

B.5 Non-financial Group declaration

B.5.1 Introduction

B.5.1.1 About this declaration

This non-financial Group declaration from Bilfinger SE relates to financial year 2022. 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 fulfils 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 (hereinafter the "EU Taxonomy Regulation"). For this declaration, we focus first and foremost on the interests of our stakeholders. In view of the multitude and heterogeneity of frameworks, none of the currently existing frameworks appear to be suitable and therefore, in the interest of focused reporting, we have refrained from using a specific framework.

In a number of places in the non-financial Group declaration, we refer to additional information, for example in the Annual Report or on our Internet site. References to the combined management report are attributable to the content of the non-financial Group declaration. All references to information outside the combined management report serve to deepen the information presented here, but are not part of the non-financial Group declaration and are therefore not audited.

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.

B.5.1.2 Business model of Bilfinger SE

The business model of the Bilfinger Group in financial year 2022 did not change as compared with the prior year. Bilfinger is an internationally active industrial services provider. The Group aims to enhance the efficiency and sustainability of process industry customers. Bilfinger's portfolio covers the entire value chain from consulting, engineering, manufacturing, construction and maintenance through to the expansion of plants and turnarounds. Services also include digital applications.

Bilfinger delivers its services in the service lines Engineering & Maintenance as well as Technologies. Bilfinger is primarily active in the regions Europe, in North America and in the Middle East. Process industry customers come from the sectors chemicals & petrochemicals, energy, oil & gas, pharma & biopharma. At the end of financial year 2022, Bilfinger employed about 30,000 people and generated revenue of approximately €4.3 billion.

More detailed explanations on the organization, strategy and goals as well as the management system of the company can be found in Chapter [B.1 The Bilfinger Group](#).

B.5.1.3 Sustainability at Bilfinger

Sustainability is a key component of our corporate strategy. With our services, we make a significant contribution to helping our customers achieve their sustainability goals. We enhance efficiency, reduce emissions and increase the performance of plants in the process industry.

We have firmly anchored the concept of sustainability in our corporate structures. It is defined as a goal in our Mission Statement and is an integral part of our Code of Conduct as well as relevant

internal Group Policies. We have been reporting on our sustainability activities on an annual basis since 2011 and have published an externally audited non-financial Group declaration every year since 2018. Bilfinger is a member of the UN Global Compact initiative, supports the UN Sustainable Development Goals and issues an annual declaration of conformity with the German Sustainability Code.

In the area of sustainability, Bilfinger is evaluated by several external institutions. We are in regular, active contact with MSCI-ESG, ISS-ESG, Sustainalytics, CDP and Ecovadis, among others.

The Executive Board is responsible for sustainability. Sustainability management at Group level is coordinated and aligned with the *SustainNet* sustainability network, which is coordinated by Corporate Treasury & Investor Relations under the responsibility of Executive Board member Matti Jäkel (Chief Financial Officer).

Members of *SustainNet* include the heads of selected corporate departments and functional units whose areas of responsibility are related to sustainability issues (as well as managing directors of operational regional and divisional management teams).

SustainNet meets at least twice a year as scheduled; in addition, meetings are convened on an ad-hoc and project-related basis. In addition to the formal exchange in the sustainability network, the members as well as employees in their functional areas are in regular contact on individual sustainability topics.

B.5.1.4 Determination of materiality

To determine the main areas of action for our own conduct, we have for years regularly conducted materiality analyses in dialog with our Group's stakeholders. The resulting materiality matrix defines our Group's sustainability topics.

In 2020, *SustainNet* conducted a new materiality analysis with the involvement of the Group's stakeholders. The results of the survey were reviewed in 2021 and again in 2022 by *SustainNet* and the Executive Board. To review the content of our non-financial Group declaration, we looked at the sustainability action areas both in terms of their business relevance and in terms of their impact on the materiality of the economic, environmental and social consequences listed in the HGB. In the process, the costs and risks associated with these topics, the impact they have on our business and our surroundings were looked at, as was the degree to which we are able to influence each aspect.

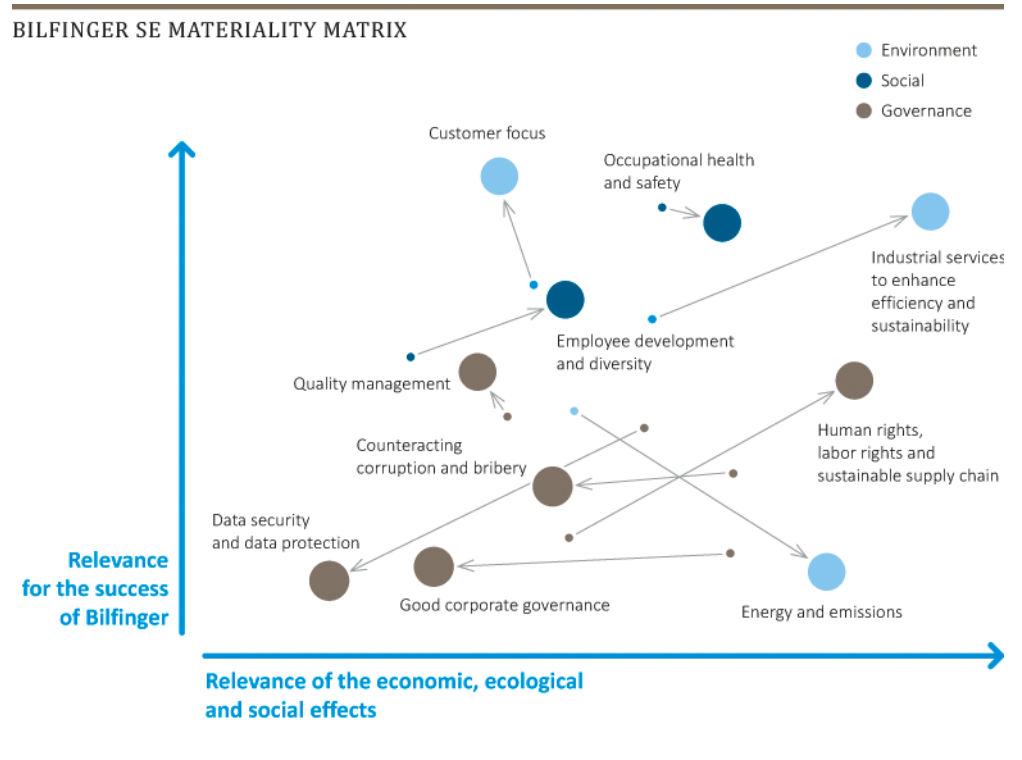
The main sustainability topics were reviewed and confirmed in comparison with the previous year. The ongoing dialog with the Group's stakeholders – including employees, customers, suppliers and representatives of the capital market and social institutions – has not resulted in any new subject areas, nor have any previously existing areas been classified as no longer material.

The review did, however, result in a relative shift in the relevant topics in terms of their positioning in the matrix:

- The importance of the service range for our customers in connection with the energy transition has increased in both dimensions.
- This also applies to the importance of respecting human rights.
- All customer and personnel-related factors are categorized with increased relevance for Bilfinger's success.
- The Group's energy consumption and emissions footprint has once again become more important for the Group's stakeholders.

- Good corporate governance and compliant behavior are seen as given, so the relative importance in both dimensions decreased.

The result of the materiality analysis 2022 is the current Bilfinger materiality matrix.



In order to structure the content of the non-financial Group declaration, the main sustainability topics were assigned to the categories *Environment*, *Social* and *Governance* (ESG). In addition, we report the disclosures in accordance with the EU Taxonomy Regulation in the *Environment* category.



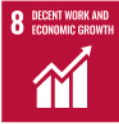

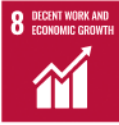
CHAPTERS OF THE NON-FINANCIAL GROUP DECLARATION

	Material topics	HGB/CSR-RUG*
E Environment	Energy and emissions	Environmental matters
	Industrial services to enhance efficiency and sustainability	Environmental matters
	Consolidated disclosures pursuant to Article 8 of the EU Taxonomy Regulation	Environmental matters
S Social	Occupational health and safety	Employee matters
	Employee development and diversity	Employee matters
G Governance	Good corporate governance	<i>Additional reported aspect</i>
	Counteracting corruption and bribery	Countering corruption and bribery
	Human rights, labor rights and sustainable supply chain	Respect for human rights and employee matters
	Quality management	<i>Additional reported aspect</i>
	Data security and data protection	<i>Additional reported aspect</i>

* CSR Guidelines Implementation Act

B.5.1.5 Sustainability targets of the Bilfinger Group

Bilfinger has further focused its sustainability targets in 2022 and set itself clear targets in each of the three sustainability categories: environment, social and governance. We support the United Nations Sustainable Development Goals (SDGs) No. 4 *Quality education*, 7 *Affordable and clean energy*, 8 *Decent work and economic growth*, and 9 *Industry, innovation and infrastructure*.

	Bilfinger sustainability targets	UN SDGs
E Environment	Become a leading partner for improving our customers' efficiency and sustainability	
	Achieve climate-neutrality in terms of Scope 1 and 2 GHG* emissions by 2030 at the latest	
	Collect data on Scope 3 GHG* emissions and support Science-Based Target Initiative	
S Social	Avoid all occupational accidents wherever possible	
	Invest at least 0.5% of Group revenue annually in employee training and development	
G Governance	Conduct at least 600 internal supplier audits annually to effectively meet the Group's due diligence obligations	

* Greenhouse Gas Protocol

Environment

Becoming a leading partner for improving our customers' efficiency and sustainability

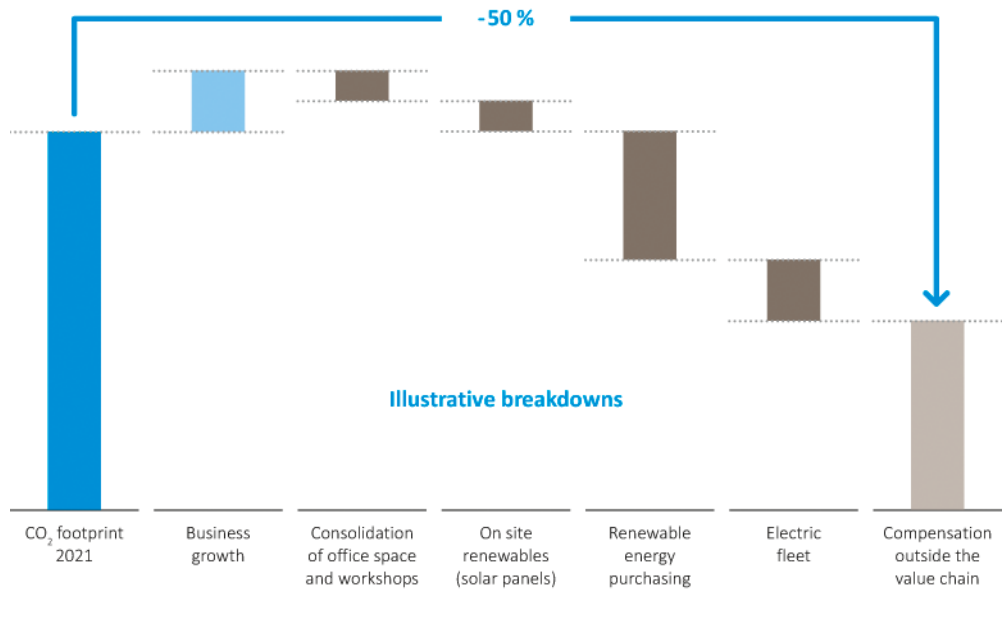
Bilfinger has set itself the target of becoming the leading partner for our customers when it comes to enhancing the efficiency and sustainability of their plants. Increasing awareness of climate change and the ensuing energy transition in many industrialized countries are generating substantial opportunities for Bilfinger to exert influence here. The chemical & petrochemical, energy, oil & gas as well as pharma & biopharma industries are the Bilfinger Group's largest customer groups. 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.

Achieve climate neutrality in terms of Scope 1 and 2 GHG emissions by 2030 at the latest

In the course of our daily work, we pay close attention to the careful use of valuable resources and address the urgent task of limiting climate change to the greatest extent possible. The focus in this regard is on efforts to reduce our own energy consumption, gradually substitute the use of fossil fuels with renewable energy sources and thus sustainably limit atmospheric pollution with harmful greenhouse gases.

Steps to reduce CO₂ emissions were initiated in financial year 2022. All regions and divisions of the Group have developed concepts to reduce their respective emissions and thus the emissions of the Group as a whole from 2023 onward in accordance with the GHG (Greenhouse Gas) Protocol Scope 1 and 2. The combination of various measures for the next few years includes a shift from purchased electricity to renewable sources, gradually replacing the passenger vehicle fleet with electric vehicles as well as installing photovoltaic systems and initiating energy efficiency initiatives at our sites. In terms of GHG Protocol Scope 1 and 2 emissions caused by our operations, we have set a target of being climate neutral by 2030 at the latest. Most importantly, this includes a reduction in emissions. In the case of unavoidable emissions, compensation is also provided through the support of additional CO₂-reducing projects combined with the purchase of *carbon credits*.

OUR ROADMAP FOR CO₂ SCOPE 1 AND 2 REDUCTION UNTIL 2030



Collect data on Scope 3 GHG emissions and support Science-Based Targets Initiative

In 2022, we developed a concept for the data collection of GHG Scope 3 emissions. It calls for all other categories in the upstream value chain to be successively added in 2023. Categories of the downstream value chain will follow in 2024.

Based on the survey of Scope 1 and 2 GHG emissions as well as the complete survey of Scope 3 GHG emissions from financial year 2024, we plan to submit Bilfinger’s targeted reduction path of GHG emissions to limit global warming to a maximum of 1.5 degrees Celsius to the *Science-Based Targets Initiative* (SBTi) for review. The concept we developed in 2022 foresees the submission of the commitments for 2023 and the submission of the reduction plan to achieve the near-term targets by 2030 for GHG Scope 1 and 2 accordingly for 2025.

Social

Avoid all occupational accidents wherever possible

The physical well-being of all our employees is our top priority. For this reason, occupational safety is a crucial factor in all our activities. 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.

Invest at least 0.5 percent of Group revenue annually in employee training and development
In order to maintain and further strengthen the Group's competitiveness, we will make targeted investments of at least 0.5 percent of Group revenue per year in the training and further education of Bilfinger employees in the future. To this end, we are using a quarter of the savings generated by the efficiency program launched in 2022 in addition to the existing expenditures.

Governance

Conduct at least 600 internal supplier audits annually to effectively meet the Group's due diligence obligations

The *Declaration of Principles on Respect for Human Rights*, which took effect at Bilfinger in 2022, together with the Group's *Code of Conduct*, which has been in place for many years, regulates the human rights-related principles that apply to all Bilfinger employees and suppliers. To effectively meet our due diligence obligations in the Group's supply chain, we have set the target of conducting at least 600 internal supplier audits per year in accordance with defined standards beginning in financial year 2023.

B.5.1.6 Assessment of risks from own business operations

The identification and evaluation of risks that arise from the company's business operations and that affect the reportable aspects are the responsibility of risk management. The focus is on the question of which risks arise from our business activities and relationships or from our products and services that have an impact on these aspects. Significant risks that are very likely to have or will have serious negative impacts on them must be reported.

Our Group-wide risk management system is described in Chapter [B.3.1 Risk management](#) in the management report of the Annual Report. Corporate Accounting, Controlling & Tax is responsible for Bilfinger's Group-wide risk management system and conducted a survey of the Group's sustainability risks at the end of the 2022 financial year. In order to identify and assess these risks, the operating units and the heads of the corporate departments concerned were surveyed about them and they were assessed at the regular meeting of the Bilfinger Risk Committee (see Chapter [B.3.1 Risk management](#)). The assessment of risks was based on the probability of occurrence and the possible extent of damage.

Reportable risks on the relevant topics were not identified.

B.5.1.7 The Bilfinger Group's sustainability indicators

KEY FIGURES	2022	2021
Environment		
Energy consumption		
Total energy consumption (MWh) ⁵	220,838	217,099
Share of renewable energy sources in total energy consumption (%)	7	n.a.
Share of non-renewable energy sources in total energy consumption (%)	93	n.a.
CO₂e emissions in accordance with GHG Protocol		
CO ₂ e emissions Scope 1 (tCO ₂ e) ^{1,3,4}	35,643	35,608
CO ₂ e emissions Scope 2 location-based (tCO ₂ e) ^{1,2,4}	16,548	23,765
CO ₂ e emissions Scope 2 market-based (tCO ₂ e) ^{1,3,4}	14,047	n.a.
Total CO ₂ e emissions Scope 1 and Scope 2 location-based (tCO ₂ e) ^{2,4}	52,191	59,374
Total CO ₂ e emissions Scope 1 and Scope 2 market-based (tCO ₂ e) ^{3,4}	49,690	n.a.
CO ₂ e emissions Scope 3 from waste (tCO ₂ e) ^{1,4}	675	n.a.
CO₂e emissions in accordance with GHG Protocol – intensity indicators		
CO ₂ e intensity (location-based) in relation to total energy consumption (tCO ₂ e / MWh) ⁵	0.24	0.27
CO ₂ e intensity (market-based) in relation to total energy consumption (tCO ₂ e / MWh) ⁵	0.23	n.a.
CO ₂ e intensity (location-based) in relation to revenue (tCO ₂ e / € million) ⁶	12.68	16.63
CO ₂ e intensity (market-based) in relation to revenue (tCO ₂ e / € million) ⁶	12.08	n.a.
CO ₂ e intensity (location-based) in relation to number of employees (tCO ₂ e / FTE) ⁷	1.77	2.07
CO ₂ e intensity (market-based) in relation to number of employees (tCO ₂ e / FTE) ⁷	1.68	n.a.
Waste volume and type		
Amount of non-hazardous waste (kg)	5,043,546	n.a.
Amount of hazardous waste (kg)	185,240	n.a.
Amount of waste water (m ³)	108,283	n.a.
Waste treatment method		
Incineration (kg)	744,995	n.a.
Recovery (kg) ⁸	3,661,268	n.a.
Landfill (kg) ⁹	822,523	n.a.
Wastewater discharge indirectly to municipal and industrial wastewater treatment plants (m ³)	107,721	n.a.
Wastewater discharge directly to own treatment plant (m ³)	562	n.a.
Consolidated disclosures pursuant to Article 8 of the EU Taxonomy Regulation		
Revenue, taxonomy-eligible share (%)	7	2
Capital expenditures (capex), taxonomy-eligible share (%)	0.1	0.0

1 The calculation method is based on the GHG Protocol using the financial control approach. Scope 1 and Scope 2 include direct and indirect emissions from all fully consolidated companies. Companies that are in the process of being sold are excluded. This applies to the complete Other Operations.

2 Scope 2 is calculated using the location-based method of the GHG Protocol's Scope 2 calculation guidance.

3 Scope 2 is calculated using the market-based method of the GHG Protocol's Scope 2 calculation guidance.

4 The CO₂ conversion factors for a large part of the calculations come from specialist database provider Ecoinvent. In addition, emission factors published by the UK Department for Environment, Food & Rural Affairs (DEFRA) were used. The Association of Issuing Bodies (AIB) data were used to determine the residual mix for the market-based calculation.

5 Energy consumption without the Other Operations segment

6 Revenue is Group revenue without the Other Operations segment.

7 Number of employees without the Other Operations segment.

8 The waste treatment method recovery includes recycling and composting.

9 Because landfill as a waste treatment method has the highest CO₂e factor, the non-hazardous waste quantities for which the waste treatment method could not be clearly determined were also added to this category.

KEY FIGURES	2022	2021
Social		
Occupational safety		
Lost Time Injury Frequency (LTIF) ¹	0.26	0.21
Total Recordable Incident Frequency (TRIF) ²	1.31	1.06
Fatalities ³	1	1
Share of women		
Executive Board (%)	0	50
Management level 1 (%)	11	6
Management level 2 (%)	6	8
Governance		
Compliance		
Indications of compliance violations ⁴	66	70
thereof indications of corruption and bribery	0	1
Investigations initiated	27	20
Disciplinary measures as a result of investigations	20	7
Persons trained in compliance issues		
E-learning module 'Anti-corruption & bribery' ⁵	8,707	4,123
E-learning module 'Code of Conduct' ⁶	4,282	8,427
On-site training module 'General Compliance Training' ⁷	582	2,937
Quality management		
Operating companies with certified quality management systems in accordance with DIN EN ISO 9001	41	43
Data security and data protection		
Data protection incidents	16	4
thereof reportable data protection violations	1	1
Human rights		
Indications of violations against respect for human rights ⁸	17	14
Investigations initiated	9	5
Disciplinary measures as a result of investigations	4	5

1 LTIF: Lost Time Injury Frequency - number of work-related accidents of employees and temporary workers with at least one lost day per 1 million hours worked.

2 TRIF: Total Recordable Incident Frequency - number of all reportable accidents involving employees and temporary workers per 1 million hours worked.

3 Work-related accidents of employees and temporary workers resulting in death.

4 Reports classified as relevant in the period from January 1 to December 31 of any given year.

5 2021: For all new employees with a PC workstation and access to the Bilfinger network as well as for current employees with a PC workstation and access to the Bilfinger network whose job requires increased compliance awareness. Abbreviated training is used for current employees.

2022: For all new employees with a PC workstation and access to the Bilfinger network as well as for current employees with a PC workstation and access to the Bilfinger network whose work does not require increased compliance awareness.

6 2021: For all new employees with a PC workstation and access to the Bilfinger network as well as for current employees with a PC workstation and access to the Bilfinger network whose job does not require increased compliance awareness. Abbreviated training is used for current employees.

2022: For all new hires with a PC workstation and access to the Bilfinger network, as well as for current employees whose job requires increased compliance awareness.

7 2021: For all employees whose work requires increased compliance awareness.

2022: For all employees who as new hires or as a result of a change in positions have taken up a job at Bilfinger that requires increased compliance awareness.

8 Reports classified as relevant in the period from January 1 to December 31 of any given year. The indications in 2022 relate to bullying, discrimination and sexual harassment.

B.5.2 Environment

Chapter [B.5.2.1 Energy and emissions](#) reports on the emissions generated by Bilfinger and the associated energy use within its own value chain.

The range of services to support the efficiency and sustainability at customer sites is presented in Chapter [B.5.2.2 Industrial services to enhance efficiency and sustainability](#). This is in addition to Chapter [5.2.3 Consolidated disclosures pursuant to Article 8 of the EU Taxonomy Regulation](#).

B.5.2.1 Energy and emissions

In its sixth report, *Climate Change 2022*¹, the Intergovernmental Panel on Climate Change examined the effects of climate change and presented the impact of the man-made share. Global temperatures are expected to rise by 2 degrees Celsius. This poses a threat to the ecosystems of our planet, endangers the health of humans, animals and plants, and can mean that the world's growing population cannot be adequately supplied with food. Bilfinger therefore attaches particular importance to climate protection.

With our Mission Statement and our Code of Conduct, we clearly commit to responsibility for society and the environment. We consume considerably less energy than manufacturing companies, but we have nevertheless set ourselves the task of making a contribution to a reduction in greenhouse gases.

¹ IPCC Sixth Assessment Report, Climate Change 2022: Impacts, Adaptation and Vulnerability

Concept

In the Bilfinger Group, energy consumption data is collected at the level of the operating units. 35 Group companies with 139 locations are certified in accordance with the international environmental management standard DIN EN ISO 14001. That is how operational units have been meeting the requirements of their regional and local customers for many years.

With the introduction of new software in 2021 to record energy consumption and calculate the associated greenhouse gas emissions, we established a structured recording process and allowed for the internal reporting of energy consumption and emissions in accordance with the *Greenhouse Gas Protocol (GHG Protocol)*.

We disclose our climate-related activities through our participation in CDP.

Energy

Energy demand has the most significant direct impact on our greenhouse gas emissions, with the main share of energy requirements coming from our properties and the vehicle fleet.

We use energy from both renewable energy sources and non-renewable energy sources. This differentiation was included in the reporting in financial year 2022.

Energy consumption is reported here in accordance with the *Greenhouse Gas Protocol* for Scope 1 and Scope 2 emissions for the Group excluding the *Other Operations* segment.

In the case of non-calendar accounting – for example if the annual statement was not yet available – data for the 2022 figures were completed on the basis of the 2021 figures. In the case of flat-rate rentals, the average consumption value per square meter was calculated in line with similar locations.

ENERGY CONSUMPTION AND SHARE BY ENERGY SOURCE ¹	2022	2021
Fuel consumption from coal and coal products (MWh)	0	n.a
Fuel consumption from crude oil and petroleum products (MWh)	125,083	n.a
Fuel consumption from natural gas (MWh)	20,810	n.a
Fuel consumption from other non-renewable sources (MWh)	312	n.a
Consumption from nuclear energy (MWh)	1,250	n.a
Consumption of electricity, heat, industrial process heat, steam and cooling from non-renewable sources (MWh)	57,453	n.a
Total non-renewable energy consumption (MWh)	204,908	n.a
Share of non-renewable sources in total energy consumption (%)	93	n.a
Fuel consumption from renewable sources ²	0	n.a
Consumption of electricity, heat, steam and cooling from renewable sources (MWh)	15,765	n.a
Consumption of self-generated non-fuel renewable energy (MWh)	166	n.a
Total renewable energy consumption (MWh)	15,931	n.a
Share of renewable sources in total energy consumption (%)	7	n.a
Total energy consumption (MWh)	220,838	217,099

¹ Based on direct and indirect energy consumption classified as relevant for Scope 1 and Scope 2 in accordance with the GHG Protocol.

² Biomass, biogas, hydrogen from renewable energies, energy generation from non-fossil waste.

In the reporting year, we improved the reporting and are now in a position to detail the energy mix by different energy sources.

The Group's total energy consumption increased in financial year 2022 by 2 percent to 220,838 (previous year: 217,099) MWh.

For our business processes, we generate energy from renewable and, to a large extent, non-renewable energy sources. This includes, for example, natural gas used to generate heat in properties – or diesel, which is burned as fuel in vehicles. We also purchase energy from external suppliers from various sources and use it to generate electricity, heat, steam and cooling at our sites throughout the Group.

Emissions

The Bilfinger Group's greenhouse gas emissions are reported in metric tons in CO₂ equivalents (tCO₂e) in accordance with the method specified in the *Greenhouse Gas Protocol*. GHG emissions in Scope 1 amounted to 35,643 (previous year: 35,608) tCO₂e in the reporting year. For Scope 2, in addition to *location-based data*, *market-based data* were also collected in 2022 with the result that Scope 2 emissions were calculated in both variants. Emissions in Scope 2 location-based were 16,548 (previous year: 23,765) tCO₂e in 2022 and 14,047 tCO₂e when using the market-based calculation. Furthermore, in 2022, emissions in the GHG Scope 3 category *waste* were also calculated for the first time. In the reporting year, these amounted to 675 tCO₂e.

Scope 1 and Scope 2 emissions in accordance with GHG Protocol

For the reporting, we established *organizational boundaries* in accordance with the *Greenhouse Gas Protocol* methodology. We have adopted the *financial control approach*. This means that reporting is based on the financial organization and takes into account all fully consolidated companies with the exception of those that are in the process of being sold (*Other Operations* segment).

Direct greenhouse gas emissions originate from sources that are owned or financially controlled by Bilfinger, including purchased in leases relevant to IFRS 16.

Scope 1 includes direct emissions from the burning of fuels for heating and cooling buildings, powering vehicles and machinery and volatilized gases that escape over time from refrigeration units. For Scope 1, this refers to:

- Burning of natural gas, oil and other materials for heating the properties
- Emissions of hydrofluorocarbons (HFCs) from the use of air-conditioning systems in the properties
- Combustion of diesel, gasoline and liquefied petroleum gas (LPG) in owned or IFRS 16 compliant leased vehicles and machinery

Scope 2 includes emissions from the generation of electricity, steam, heating and cooling purchased by the company from utilities (indirect emissions). This relates to:

- Electricity consumption in properties, fleet and machinery
- Purchased district heating, steam and cooling

In reporting on indirect emissions (Scope 2), we distinguish between *market-based* and *location-based* methods, following the *GHG Protocol Scope 2 Guidance*. In the previous year, we reported Scope 2 emissions using the *location-based* method. This method uses emission factors as an average country value for the relevant sites. We use a database from the provider *Ecoinvent* for this purpose. The basis for the calculation is the value from the methodology developed by the *Intergovernmental Panel on Climate Change (IPCC) 2013-climate change-GWP 100a-(kg CO₂-Eq) per 1 unit of reference product*.

In financial year 2022, the additional determination using the *market-based* method was added. This approach takes into account the actual electricity mix of the respective utility.

Scope 1 emissions in 2022 were at the level of the previous year. The location-based value for Scope 2 decreased by 30 percent. The reduction is largely due to an improvement in measurement. Our business model means that we often operate on site at customer plants and also rent properties there. While the calculation of several Scope 2 emissions in 2021 was attributed to the heating type district heating, it turned out in the year under review that it is actually industrial process waste heat. Here, emissions generated by the production plant are attributed to the owner of the plant. Waste heat is generated as a by-product with emissions of almost zero. The smaller portion of the reduction is attributable to the lower number of properties.

The figure for Scope 2 emissions, which was also collected using the market-based methodology for the first time in 2022, amounted to 14,047 tCO₂e. This calculation takes into account the specific choice of a company's electricity tariffs. The market-based Scope 2 emissions figure was 15 percent below the location-based average figure in the reporting year.

Emissions in accordance with GHG Scope 3

In 2022, we developed a concept for the data collection of Scope 3 emissions in accordance with GHG. Due to the significantly greater complexity compared to Scope 1 and Scope 2, we provide for Scope 3 determination in three stages. In financial year 2022, the waste category was collected as the first Scope 3 relevant emission source in Bilfinger's upstream value chain. Our concept calls for all other categories in the upstream value chain to be successively added in 2023. Categories of the downstream value chain will follow in 2024.

Waste

Following the calculation logic of the GHG Protocol, the waste type and quantity as well as the waste treatment method are required to determine the emissions from waste generated, because the emission factors vary accordingly. In financial year 2022, the waste and wastewater category generated greenhouse gas emissions of 675 tCO₂e. Because these data were collected for the first time, a comparative figure for the previous year is not available.

WASTE AMOUNT AND TYPE	2022	2021
Amount of non-hazardous waste (kg)	5,043,546	n.a.
Amount of hazardous waste (kg)	185,240	n.a.
Amount of wastewater (m ³)	108,283	n.a.

WASTE TREATMENT METHOD	2022	2021
Incineration (kg)	744,995	n.a.
Recovery (kg) ¹	3,661,268	n.a.
Landfill (kg) ²	822,523	n.a.
Wastewater discharge indirectly to municipal and industrial wastewater treatment plants (m ³)	107,721	n.a.
Wastewater discharge directly to own treatment plant (m ³)	562	n.a.

¹ The waste treatment method recovery includes recycling and composting.

² Because landfill as a waste treatment method has the highest CO₂e factor, the non-hazardous waste quantities for which the waste treatment method could not be clearly determined were also added to this category.

Total emissions in accordance with GHG Protocol

An overview of the total emissions by scope is shown in the following table. In the coming year, the other Scope 3 categories will be gradually added.

CO ₂ EMISSIONS IN ACCORDANCE WITH THE GHG PROTOCOL	2022	2021
Scope 1 emissions (tCO ₂ e) ^{1, 3}	35,643	35,608
Scope 2 location-based emissions (tCO ₂ e) ^{1, 2, 3}	16,548	23,765
Scope 2 market-based emissions (tCO ₂ e) ^{1, 4}	14,047	n.a.
Total Scope 1 and Scope 2 location-based ^{2, 4}	52,191	59,373
Total Scope 1 and Scope 2 market-based ^{3, 4}	49,690	n.a.
Scope 3 emissions from waste (tCO ₂ e) ¹	675	n.a.

¹ The calculation method is based on the GHG Protocol using the financial control approach. Scopes 1, 2 and 3 include direct and indirect emissions from all fully consolidated companies. Companies that are in the process of being sold are excluded. This applies to the complete reporting segment Other Operations.

² Scope 2 is calculated using the location-based method of the GHG Protocol's Scope 2 calculation guidance.

³ Scope 2 is calculated using the market-based method of the GHG Protocol's Scope 2 calculation guidance.

⁴ The CO₂ conversion factors for a large part of the calculations come from specialist database provider Ecoinvent. In addition, emission factors published by the UK Department for Environment, Food & Rural Affairs (DEFRA) were used. The Association of Issuing Bodies (AIB) data were used to determine the residual mix for market-based calculation.

Additionally, we present intensity indicators for both our direct and indirect emissions in order to make the development transparent irrespective of the company's growth. The CO₂ equivalents from Scope 1 and Scope 2 are set in relation to energy consumption, Group revenue and the number of employees. Compared with the figures for which a year-on-year comparison can be made, the intensity indicators show an overall positive development in the reporting year.

CO ₂ EMISSIONS IN ACCORDANCE WITH THE GHG PROTOCOL – INTENSITY INDICATORS	2022	2021
CO ₂ e intensity (location-based) in relation to total energy consumption (tCO ₂ e / MWh) ¹	0.24	0.27
CO ₂ e intensity (market-based) in relation to energy consumption (tCO ₂ e / MWh) ¹	0.23	n.a.
CO ₂ e intensity (location-based) in relation to revenue (tCO ₂ e / € million) ²	12.68	16.63
CO ₂ e intensity (market-based) in relation to revenue (tCO ₂ e / € million) ²	12.08	n.a.
CO ₂ e intensity (location-based) in relation to the number of employees (tCO ₂ e / number of employees) ³	1.77	2.07
CO ₂ e intensity (market-based) in relation to the number of employees (tCO ₂ e / number of employees) ³	1.68	n.a.

1 Energy consumption excluding the Other Operations segment.

2 Revenue is Group revenue excluding the Other Operations segment.

3 Number of employees excluding the Other Operations segment.

Reduction of GHG emissions and Science-Based Targets Initiative

Steps to reduce CO₂ emissions were initiated in financial year 2022. All regions and divisions of the Group have developed concepts to reduce their respective emissions and thus the emissions of the Group as a whole from 2023 onward in accordance with GHG Scope 1 and 2. The combination of various measures for the next few years includes a shift in purchased electricity to renewable sources, gradually replacing the passenger vehicle fleet with electric vehicles as well as installing photovoltaic systems and initiating energy efficiency initiatives at our sites. In terms of GHG Scope 1 and 2 greenhouse gas emissions caused by our operations, we have set a target of being climate neutral by 2030 at the latest. Most importantly, this includes a reduction in emissions. In the case of unavoidable emissions, compensation is also provided through the support of additional CO₂-reducing projects combined with the purchase of carbon credits.

Based on the survey of Scope 1 and Scope 2 emissions as well as the complete survey of Scope 3 emissions beginning in financial year 2024, we plan to submit Bilfinger's targeted reduction path of GHG emissions to limit global warming to a maximum of 1.5 degrees Celsius to the Science-Based Targets Initiative (SBTi) for review. The concept we developed in 2022 foresees the submission of the commitments for 2023 and the submission of the reduction plan to achieve the near term targets by 2030 for Scope 1 and Scope 2 emissions accordingly for 2025.

The broader reduction concepts for Scope 3 emissions will be developed based on the data collection for this category.

B.5.2.2 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.

We pay particular attention to the quality of our services and to delivering a range of products and services that is consistently aligned with the needs of our customers. The aspect of *customer focus* is thus directly related to our central strategic target of enhancing the efficiency and sustainability of our customers' plants through our work.

A *Group Executive Management (GEM)* was set up in the financial year in order to more closely link the exchange between the Executive Board and the operating units with direct customer contact. The composition and duties of this committee are described in Chapter [B.5.4.1 Good corporate governance](#). Close contact between the Executive Board and the managers with operational responsibility in *Group Executive Management* brings operations even closer to the Executive Board and further improves the alignment of Board decisions with customer requirements.

Concept

Increasing awareness of climate change and the ensuing energy transition in many industrialized countries are opening up attractive market opportunities 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, pharma & biopharma and oil & gas industries are the Bilfinger Group's largest customer groups. As a result of socially and politically mandated energy transition and climate protection measures in all key stages of the value chain, these industries are all facing fundamental innovative leaps. They have the immediate task of enhancing their plants, securing their future energy supply and significantly reducing their carbon footprint in the process.

Our target is to be the leading 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 at the core of our Group's strategic direction.

Bilfinger's focus in this regard includes areas of activity in which the company is already established, including nuclear power, hydropower and district heating networks. There are also areas of growing strategic importance such as the production, transport and storage of hydrogen, carbon capture and storage and battery production. With its portfolio of services, the Group is addressing the imminent decarbonization of energy-intensive production, transport and processing operations and increasing 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.

Bilfinger's portfolio brings together services that contribute to increased efficiency and sustainability in various customer segments. This contribution significantly deviates from the specifications of environmentally sustainable activities as defined by Regulation (EU) 2020/852 Taxonomy Regulation (*EU Taxonomy Regulation*), which is explained elsewhere.

Customer segments

The services described below in the Group's *customer segments* represent an excerpt from the broad range of industrial services with which Bilfinger improves the efficiency and sustainability of its customers' plants:

Hydrogen

Bilfinger's objective is to make a contribution to the increased use of hydrogen as part of a climate-friendly energy value chain. Here, the Group can apply the expertise it has established over the course of many years in the field of gas treatment for the utilization and transport of hydrogen along the entire value chain.

In hydrogen production projects, Bilfinger acts as an independent system integrator. The existing engineering, prefabrication and installation competencies have already been proven in a number of projects.

In the transport and storage of hydrogen, Bilfinger mainly supports the expansion or conversion of existing gas infrastructure. Bilfinger's experience and capabilities in the field of gas treatment – including in gas drying – position it as a competent partner for technology companies.

Carbon capture and storage

Carbon capture and storage (CCS) is a technology that will play a key role in achieving the goal of climate-neutral industrial production in the years ahead. By capturing CO₂ emissions as they are generated and then processing or storing them, the volume of environmentally harmful greenhouse gas emissions can be significantly reduced.

With its expertise, Bilfinger delivers development and support for all aspects of CCS-related technology. This includes the separation of CO₂ emissions, their purification, compression and liquefaction as well as their storage and transport. Bilfinger prepares feasibility and environmental impact studies as well as safety concepts while also managing approval processes. The company supports construction of plants through engineering, project management and the procurement, manufacture and assembly of required components.

Nuclear power

In a growing number of countries in Europe – currently mainly the United Kingdom, France and Finland – nuclear power is considered part of the national climate protection strategy. These countries are counting on modern nuclear power plants to achieve their targets for reducing CO₂ emissions with a high degree of energy availability. Bilfinger is well positioned in these markets as a partner for substantial portions of the life cycle of nuclear power plants.

Hydroelectric power

Of regional importance, particularly in the Alpine countries, are Bilfinger's activities in the generation and storage of energy generated by hydroelectric power. In addition to projects in hydraulic steel engineering for river power plants, Bilfinger also focuses on the assembly of turbines and valves as well as the design and construction of pressure piping systems for pumped-storage power plants. Here the company can offer its customers a complete package from a single source including engineering and manufacturing, assembly and commissioning.

Battery production

The dynamic growth market of battery production is driven by the trend toward a sustainable reduction of CO₂ emissions. Business opportunities for Bilfinger can be found in the engineering and construction of plants for the processing of required raw materials as well as plants for the demanding chemical production of precursor materials for batteries.

District heating and waste heat

Optimizing municipal supply networks is a key component when it comes to more efficient energy use. Bilfinger has many years of experience in this area, particularly in German-speaking regions. District heating networks in particular offer the possibility of taking waste heat – from industrial processes, for example – and transferring it to different locations for use. But networks based on the same principle can also be used for decentralized cooling, potentially leading to a considerable reduction in energy consumption and emissions.

Products

Alongside its focus on these *customer segments*, Bilfinger also delivers a comprehensive range of products that help enhance efficiency and sustainability to customers in the chemical & petrochemical, pharma & biopharma, oil & gas as well as energy sectors. Measures to increase the energy efficiency of existing plants, for example, can have a significant impact on the reduction of energy consumption and emissions. Despite significant new investment projects in the use of renewable energy sources, CO₂ emissions will continue to be largely determined by existing industrial plants in the years to come. These must be optimized and modernized to reduce energy consumption and emissions while maintaining the same capacity utilization.

Measures that can be executed within the framework of the existing infrastructure include, for example, improved thermal insulation. These services are an important part of the Group's portfolio. A certified analysis method also used by Bilfinger – *Thermal Insulation Performance (TIP) Check* – can provide information on energy and heat losses through poorly insulated components and thus help to place optimally insulating materials where they are needed.

A more complex energy efficiency method used by Bilfinger is the so-called *pinch analysis*. It evaluates the cold and heat flows of a process and, in addition to an evaluation of the current situation, also provides a theoretically ideal system status. Based on this ideal situation, Bilfinger then develops an individual energy efficiency concept and proposes modifications to the plant that optimize combined heat and power.

Revenue from industrial services to enhance efficiency and sustainability

The basis for measuring revenue in the *customer segments* mentioned above and with *products* for enhancing efficiency and sustainability is a detailed recording of customer contracts by plant type and trade.

Total revenue from these activities in the reporting year amounted to €713.0 million (previous year: around €500 million). The increase is attributable on the one hand to significantly higher revenue, and on the other hand to an improvement in the quality of data collection compared with the previous year.

Revenues in the customer segments mentioned above, which are attributable to the shift from fossil fuels to alternative energy sources and thus contribute to more sustainable business activities, totaled €445.4 million (previous year: around €220 million). The largest revenue volumes were in the areas of nuclear energy with €147.4 million (previous year: around €100 million), district heating and waste heat with €75.8 million (previous year: around €5 million), battery production with €68.4 million (previous year: around €45 million), hydropower with €39.7 million (previous year: around €25 million), waste recycling and wastewater treatment with €27.5 million (previous year: around €4 million) as well as hydrogen (production and transport) with €22.0 million (previous year: around €5 million).

This is on top of activities for the maintenance and modernization of existing plants with the aim of achieving more energy-efficient and lower-emission plant utilization at the same level of capacity utilization. These generated revenue of €267.6 million (previous year: around €250 million). The largest share in this context is accounted for by optimizing the temperature insulation of industrial plants.

The partially still low volume of revenue is due to the early stage of implementation of the respective projects in the course of the energy transition. Here Bilfinger has set itself the goal of leveraging the corresponding existing growth potential.

5.2.3 Consolidated disclosures pursuant to 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 redirect capital flows to sustainable economic activities. It represents an important step toward achieving climate neutrality for Europe by 2050. In this context, the EU Taxonomy serves as a classification system for environmentally sustainable economic activities.

Below we present the share of our consolidated revenue, capital expenditures (capex) and operating expenditures (opex) for the 2022 reporting period that is associated with Taxonomy-eligible as well as Taxonomy-aligned economic activities related to the first two environmental objectives (climate change mitigation and climate change adaptation) in accordance with Article 8 of the Taxonomy Regulation.

A Taxonomy-eligible economic activity is an economic activity described in the Delegated Acts that complement the EU Taxonomy Regulation, i.e. the Delegated Act on climate-related environmental objectives, taking into account the complementary Delegated Act on nuclear power and natural gas, regardless of whether that economic activity meets some or all of the technical assessment criteria set out in those Delegated Acts. A Taxonomy-non-eligible economic activity is any economic activity that is not described in the Delegated Acts that supplement the EU Taxonomy Regulation.

In the reporting year, it was examined for the first time whether the respective Taxonomy-eligible activities are Taxonomy-aligned. 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 adverse effects on 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 (IFRS) 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 for the reporting year 2022 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 of the EU Taxonomy Regulation. When classifying economic activities to the activities mentioned in the Delegated Acts on Climate Targets, particular attention was paid to the activity description in the Delegated Act. As an additional aid to interpretation, the relevant technical screening criteria were also considered. If these are not applicable to the economic activity of the Bilfinger Group, then such activities were not identified as Taxonomy-eligible. This relates, for example, to the classification of insulation work on pipelines and industrial plants, which was not recorded as Taxonomy-eligible because the technical assessment criteria of *activity 7.3. Installation, maintenance and repair of energy-efficiency equipment* only cover the insulation of buildings in the strict sense. For all contracts with revenue in reporting year 2022 that were classified

as Taxonomy-eligible, a Taxonomy alignment review of the underlying activity was performed. For this purpose, an assessment of the criteria on the substantial contribution to an environmental goal as well as the non-violation of the other environmental goals was conducted for each contract in question. The so-called EU Taxonomy Compass, which is provided by the EU Commission, served as the basis for the assessment.

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 regard to the procedures in place for upholding human rights, the Bilfinger Group has implemented a multi-stage due diligence process which, within the framework of the Compliance Management System in accordance with the so-called prevent-detect-respond model, ensures that risk-based measures to minimize human rights risks in business processes are established, monitored and modified as necessary. 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 *Declaration of Principles on Respect for Human Rights*. This declaration, which is binding for all employees of the Bilfinger Group and, like the Group's Code of Conduct, represents an overarching governance document, explains all measures taken to safeguard compliance with human rights. This also applies to what we expect from suppliers in the supply chain with regard to the implementation of appropriate measures.

Guide *Step 2* is implemented by Bilfinger through the annually recurring and event-related risk analysis, which serves as a basis for the development and implementation of measures. During the risk analysis, we identify various factors such as corporate structure, procurement structures or the type and scope of business activities to determine whether and to what extent human rights and environmental risks could lead to any damage to protected legal positions as a result of our own business activities and / or business relationships with suppliers. Potential risks are then counteracted with appropriate preventive measures. Remedial measures are implemented for actual risks – this is how Bilfinger implements Guide Step 3. The corporate function Compliance together with other departments such as Corporate Internal Audit monitor the implementation of mitigating measures (see Guide Step 4). With regard to the communication – both internally and externally – 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 Bilfinger Statement of Principles on Human Rights. This obligation has been in place since January 1, 2023. We have already reported on this process in the non-financial Group declaration and in the Bilfinger Code of Conduct.

With the help of the so-called *Confidential Reporting Line*, Bilfinger's whistleblower system, employees as well as third parties can anonymously report information on possible compliance violations (*Guide Step 6*).

Counteracting corruption and bribery is a central component of our compliance management system. The comprehensive concept is presented in Chapter [B.5.4.2 Counteracting bribery and corruption](#).

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. Training courses which address all the risks of our business activities relating to competition law 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 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. Any infringement is strictly forbidden. In this context, tax governance and tax compliance are key elements of corporate management and supervision. 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 2022, 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.

EU Taxonomy-eligible and Taxonomy-aligned revenue

Bilfinger's Taxonomy-eligible economic activities contribute to the first environmental objective, climate change mitigation. The relevant technical screening criteria are listed in Annex I of the Delegated Act on the climate-related objectives.

Total revenue of €4,312.0 million (previous year: €3,737.4 million) corresponds to the revenue in the consolidated income statement. Total revenue from Taxonomy-eligible economic activities in the reporting year amounted to €267 million (previous year: €67 million). This corresponds to a share of total revenue of 6 percent (previous year: 2 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. Revenue from Taxonomy-aligned economic activities in the reporting year amounted to €0 million. The share of revenue from Taxonomy-aligned economic activities in total revenue is 0 percent and 0 percent of revenue from Taxonomy-eligible activities.

The economic activities of the Bilfinger Group as an industrial services provider in the process industry are largely not covered by the Delegated Acts on Climate Targets in the EU Taxonomy Regulation. They can only be allocated to the economic activities mentioned in the Delegated Acts on a smaller scale and designated as Taxonomy-eligible. Bilfinger's main Taxonomy-eligible economic activities are described below.

In the activities in the area of cogeneration of heat/cool and power with bioenergy, revenue in the reporting year was less than €0.1 million. For this reason, revenue of €0 million is reported for this activity.

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 €31 million (prior year: €24 million) from the construction of power plants that produce electricity from hydropower. This mainly involves special piping in hydropower plants in the Engineering & Maintenance Europe segment, especially in Austria. 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 would qualify as Taxonomy-aligned with regard to the substantial contribution to climate change mitigation.

4.15 District heating / cooling distribution

In the reporting year, Bilfinger generated €37 million or 1 percent of Taxonomy-eligible revenue in the area of district heating and cooling distribution, particularly with piping. This activity was carried out primarily in the Engineering & Maintenance Europe segment with a focus on Germany, Austria and Switzerland. For classification as a Taxonomy-aligned activity, evidence of environmental impact assessments and climate risk analyses performed, for example, is required. In general, these are prepared or obtained by other parties, such as the plant operators. In the reporting year, Bilfinger, in its function as contracted service provider, did not have access to such documentation and therefore reports revenue from this activity as Taxonomy-eligible but not Taxonomy-aligned.

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 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 €74 million (2 percent of total revenue). The description of Activity 4.27 includes the criteria that the construction permit for the new nuclear power plant in question is granted by the competent authorities of an EU member state. Since the building permit for the Hinkley Point C power plant was granted before the UK left the European Union, this description applies to both the UK and Finnish nuclear power plant builds. For new nuclear power plant construction in the UK, however, the substantial contribution to climate change mitigation and adaptation cannot be met, because the criteria in question require that the power plant be located in an EU member state. Accordingly, activities in the construction of a new nuclear power plant in the UK cannot be Taxonomy-aligned.

For the activities within the scope of the new construction of the Finnish nuclear power plant Olkiluoto-3 (OL3), the above-mentioned criterion of being located in an EU member state is met. The additional criteria for Taxonomy alignment of the new power plant construction were audited reviewed by the Finnish power plant operator Teollisuuden Voima Oyj (TVO) and Taxonomy alignment was declared in their Annual Report 2022. However, this reporting was not subject to an audit from an auditing firm. It was therefore not possible to provide sufficient evidence of EU Taxonomy alignment for Bilfinger's activities in connection with the construction of the new OL3 nuclear power plant.

6.14 Infrastructure for rail transport

Bilfinger generated €21 million or 0.5 percent of Group revenue in reporting year 2022 from activities in the construction of rail transport infrastructure, primarily in the Engineering & Maintenance International segment with a focus on the U.S. Bilfinger is working in this area, for example,

on barrier-free access to train stations and platforms. It was not possible to provide evidence of Taxonomy alignment for financial year 2022, because the required evidence mainly relates to European guidelines whose compatibility with U.S. guidelines has not yet been adequately clarified.

7.1 Construction of new buildings

The Taxonomy-eligible activities in the construction of new buildings were mainly performed in the Engineering & Maintenance International segment in the U.S. in the reporting year. In 2022, €12 million in Taxonomy-eligible revenue (0.3 percent of consolidated revenue) was generated from the construction of new buildings. It was not possible to prove the Taxonomy alignment of this activity, since, for example, the DNSH criteria for pollution prevention and control refer to European directives. Compatibility with U.S. guidelines could not be sufficiently clarified in the reporting year.

7.2 Renovation of existing buildings

In the reporting year, Bilfinger generated €55 million or 1 percent of Group revenue from building renovations, in particular in the Engineering & Maintenance International segment in North America. Here, Bilfinger is particularly active in the construction of buildings and their preparation. Among other things, proof of a significant contribution to climate change mitigation, which relates to the implementation of an EU directive, could not be provided for the U.S. activities.

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 €18 million in Taxonomy-eligible revenue (0.4 percent of Group revenue). This revenue was generated in the Engineering & Maintenance Europe and Engineering & Maintenance International reporting segments. Examples of this activity include the installation of district heating as well as heating, ventilation, and air conditioning (HVAC) and the replacement of windows and insulation on buildings. This business activity is not reported as Taxonomy-aligned in the reporting year 2022. Revenue from the Engineering & Maintenance International reporting segment was generated in North America. The alignment of the regulations there with the implementation of the EU regulations, which are the target of the technical screening criteria here, was not sufficiently clarified in the reporting year. For the most part, this problem does not exist in the Engineering & Maintenance Europe reporting segment.

In addition, a climate risk and vulnerability assessment as well as the fulfillment of various European regulations for the prevention of pollution must be demonstrated. Given the fact that Bilfinger is mainly involved in the installation, maintenance and repair of customer equipment, there are no significant climate risks for Group activities in this area. With regard to compliance with European regulations on the prevention of pollution for activities within the European Union, it was not possible for Bilfinger to provide documentation within the framework of the EU Taxonomy in 2022. The company will endeavor to do so in the coming reporting years.

EU Taxonomy-eligible and Taxonomy-aligned capital expenditures (capex)

Capital expenditures (capex) in the context of EU Taxonomy reporting are defined in Annex I of the Delegated Act to Article 8 of the EU Taxonomy Regulation. The total amount of capital expenditure (capex) represents the denominator and comprises investments in property, plant and equipment (see Chapter [C.6.16 Property, plant and equipment](#)) and intangible assets (see Chapter [C.6.15 Intangible assets](#)), as well as capitalization of rights of use from leases (see Chapter [C.6.17 Leases](#)), and amounts to €103 million in the reporting year. The numerator of Taxonomy-eligible capex was

determined as follows: Investments in assets or processes related to Bilfinger's Taxonomy-eligible economic activity were estimated. For this purpose, these capital expenditures were deducted from the total capex that itself originated from Taxonomy-eligible activity. In the reporting year, investments in land and buildings, solar installations, vehicles and electric charging points amounting to €41 million were deducted. The remaining capex of €62 million was multiplied by the Taxonomy-eligible revenue share of 6 percent. This part of the capital expenditure is allocated to the Taxonomy-eligible economic activities using the respective shares of revenue. Capex for Taxonomy-eligible business activities allocated in this way amounted to €4 million in the reporting year. Capex plans for the expansion of Taxonomy-eligible activities or for the conversion of Taxonomy-eligible activities into Taxonomy-aligned activities were not made in the reporting year. Capital expenditures in assets and processes derived from Taxonomy-eligible economic activities are the third component of Taxonomy-eligible capital expenditures. They include the above-mentioned investments in land and buildings (activity 7.1), solar installations (activity 4.1), vehicles (activity 3.3) and electric charging points (activity 6.15) amounting to €41 million. The total of both components constitutes the EU Taxonomy-eligible capex of €45 million, or 44 percent of total capital expenditures of €103 million.

The amount of Taxonomy-aligned capital expenditures was determined as follows in the reporting year: The total capex after deduction of capital expenditures in production from Taxonomy-eligible activities amounting to €62 million was multiplied by the Taxonomy-aligned share of revenue of 0 percent. This results in a Taxonomy-aligned capex of €0 million or 0 percent of the total capex of €103 million. Investments in production from Taxonomy-aligned economic activity 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.

EU Taxonomy-eligible and Taxonomy-aligned operating expenses (opex)

Bilfinger's business model as a service provider without significant production activities is asset-light. The share of property, plant and equipment and right of use assets from leases in total assets is thus at 13.7 percent (previous year: 13.8 percent). Operating expenses (opex) as defined in the Delegated Act on Article 8 of the EU Taxonomy Regulation as well as the other operating expenses included in the definition are therefore not significant for Bilfinger. The total amount of operating expenses in the reporting year is €127.3 million (previous year: €105.2 million). Due to the immateriality of the operating expenses in relation to total operating expenses, the Group is exempt from determining the proportion of Taxonomy-eligible and Taxonomy-aligned operating expenses in accordance with the definition of the Delegated Act to Article 8 of the EU Taxonomy Regulation and reports these at 0 percent (previous year: 0 percent) in each case.

REVENUE FY 2022: TEMPLATE 3 TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (NUMERATOR)	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount	%	Amount	%	Amount	%
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
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
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
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
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
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
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
Total amount and proportion of Taxonomy-aligned economic activities in the numerator of the applicable KPI	0.0	100.0	0.0	0.0	0.0	0.0

REVENUE FY 2022: TEMPLATE 4 TAXONOMY-ELIGIBLE BUT NOT TAXONOMY-ALIGNED ECONOMIC ACTIVITIES	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount	%	Amount	%	Amount	%
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
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	74.1	27.7	74.1	27.7	0.0	0.0
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
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
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	3.7	1.4	3.7	1.4	0.0	0.0
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
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	189.3	70.9	189.3	70.9	0.0	0.0
Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the denominator of the applicable KPI	267.1	100.0	267.1	100.0	0.0	0.0

REVENUE FY 2022: TEMPLATE 5 TAXONOMY-NON-ELIGIBLE ECONOMIC ACTIVITIES

	Amount	%
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
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
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
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
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
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
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	4,044.9	100
Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the applicable KPI	4,044.9	100

CAPEX FY 2022: TEMPLATE 1 NUCLEAR AND FOSSIL GAS RELATED ACTIVITIES

Nuclear energy related activities		
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
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
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		
The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.		No
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
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.		No

CAPEX FY 2022: TEMPLATE 2 TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (DENOMINATOR)	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount	%	Amount	%	Amount	%
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 denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
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 denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
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 denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
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 denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
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 denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
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 denominator of the applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0
Amount and proportion of other 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
Total applicable KPI	0.0	0.0	0.0	0.0	0.0	0.0

CAPEX FY 2022: TEMPLATE 3 TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (NUMERATOR)	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount	%	Amount	%	Amount	%
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
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
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
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
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
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
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
Total amount and proportion of Taxonomy-aligned economic activities in the numerator of the applicable KPI	0.0	100.0	0.0	0.0	0.0	0.0

CAPEX FY 2022: TEMPLATE 4 TAXONOMY-ELIGIBLE BUT NOT TAXONOMY-ALIGNED ECONOMIC ACTIVITIES	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount	%	Amount	%	Amount	%
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
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	1.1	2.4	1.1	2.4	0.0	0.0
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
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
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	0.1	0.1	0.1	0.1	0.0	0.0
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
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	43.7	97.5	43.7	97.5	0.0	0.0
Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the denominator of the applicable KPI	44.8	100.0	44.8	100.0	0.0	0.0

**CAPEX FY 2022: TEMPLATE 5
TAXONOMY-NON-ELIGIBLE ECONOMIC ACTIVITIES**

	Amount	%
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
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
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
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
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
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
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	58.0	100.0
Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the applicable KPI	58.0	100.0

OPEX FY 2022: TEMPLATE 5 TAXONOMY-NON-ELIGIBLE ECONOMIC ACTIVITIES	Climate change adaptation (CCA)	
	Amount	%
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
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
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
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
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
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
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	0.0	0
Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the applicable KPI	127.3	100

B.5.3 Social

B.5.3.1 Occupational health and safety

Bilfinger has made it its top priority to ensure the health and well-being of all its employees. No employee's health shall be adversely affected by his or her work. Occupational health and safety standards are set throughout the Group by the corporate function HSEQ (Health, Safety, Environment, Quality). The design and implementation of these measures are decentralized to the Group companies.

Concept

Occupational safety

For Bilfinger as a service provider for industrial customers, the safety of its employees is of particular importance. Because Bilfinger often operates in particularly safety-sensitive areas in customers' plants, aspects of occupational safety are of central importance for business activities. 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*. To get as close as possible to this aspiration, we take a two-pronged approach: We implement the necessary technical and organizational measures and address occupational safety in extensive communication measures for employees.

The occupational safety standards developed centrally by the corporate function HSEQ are expressed in Group-wide uniform guidelines and *Standard Operating Procedures (SOPs)*. Responsibility for compliance with these guidelines 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.

To record, process and communicate HSEQ incidents to the same standards worldwide, we use standardized management software throughout the Group. All types of HSEQ incidents can be recorded quickly and flexibly directly on site using a mobile IT application. This workflow makes it easier for employees to process HSEQ incidents and creates the central conditions for developing corrective measures to avoid similar situations in the future.

In conjunction with the comprehensive technical and organizational measures, intensive communication in the area of occupational safety is of great importance. The aim is to maintain a high level of awareness of the particular importance of HSEQ incidents among our employees and to further improve it. For example, we draw attention to general occupational safety aspects and current accident statistics in the form of monthly *Safety Moments* circulars. Since the end of 2022, there has been a general requirement that all discussions and meetings involving four or more people begin with a Safety Flash in which aspects of occupational safety are addressed. In addition, monthly articles on occupational safety appear in the employee magazine *Bilfinger Update*.

An important measure for raising awareness regarding topics of occupational safety is our safety program Safety Works! as well as the safety campaigns that were developed in this context. In 2022, the *In the line of fire / Danger – watch out!* campaign aimed to familiarize employees with the six most important hazards of the *Life Saving Rules / Work in the line of fire*. This involves using QR codes so that employees can view short safety videos on stationary and mobile devices.

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 maintaining the health of all employees.

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. The findings from these safety walks 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.

As part of Bilfinger Matrix certification, 37 companies with 145 locations have been certified pursuant to the occupational health and safety standard DIN EN ISO 45001 and eight companies with 43 locations have been certified pursuant to the *Safety Certificate Contractors Petrochemical (SCCP)* standard.

Regular internal audits are carried out at the Group companies. Following the restrictions imposed as a result of the COVID-19 pandemic in the previous year, the number of audits carried out on site was increased again in the reporting year. A total of 14 Group companies in Germany, Norway, Belgium, the Netherlands, South Africa and Kuwait were audited. In addition to these internal audits, there are further external audits, including by certifiers, authorities or customers.

As key figures in the area of occupational safety, we report on *Lost Time Injury Frequency (LTIF)*, *Total Recordable Incident Frequency (TRIF)* and the number of fatalities resulting from occupational accidents. The *LTIF* indicator measures the number of days lost due to work-related accidents per million hours worked. It amounted to 0.26 in financial year 2022 (previous year: 0.21). This *TRIF* indicator measures the number of days lost due to reportable accidents per million hours worked. In 2022, it was 1.31 (previous year: 1.06). Bilfinger's LTIF and TRIF figures in 2022 were

again better than the industry average determined among our competitors and selected clients (data from 2021).

Regrettably, there was one occupational accident resulting in death in 2022. A total of 15 employees died as a result of COVID-19 in 2020 and 2021; fortunately, no further deaths occurred in 2022.

OCCUPATIONAL SAFETY INDICATORS		
	2022	2021
LTIF ¹	0.26	0.21
TRIF ²	1.31	1.06
Fatalities ³	1	1

1 LTIF: Lost Time Injury Frequency – number of work-related accidents for employees and temporary workers with at least one day lost, based on 1 million hours worked

2 TRIF: Total Recordable Incident Frequency – number of all reportable accidents for employees and temporary workers, based on 1 million hours worked.

3 Work-related accidents of employees and temporary workers resulting in death.

Health protection

The measures taken locally at Group companies on the basis of central requirements to maintain employee health include, for example, programs to improve ergonomics in the workplace or to deal with psychological demands and stresses. Preventive medical checkups are also made available.

In the event of incidents of particular significance for the health of employees, the corporate function HSEQ assumes a central coordination role in health protection, as has been the case with the COVID-19 pandemic. The number of employees with COVID-19, for example, is collected at headquarters for the entire Group. This also includes the severity of disease progression, quarantine status and the number of employees who have recovered and returned to work. Information on the current status of all COVID-19 cases in the Group is provided by a dashboard that was established in the first years of the pandemic on the basis of the management software that has been used at Bilfinger for many years. In line with the decentralized Group organization, responsibility for the selection and implementation of specific protective measures related to the respective local COVID-19 situation was with our units. This enables specific, timely and effective responses to developments on the ground. Depending on the type of job and the intensity of contact among the workforce, a measured approach is taken with the objective of minimizing the impact on the health of employees and their families.

B.5.3.2 Employee development and diversity

Our business model as an industrial services provider is shaped by the availability, skills and value orientation of our employees. Continuous training and qualification of our employees are key in this regard.

Concept

The continuous development of employees throughout the Group is a key factor for the success of the company. Group-wide human resources management is based on clearly-defined standards that are firmly anchored in our Group Policies and therefore apply to all employees. Talent management, compensation and internal reporting are the cornerstones of employee development.

Employee development

Central human resources management processes are outlined in our *HR Calendar*. They relate, for example, to the annual performance assessment, development planning and salary review in the course of the financial year. We generally track our annual performance and development cycle in digital form. The annual employee appraisals are conducted on the basis of standardized discussion guidelines, with the help of which all those involved reflect on what has been achieved and define the resulting development measures in a structured manner. Salaried employees also set individual goals for the year ahead.

To develop and retain internal talent at Group level, we have established various programs for high-potential employees and management levels 2 to 4.*

As part of the annual Talent Review, the potential of 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 Corporate Human Resources and the Executive Board. The Talent Review's identification of potential is followed by a nomination to the global management development programs, which serve to promote the development of management and specialist competencies as well as networking.

In addition, the Bilfinger Academy offers so-called regional *leadership camps* that enable our Bilfinger managers to develop an integrative leadership style and to be successful in their role as *people leaders* at Bilfinger. The two events, *Leadership Base Camp* and *Leadership Advanced Camp*, are three-day trainings intended for the different experience levels of new and more experienced leaders.

* Management levels at Bilfinger are structured on the basis of budget responsibility, size of executive scope or strategic importance in the position held. The level below the Executive Board is management level 1.

In addition to the management development programs, the Bilfinger Academy bundles the internal further training programs for all employees with a PC workstation. The established continuing education program *Digital Learning Week* was further developed in 2022. The new *Learning Days* format focuses more on internal networking and knowledge sharing. For example, more internal trainers were used and new formats such as *Round Tables* or *Meet & Ask* gatherings were introduced. In consultation with their supervisors, employees were able to register online for seminars and trainings on topics such as project management, self-management, leadership and work techniques.

To specifically promote project management skills, which are of great importance in Bilfinger's business model, we have introduced a qualification series together with external trainers which offers training in accordance with the internationally recognized standards of the Project Management Institute (PMI). This program has been intensified and 10 new courses with a total of more than 100 participants were launched Group-wide in 2022.

At the regional and local levels, Bilfinger's operating units offer additional development and training opportunities that are oriented toward their respective needs.

A portion of the savings generated by the efficiency program launched at Bilfinger in 2022 will in future be invested specifically in employee training and development in order to maintain and further strengthen the Group's competitiveness. The objective is to increase investment in training and development to an annual share of at least 0.5 percent of Group revenue in the future.

The *Bilfinger Apprentice Campaign* project was launched in 2022 as a means of positioning Bilfinger even more strongly on the German-speaking market as an attractive employer in the area

of vocational training. The goal is to develop an employer profile with a focus on training in order to make the Group's offering in this area better known to the relevant target groups in 2023.

Diversity

The diversity of our employees is of fundamental value to Bilfinger. We consider diversity in terms of differences in age, gender, religion, ideology and ethnic origin, as well as in physical and mental abilities, sexual orientation and identity of our employees. We have given ourselves the task of making these central dimensions of diversity an integral part of our daily work and the interaction among colleagues.

Cultural and linguistic diversity are part of everyday life at a globally active company like Bilfinger, with employees from a total of 112 nations. We are convinced that it is precisely this diversity that makes Bilfinger unique. Through their different approaches and perspectives, our employees create innovative solutions for our customers and thus make a key contribution to the success of our company.

Respect for and appreciation of diversity in our company is most clearly expressed in the fact that we prohibit discrimination of any kind. We have anchored this principle in our Code of Conduct, which applies to all employees without restriction. Violations of our Code of Conduct will not be tolerated under any circumstances; more detailed explanations are provided in Chapter [B.5.4.2 Counteracting bribery and corruption](#).

Our global diversity initiatives seek to establish a common understanding of why diversity is of fundamental value to us as a Group. Senior management in the Group regularly highlights the relevance of these issues in internal publications. The topic of diversity is also of crucial importance in the cooperation with junior managers and young talent. In 2022, the company's Labor Director launched a virtual series of talks on this topic.

As an employer, we would like to be attractive for employees in a wide range of life situations. For this reason, we seek to create a working environment that is as modern as possible, for example through hybrid forms of work and flexible working hours. This approach includes providing support for childcare or other family responsibilities through flexible working time models.

When looking for new employees, we specifically expand conventional recruiting channels to address potential employees and trainees among refugees, for example. When filling positions internally and as part of our succession planning, we believe it is important to have a diverse field of applicants.

In order to strengthen intercultural cooperation and reduce unconscious bias, employees are offered a wide range of further education and training opportunities. In addition, job rotation programs, such as our in-house trainee program, or temporary secondments to international assignments promote the transfer of knowledge between the various locations while also helping to establish an atmosphere of cultural openness.

The focus of the Bilfinger Mentoring Program is on fostering the exchange of experience between less experienced employees and experienced employees from different business segments and countries in order to support the transfer of knowledge as well as perspective changes in a sustainable manner within the Bilfinger Group.

Internal communication activities are given high priority: We use Group-specific training programs to provide information about diversity and its importance at Bilfinger. By doing so, we want to empower our employees to become ambassadors for a diverse corporate culture. Our digital corporate media regularly feature portraits of inspiring personalities and teams who contribute to a diverse corporate culture. We also use collaborative formats such as our internal MS Teams channel *Diversity@Bilfinger* to promote an exchange of ideas and information among employees.

In addition to these Group-wide diversity initiatives, Bilfinger also relies heavily on local initiatives that are tailored to regional needs and relevant diversity topics in the Group units in individual regions. In 2022, for example, a local interest group of employees from different business units was set up in our company in the United Kingdom. The group has taken it upon itself to design and implement local projects on diversity.

In the United States, for example, we specifically recruit employees at universities and colleges where a significant proportion of students are from ethnic minorities. In addition, interview questions aimed at the relevance of diversity among employees in everyday working life are an integral part of the recruitment process at Bilfinger units in the U.S. context.

The proportion of women in management positions has been established as a metric at Bilfinger. At the end of November 2020, the Executive Board resolved to achieve a target figure at Bilfinger of 10 percent women in management levels 1 and 2 below the Executive Board by December 31, 2023, in accordance with Section 76 (4) of the German Stock Corporation Act.

On November 26, 2020, the cut-off date for the definition of the target figure, this proportion was 8 percent in management level 1 and just under 5 percent in management level 2. As of December 31, 2022, the proportion of women in management level 1 was 11 percent (previous year: 6 percent) and in management level 2 it was 6 percent (previous year: 8 percent).

The Supervisory Board has set a target of 30 percent women and men on the Executive Board by December 31, 2023. In the case of an Executive Board with two or three members, this means having at least one woman and one man. As of December 31, 2022, the Executive Board consisted of two members, both of whom are men.

Further information can be found in Chapter [A.4.1 Declaration of corporate governance and corporate governance report](#), which is also available on the website www.bilfinger.com under *Investors / Corporate Governance / Declaration of corporate governance*.

PROPORTION OF WOMEN IN MANAGEMENT POSITIONS			
	2022	2021	Target 2023
in %			
Executive Board	0%	50%	30%
Management level 1	11%	6%	10%
Management level 2	6%	8%	10%

B.5.4 Governance

B.5.4.1 Good corporate governance

Within the scope of our activities, we observe the generally recognized principles of responsible *corporate governance*. For Bilfinger, *good corporate governance* most importantly means responsible behavior toward shareholders, employees, business partners, society and the environment. It also determines the actions of Bilfinger SE's executives and management bodies in particular. It is generally understood to refer to the entire management and control system of a company, including its organization, its business management principles and guidelines as well as the internal and external monitoring and control mechanisms. A comprehensive and transparent corporate governance ensures the responsible, value-oriented and sustainable management and control of the company. It forms the foundation for sustainable business success and fosters trust among our shareholders, employees, and customers as well as our business partners and the financial markets. We view *good corporate governance* as an all-encompassing topic that is inextricably linked to the other aspects of sustainability.

Concept

The management bodies and the leadership of the Group, the basic structure of the Bilfinger Group as well as the framework and rules for governance in the Group are described in greater detail below.

Management committees and leadership

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. 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. The third corporate body is the Annual General Meeting, which, in accordance with the law, is primarily responsible for fundamental decisions.

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 of Bilfinger issue an annual declaration of compliance with regard to the application of the recommendations of the GCGC.

The declaration of compliance and the GCGC as well as further details on the duties and responsibilities of the boards of the company are provided in Chapter [A.4.1 Declaration of corporate governance and corporate governance report](#) of the Annual Report.

Executive Board

The Executive Board conducts the business and manages the company and the Group in the interests of the company on its own responsibility. It also takes into account the sustainability aspects of environment, social and governance (ESG). 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*, the *Bilfinger Risk Committee*, the *Safety Council*, the *Compliance Review Board*, the *Independent Allegation Management Committee* and *SustaiNet*.

Group Executive Management

This year, the Executive Board created Group Executive Management (*GEM*), a management team to advise and support the Executive Board on the operational and strategic issues of the Group. The committee discusses and develops relevant topics and, where relevant, prepares them for decision by the Executive Board. The main goal of the GEM is to achieve a reduction in administrative processes, strengthen individual responsibility and allow for faster decision-making. In addition to the Executive Board, the GEM comprises the heads of the three segments (Engineering & Maintenance Europe, Engineering & Maintenance International, Technologies), the Head of Products & Innovation, the Head of Corporate HR & HSEQ and the Head of Corporate Procurement. The GEM meets at least once a month.

Bilfinger Risk Committee

The Bilfinger Risk Committee (*BRC*) meets quarterly at the behest of the Executive Board and advises it on issues related to risk assessment. It consists of the members of the Executive Board and Chief Financial Officer (CFO), the Finance Directors (FDs) of the individual regions / divisions, and selected heads of corporate departments. 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 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 Corporate HR & HSEQ as well as the Executive Presidents (EPs) of the individual regions / divisions. The Safety Council meets monthly and decides on all Group-wide HSEQ issues. In this regard, the Safety Council makes a significant contribution to the implementation of HSEQ objectives throughout the Group.

Compliance Review Board

The Compliance Review Board (*CRB*) manages and monitors the organization and implementation of our compliance management system. It is comprised of the full Executive Board as well as selected heads of the corporate departments and convenes quarterly under the chairmanship of the Chief Compliance Officer. The CRB has a central role in ensuring the effectiveness of our compliance management system.

Independent Allegation Management Committee

The Independent Allegation Management Committee (IAMC) is composed of heads and representatives of Compliance, Legal & Insurance, Internal Audit & Investigations, Accounting, Controlling & Tax, and HR & HSEQ and meets as often as necessary, but at least once a month. Under the chairmanship of the Chief Compliance Officer (CCO), 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.

Disciplinary Committee

The Disciplinary Committee (DC) convenes on an ad-hoc basis – generally when a case has been presented by the Independent Allegation Management Committee – to decide on disciplinary measures for employees in connection with a violation of the Bilfinger Code of Conduct. The DC is chaired by the Head of Corporate HR & HSEQ. The committee also includes the General Counsel / Chief Compliance Officer, the Head of Labor Law / Co-Determination and the direct supervisor of the business unit where the matter under review occurred.

SustainNet

SustainNet is a sustainability network responsible for coordinating and harmonizing sustainability management at Group level. It is coordinated by Corporate Treasury & Investor Relations in the area of responsibility of member of the Executive Board Matti Jäkel (Chief Financial Officer). Members of SustainNet include heads of selected corporate departments and functional units whose areas of responsibility have a bearing on sustainability issues, as well as the executive management of regional and divisional operations.

SustainNet meets at least twice a year; in addition, meetings are convened on an ad-hoc and project-related basis.

Supervisory Board

In accordance with Article 11 of the Articles of Incorporation, the Supervisory Board of Bilfinger SE consists of 12 members, including equal representation of the shareholders and the employees. It advises and monitors the Executive Board and is responsible for the appointment and dismissal of Executive Board members, their employment contracts and remuneration. Monitoring also covers the topics of sustainability *environment, social & governance (ESG)* and 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 were last reviewed and updated in the reporting year and are available on the Bilfinger SE website. The Supervisory Board has established various committees in order to ensure more efficient operations. Details of the committees are explained in Chapter [A.4.1 Declaration of corporate governance and corporate governance report](#) of the Annual Report. The Supervisory Board has, among other things, assigned the supervision and preparation of the topic of sustainability with regard to *ESG* to the committees responsible for the corresponding (financial) topic areas, with the overall and ultimate responsibility for this remaining unchanged with the Supervisory Board.

Fundamental structure the Bilfinger Group

The Bilfinger Group is hierarchically and decentrally organized. It is managed by Bilfinger SE as the parent company and headquarters. Headquarters – under the leadership of the Executive Board – is responsible for the fundamental structural and technical management as well as the administration of the Bilfinger Group. It is divided into corporate departments, in some cases with corporate functions as subunits and each of them is assigned to the responsibility of a member of the Executive Board. Operationally, the Group has been divided into two service lines (Engineering & Maintenance and Technologies) and within these into eight regions and two divisions, to which in turn the individual Group companies are allocated. The regions and divisions have a high degree of entrepreneurial autonomy within the framework of the decentralized structure.

Responsibility in each region and division lies with an Executive President who is responsible for operating business and who reports to the Chief Executive Officer (CEO) on the Executive Board, and a Finance Director, who is responsible for commercial matters and reports to the Chief Financial Officer (CFO). There are three Global Excellence Teams (HSEQ, Global Development and Operational Excellence) established in the form of corporate departments that provide targeted support to the regions, divisions and Group companies to develop new areas of business, increase efficiency and, moreover, ensure our HSEQ standards.

This organizational form enables short decision-making paths and lean administration. Governance at Bilfinger is closely aligned with this structure of the Bilfinger Group. The dual control principle generally applies to all actions and measures, especially those with a binding external effect.

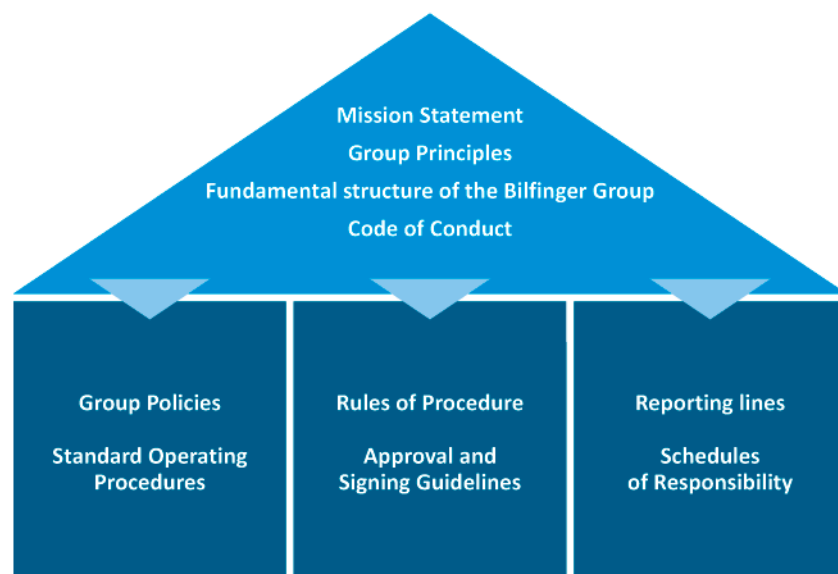
Frameworks and regulations

Our frameworks and regulations for the implementation of governance in the Group go beyond statutory requirements for the management of German listed companies. We provide both guidelines and binding regulations for the actions of each individual, oriented on the needs of our business.

In this context, Bilfinger governance is essentially defined and implemented through its various components, including the governance documents and the regulations they contain as well as how they relate to each other. Bilfinger employees are provided with all key governance documents in a combined and transparent form through a governance portal. Updates and changes are administered accordingly in the portal. This is designed to effectively help employees apply and implement Bilfinger governance in their daily work.

There is a clear and transparent structuring of Bilfinger governance as laid out below.

IMPLEMENTATION OF GOVERNANCE IN THE GROUP



Mission Statement, Group Principles, Code of Conduct

Our Mission Statement, our Group Principles and our Code of Conduct, together with the basic structure of the Group, form the framework for governance, with priority given to more general guidelines.

Our corporate values are specified in the Mission Statement and Group Principles. Integrity and security serve as the foundation and are of the utmost priority. The Mission Statement also describes our passion, values and competencies and illustrates the cornerstones of our corporate culture. On this basis, our Group Principles set out behavioral guidelines in abstract form for all employees, in particular for the areas of HSEQ and risk-conscious behavior.

The principles laid out in the Code of Conduct serve as a further benchmark for our actions. The Bilfinger Code of Conduct applies to activities throughout the world and has been translated into a total of 18 languages. It provides specific guidance for responsible, compliant and integrity-oriented behavior in everyday business and is mandatory for all managers and employees – regardless of where they work and what job they do. It is valid throughout the Group and relates to how we deal with each other and how we deal with customers and business partners. In addition to the general principles of behavior in the area of compliance, the Code of Conduct includes, among other things, rules related to integrity as well as the handling of conflicts of interest, and prohibits corruption and discrimination of any kind. The individual topics are specified by associated Group Policies and Group Standard Operating Procedures (*Group SOPs*). The Code of Conduct as well as the substantiated Group Policies and Group SOPs are regularly reviewed and adjusted for current needs and developments.

The components of Bilfinger governance provide specific guidelines for management and organization within the Group. These requirements can be divided into three pillars – content and process requirements (Group Policies and *Group SOPs*), requirements for the framework and scope of actions and measures (Rules of Procedure as well as approval and signature requirements) as well as further requirements for responsibility and organization (reporting lines and schedules of responsibility).

Group Policies and Group SOPs

In addition to the Group's specific guidelines on the Code of Conduct, all other subject-related issues and processes classified as requiring regulation throughout the Group are also set out in Group Policies. Special processes are, in turn, regulated in *Group SOPs*, which are binding for all employees. In each case, local requirements must be taken into account. In certain exceptions, these also allow for specific implementation regulations and deviations in exceptional situations. Responsibility for the Group Policies and SOPs lies with the corporate departments and corporate functions at Group headquarters. Group policies and Group SOPs are regularly reviewed to ensure that they are up to date, and adjusted as necessary.

Rules of procedure and approval and signature requirements

In addition to the content of the Group Policies and Group SOPs, the actions of individual Bilfinger employees and managers in the Group are governed by rules of procedure and approval requirements. The regional and divisional heads as well as the managing directors or other board representatives of a Bilfinger company each have rules of procedure that contain, among other things, internal approval requirements for certain actions and measures. Approval requirements exist for each unit and level of the Group and the approval requirements within the regions and divisions are defined by the respective management in its scope of action. Furthermore, binding guidelines

and limits exist for each Group unit regarding the signing or other execution or submission of business-relevant documents and declarations by Bilfinger employees. These elements ensure that a clear framework for action is in place for each individual Bilfinger employee and manager. The approval and signature requirements are regularly reviewed to ensure that they are up to date, and adjusted as necessary, as was most recently the case in the reporting year.

Schedules of responsibility and reporting lines

The rules of procedure also contain the relevant reporting lines and procedural regulations, including the possible allocation of responsibilities and requirements relating to joint decisions in the relevant executive bodies of the Group company or the regional or divisional management. Reporting lines also exist for each Bilfinger employee. The reporting line corresponds in principle to the disciplinary responsibility, but may also be split if there is a different functional allocation.

The provisions in the rules of procedure are supplemented by a mandatory schedule of responsibility, in which the responsibilities for each member of the executive body of a Group company or a region / division head are clearly allocated. The purpose of this approach is to ensure that there is clear accountability and organization for each respective manager.

The implementation of governance at Bilfinger as described serves as a basic structure and framework in the design of the corresponding material factors, which are organized by the relevant specialist departments. Where relevant, the concepts are described in more detail in the chapters that follow.

B.5.4.2 Counteracting corruption & 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.

Concept

Responsibility for the anti-corruption and anti-bribery framework lies with *the corporate function Compliance* at 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.

The Bilfinger compliance management system is also 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. Accepting small payments to secure or accelerate routine official acts ("acceleration payments") is 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 directly 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 act 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, variable remuneration for managers at management levels 1 and 2 includes an individual integrity factor. This factor is determined and taken into consideration annually with regard to the extent a manager implements the topics of integrity and compliance into his or her daily actions and how much he or she actively supports and promotes them in his or her environment.

To manage and monitor the design and implementation of our compliance management system, the Executive Board has established a Compliance Review Board (CRB), whose tasks and composition are described in Chapter [B.5.4.1 Good corporate governance](#).

Our subsidiaries are supported by compliance managers and compliance officers at both the regional and divisional levels. In addition, each regional or divisional 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 compliance managers and officers 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	Total number of persons in target group		Number of trained persons (absolute)		Share of trained employees (relative)	
	2022	2021	2022	2021	2022	2021
E-learning module 'Anti-Corruption & Bribery' ¹	9,081	4,220	8,707	4,123	96%	98%
E-learning module 'Code of Conduct' ¹	4,549	8,662	4,282	8,427	94%	97%
On-site training module 'General Compliance Training' ²	603	2,944	582	2,937	97%	100%

1 2021: For all new employees with a PC workstation and access to the Bilfinger network as well as for existing employees with a PC workstation and access to the Bilfinger network whose job requires increased compliance awareness. Abbreviated training is used for existing employees.
2022: For all new employees with PC workstation and access to the Bilfinger network as well as for existing employees with PC workstation and access to the Bilfinger network whose activities do not require increased compliance awareness.

2 2021: For all employees whose work requires increased compliance awareness.
2022: For all employees who as new hires or as a result of a change of position have taken up a job at Bilfinger that does not require increased compliance awareness.

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 a long-established point of contact within the Group for initial information on how to proceed in the event of any compliance-related issues. In the year under review, 441 (previous year: 296) Compliance Help Desk requests were documented.

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.

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 for many years 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's website as well as on the Group intranet. 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. 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 [B.5.4.1 Good corporate governance](#).

In the extremely rare event that an employee is found to have been involved in serious misconduct, the Disciplinary Committee headed by Corporate Human Resources at Group headquarters takes any decisions on disciplinary measures and sanctions that are to be initiated. These range from informal warnings through to immediate termination including negative financial consequences. If misconduct on the part of a business partner is identified, the Independent Allegation Management Committee decides on necessary measures. These measures can include, among other things, termination of the business relationship, assertion of civil claims or the filing of an official complaint.

NUMBER OF NOTICES OF COMPLIANCE VIOLATIONS	2022	2021
Indications of compliance violations ¹	66	70
thereof: indications of corruption and bribery	0	1
Investigations initiated	27	20
Disciplinary measures as a result of investigations	20	7

¹ Reports classified as relevant in the period from January 1 to December 31 of any given year.

In financial year 2022, 66 (previous year: 70) indications of compliance violations were identified. Of these, none included indications of corruption or bribery (previous year: 1). Against the background of Bilfinger's uncompromising stance when it comes to dealing with compliance-related

issues, the number of investigations initiated increased to 27 (previous year: 20), as did the number of disciplinary measures taken as a result of these investigations (previous year: 7).

B.5.3.3 Human rights, labor rights and sustainable supply chain

In 2022, the Executive Board of Bilfinger SE adopted a *Statement of Principles on Human Rights*, which is binding throughout the Group and is published on the company's website at www.bilfinger.com/ueber-uns/nachhaltigkeit/governance/. The declaration governs the human rights-related principles applicable to all employees and suppliers at Bilfinger. It 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*). In this context, the Policy Statement forms the basis of governance for *Human Rights Risk Management*, which is fully integrated into Bilfinger's *compliance management system (CMS)*.

Respect for human rights is closely linked to the principles for acting with integrity that have been established at Bilfinger for many years and are set out in the Group's *Code of Conduct*. The Code of Conduct defines principles of acting with integrity both toward other employees and toward external persons and organizations. It is aimed at all employees throughout the Group – regardless of where they work and what they do. Our managers and employees are obligated to adhere to the principles formulated in the Code of Conduct and to confirm in writing that they have received and familiarized themselves with it. The Code of Conduct is explained in detail in Chapter *B 5.4.2 Counteracting bribery and corruption*.

The *Code of Conduct*, together with the *Statement of Principles on Human Rights*, establishes a framework for exercising responsibility for society and the environment. Violations of the Code of Conduct or the Declaration of Principles on Respect for Human Rights are not tolerated; the handling of indications or suspected cases and the sanctioning of potential violations are governed by the compliance management system that has been in place throughout the Group for many years.

Concept

In its *Statement of Principles on Human Rights* Bilfinger commits itself to the *Universal Declaration of Human Rights of the United Nations*. Furthermore, the principles of the UN Global Compact initiative apply, which Bilfinger has committed to uphold as a member. Because human rights can also be impacted by environmental damage, Bilfinger clearly acknowledges its responsibility to protect the environment.

Basic principles of human rights

Bilfinger expects its employees and its suppliers in the supply chain to fully commit to 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.

Expectations for all employees and suppliers in the supply chain

Bilfinger expects all employees and suppliers in the supply chain to assume responsibility for the values and measures listed below and to consistently align their actions with these measures:

Forced labor

- No use of or contribution to slavery, servitude, forced or compulsory labor or human trafficking.

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, marital status 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

- Maintaining 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. 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.

- Compliance with global working time regulations.
- Compliance with all wage and compensation laws worldwide, meaning fair compensation for workers.
- Acting 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 application of 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 organizations or trade unions.

Environmental protection

- Putting particular importance on climate protection and contribution to the reduction of greenhouse gases.
- Strengthening environmentally sustainable economic activities.
- Raising awareness of climate change and the need to accelerate the launch of global energy transition initiatives.

Grievance

- Establishing a protected procedure for reporting possible violations of human rights principles.
- Identification and management of risks.
- Active reduction of negative impacts.
- Providing a structured incident response with structured processes to resolve these issues when they occur.

Upholding human rights and environmental due diligence obligations

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 system follows a risk-based approach and is based in its design and operationalization on the prevent-detect-respond model, which has proven itself in Group practice. The model is explained in detail in the Bilfinger Group’s *Statement of Principles on Human Rights*. It covers all areas of business activity and is designed in such a way that compliance violations are prevented through precautionary measures, misconduct of all kinds is recognized at an early stage and, in the case of confirmed violations, remedial measures are taken quickly and applied consistently.

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 [B.5.4.1 Good corporate governance](#).

To monitor compliance with the due diligence obligations of the company, its employees and its suppliers, as well as for the ongoing development of *human rights risk management*, Bilfinger also appointed the Group's *Chief Human Resources Officer as Human Rights Officer* at the end of 2022. Together with a compliance officer as deputy, he is responsible for *human rights risk management*. Both report regularly to the Executive Board and to the *Group Executive Management*.

To effectively meet our due diligence obligations in the Group's supply chain, we have set the goal of conducting at least 600 internal supplier audits per year in accordance with defined standards beginning in financial year 2023.

Documentation and reporting

In addition to the reports required by law, Bilfinger regularly prepares internal reports as well as incident-related internal information and progress reports, in particular on cases that have been classified as *serious*. These reports are sent to the Executive Board and the Supervisory Board.

Bilfinger has been reporting transparently for years on the number of indications of human rights violations within the Group, the investigations initiated as a result of these investigations and the disciplinary measures taken. In 2022, 17 (previous year: 14) indications of violations were identified that related to bullying, discrimination and sexual harassment. Investigations were initiated in 9 (previous year: 5) cases, resulting in internal disciplinary measures in 4 cases (previous year: 5).

NUMBER OF INDICATIONS OF VIOLATIONS OF HUMAN RIGHTS*

	2022	2021
Indications of violations ¹	17	14
Investigations initiated	9	5
Disciplinary measures as a result of investigations	4	5

* The number of indications of human rights compliance violations is a partial quantity to the number of indications of compliance violations presented in Chapter [B.5.4.2 Counteracting corruption and bribery](#).

¹ Reports classified as relevant in the period from January 1 to December 31 of a respective year. The references relate to bullying, discrimination and sexual harassment.

B.5.4.4 Quality management

For us, the satisfaction of our customers is directly linked to the quality of our services. This link is also part of the DIN EN ISO 9001 standard. This standard is applied centrally as a benchmark for our quality management system. The expectation in the Group is that operating units will meet the criteria defined in DIN EN ISO 9001, even if they do not pursue external certification.

Concept

In order to be able to provide the quality required by our customers, we have established an extensive quality and process management system. It starts with the operating units, which are responsible for the quality of their products and services and for their monitoring. They are supported by the quality management of the regions and / or divisions as well as by the corporate function HSEQ. System requirements, internal audits as well as training and education measures

for quality assurance are intended to ensure that our standards of quality are maintained at all possible times and continuously developed.

For the project business, we have established a Group-wide process that is oriented toward different risk classes. The so-called *stage-gate process* is used to standardize and ensure the quality of business processes in the operating companies when it comes to offers and orders. This process begins in the business development phase and ends with the expiration of the warranty period. The stage gates are predefined points (decisions and reviews) in the life cycle of an offer or order, the successful completion of which is determined by a stage-gate certificate.

In addition, Bilfinger has had a cross-regional matrix certificate since 2015 which helps ensure uniform quality standards in the Group and which, by the end of 2022, already included 150 locations in 41 Bilfinger companies. Our Health, Safety, Environment and Quality (HSEQ) processes and their implementation in the operating units are audited and certified by external companies.

NUMBER OF OPERATING COMPANIES WITHIN THE MATRIX WITH CERTIFIED QMS IN ACCORDANCE WITH DIN EN ISO 9001	Number	
	2022	2021
Operating companies with certified QMS	41	43

B.5.4.5 Data security and data protection

To be able to provide our services, we collect, store and process a range of data. On the one hand, this relates to personal data of our employees and of our suppliers, but also to data about plants, processes and people at our customers' sites, because we are providing an increasing number of services for the digitalization of plants. Information is therefore an integral part of our business processes and thus represents an important corporate asset that must be protected in an appropriate manner against unauthorized access. In the context of an ever-increasing global networking of computer systems, protection against abuse, manipulation, espionage or theft requires increasingly complex procedures.

Data leaks or issues related to accessing data could have a serious impact on the relationship to employees or business partners. For this reason, our processes and activities for data security and data protection are important prerequisites for the acceptance of our business model by our stakeholders.

Concept

Data security

Bilfinger has therefore adopted targeted regulations with regard to information security and data protection and has taken appropriate organizational measures.

The fundamental regulations for the secure and legally compliant handling and processing of data are summarized in our Group Policy on Information Security. It is binding for all those employed by the Group and for all those working on behalf of Bilfinger. It describes the components of information security, principles for handling of data, the processing of data and the obligations of managers, IT specialists, employees and external parties. Violations of the provisions of this Group Policy and its annexes or of existing laws may result in disciplinary, contractual or criminal consequences.

In addition to the Group Policy for Data Security, various Standard Operating Procedures (SOP) have been defined with the goal of implementing the Group Policies on information security in all

Group companies. These include, for example, SOPs on the topics of *information management standards, ERP, web and cloud services, emergency security* as well as *ethics and IT practice*.

Technical responsibility for information security lies with the manager responsible for information security at Bilfinger Global IT GmbH, who is supported by the dedicated, central competence center for the topic of information security. The Information Security team checks to ensure that IT services that are planned or in operation are compliant with the Group Policy on Information Security as well as regulatory requirements. In addition, each organizational unit must appoint a person responsible for data protection who works together with the manager responsible for information security as a coordinator.

We counter the risks in the *cyber security* environment with a broad package of measures, such as systematic monitoring of incoming and outgoing e-mail traffic to prevent malicious e-mails with a cloud-based e-mail gateway. In the event of specific threats, we work together closely with the relevant authorities. The central data centers have been migrated to *Microsoft Azure* in the *cloud* and are subject to ISO 27001 certification, which lays out the requirements for establishing, implementing, maintaining and continuously improving an information security management system. In addition, measures to make network access more stringent are checked by means of regular vulnerability analyses, e.g., through so-called friendly hacking. To monitor security-relevant events, Bilfinger uses a *Security Information and Event Management System (SIEM)* which collects all central logs and evaluates them for anomalies. A further focus of activities is the timely elimination of newly reported vulnerabilities of software manufacturers. In addition to the immediate elimination of security vulnerabilities that have become known, training requirements are also defined in such cases for all those employed in the Group with computer workstations in order to raise awareness of the increasing risk.

Every employee or person working on behalf of the Bilfinger Group is obligated to report any possible or actual threat to the information available in the Group as a security incident in a timely manner. In addition, each business unit is obligated to establish and maintain a comprehensive and effective emergency management system in accordance with its business area and area of responsibility. If there is a security incident, the Group-internal *Independent Allegation Management Committee (IAMC)* is, when necessary, commissioned with an investigation into the violation.

Data protection

A uniform Group Policy on Data Protection applies in the Bilfinger Group, defining a uniform standard for the handling of personal data. It is based on the provisions of the European General Data Protection Regulation and on globally accepted basic data protection principles for the processing of the personal data of employees, customers, suppliers and other business partners. The policy is binding for all Group companies and is intended to ensure that the data protection standards described in the policy are not undercut. It also applies to Group companies in countries that do not have their own statutory data protection regulations.

The policy describes the tasks and responsibilities of the external Data Privacy Officer, the internal Data Privacy Officer as well as the Data Privacy Coordinator. It also outlines the data protection principles, specifications for data transmission and commissioned data processing, the rights of data subjects and the responsibilities of Group companies.

If data protection violations occur or are suspected, the Group Policy on Data Protection lays out a procedure for the reporting of data protection violations. A reporting form is available to all those employed by the Bilfinger Group as a guideline for this purpose. The reports flow for further processing and for the purposes of evaluation into a database in which the (suspected) data protection violation is described.

The Executive Board is informed about data security and the structure of data protection at least once a year. The Executive Board is immediately informed of any serious incidents at work.

In financial year 2022, 16 (previous year: 4) data protection incidents were identified, 1 of which was classified as a reportable data protection breach (previous year: 1). The main reason for the increase in data breaches are the numerous conversions from on-premise to cloud-based solutions and the associated new analysis options in the IT landscape, which can be used to uncover vulnerabilities.

NUMBER OF DATA PROTECTION VIOLATIONS		
	2022	2021
Data protection incidents	16	4
thereof reportable data protection violations	1	1

D.3 Practitioner's Report on Non-financial Reporting

Independent Practitioner's Report on a Limited Assurance Engagement on Non-financial Reporting *

To Bilfinger SE, Mannheim

We have performed a limited assurance engagement on the non-financial group statement of Bilfinger SE, Mannheim, (hereinafter the "Company") for the period from 1 January to 31 December 2022 (hereinafter the "Non-financial Group") included in section "Non-financial Group Declaration" of the combined management report.

Not subject to our assurance engagement are the external sources of documentation or expert opinions mentioned in the Non-financial Group Statement.

Responsibility of the Executive Directors

The executive directors of the Company are responsible for the preparation of Non-financial Group Statement in accordance with §§ (Articles) 315c in conjunction with 289c to 289e HGB ("Handelsgesetzbuch": "German Commercial Code") and Article 8 of REGULATION (EU) 2020/852 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18. June 2020 on establishing a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (hereinafter the "EU Taxonomy Regulation") and the Delegated Acts adopted thereunder, as well as for making their own interpretation of the wording and terms contained in the EU Taxonomy Regulation and the Delegated Acts adopted thereunder, as set out in section "Consolidated disclosures pursuant to Article 8 of the EU Taxonomy Regulation" of the Non-financial Group Statement.

This responsibility includes the selection and application of appropriate non-financial reporting methods and making assumptions and estimates about individual non-financial disclosures of the Group that are reasonable in the circumstances. Furthermore, the executive directors are responsible for such internal controls as the executive directors consider necessary to enable the preparation of a Non-financial Group Statement that is free from material misstatement whether due to fraud or error.

The EU Taxonomy Regulation and the Delegated Acts issued thereunder contain wording and terms that are still subject to considerable interpretation uncertainties and for which clarifications have not yet been published in every case. Therefore, the executive directors have disclosed their interpretation of the EU Taxonomy Regulation and the Delegated Acts adopted thereunder in section "Consolidated disclosures pursuant to Article 8 of the EU Taxonomy Regulation" of the Non-financial Group Statement. They are responsible for the defensibility of this interpretation. Due to the immanent risk that indeterminate legal terms may be interpreted differently, the legal conformity of the interpretation is subject to uncertainties.

Independence and Quality Control of the Audit Firm

We have complied with the German professional provisions regarding independence as well as other ethical requirements.

Our audit firm applies the national legal requirements and professional standards – in particular the Professional Code for German Public Auditors and German Chartered Auditors

* PricewaterhouseCoopers GmbH has performed a limited assurance engagement on the German version of the non-financial group statement and issued an independent practitioner's report in German language, which is authoritative. The following text is a translation of the independent practitioner's report.

(“Berufssatzung für Wirtschaftsprüfer und vereidigte Buchprüfer“: “BS WP/vBP”) as well as the Standard on Quality Control 1 published by the Institut der Wirtschaftsprüfer (Institute of Public Auditors in Germany; IDW): Requirements to quality control for audit firms (IDW Qualitätssicherungsstandard 1: Anforderungen an die Qualitätssicherung in der Wirtschaftsprüferpraxis - IDW QS 1) – and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Responsibility of the Assurance Practitioner

Our responsibility is to express a conclusion with limited assurance on the Non-financial Group Statement based on our assurance engagement.

We conducted our assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised): Assurance Engagements other than Audits or Reviews of Historical Financial Information, issued by the IAASB. This Standard requires that we plan and perform the assurance engagement to obtain limited assurance about whether any matters have come to our attention that cause us to believe that the Company's Non-financial Group Statement, other than the external sources of documentation or expert opinions mentioned in the Non-financial Group Statement, are not prepared, in all material respects, in accordance with §§ 315c in conjunction with 289c to 289e HGB and the EU Taxonomy Regulation and the Delegated Acts issued thereunder as well as the interpretation by the executive directors disclosed in section “Consolidated disclosures pursuant to Article 8 of the EU Taxonomy Regulation” of the Non-financial Group Statement.

In a limited assurance engagement the procedures performed are less extensive than in a reasonable assurance engagement, and accordingly a substantially lower level of assurance is obtained. The selection of the assurance procedures is subject to the professional judgement of the assurance practitioner.

In the course of our assurance engagement, we have, amongst other things, performed the following assurance procedures and other activities:

- Gain an understanding of the structure of the Group's sustainability organisation and stakeholder engagement
- Inquiries of the executive directors and relevant employees involved in the preparation of the Non-financial Group Statement about the preparation process, about the internal control system relating to this process and about disclosures in the Non-financial Group Statement
- Identification of likely risks of material misstatement in the Non-financial Group Statement
- Analytical procedures on selected disclosures in the Non-financial Group Statement
- Reconciliation of selected disclosures with the corresponding data in the consolidated financial statements and group management report
- Evaluation of the presentation of the Non-financial Group Statement
- Evaluation of the process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Non-financial Group Statement
- Inquiries on the relevance of climate-risks

In determining the disclosures in accordance with Article 8 of the EU Taxonomy Regulation, the executive directors are required to interpret undefined legal terms. Due to the immanent risk that undefined legal terms may be interpreted differently, the legal conformity of their interpretation and, accordingly, our assurance engagement thereon are subject to uncertainties.

Assurance Opinion

Based on the assurance procedures performed and evidence obtained, nothing has come to our attention that causes us to believe that the Non-financial Group Statement of the Company for the period from 1 January to 31 December 2022 is not prepared, in all material respects, in accordance with §§ 315c in conjunction with 289c to 289e HGB and the EU Taxonomy Regulation and the Delegated Acts issued thereunder as well as the interpretation by the executive directors disclosed in section "Consolidated disclosures pursuant to Article 8 of the EU Taxonomy Regulation" of the Non-financial Group Statement. We do not express an assurance opinion on the external sources of documentation or expert opinions mentioned in the Non-financial Group Statement.

Restriction of Use

We draw attention to the fact that the assurance engagement was conducted for the Company's purposes and that the report is intended solely to inform the Company about the result of the assurance engagement. Consequently, it may not be suitable for any other purpose than the aforementioned. Accordingly, the report is not intended to be used by third parties for making (financial) decisions based on it. Our responsibility is to the Company. We do not accept any responsibility to third parties. Our assurance opinion is not modified in this respect.

Frankfurt/Main, 1 March 2023
PricewaterhouseCoopers GmbH
Wirtschaftsprüfungsgesellschaft

Nicolette Behncke ppa. Benjamin Wolf
Wirtschaftsprüferin
[German public auditor]