of human rights-related or environmental due diligence obligations. Such reports may relate to the economic activities of Bilfinger in its own business area or the economic activities of a direct or indirect supplier.

The complaints procedure is provided by an external service provider and is individually adapted to Bilfinger's needs. It is accessible to potentially disadvantaged persons; the confidentiality of identity is maintained and it ensures effective protection against discrimination or punishment on the basis of a complaint.

Relevant information is documented and confirmed to the person providing the information. The persons entrusted by Bilfinger with conducting the process will, to whatever extent possible, discuss the facts of the case with the whistleblowers. The persons entrusted with conducting the proceedings shall act impartially. These persons act independently, are not bound by instructions and are obligated to maintain confidentiality. Information on how to access the complaints procedure is publicly available.

The effectiveness of the process is reviewed at least once a year and on an ad-hoc basis if Bilfinger anticipates a significant change or significant increase in the risk situation in its own business area or at direct suppliers.

The complaints procedure is not a blanket procedure, but an individual procedure with individual examinations. Depending on the objectively established facts, counter-measures and controls are introduced that are as effective and proportionate as possible. In the interest of proportionality, the specialist departments concerned, generally Procurement, HSEQ, Legal and/or Compliance, review on a case-by-case basis whether the issue can be remedied by existing corrective measures. If this is the case, suitable measures are implemented. The corrective measures are then identified in consultation with the supplier, taking data protection considerations into account.

The company's own employees are made aware of how to use the system through measures such as compliance training and various communication campaigns. Appropriate communication measures are implemented at our locations in cooperation with our customers to involve employees in the value chain.

It is not technically possible for Bilfinger or the external service provider to draw conclusions about the identity of the person providing the information, unless the person providing the information voluntarily waives their anonymity. The identity of the person providing the information is protected and only passed on internally if this is necessary and legally permissible. The whistleblower system is managed and administered by trained employees who are sworn to secrecy.

Reported information is investigated without exception; proven misconduct is sanctioned depending on the results of the investigation.

Stakeholders who are intended as target users of the whistleblower system are not included in the review of its effectiveness.

The rules of procedure for the whistleblower system are publicly available so that employees, workers in the value chain and other third parties can find out about the application, system and availability of the procedure. A relevant document can be downloaded from the Bilfinger website in English and German.

Any form of reprisal, discrimination or other retaliation against a person who has reported or is reporting a complaint in good faith is prohibited and will in turn result in an internal investigation and disciplinary or other appropriate action against the person taking retaliatory action.

S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

Of the impacts of Bilfinger's business activities identified in the materiality analysis, no negative impacts on workers in the value chain were classified as material.

Measures that are suitable for achieving positive effects are explained in Chapter [*MDR-T Tracking effectiveness of policies and actions through targets*](#).

Bilfinger has integrated the measures with which the company upholds its human rights-related due diligence obligations into its compliance management system, which has been an established part of the company for many years.

The compliance management system, which is aligned with the risk situation of the company, covers all areas of the business and pursues the objective of preventing compliance violations through preventive measures, recognizing early any type of misconduct and, in the case of confirmed violations, reacting quickly and consistently punishing misconduct. In its design and operationalization, Bilfinger is guided by the prevent-detect-respond model, which is recognized and proven in legal and Group practice and is explained in detail in the Bilfinger Group's Statement of Principles on Human Rights. The integration of risk management into the existing compliance management system is intended to ensure that Bilfinger has a complete overview of its own risk disposition. Corresponding measures are discussed at regular meetings of the Executive Board, Group Executive Management and the Compliance Review Board. Risk management is anchored in all relevant business processes through Executive Board resolutions and through appropriate measures.

Effectiveness reviews in the context of implemented compliance measures, in particular with regard to preventive and remedial measures, but also with regard to those that have a long-term positive impact on workers in the value chain so that desired goals are achieved, are carried out as part of recurring audits or internal assessments. One example of this is the compliance risk assessment, which provides for a defined control procedure for appropriateness and effectiveness reviews and, with regard to the likelihood and severity of the violation, maintains a level of control after a measure has been implemented. Measures defined in the compliance risk assessment are the consequences of a series of risk analyses and specifically defined for a concrete need, so that suitable implementation actions can be determined and taken with a view to achieving concrete results for the workforce in the value chain.

In addition, effectiveness checks as part of audits relating to the ISO 37301 certification of the Bilfinger compliance management system should be mentioned, which help to achieve desired results, especially in the market, so that a positive effect on employees in the value chain can arise if, for example, a customer commissions Bilfinger for a project on the basis of its compliance certification in addition to its expertise.

Among the impacts of Bilfinger's business activities identified in the materiality analysis, no actual or potential negative impacts on workers in the value chain were classified as material. Likewise, of the risks identified in the materiality analysis for Bilfinger, no risks in connection with workers in the value chain were classified as material.

In order to continue to take advantage of the opportunities relating to workers in the value chain that were classified as material in the materiality analysis, Bilfinger pursues the consistent application of the principles laid out in the Code of Conduct, the Supplier Code of Conduct and the Declaration of Principles on Respect for Human Rights. To this end, Bilfinger applies its Group-wide compliance management system described in detail above.

No serious human rights issues or incidents were reported in Bilfinger's upstream or downstream value chains during the reporting period.

Bilfinger uses financial and human resources to protect the company, its own employees and workers in the value chain from risks. At the same time, value added is to be created for groups affected by Bilfinger's business activities. Bilfinger Governance defines and regulates the appropriate use of these resources, for example through Group guidelines or standard operating procedures.

Metrics and targets

S2-5 – Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities

Our Declaration of Principles on Respect for Human Rights, together with our Code of Conduct for all employees and suppliers lay out the relevant requirements that we set in our value chain. This applies in particular to the human rights-related principles that apply at Bilfinger, including in particular safe workplaces that meet international labor standards, fair working conditions, anti-discrimination and the guarantee of the right of association and collective bargaining. No negative impacts were identified in the materiality analysis.

The goal is to subject as many direct suppliers as possible to a review. The number of 1,599 supplier audits carried out in 2024 will be increased by at least 10 percent in 2025. A more extensive target-based management of material risks and opportunities in connection with workers in the value chain is not currently established.

The target for managing the material impacts, risks and opportunities related to workers in the value chain is explained in Chapter *MDR-T Tracking effectiveness of policies and actions*.

Our knowledge from these perspectives results primarily from a continuous dialog with our suppliers in day-to-day business. In addition, in the specific case of workers in the value chain, the applicable requirements of the relevant legal and regulatory provisions are naturally taken as a basis. Further information on this can be found in Chapter *SBM-2 Interests and views of stakeholders*.

The tracking of Bilfinger's performance with regard to the achievement of targets relating to workers in the value chain is carried out in particular within the framework of Bilfinger's compliance management system.

We can identify findings or opportunities for improvement arising from Bilfinger's performance through dialog with our suppliers and, in particular, through findings that we gain within the scope of our compliance management system.

B.5.4 Governance information

Business conduct

Governance

GOV-1 – The role of the administrative, management and supervisory bodies

The role of the administrative, management and supervisory bodies with regard to the key sustainability matters for Bilfinger – and thus also the matter of governance – is explained in detail in Chapter [GOV-1 Role of the administrative, management and supervisory bodies.](#)

It also describes the expertise of the members of the administrative, management and supervisory bodies with regard to aspects of corporate policy. In addition to the Executive Board and the General Executive Management, the main committees responsible for this in the administration are the Compliance Review Board, the Independent Allegation Management Committee and the Disciplinary Committee, whose function and composition are described in Chapter [GOV-1 The role of the administrative, management and supervisory bodies.](#)

Impact, risk and opportunity management

IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities

The process for identifying material impacts, risks and opportunities for all sustainability matters – and therefore also in connection with corporate policy – is explained in Chapter [IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities.](#)

The relevant criteria used in the processes are also presented there. The result of the materiality analysis for the sustainability matter of corporate governance, including the subtopics, sub-subtopics and disclosure requirements assessed as material, is described in Chapter [IRO-2 Disclosure requirements in ESRS covered by the undertaking's non-financial Group declaration.](#)

G1-1 – Business conduct policies and corporate culture

Integrity and good corporate governance play a key role in our company's business activities. We seek to implement responsible corporate governance, integrity in our day-to-day business, transparency in our business processes, avoiding conflicts of interest and a strict rejection of unlawful activities.

As part of their duty of care, Bilfinger's management, administrative and supervisory bodies attach great importance to promoting this kind of corporate culture. Further explanations can be found in the Chapters [GOV-4 Statement on due diligence](#) and [MDR-P Concepts for dealing with material sustainability matters.](#) To this end, we have set targets that are described in Chapter [MDR-T Tracking effectiveness of policies and actions through targets.](#)

The Executive Board of Bilfinger is responsible for the Group-wide distribution of the Code of Conduct. The company also aligns its corporate culture with the recommendations of the German Corporate Governance Code. The Executive Board ensures that managers are in a position to provide their employees with qualified information and guidance. All employees are obligated to ensure that the provisions of this Code of Conduct are implemented worldwide. Employees confirm that they have received and read the Code of Conduct. The provisions contained in the Code of Conduct are also the subject of regular employee appraisals.

Bilfinger does not tolerate any violations of the Group-wide Code of Conduct and the associated guidelines and processes. Violations have serious consequences and result in disciplinary action, up to and including termination of employment and, if necessary, reporting to the relevant authorities. The mechanisms for identifying, reporting and investigating concerns about unlawful conduct are explained in Chapter [G1-3 Prevention and detection of corruption and bribery.](#)

The views of internal and/or external stakeholders are taken into account in the reporting. They are described in the Chapters [IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities](#) and [SBM-2 Interests and views of stakeholders.](#)

In accordance with the requirements of the respective national regulations and the German Whistleblower Protection Act, Bilfinger fosters an environment and a culture in which violations

and concerns can be raised directly by anyone inside or outside the company. The information can be submitted confidentially and, as far as legally permissible, anonymously. Persons who provide information to the best of their knowledge and belief and in accordance with the principles established in the Code of Conduct do not have to fear reprisals or discrimination.

The company has set up a corresponding whistleblower system for reporting compliance violations, which allows for reports both in writing and over the phone. Even in the case of written anonymous reports, contact can be made through a mailbox procedure, provided that the reporting party makes this possible by setting up the mailbox. Dealing with the whistleblower system is part of ongoing compliance training, which is also explained in this section. The whistleblower system is operated by an independent, specialist service provider. It is responsible for training the specialists who work there.

As far as the protection of whistleblowers is concerned, Bilfinger is subject to the requirements of national law with regard to the implementation of Directive (EU) 2019/1937. With the Group Policy on Code of Conduct Violations and Investigations, the company has established a set of rules that regulate the standard for handling reports of compliance violations and the investigation process. The investigations are carried out promptly and objectively by independent specialist units, and necessary decisions are made in accordance with the legal requirements of the Directive (EU) 2019/1937 and the German Whistleblower Protection Act. This is within the framework of the investigation procedures for serious breaches in multidisciplinary committees that are independent of the management levels involved.

Given Bilfinger's business model and activities, the sustainability matter of animal welfare was not classified as material in the materiality analysis.

Regular training on the content of the Code of Conduct takes place within the framework of employee development. In addition to the general compliance training courses held every two years for employees whose position is associated with a higher risk profile (highly exposed functions), employees are trained annually on individual topics of the Code of Conduct through online training courses. In addition to the content component, all training courses also include a commitment to promoting a corporate culture based on ethical behavior. Compliance is also a regular topic in the leadership programs. The training concept is presented in Chapter [G1-3 Prevention and detection of corruption and bribery](#).

The group of highly exposed functions primarily includes employees with management tasks (for example, managing directors), as well as sales and purchasing employees. A more detailed explanation of this is presented in Chapter [G1-3 Prevention and detection of corruption and bribery](#).

G1-2 – Management of relationships with suppliers

For Bilfinger as an industrial services provider to the process industry, the company's workforce is critical to its success. Because a large share of business is dependent on purchased services, this is of key importance.

The measures established at Bilfinger to prevent late payment to the Group's suppliers, including small and mid-sized enterprises (SMEs), are explained in Chapter [G1-6 – Payment practices](#).

The objectives and measures relating to supplier relationships are explained in detail in the Chapter [MDR-A Actions and resources in relation to material sustainability matters](#). There you will find a detailed description of the underlying policies as relates to their implementation in the value chain. They relate in particular to the following aspects:

- Selection process and onboarding of new suppliers
- Continuous risk analysis of the supplier pool

- Drafting supplier contracts
- Review of compliance with agreed standards and any consequences

The Bilfinger Code of Conduct for Suppliers, which all of the Group's suppliers must adhere to, contains defined social and ecological criteria. This also applies to Bilfinger's Statement of Principles on Human Rights.

G1-3 – Prevention and detection of corruption and bribery

Bilfinger is committed to the fight against corruption and bribery. Corrupt behavior is contrary to our values. We are also convinced that corruption undermines business relationships, distorts competition and exposes companies and individuals to unnecessary risks.

Responsibility for the anti-corruption and anti-bribery framework lies with Group headquarters.

Bilfinger's compliance management system covers all areas of the business and pursues the objective of preventing compliance violations through preventive measures, recognizing early any type of misconduct and, in the case of confirmed violations, reacting quickly and consistently punishing misconduct. An independent auditor reviews the conformity of the Bilfinger compliance management system with the DIN ISO 37301/2021 standard for key Bilfinger locations, including Group headquarters.

The Bilfinger compliance management system is initially laid out in the Code of Conduct, which is binding for all those employed at Bilfinger worldwide. Bribery and corruption are prohibited for all employees. They may not hold out the prospect of or grant to our customers, suppliers or other business partners money or anything of value, either directly or indirectly, to influence their decisions or to gain any improper advantage. This principle also applies in reverse: No one acting for or on behalf of Bilfinger can allow him- or herself to be corrupted or bribed through the acceptance of unfair economic advantages from business partners. Small payments to secure or accelerate routine official acts ("acceleration payments") are also prohibited for employees of the Bilfinger Group.

In our Code of Conduct, we also lay out principles in connection with donations, sponsoring activities, gifts, hospitality and entertainment events as well as dealings with public officials.

The Chief Compliance Officer of the Bilfinger Group reports through the General Counsel to the Chairman of the Executive Board and has an additional reporting line to the Supervisory Board and its Audit Committee. Managers have a special role to play in the implementation of the Code of Conduct and the compliance management system. They must live up to their functions as role models. The annual performance evaluation of managers therefore includes an individual integrity assessment that then forms part of the annual dialog on career development. In addition, the variable remuneration for managers includes an individual integrity and safety element. This factor is determined annually and takes into account the fulfilment of requirements and the operationalization of a culture of integrity and safety by the manager or by the organization for which the manager is responsible.

To manage and monitor the design and implementation of our compliance management system, the Executive Board has established a Compliance Review Board, whose tasks and composition are described in Chapter *GOV-1 The role of the administrative, management and supervisory bodies*.

Our subsidiaries are managed by Regional Compliance Directors at segment and regional level. In addition, each segment and regional management, each executive management and each departmental management assume responsibility for the effectiveness of the compliance management system, including the internal control system (ICS).

The international network of Compliance Representatives ensures that employees in the Group's business units have an additional local compliance contact person. The Compliance Representatives are specially trained experts who, in addition to their primary functions in the company, support their colleagues with compliance and integrity questions and thus strengthen the presence and visibility of the topic of compliance at their locations. The Compliance Representatives maintain a regular exchange of information with compliance managers and compliance officers and contribute experience and challenges of the individual locations to the further development of the respective compliance program.

To prevent future misconduct, we rely on measures such as practical advice from the Chief Compliance Officer, Compliance Directors and compliance managers as well as the Compliance Help Desk, guidelines, supporting IT tools, training and communication measures.

Our compliance training modules include on-site training and e-learning programs in which knowledge is conveyed and case studies are discussed. The total number of people in the target group of the individual trainings sometimes varies greatly from year to year as a result of a multi-year training concept.

NUMBER OF PERSONS TRAINED IN COMPLIANCE-RELATED QUESTIONS ¹	Total number of persons in target group		Number of trained persons (absolute)		Share of trained employees (relative)	
	2024	2023	2024	2023	2024	2023
E-learning 2023 - Module 1 - Code of Conduct ¹	307	11,781	257	11,415	84%	97%
E-learning 2023 - Module 2 - Anti-corruption & bribery	382	9,081	321	8,707	84%	96%
E-learning 2023 - Module 3 - Anti-corruption & bribery (brief)	–	–	–	–	–	–
E-learning 2023 - Module 1 - Code of Conduct (brief)	–	–	–	–	–	–
Compliance e-learning 2024 (Basic training)	2,311		1,862		81%	
Compliance refresher e-learning 2024	9,834		9,260		94%	
On-site training - General Compliance Training ²	424	2,904	384	2,784	91%	96%

¹ The e-learning courses are mandatory for employees with a PC workstation and access to the Bilfinger network.

Four training modules were rolled out in 2023 (modules 3 and 4 as refresher trainings). Anyone with module 1 and/or 2 on the curriculum in 2023 who did not complete it was assigned it again in 2024.

In 2024, there was a change from the four modules to just one e-learning course per year – Compliance e-learning 2024 (basic training) for new employees and Compliance refresher e-Learning 2024 for employees who completed the four modules on the curriculum in 2024. The basic training and refresher e-learning were redesigned in 2024 and rolled-out in mid-October. Any e-learning courses that have not been completed will be added directly to the learning plan again in 2025.

² Participation in general compliance training is mandatory for so-called 'exposed functions', i.e. employees with an increased risk exposure from a compliance perspective.

Supervisory Board and Executive Board members receive special training due to their prominent position.

All Bilfinger employees also have access to a central Compliance Help Desk that offers support in all compliance-related questions. The Compliance Help Desk is an established point of contact within the Group for initial information on how to proceed in the event of any compliance-related issues.

In order to deliver our services to the market, we depend on cooperation with numerous business partners. Because the compliant behavior of our business partners is an indispensable prerequisite for us, we use a risk-based, IT-supported process to review our potential business partners before entering into a business relationship (so-called *third-party due diligence*). When carrying out such integrity audits, Bilfinger business units are supported by the Compliance department in the risk evaluation. We also require our suppliers to adhere to relevant compliance rules by

means of a Supplier Code of Conduct (vendor declaration). Contractual obligations to comply with anti-corruption regulations are also applied.

In addition to prevention, the rapid identification of any misconduct and an appropriate response to such misconduct are essential components of our compliance management system. There has been a whistleblower system in place to manage the receipt, documentation and processing of suspicious cases in connection with possible violations of our Code of Conduct. It is available to our employees as well as to outside individuals and entities. The contact details are available on the Bilfinger Group website as well as on the Group intranet and other means of communication adapted to local conditions (for example, posters). Indications of any misconduct can be given on a confidential basis with this system – anonymously if desired.

A department at Group headquarters specializing in internal investigations deals with all notifications related to suspicious cases from internal and external sources and, in cooperation with the compliance organization, conducts a preliminary review of the notifications received. The Investigations department reports to the Head of Internal Audit, while the Compliance organization involved in the investigations reports to the Head of Legal and Compliance through the Chief Compliance Officer. This ensures the independence of the investigations. If the suspicions of a violation are confirmed, an internal investigation is initiated. Particularly serious allegations are forwarded to the *Independent Allegation Management Committee* for assessment and for a decision on further action. The composition and duties of this body, which is appointed by the Executive Board, are described in Chapter [GOV-1 The role of the administrative, management and supervisory bodies](#).

The results of the investigations and corresponding follow-up measures are reported to the Executive Board and the Audit Committee of the Supervisory Board on a regular, at least quarterly, basis.

Depending on the target group, the concepts and behavioral requirements are communicated to business partners either through policies published in regular governance updates within the company or through contractual provisions. This also ensures that employees and business partners are committed to these rules in an appropriate form.

Training programs are designed to ensure that they include awareness training as well as training on key anti-corruption content. This means that employees are given the ability to recognize critical issues and dilemmas in their respective areas of responsibility and to act responsibly and with integrity as a result. Participation in these training courses is mandatory and will be checked.

In addition to e-learning for employees with PC workstations, which also includes all employees with high-risk functions, all employees in this risk group receive additional classroom training, either in person or online. This is offered every two years. The percentage of high-risk functions covered by training programs is shown in the table above the number of persons trained in compliance issues.

Training courses on current compliance issues are held annually for members of the Executive Board and Supervisory Board. In addition, members of the Executive Board and members of the Supervisory Board, insofar as they are employees, take part in the company's compliance e-learning program.

Metrics and targets

G1-4 – Incidents of corruption or bribery

In the reporting period, there were no convictions or fines for violations related to corruption and bribery regulations at Bilfinger. As a result, no measures were required in the reporting period to address breaches in procedures and standards of anti-corruption and anti-bribery.

G1-6 – Payment practices

Bilfinger pays its suppliers in accordance with the agreed payment terms. No distinction is made between larger suppliers and small and medium-sized suppliers. This means that small and medium-sized suppliers cannot be systematically or deliberately discriminated against because of their size.

For this reason, we have concluded that separate reporting on Bilfinger's payment practices toward small and medium-sized companies, including a disclosure of corresponding metrics, is neither material nor necessary to meet the required disclosure obligation. It is therefore excluded in accordance with ESRS 1, 3.2, 34.b.

In financial year 2024, it took Bilfinger an average of 40.8 days* to pay an invoice from the date when the contractual or statutory term of payment started. This period applies to all suppliers regardless of their size.

Based on the data in the enterprise resource planning (ERP) system, which has been introduced in the majority of Group companies, key figures that can be used to check compliance with the targeted payment practices for all suppliers are regularly collected. They provide information on potentially unjustified deviations from payment amounts and payment deadlines.

The standard terms of payment are generally uniform throughout the Group, provided that they do not violate country-specific legal provisions or deviating provisions have been agreed by mutual consent in individual cases. No distinction is made between supplier categories.

We generally seek to pay supplier invoices after 30 days with a 3 percent discount or after 45 days with a 2 percent discount or after 60 days net from the date of receipt. Deviating agreements can be made in justified individual cases.

These standard payment terms with a payment target of 30 days were used for 35.2 percent of all payments made in the reporting year, 63.9 percent for 45 days and 79.7 percent for 60 days.

No court proceedings for late payment were pending as of the reporting date.

* Collection of data in ERP system with Group-wide coverage of approximately 80 percent.

B.5.5 Index

Reporting on the sustainability matters required under Sections 315d and 289c HGB

Reporting on the sustainability matters required by Sections 315d and 289c HGB is provided in the following sections of this non-financial Group declaration. The policies, measures and targets presented relate to both Bilfinger SE and the Bilfinger Group.

Environmental matters

ESRS E1 Climate change (complete)

Disclosures in accordance with Article 8 of Regulation 2020/852 (Taxonomy Regulation) (complete)

Company-specific disclosure: Industrial services to enhance efficiency and sustainability (complete)

Employee matters

ESRS S1 Own workforce (complete)

ESRS S2 Workers in the value chain (complete)

Social matters

ESRS S1 Own workforce, there:

SBM-2 – Interests and views of stakeholders

S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns

ESRS S2 Workers in the value chain, there:

SBM-2 – Interests and views of stakeholders

SBM-3 – Impacts, risks and opportunities and their interaction with strategy and business model

S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns

Respect for human rights

ESRS S1 Own workforce, there:

SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model

S1-1 – Policies related to own workforce

S1-2 – Processes for engaging with own workforce and workers' representatives about impacts

S1-3 – Processes to remediate negative impacts and channels for own workforce to raise concerns

S1-17 – Incidents, complaints and severe human rights impacts

ESRS S2 Workers in the value chain, there:

SBM-2 – Interests and views of stakeholders

S2-1 – Policies related to value chain workers

S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns

S2-4 – Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions

S2-5 – Targets related to managing material impacts, advancing positive impacts, as well as to risks and opportunities

Combating corruption and bribery

ESRS G-1 Corporate governance, there:

G1-3 Prevention and detection of corruption and bribery

G1-4 Confirmed incidents of corruption or bribery