



MODERN SLAVERY STATEMENT

CALENDAR YEAR 2025

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Introduction

Webuild is committed to promoting respect and effective recognition of the human rights enshrined in the International Charter of Human Rights, the fundamental conventions of the International Labour Organisation, the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

Mindful of its leadership role in the value chain, Webuild actively encourages respect for human rights — including among external partners — through dedicated initiatives and measures, aimed at reducing risks of violation in its operations and supply chains.

Reporting entities

This document constitutes Webuild’s Joint Modern Slavery Statement and covers the calendar year ending 31 December 2025 (reporting period). This statement complies with the reporting criteria of the Australian Modern Slavery Act 2018 (Cth.) (hereinafter also “Australian Modern Slavery Act”), and Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (hereinafter also “Canadian Modern Slavery Act”), requiring certain reporting entities to publish information describing their actions to assess and address modern slavery risks.¹

This statement refers to the Webuild Group and it is a joint statement covering the following reporting entities pursuant to:

- *the Australian Modern Slavery Act:*
 - ✓ Webuild S.p.A.
 - ✓ Spark NEL DC Joint Venture
 - ✓ Clough Projects Australia Pty Ltd.
 - ✓ Clough Projects Pty Ltd.
 - ✓ Salini Australia Pty Ltd.
 - ✓ SC Hydro Pty Ltd.
 - ✓ SLC Snowy Hydro Joint Venture
 - ✓ Saipem Clough Joint Venture (SCJV)
 - ✓ Clough - BMD Joint Venture (CBJV)
 - ✓ Integrate Joint Venture
 - ✓ WGB J.V.

- *the Canadian Modern Slavery Act:*
 - ✓ Webuild S.p.A.
 - ✓ Mobilinx Hurontario Contractor JV
 - ✓ Webuild Civil Works Inc.
 - ✓ Connect 6iX Contractor Joint Venture
 - ✓ Pape North Connect J.V. - Webuild Civil Works – Fomento
 - ✓ Astaldi Canada Design and Construction

¹ The contents of this Statement are also pursuant to the recommended reporting criteria of the UK Modern Slavery Act 2015, although neither Webuild S.p.A. or any of its subsidiaries are required to comply with it, so far.

Our operations and structure

Webuild is a major global operator specialised in building large complex infrastructure for the sustainable mobility, hydropower, water, and green buildings sectors.

Leader

in the international water sector

Top 10

international companies for sustainable mobility projects

Top 10

companies in Europe

Top 3

international companies in Australia

Webuild's international competitiveness is the result of a century-long journey, which has seen it bring together some of the leading construction companies on the global stage, such as Impregilo, Astaldi, Lane (United States), Clough (Australia), Cossi Costruzioni and Seli Overseas, into a single organisation.

The Group's current size places it among the largest construction players globally, the result of a strategy rolled out in 2012 and continued to date thanks to its people's expertise and contributions.

This growth has been a strategic game-changer, enabling Webuild to increase investments in innovation and health and safety, reinforce processes and procedures, manage increasingly complex supply chains and introduce different types of resources and skills.

OUR INTERNATIONAL LOCATIONS

With 120 years of engineering experience gained on five continents, drawing on the skills of around 95,000 people of more than 125 nationalities, Webuild operates in roughly 50 countries, developing excellent operational supply chains with our approximate 17,500 partners.

No. 1

operator in Italy

c. 50

countries
Global presence

> 85

offices around the world

c. 150

key projects underway around the globe



Geographical breakdown of revenue



The workforce is essential to Webuild’s operations which involve a high number of workers, all of whom are committed to ensuring the effectiveness and quality of the complex projects and infrastructure that the Group is commissioned to build.

Workforce 2025 by region	Direct personnel
Africa	8,910
Europe	10,549
Americas	5,226
Asia and Oceania	15,992
Total	40,667

With respect to direct personnel, the blue collars were 65.9%, the white collars 32.8% and the managers 1.2%. Moreover, the permanent employment contracts accounted for 81.8%.

The creation of jobs by the Group in the countries where it operates is important as it enables local personnel to improve their skills and expertise and to generate additional wealth for the economy. On average, 80% of direct employees were hired locally.

OUR CONTRIBUTION TO A SUSTAINABLE WORLD

Webuild assists its customers to work towards the Sustainable Development Goals (SDGs), combat climate change, engage in the energy transition, manage and safeguard water resources and develop infrastructure for security and defence purposes.

>95%

Order backlog of projects linked to achievement of the SDGs



We operate in four key areas - sustainable mobility, hydro-energy, water and green buildings sectors – with a direct impact on 11 of the 17 SDGs defined by the United Nations.

Strategy, business model and value chain

Webuild has adopted a long-term sustainability strategy embedded in its business model and strategic decision-making processes. This strategy has a two-pronged approach:

- contribute to tackling the main global challenges linked to climate change, resources management and social-economic development;
- act responsibly in all areas of its operations.

Accordingly, Webuild undertakes to not only define ESG targets but to also embed them in all its operating activities and projects, strengthening its ability to respond to the main global megatrends and in step with developments in its sector, such as the growing focus on digitalisation, sustainable materials, electric equipment, autonomous solutions and climate-resilient designs.

Webuild’s sustainability strategy is formalised in its 5P Sustainability Manifesto which identifies five strategic priorities, People, Planet, Partnership, Progress and Prosperity, and is closely tied to the Group’s Vision, Mission and Purpose. The Manifesto reflects Webuild’s real commitment to working towards achievement of the United Nations’ Sustainable Development Goals (SDGs) that are pertinent to it.

VISION

We envision, design and build a new world, bringing the present closer to the future, to improve peoples’ lives today and tomorrow.

MISSION

We make sustainable development a reality in the areas in which we operate, applying the most innovative solutions to build major infrastructures.

PURPOSE

Webuild: partner for a sustainable future



Webuild periodically draws up an ESG Plan, using the results of the materiality assessment and considering its strategic plan, to translate its commitments into firm and measurable targets.






The Group intends to use the ESG Plan to accelerate its climate transition by developing innovative solutions to improve the environmental sustainability of projects and activities, consolidate its role as a sector leader in terms of health and safety, skills development, diversity and inclusion, and contribute to improving the sector’s efficiency, leveraging innovation and digitalisation.


To this end, the 2024-2025 ESG Plan builds on the results achieved with the previous 2021-2023 ESG Plan with even more ambitious goals in order to respond to stakeholders' expectations and the main global challenges.

In line with this vision, Webuild's ESG priorities include combatting climate change and promotion of the circular economy (environment), the protection and enhancement of its people (social), and innovation as a strategic driver for sustainability and the improvement of business efficiency, ensuring high standards of governance, integrity, transparency and stakeholder engagement (governance).


The ESG Plan's three strategic pillars (Green, Safety & Inclusion, Innovation - the sustainability "work sites"), for which the Group has defined programmes and targets to be pursued over the plan period, are based on these priority areas.

The targets set out in the 2024-2025 ESG Plan and the results which confirm full achievement of all the Group's objectives are presented below. They show how the Group makes a substantial contribution to the UN's main SDGs and seizes the opportunities offered by global megatrends and the transition to a low-carbon economy, thanks to its core business strongly oriented towards the creation of sustainable infrastructures. The results for 2025 represent the final outcomes of the 2024-2025 ESG Plan.

	SUSTAINABILITY "WORK SITES"	TARGETS	2025 RESULTS
Sustainability of Sites 	Green builders 	GHG emissions intensity (scope 1&2)⁽¹⁾ (2025 vs 2022)	-10 % -34 %
	Safe and inclusive builders 	Lost time injury frequency rate⁽²⁾ (2025 vs 2022) Women managers in the Group (2025 vs 2023)	-6 % -20 % +20 % +27 %
Sustainability of Works 	Innovative and smart builders 	Investments in innovative and clean-tech projects (2024 - 2025)	€430 m €586 m



Engineering solutions that guarantee sustainability during execution of the project



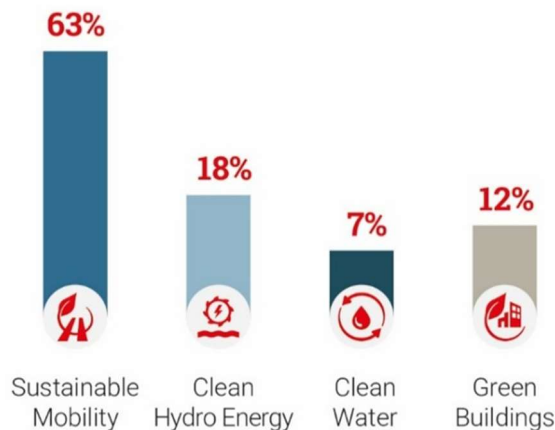
Adoption of solutions that guarantee sustainability throughout the project life cycle

Note: 1) tCO₂ scope 1-2/€m revenue Scope 1: direct emissions Scope 2: indirect emissions Scope 3: indirect emissions associated with activities upstream or downstream of the Group's operations; 2) Lost time injury frequency rate: sick leave (days) x 1 million hours worked

The Group's commitment is reflected in its business areas:

- Sustainable Mobility: rail and metro projects contribute to reducing the carbon footprint in the transport sector, while roads, bridges and tunnels (designed in line with resilience criteria) improve the infrastructure's ability to adapt to climate-related effects.
- Clean Hydro-Energy: hydroelectric plants built by the Group contribute to increasing the generation of clean energy which significantly benefits the environment;
- Clean Water: water treatment plants and infrastructure facilitate better management and quality of water resources;
- Green Buildings: the sustainable buildings built by the Group reduce the sector's carbon footprint and strengthen its resilience to climate impacts.

Breakdown of revenue by business area



In performing its contracts in these business areas, Webuild undertakes to:

- develop and build construction projects that minimise their environmental impact, using sustainable materials, reducing the consumption of natural resources and improving the energy efficiency of buildings and infrastructure;
- integrate innovative solutions that strengthen climate resilience, such as technologies to reduce CO₂ emissions and manage water resources sustainably and efficiently;
- reach and maintain high standards in terms of environmental certification for projects such as LEED, which attests to the sustainability of buildings, and ENVISION or IS certification which guarantee the sustainability of infrastructure.

Business model and contribution to global challenges

Webuild's business model is designed to assist its customers to build complex infrastructure able to efficiently address the current megatrends and challenges posed by the wider social-economic context, through three strategic pillars:

- expertise and innovation
- centralised governance
- sustainability

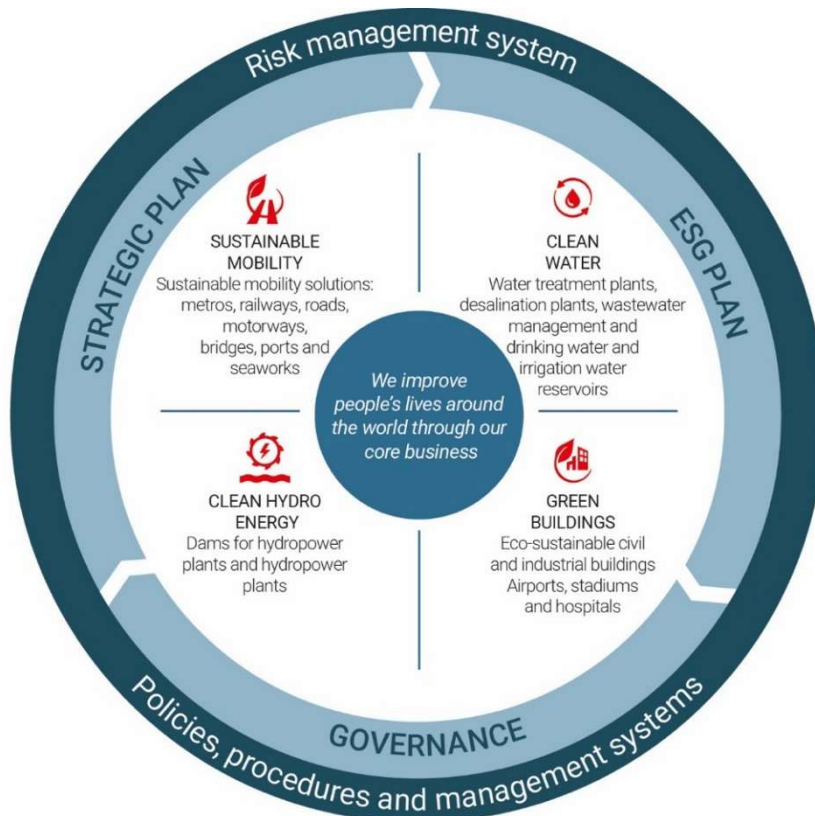
This model is based on the best possible use of all material and immaterial resources (inputs) available to the Group to build complex works (outputs), allowing it to contribute to sustainable development. This approach facilitates the generation of economic value for shareholders, investors, customers and partners, environmental value for the areas in which it works and social value for people and communities (outputs).

The following figure presents Webuild's business model, showing the main inputs leveraged by the Group to grow its business and the main outputs and results in the form of short- and medium to long-term benefits for stakeholders, the environment and the wider community.

INPUT

Material and immaterial resources necessary to carry out our business

Financial resources	Human capital	Stakeholder engagement	Natural resources	Innovation and clean tech
Financial resources to make the investments necessary to build infrastructure and, where applicable, operate/maintain it	Capacity, expertise and experience of the Group's people necessary to reach its strategic objectives	The Group's network of relationships with key stakeholders, its license to operate and support to local communities	Environmental processes and resources that provide goods and services enabling Webuild to carry out its activities	Innovative solutions and technologies that contribute to the Group's competitive edge
Sustainability linked bonds of €400 million	~ 40,700 own workers	~ 50 countries with projects underway ~ 17,500 supply chain partners	~ 1.7 m MWh energy consumed ~ 31 m tonnes of materials used	€333 m investments in innovative and clean tech projects in 2024



OUTPUTS

Effects on stakeholders, the environment and the local communities

Financial resources	Human capital	Stakeholder engagement	Natural resources	Innovation and clean tech
Contribution to sustainable development by building infrastructure that can address global challenges	Development of specific know-how, enhancement of people and dissemination of a culture of health and safety as an essential value for business	Strengthening of the value chain and contribution to local communities, thanks to the involvement of local suppliers and the dissemination of specific technical knowledge and ESG principles	Reduction of direct and indirect GHG emissions through the targets established in Webuild's Climate Strategy and optimised use of natural resources	Adoption of solutions that ensure better construction quality and social-environmental performance
44.6% Taxonomy-aligned turnover, 52.1% Taxonomy-aligned CapEx and 50.1% of Taxonomy-aligned OpEx	~1.3 m training hours provided to own workers and value chain workers 23% workers under 30 -20% LTIFR to 2025 (vs 2022)	80% workers hired locally 92% local procurement	2030 target -47% Scope 1&2 to 2030 (vs 2019) -15% Scope 3 by 2030 (vs 2019)	€586 m investments in innovative projects and clean tech in the 2024-2025 two-year period

Specialist technical expertise and the experience of Webuild's people are essential for its business model, as are its partnerships and relations with stakeholders that ensure synergies during the development of projects and achievement of shared development objectives. The model also links the use of natural resources to advanced construction techniques to improve the infrastructure's sustainability during its construction and over the project's entire life cycle. Innovation is key to this process as it facilitates the pursuit of competitive design solutions to the technical and engineering and challenges that arise right from the tendering stage, drives improvements in the infrastructure's environmental efficiency, and generates value for the workers and areas in which Webuild works.

The global scale and diversification of the Group's operations are other distinctive characteristics, which contribute to its resilience. Thanks to a deep long-term order backlog and a unique track record of large works built in more than 100 countries, the Group is able to manage large-scale projects in different environments. These factors pave the way for opportunities, allowing Webuild to both develop infrastructure that can meet the specific requirements of a certain area and create tangible benefits for the local stakeholders and also build up its internal expertise and foster synergies with qualified partners, ensuring a constant exchange of ideas, innovative solutions and cutting-edge construction techniques.

The business model is supported by:

- the corporate governance system, anchored in principles of ethics and integrity;
- the group strategy set out in its 2023-2025 strategic plan and ESG Plan, essential to pragmatically plan how to evolve the business and ensure continuity;
- the risk management system designed to facilitate knowledgeable decisions by assessing and analysing risks and opportunities;
- the regulatory and internal management system, comprising operating policies and procedures that ensure the Group acts in line with its internal principles and guidelines.

The Group's sustainability objectives also reflect the ESG requirements and commitments of its customers that are mostly public sector bodies, government institutions and private sector customers. Examples are the projects funded by the Italian National Recovery and Resilience Plan or the Multilateral Development Banks.

Webuild pursues a global approach to sustainability tailored to its local communities. It operates in many regions around the world and always commits to obeying local regulations and promoting initiatives that meet the specific environmental and social challenges of each context. This can include the use of local suppliers to reduce the environmental impact, preferring local workers to whom it guarantees responsible working practices thus creating development opportunities that last long after the construction of the individual project. In addition, the Group is committed to ongoing engagement with the local communities within the scope of its operations and influence.

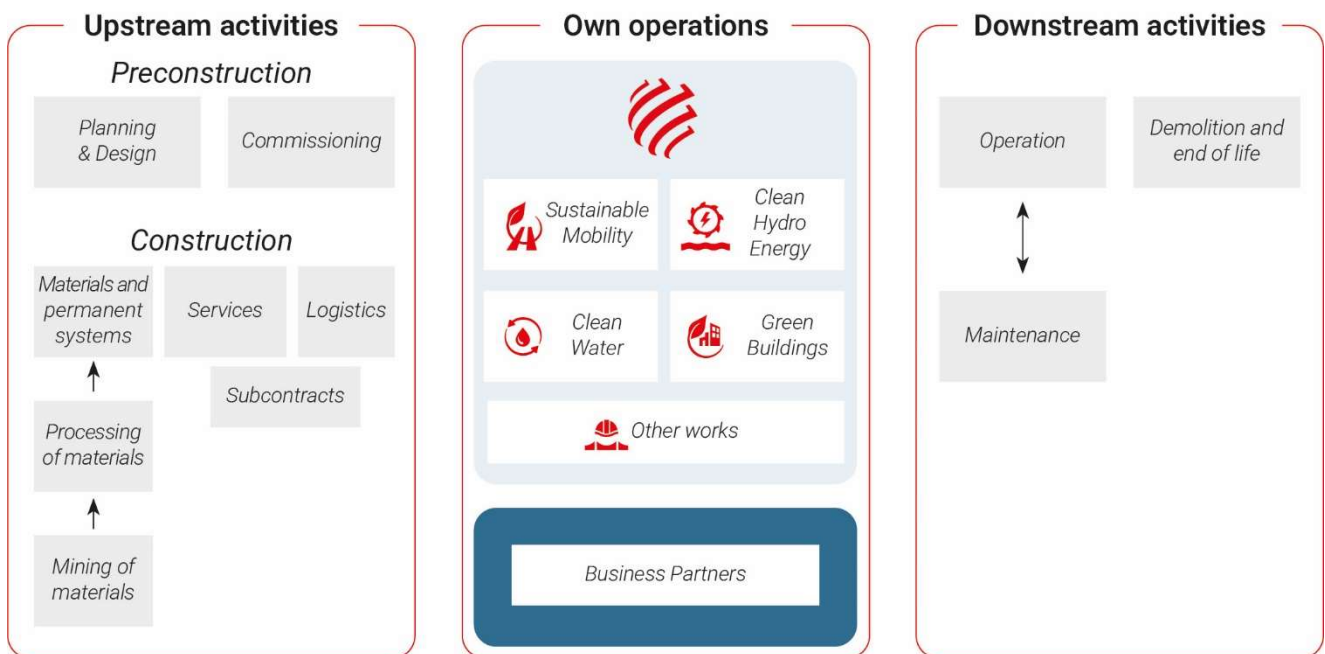
It also liaises with non-government organisations (NGO), international and local institutions to ensure that all the most important issues are heard and dealt with transparently and harmoniously. Webuild pursues ongoing improvement in its ESG performance (confirmed by the independent ratings received) by adopting business practices designed for sustainable development.

Value chain

With a view to continuous and widespread improvement, Webuild scrupulously monitors its value chain which is highly regulated and comprises a multitude of actors that participate in the planning, assessment, approval, development, construction and operation of infrastructure, depending on their roles and responsibilities assigned under the applicable regulations. Webuild's value chain is complex and includes both public and private sector operators, each of which play a part in the project's evolution.

The following figure is a simplified presentation of the value chain, showing the main phases of an infrastructure project's life cycle, comprising:

- planning, design and commissioning performed before a contract is awarded, and production of the goods and services procured by the Group - upstream,
- operation, maintenance and demolition of the works built by Webuild - downstream.



Planning a project involves a number of activities that include identifying the project locations, feasibility studies and completing social and environmental procedures. They include an assessment of potential impacts, consultations with affected parties and the identification of mitigation and compensation measures. During this phase, the public authorities (usually ministries, state environmental protection agencies and local bodies of the area where the project is to take place) assess the adequacy of the social and environmental impact assessments, the consultation programmes and mitigation plans prepared by the project proponent, which can sometimes require compliance with specific measures to be adhered to by the project proponent during the project. Once the competent authorities have issued the appropriate permits and authorisations, contractors such as Webuild enter the process by participating in calls for tenders made by the public and private sector customers. These contracts may cover specific project activities (e.g., just construction), the entire Engineering, Procurement and Construction (EPC) cycle and also the subsequent Operation & Maintenance (O&M) activities.

Therefore, the contractor does not take part in any activities prior to the assigning of the contract or the assessment processes, including the analyses of the project's social and environmental impacts and stakeholder consultations. Any long-lasting effects of the project, such as the loss of biodiversity or expropriation of land, are the sole responsibility of the project proponent. The contractor is obliged to comply with the applicable regulations, the contract and any provisions imposed by the competent authorities. The impacts attributable to the contractor arise solely from the

contract activities and are mainly of a temporary nature (e.g., disruptions caused by the work sites, occupational health and safety).

Despite this clear distinction, as part of its operations and responsibilities, Webuild considers the entire life cycle of the infrastructure as far as possible to promote its sustainability, generate value for the local area and provide a service to the community, contributing to the circular economy and decarbonisation. It requires its business partners and designers to take the same approach.

In addition to the planning and design phase, Webuild's upstream value chain includes all the suppliers of goods, services and materials necessary for construction activities. Some of the main actors include:

- suppliers of raw materials to produce materials and other goods for construction;
- suppliers of materials such as cement, steel, aluminium, concrete and other construction materials;
- suppliers of technologies and equipment, like construction machinery and heavy equipment (diggers, cranes and concrete mixers) and advanced technologies such as software to design and manage projects;
- subcontractors and suppliers of specialist services such as logistics, installation of sundry systems, security systems, civil engineering works and geotechnical activities;
- financial partners like banks and financial institutions that provide the capital to finance large infrastructure projects, which are often of a long-term nature and are capital-intensive.

Once the construction phase has been completed and the infrastructure has been commissioned, the operation and maintenance phase begins. The final phase is when the infrastructure reaches the end of its life. These phases are usually the responsibility of other operators (i.e., not the contractor that is involved in the construction phase) but can in some limited cases involve the Group, especially when the construction activities are part of a longer term project which includes the operators of the commissioned infrastructure. This is however a very small part of the Group's business model.

Policies adopted to manage material sustainability matters

To effectively implement its vision, mission and values (such as integrity, transparency and probity), Webuild has adopted an organisational and management model based on a system of principles (Code of Ethics and Policies) and management and control tools (risk management, models, procedures and controls) to supervise material ESG topics in line with local regulations and international guidelines.

Webuild is also a signatory of the UN's Global Compact, the largest global sustainability initiative that requires companies to align their operations and strategies with ten universally-recognised principles on human rights, labour practices, the environment and anti-corruption.

Webuild drafts its Policies, which are approved and signed by the parent's Chief Executive Officer, using structured processes that incorporate the expectations and concerns of the relevant stakeholders. They are applicable to all Webuild personnel and the parties that work for or with it (e.g., subcontractors, suppliers, consultants, brokers and agents). These Policies and embedded principles are applicable to all its branches and directly-run work sites. In the case of non-group companies and work sites managed by an entity other than the parent, their competent person (legal representative, project manager or director) is responsible for the definition of policies in line with those of Webuild. They are also responsible for sharing them with relevant third parties.

Top management oversees application of the Policies by regularly comparing performances to targets. Webuild monitors and transparently communicates its Policies, strategies and results achieved to stakeholders in documents published on its website (in the "Sustainability"² section) or by using other communication tools deemed appropriate in the circumstances.

² <https://www.webuildgroup.com/en/sustainability>

An overview of the Group's policies is provided below.

Policy	Internationally-recognised references
<p>Code of Ethics</p> <p>This establishes the conduct to be adopted at work and sets out an ethical leadership model.</p>	<p><i>SDGs, OECD Guidelines for Multinational Enterprises, UN Global Compact</i></p>
<p>Sustainability Policy</p> <p>This sets out the guidelines to foster the economic growth, social well-being and environmental protection in the countries where Webuild operates.</p>	<p><i>SDGs, UN Global Compact, ISO 26000</i></p>
<p>Suppliers' Code of Conduct</p> <p>This extends Webuild's responsible and sustainable operating practices to its supply chain.</p>	<p><i>OECD Guidelines for Multinational Enterprises, UN Global Compact, ISO 9001, ISO 45001, ISO 14001, ISO 37001, IFC's Environmental and Social Performance Standards (World Bank Group), United Nations Guiding Principles on Business and Human Rights</i></p>
<p>Social Responsibility and Human Rights Policy</p> <p>This sets out the Group's commitments to protect the human rights of the affected stakeholders in areas such as health and safety, child labour, forced or illegal labour (especially as regards migrants), freedom of association and the right to collective bargaining, inclusion and diversity and, more generally, working conditions and the rights of local communities and indigenous peoples.</p>	<p><i>OECD Guidelines for Multinational Enterprises, United Nations Guiding Principles on Business and Human Rights, SA 8000, ISO 45001, IFC's Environmental and Social Performance Standards (World Bank Group)</i></p>
<p>Health and Safety Policy</p> <p>This sets out the Group's principles to protect the health and safety of its employees, suppliers and subcontractors during the entire life cycle of its contracts (design, construction and development) and in the workplace; it promotes the workers' "right to intervene" when necessary and its objective of "zero injuries".</p>	<p><i>ISO 45001, SA 8000</i></p>
<p>Road traffic safety Policy</p> <p>This sets out the principles Webuild is committed to complying with to ensure road traffic safety.</p>	<p><i>ISO 39001</i></p>
<p>Equal opportunities, Diversity & Inclusion Policy</p> <p>This presents the Group' commitment to discourage all forms of discrimination based on gender, nationality, ethnicity, marital status, religion or other characteristics envisaged by law.</p>	<p><i>UNI PdR 125; ISO 30415</i></p>
<p>Environmental Policy</p> <p>This contains the principles designed to mitigate adverse effects on the environment, protect the ecosystem and promote environmental benefits, addressing global challenges and affirming the right of workers to intervene to stop activities that could be harmful to the environment.</p>	<p><i>ISO 14001, ISO 39001, ISO 14040, PAS 2080, IFC's Environmental and Social Performance Standards (World Bank Group)</i></p>
<p>Environmental Code of Conduct</p> <p>This contains operating and organisational rules designed to facilitate cultural change, actively involve workers and the value chain, cultivate a sense of belonging and support the conscious adoption of Webuild's Environmental Policy.</p>	<p><i>ISO 14001, ISO 14040, ISO 50001, PAS 20400, IFC's Environmental and Social Performance Standards (World Bank Group)</i></p>
<p>Energy Management Policy</p> <p>This sets out the principles for the efficient and responsible use of energy, encouraging the adoption of innovative technologies and cutting edge energy solutions.</p>	<p><i>ISO 50001</i></p>

Policy

Internationally-recognised references

Quality Policy

This presents the principles that guide Webuild to ensure customer satisfaction, the active involvement of all stakeholders and the continuous improvement of the Quality System, based on its fundamental goal of “build to perfection”.

ISO 9001, ISO 21500

Anti-corruption Policy

This contains the anti-corruption principles to be adhered to by employees, based on the fundamental tenet of “zero tolerance”.

ISO 37001

Modern slavery risks in our operations and supply chains

The construction sector has always encountered many challenges linked to human rights, some of which are closely tied to the UN's SDGs, such as for example, the need to ensure access to energy, clean water and sanitation and hygiene services, proper levels of health and safety, fair and decent working conditions and protection of communities and territories.

Webuild is fully aware of how important it is to address these challenges and, as a leading actor of its value chains, to actively encourage respect for human rights by all its partners.

In line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, Webuild adopts due diligence processes with regard to social, environmental and governance matters to ensure its operations are carried out responsibly. These processes are embedded in the Group's policies, procedures and management systems, and actions and objectives, and in the related monitoring processes.

Specifically, the due diligence processes allow the Group to identify and manage the actual and potential negative impacts connected with its own operations and its upstream and downstream value chain, including through other business relationships. They are also embedded in its strategy and governance to ensure Webuild's activities are performed in compliance with applicable national and international regulations while concurrently promoting responsible practices in developing business.

As part of this process, it conducts regular human rights risk assessments on the activities carried out by its direct workers and/or via subcontractors at its work sites as well as for the rest of its supply chain.

In 2025, Webuild has reinforced its due diligence procedure for human rights and refined the impact identification and assessment method (the human rights risk assessment).

While the previous procedure's key structural elements were maintained, the new structure, with its greater depth and traceability, improves consistency with the European and international regulatory framework and the growing demand for organisations to focus on social issues from multiple stakeholder categories.

The first phase of this project was to identify and update the categories of human rights relevant to the Group based on the activities carried out and the main regulations and principles and international standards about human rights.

Based on this phase, the Group adjusted and restructured the Human Rights Risk Register, which describes the specific risk events mapped and related to the activities performed either by own workers and/or value chain workers at the Group work sites for each relevant category, i.e.:

- child labour;
- forced labour;
- violation of freedom of association and collective bargaining;
- discrimination;
- inadequate working and living conditions;
- violations of rights of local communities;
- violations of privacy rights.

During the second phase, the settings of the country risk assessment tool associated with the relevant human rights categories were revised.

The assessment is based on a set of normalised and weighted international set of indicators to be assigned to each country a risk score, the mixed country risk, grouped in four levels (low, medium low, medium high, high), and integrated with an "alert" system, which reports when some additional indicators record high or medium-high levels on rights with a high impact on people, such as child or forced labour or working conditions.

The subsequent phase covered an assessment of activities carried out by own workers or value chain workers at the Group's operating sites. Each work site has a country risk level depending on the country where it is located and, if it exceeds a set ceiling, the residual risk is assessed by the project managers using a structured questionnaire. The tool requires mapping of specific risk events for each category and active prevention and mitigation measures (both more standardised than the previous methodology). In addition, an estimate of the level of residual risk is required based on criteria and assessment scales consistent with those used for the impact materiality assessment (likelihood, severity, scale and irremediable nature of the impact).

In 2025, the country risk assessment covered all the projects classified as operating to define the reporting method (the Group has a sustainability data collection system for all relevant indicators of these projects). None of the 21 countries analysed for the mixed country risk parameter were found to be at "high risk", while six were classified as "medium-high" risk.

The Group pursues a commercial strategy that from year to year further impacts the composition of the country risk described. Indeed, around 80% of the Group's order backlog is in countries that are substantially low or medium-low risk, such as in the EU (mainly Italy), North America and Oceania.

The assessment of activities conducted by subcontractors at the Webuild work sites is performed together with the assessment of own operations applying the method below.

With respect to the rest of the direct supply chain, the assessment evaluates two main categories:

- Country risk, based on the mixed country risk

Based on orders issued in the first ten months of 2025, 88% of the suppliers are based in countries with a "low" or "medium-low" risk while 12% work in "medium-high" risk countries. None of the assessed suppliers are based in countries classified as "high" risk.

- Commodity supply risk

With respect to the above orders, just over 1% refer to large categories of purchases that include or may include the goods listed in the ILAB³ list, if produced in countries specifically indicated in the list (good-country logic)⁴. This percentage is calculated on a prudent basis and is an overestimate of the risk exposure.

For the purposes of this Statement, the main risks identified are summarised below.

Recruitment practices, migrant workers and minimum age for employment

The Group operates in geographical areas where the characteristics of the labour markets and regulatory framework and/or practices do not always comply with international conventions and best practices. This could give rise to risks of forced or compulsory labour.

Specifically, in the Persian Gulf area, where the local labour force is insufficient and/or inadequate for the Group's needs, significant resort to migrant workers (mostly from South-East Asia) is necessary to carry out the projects. This category of workers, identified by the Group using specific methods and analyses, is particularly vulnerable and is exposed to risks of forced or compulsory labour practices. Specifically, there are two risk factors:

- use of recruitment agencies that may adopt improper practices, such as obliging the workers to pay recruitment fees (when hired), employment fees (throughout their employment) and cash deposits which are forms of debt (debt bondage);
- labour conditions that may limit the migrant workers' freedom of movement which are in some cases allowed or facilitated by local regulations, such as the ban on leaving their accommodation outside work hours, as well

³ The Bureau of International Labor Affairs (ILAB) within the U.S. Department of Labor which prepares a list of goods which, if produced in certain countries, are at high risk of being produced using forced and/or child labour in violation of international standards. This list complies with the Trafficking Victims Protection Reauthorization Act (TVPRA).

⁴ The percentage does not refer to the entire category at international level, but only when it relates to goods coming from countries included in the ILAB list as at risk of child or forced labour.

as limitations on holiday arrangements, the possibility of leaving the country, resignations and changes of employer.

The potential risk of hiring people under the minimum working age established by the applicable local regulations is minimal and tied to the risk of false identity documents (e.g., in some Sub-Saharan countries).

Actions taken to address our modern slavery risks

Internal policies

The Group's commitment towards human rights is clearly expressed in a full set of internal policies, which include:

- Code of Ethics
- Sustainability Policy
- Social Responsibility and Human Rights Policy
- Suppliers' Code of Conduct

They set out principles for protection of workers and stakeholders and rules of conduct that everyone who works with Webuild around the world is required to comply with.

These principles cover health and safety, child labour, forced labour, freedom of association and collective bargaining, diversity and inclusion and working conditions in general, as well as the rights of local communities and indigenous peoples.

The **Code of Ethics** is the Group's baseline of values and defines the principles of probity, accountability, transparency and respect required of employees, collaborators, suppliers, subcontractors and partners. It provides guidance applicable throughout the Group on its policies on sustainability, human rights, health and safety, inclusion and engagement with communities.

The **Sustainability Policy** guides the Group towards sustainable, responsible and inclusive development in all areas of its operations. It requires that employment decisions be based on objective criteria, considering skills and performances. It promotes technical development and collaboration with strategic partners along the supply chain, and encourages local hiring and sourcing to generate shared value and positive impacts, while respecting the rights of local communities and indigenous peoples.

Social Responsibility and Human Rights Policy: this formalises the Group's commitment to ensuring (at worldwide level and without limitation) respect for dignity, fundamental rights and the freedom of all people involved in its operations, be they workers, suppliers, local communities or stakeholders. The policy addresses fundamental issues such as health and safety, child or forced labour, freedom of association and the right to collective bargaining, diversity and inclusion, working conditions and the rights of indigenous peoples. Webuild strongly discourages any form of exploitation and especially that of migrant workers. It does not tolerate any form of forced or child labour along the value chain and fully complies with the minimum age established by the laws of the countries where it operates.

It developed the policy in line with the UN's Guiding Principles on Business and Human Rights with the participation of internal and external actors, focusing on the areas at greater risk and assembling the main concerns expressed by external stakeholders, such as NGOs and experts, through interviews conducted with group employees.

Suppliers' Code of Conduct: this fundamental tool extends the Group's principles of sustainability, integrity and social responsibility along the value chain. It emphasises the Group's commitment to protecting and developing value chain workers and local communities, as well as reiterating its position against all forms of child, forced or illegal labour in favour of fair and inclusive working conditions. To this end, the code defines the minimum standards expected of suppliers and subcontractors for each issue.

The code also ensures protection against all forms of retaliation, discrimination or penalisation against whistleblowers, supported by an anonymous and multilingual whistleblowing system, which is also available to third parties.

Health and Safety Policy: this expresses the Group's ongoing commitment to protecting the safety of all people involved in its operations, ensuring safe and healthy working environments at every stage of the activities and pursuing the "zero

injuries” target. It is applicable to all operating units, including the Group’s suppliers and subcontractors and encourages a shared and widespread safety culture.

Equal opportunities, Diversity & Inclusion Policy: this reinforces the principles enshrined in the Code of Ethics and the Social Responsibility and Human Rights Policy to promote a safe, inclusive and rewarding environment. It ensures equal opportunities for equal roles and decisions based on objective criteria (skills, aptitudes and performance) while rejecting all forms of discrimination. Webuild acknowledges diversity to be a lever to generate synergies, improve decision quality and grow the Group’s results and performance over time.

Webuild rejects any form of harassment, intimidation or coercion. It has a range of secure channels to report incidents of discrimination, ensuring the protection of whistleblowers and it has appropriate procedures in place to investigate any notifications.

Trade unions agreement

In 2014, Webuild signed a framework agreement with the Italian national trade unions (Feneal-UIL, Filca-CISL and Fillea-CGIL) and the international trade union for the construction sector (BWI – Building and Wood Workers’ International) to jointly affirm and encourage respect for compliance with the basic principles and rights in employment relationships, encourage social justice and sustainable development by both itself and the consortia of which it is a member and vis-à-vis its contractors, subcontractors and suppliers.

The framework agreement covers child labour, forced or compulsory labour, the freedom of association and collective bargaining, non-discrimination, work hours, economic treatment, work conditions, specialised training, the environment, welfare, and employment relationships.

Operational practices

The Group enters into employment contracts with its employees that comply with the applicable local regulations, the principles of the framework agreement signed with BWI (Building and Wood Workers’ International) and those in any agreements signed with the local trade unions with respect to work hours and holidays, economic treatment and other employment aspects. The Group’s intention is to ensure scrupulous compliance with the applicable regulations in each country to mitigate the risk of non-compliance and, where possible, provide conditions that are better than those envisaged by the local regulations.

The Company has also issued internal guidelines for its operating units for the correct management of the activities at risk. These guidelines provide for management and monitoring of human rights and specific reports to be sent to Corporate.

The main operational practices for managing the identified risks are summarized below.

With reference to the risk of forced or compulsory labour, the Group ensures that candidates for work in the countries at risk are provided with exhaustive information about the contractual terms and work conditions in a language that they understand before they leave their country of origin. In addition, the Group fully bears the costs of recruitment, travel, visas, medical visits, etc. Migrant workers are guaranteed the possibility to change jobs and to leave their destination country without prejudice to the possible notice obligation imposed by the applicable legislation, visa requirements and employment contracts. No workers are deprived of their identity documents unless this has been authorised by them and solely for their safekeeping. The Group requires the recruitment agencies to comply with these principles through specific contractual clauses and non-compliance could entail termination of the contracts.

As regards potential child labour risk, the Group does not hire people under the minimum working age established by the applicable regulations and the highest international standards. In countries where the presence of false identity documents is rife (e.g., some African countries), the Group has special procedures in place to check the authenticity of the documents, either identification documents or driving licences, assisted by the local authorities.

Webuild is certified according to the SA8000 standard - Social Accountability for all its operations in Italy and personnel on secondment abroad. It performs regular assessments of social responsibility risks and monitors its performance.

Specifically, the Social Performance Team addresses and manages the aspects required by the SA8000 standard. The team comprises a balanced representation of:

- worker representatives for SA 8000; and
- management team members.

When a Social Performance Team is set up at individual project level:

- if present, the relevant trade unions may appoint one or more members as workers' representatives to the SPT;
- when the trade unions do not designate a representative or the organisation is not unionised, the workers may directly elect one or more representatives for the SA8000 standard.

In no circumstance may the workers' representatives for SA8000 be considered to substitute the trade union representatives.

Selection, onboarding, and monitoring of suppliers

As part of its due diligence process and in order to assess supply chain risks, Webuild has defined specific management methods, including:

- qualification process for potential suppliers based on a dedicated human rights multi-factor assessment;
- contract clauses that require formal acceptance of the Code of Ethics and the Suppliers' Code of Conduct, and extension of this commitment to the supplier's subcontractors, which is mandatory for the contracts to be valid;
- monitoring, checks and audits to ensure compliance with its standards;
- regular assessments of the suppliers' performances, which include ethical and social aspects.

Assisted by the Compliance Department, the Vendor Management and Sustainability Department manages the qualification process, which involves a number of preliminary checks of the potential supplier's reputation, its expertise and that it is not included in the Sanctions List. Webuild's standard procedure includes many ESG-related aspects, such as compliance and anti-corruption, human rights, health and safety, diversity and inclusion, respect for the environment, emissions reduction, involvement of the value chain and other governance topics. Full compliance with the human rights requirements is essential for a supplier to pass the qualification process. In 2025 the percentage of orders with suppliers qualified using social and environmental criteria was 92%.

Based on these questionnaires, specific analyses and detailed checks may follow, such as assessment visits to the supplier's production units and offices. Additional risk analyses are performed for certain suppliers that fall into the counterparty risk category using the methods and tools defined by the Risk Management Unit. Upon completion of the checks, suppliers found to be suitable for qualification are included in the suppliers register and the reference Vendor List. Certain contracts require adoption of a specific additional qualification system depending on the applicable regulatory and contractual requirements. For example, suppliers working on projects subject to LEED environmental certification are subjected to additional checks to verify their compliance with specific environmental parameters, while other specific requirements, such as social criteria, are checked for projects acquired in some countries. These may include checking potential suppliers whose workforce mainly consists of employees from special categories (e.g., ethnic minorities).

In addition, in order to bolster oversight of the supply chain's ESG performance, Webuild invites suppliers to register on the Open-es platform during the qualification and sourcing phases. These platforms collect and monitor suppliers' ESG performances using specific parameters and assist them improve. With a view to continuous improvement, in 2025 the invitation to use Open-es was extended to all Webuild suppliers and not just those in Europe.

Open-es evaluation consists of completing a questionnaire and uploading the supporting attachments and is based on three pillars:

- Environment: this indicator measures a company's impact on the environment, considering aspects such as climate change, energy efficiency, pollution, consumption of water resources, etc.;
- Social: this indicator measures a company's impact and engagement with the local area, people, employees, suppliers, customers and communities that it works with, evaluating its compliance with human rights, absence of child or forced labour and discrimination, compliance with international standards, adequate wages for employees, the right to join a trade union, the existence of whistleblower reporting channels and social protection systems, diversity and inclusion, health and safety, employee well-being, etc.;
- Governance: this indicator measures how a company is managed in terms of ethical standards and best practices and covers business strategy and model, stakeholder engagement, oversight of risks and opportunities, ethical conduct, value chain management, etc.

The Open-es sustainability score takes into account the size of the evaluated company and its business sector and it can be validated by having a third party check the questionnaire responses. In addition to a company's sustainability performance, the platform also measures its collaborative attitude and sharing of experiences with the community. In addition, suppliers can also upload action plans for monitoring progress.

To support this process, the Vendor Management and Sustainability Department regularly monitors registrations and the questionnaire completion status. It provides direct assistance to suppliers by email and telephone, if requested.

The Open-es ESG evaluations are integrated into Webuild's procurement platform, enabling all the platform users (head office or project procurement departments) to access the data and use them as a parameter to assess suppliers during the sourcing phase. Oversight of these activities is ensured by specific internal KPIs, designed to measure the level of ESG coverage both during the bidding and supplier onboarding phases.

Finally, the selection of suppliers for new business is not only based on the quality and competitiveness of their products and services but also on their social and environmental performance and compliance with ethical values checked at the work sites while the suppliers are carrying out their work. Webuild has a performance assessment process, which has a multi-disciplinary approach involving the project/work site bodies (Procurement Manager, Technical Manager, Service Manager and HSE Manager) and economic-financial analyses based on the database on the Orbis platform (third party).

Compliance with requirements is checked by considering the following aspects:

- legal requirements; Code of Ethics; major disruptions: compliance with ruling regulations and Webuild's Code of Ethics;
- HSE (Health, Safety, Environment): compliance with regulations, accident prevention, use of PPE, training on health and safety and the environment, etc..

Additional areas evaluated relate to operating aspects:

- Technical: transparency, availability, proactiveness, competitiveness, accurate account-keeping, machinery, equipment, training and skills, technical capacity and quality requirements;
- Service: compliance with deadlines;
- Financial soundness.

The Webuild procurement platform assesses performance and the results are available to all platform users and are an integral part of the supplier screening criteria during the sourcing phase.

Whistleblowing and grievance systems

Webuild has a whistleblowing system that can be accessed through an external multilingual web portal. This allows all affected parties to make anonymous or confidential (at their own discretion) notifications about potential violations or incorrect behaviour. To ensure the correct use of the system, Webuild has issued whistleblowing management guidelines. It also considers notifications made through other channels, such as anonymous letters.

Employees are obliged to report any violations of internal and/or external regulations, ethical and integrity principles, the organisational, management and control model as per Italian Legislative decree no. 231/2001 (the “231 Model”), the Anti-corruption Model and/or all anti-corruption laws by their company, a colleague, a consultant or third party. Webuild guarantees the protection of the whistleblower in accordance with the provisions of Italian Law no. 24/2023 on whistleblowing and Regulation (EU) no. 2016/679 on personal data protection. All whistleblowers are protected against any form of reprisal, discrimination or unfair treatment, without prejudice to legal requirements or the protection of the rights of the company or people who deliberately make a false notification. Webuild does not allow retaliation of any form against an employee who reports suspected incidents of wrongdoing in good faith.

The Compliance Department handles all notifications and the related checks. Once it has performed an initial analysis of the notification, the department may involve the following departments in performing the necessary checks as long as there are no conflicts of interest:

- Internal Audit, for notifications about suspected fraud, inefficiencies and ineffectiveness of internal controls;
- HR, Organisation and QHSE, for suspected violations of rules about the correct performance of duties and suspected violations of quality, health, safety and environmental regulations;
- Security, for suspected crimes and situations that could put the safety of people or company assets in danger.

The whistleblowing management guidelines establish that any conflicts of interest (when the person in charge of checking the notification has a personal and/or professional interest that affects their impartiality) must be communicated and avoided by assigning the checks to another department or employee. They also provide that the employees who check the notifications and manage the consequent internal investigation may not be part of the department under investigation, unless this is essential to allow the investigation to take place and the employees can provide adequate guarantees of their independence.

The Compliance Department regularly communicates the progress and outcome of investigations performed as a result of whistleblowing notifications to the Control, Risk and Sustainability Committee, the Board of Statutory Auditors and the Integrity Board. The data communicated (number of notifications, the companies where the alleged non-compliance took place, the investigation findings, etc.) do not include any information that could allow identification of the whistleblower.

Given its independent status, the Integrity Board autonomously performs checks and assesses notifications it receives directly related to alleged serious violations as per Italian Legislative decree no. 231/2001. When necessary, it may be assisted by external experts.

Awareness and training

As part of its push to inform and raise employee awareness Webuild defines and holds training and information activities for its employees on ethics and integrity, human rights, diversity and inclusion, health, safety and well-being in the workplace, as well as security issues, every year. These activities are targeted at both the head office and work sites and may cover specific matters or be designed to provide a greater understanding of the Group’s commitments. To this end, Webuild has an e-learning platform, E-learning Academy, which provides both mandatory and optional courses available to all employees who have access to the platform.

The principal training programmes on corporate culture matters include:

- mandatory training for new hires on human rights and the content of the Code of Ethics, the 231 Model as per Italian Legislative decree no. 231/2001, the Anti-corruption System and whistleblowing;
- additional compliance training activities are assessed by the Compliance Department once a year, assisted by the Group HR, Organisation and QHSE Department.
- formal renewal by all employees of their compliance with the Group’s ethical principles and confirmation that there are no conflicts of interest.

Assessing the effectiveness of our actions

Webuild implements a dual approach to determine the effectiveness of its efforts in tackling modern slavery: prevention and responsiveness.

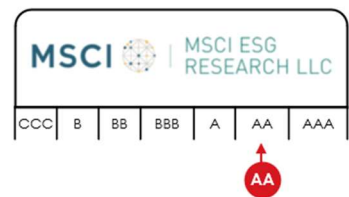
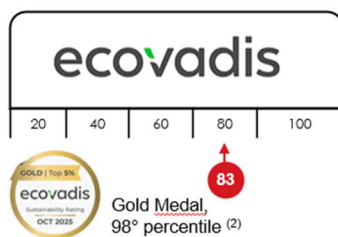
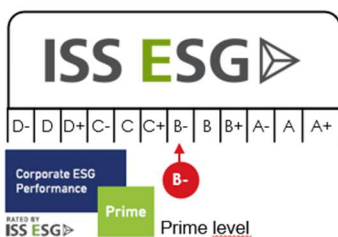
Prevention activities comprise regular update of human rights risk assessment for both operations and supply chains, as well as data monitoring through its sustainability reporting system active in all significant operating units, which include specific KPIs on potential breach of human rights.

Response activities are included in many internal monitoring, assessments and on-site audit conducted by the Internal Audit and Compliance Dept. (for example, over compliance with policies and procedures, over contractual terms and conditions, over processes, etc.) and Safety, Environment and Quality Dept. Moreover, responsiveness comprises actions to give appropriate answers to concerns raised through the whistleblowing platform or the grievance mechanisms in place at sites, as well as regular review and update of our policies and procedures.

As well as the constant checking of the progress, assessments and ratings of Webuild by investors, leading ESG rating agencies, assessment and certification bodies, customers and other stakeholders - such as NGOs - are all taken into consideration in monitoring the progress made towards achieving the parent's targets.

Ratings are assigned after Webuild's ESG policies and performances are analysed and assessed and are an important tool for its stakeholders because they provide succinct, independent and comparable information that can be used to understand the Group's progress towards achievement of its targets and its non-financial performance tied to governance, ethics and integrity, social and environmental areas.

An overview of the main rating agencies and Webuild's ratings in 2025 is provided below⁵.



Next steps

Mindful of the importance of a continuous improvement approach for properly addressing modern slavery risks, Webuild will further its commitment and efforts in 2026, focusing in particular in:

- increasingly involving suppliers in the ESG Open-es platforms to expand the ESG mapping of the supply chain and encourage suppliers to improve their sustainability performance in line with their size and capacity,
- continuing to raise awareness on human rights through information initiatives and training programmes,
- setting measures to improve transparency and accountability in our operations and supply chains,

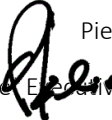
⁵ Following the strategic partnership announced on 1 July 2024, Moody's began to replace the Moody's ESG Scores it used previously with MSCI ESG Ratings. Accordingly, Webuild now refers to the MSCI ESG ratings for its sustainability performance.

- implementing the Group's ethics Policies and Procedures in all new projects and relevant entities.

Consultation and approval process

This Statement has been prepared by Webuild S.p.A. by collecting and elaborating data and information referring to or directly provided by its operating units or subsidiaries for calendar year 2025. Moreover, Webuild specifically engaged with and consulted the management representatives and the key teams of the reporting entities.

Pursuant to Section 14 subparagraph (2)(d)(ii) of the *Australian Modern Slavery Act* and to Section 11 subparagraph (4)(b)(ii), this Statement was approved on 14th May 2026 by the Board of Directors of Webuild S.p.A. as the parent entity and signed by Pietro Salini who has the authority in his role of Chief Executive Officer of Webuild S.p.A.


Pietro Salini
Chief Executive Officer
Webuild S.p.A.

19 May 2026