

## **Policy statement on the human rights strategy within the Piepenbrock Group**

The Piepenbrock Group has offices in 800 locations in Germany. As a single-source provider of facility services, the Piepenbrock Group offers comprehensive end-to-end solutions in the four business fields of Facility Management, Building Cleaning, Maintenance and Security. In addition, the Group provides specialist services such as cleanroom cleaning, winter services, groundskeeping, energy management, industrial safety checks and FM consulting. Alongside the services business, Piepenbrock also has an industrial division, which is concerned with construction of packaging machinery and production of cleaning agents.

The Piepenbrock Group obtains the products and services it requires for the execution of its own contracts from several thousand suppliers across a wide range of supply chains.

### **Policy statement**

We are committed to respecting human rights in accordance with the United Nations Guiding Principles on Business and Human Rights. As a service provider operating throughout Germany, the Piepenbrock Group is committed to complying with current law, observing social and ethical standards and conducting its business activities in a sustainable manner.

We see it as our responsibility to ensure that the value-added chain in which we deliver our services operates fully within the scope of international standards and principles of business practice. We support the United Nations Agenda 2030 for Sustainable Development, with its Sustainable Development Goals (SDGs), and we are a signatory on the Charta der Vielfalt (German Diversity Charter) – an employer initiative to promote diversity in companies and institutions. The Group conducts its business activities in accordance with the following international standards and guidelines:

- The principles of the United Nations Global Compact (UNGC)
- The core labour standards of the International Labour Organization (ILO)
- The United Nations Universal Declaration of Human Rights
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The United Nations Convention on the Rights of the Child (UNCRC)
- The United Nations Convention on the Elimination of all Forms of Discrimination Against Women (UN CEDAW)

At national level, the Piepenbrock Group adheres to the standards and basic principles of the Lieferkettensorgfaltspflichtengesetz (LkSG) (German Act on Corporate Due Diligence Obligations in Supply Chains) with regard to respecting human rights.

This policy statement is a supplement to the Code of Conduct and all other existing company policies, guidelines and directives of the Piepenbrock Group.

The statement defines and clarifies how we promote human rights and apply them in our business activities.

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It applies to all employees, business partners and suppliers that are associated with the Piepenbrock Group. It is our expectation that the applicable legal provisions, international agreements and conventions, and the due diligence obligations set out below concerning human rights and environmental matters, will all be respected, observed and implemented.

### ■ **Prohibition of child labour**

The Piepenbrock Group does not tolerate any form of child labour.

Child labour is prohibited. The minimum age of admission to employment may not be lower than the minimum school-leaving age, without prejudice to such rules as may be more favourable to young people and except for limited derogations. Children and young people must be protected against any work likely to harm their safety, health or physical, mental, moral or social development or to interfere with their education. In line with the ILO core labour standards, we comply with the minimum age for employment and strictly reject any child labour.

### ■ **Prohibition of forced labour**

The Piepenbrock Group is opposed to forced or compulsory labour in any form.

No one shall be forced to perform compulsory labour. In line with the ILO core labour standards, Piepenbrock rejects any use of forced or unlawful compulsory labour in connection with its business activities.

### ■ **Freedom of association and right of collective bargaining**

The Piepenbrock Group respects the right to freedom of association, which allows all employees to form and join trade unions or other types of employee representative body, and to participate in collective bargaining to establish working conditions.

The company's success is dependent on ensuring open and constructive dialogue based on mutual trust. Piepenbrock's aim is therefore always to maintain a stable relationship with trade unions and employee representative bodies for the good of both the company and the workforce. No one is either favoured or disadvantaged by virtue of their membership or non-membership of a trade union or employee representative body.

### ■ **Protection against discrimination and unequal treatment**

Piepenbrock prohibits any form of discrimination or unequal treatment with regard to the recruitment or employment of company staff.

We do not tolerate any discrimination against our employees. No one shall be disadvantaged, favoured or harassed because of characteristics such as gender, hair colour, religion, nationality, political or other beliefs, ethnicity, disability, age, sexual orientation or any other characteristics which are protected under local legislation, such as membership of a national minority group or pregnancy. Piepenbrock is a signatory on the Charta der Vielfalt (German Diversity Charter) and has participated for over ten years in Germany's annual Diversity-Tag (Diversity Day), which aims to create working environments that are free from discrimination and characterised by solidarity, acceptance and mutual trust.

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### ■ **Right to health and safety in the workplace**

The Piepenbrock Group recognises that protecting and supporting the health of its employees is a number one priority.

We believe our workforce is our greatest asset. We therefore take the well-being and health of our employees very seriously. In some cases, the day-to-day work of our workforce involves a number of dangers. For example, anyone handling cleaning agents, machines and systems or working under special conditions is subject to specific occupational health and safety measures. In order to reduce occupational accidents to a minimum and protect the health of our employees, we have implemented a comprehensive occupational health, safety and environmental management system (including DIN ISO 45001), which applies to everyone. We review this regularly in internal and external audits. All employees receive regular training in the relevant aspects of occupational health and safety. The company also actively supports employees' physical and mental health through health management programmes.

### ■ **Remuneration**

The Piepenbrock Group offers its employees a competitive and performance-based remuneration package, supplemented by additional benefits.

We pay our employees fairly, ensuring both internal and external equity. Uniform principles form the basis for a universally balanced remuneration scheme. Where applicable, remuneration is in line with the statutory guaranteed minimum wages and/or minimum standards for the respective sectors.

### ■ **Working hours**

The Piepenbrock Group adheres to the applicable national working-time regulations as a minimum.

Moreover, we advocate a schedule of working time and breaks that takes into account both operational and individual needs. By implementing different working-time models, Piepenbrock facilitates the reconciliation of work and personal life to enable employees to enjoy a good work-life balance at all stages of their career and life.

### ■ **Recruitment and training**

The Piepenbrock Group recruits new employees on the basis of their individual skills and promotes long-term employability by offering ample opportunities for training.

We champion equal opportunities and systematically develop the skills and talents of our employees through forward-looking training and education programmes, with a view to securing a high level of productivity and employability for the long term. This approach incorporates personal and individual development as well as technical advancement.

### ■ **Rights of local communities**

The Piepenbrock Group respects the human rights of the local communities in all its locations and takes into account the possible impacts of the Piepenbrock Group's business activities.

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We undertake to respect and protect, in particular, the rights of especially vulnerable target groups such as children, refugees, women, migrant workers and ethnic or religious minorities. We are opposed to the unlawful taking of land, forests and bodies of water, as well as to evictions and the disproportionate deployment of security forces.

### ■ **Environmental protection**

The Piepenbrock Group respects all applicable environmental regulations and is committed to its corporate responsibility to the environment. Under the motto "Piepenbrock Goes Green", we aim to organise our internal procedures, and our services and products in all areas of the business, in a more environmentally-friendly fashion. In this way, we make an active contribution towards environmental protection.

In the course of our business activities, we always abide by international agreements and conventions such as the United Nations Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal. Our business practices incorporate the highest level of environmental protection, careful use of resources and energy conservation. We are committed to achieving a steady reduction in energy consumption and greenhouse gases, reducing water and air pollution to the absolute minimum and promoting good water and air quality. We encourage our employees to adopt sustainable environmental practices both at work and at home. They take part in training and further education courses at regular intervals.

## **Risk analysis**

The Piepenbrock Group conducts a risk analysis annually – and on an ad-hoc basis as needed – in order to determine, evaluate and address the human rights-related impact of its economic activities within its own business operations and along the supply chains, and also the human rights-related risks and environmental risks within the Group itself and vis-à-vis its direct suppliers. The risk analysis takes into account industry-, product- and country-specific factors and covers all the legal positions that are protected by the aforementioned applicable conventions and laws.

An ad-hoc risk analysis is conducted if there is actual evidence to suggest sub-suppliers have violated a human rights-related or environmental obligation, or in the case of a change in business activity, which could prompt the emergence of or a change in human rights-related or environmental risks.

## **Company-specific risks**

The labour-intensive service industry relies heavily on its workforce, so occupational health and safety, fair employment conditions, wages, and unequal treatment and discrimination, in particular, are key topics of interest.

In the business field of Building Cleaning, we must be mindful of the ecological hazards associated with the use of cleaning agents and specific cleaning methods and technologies. The same applies to our subsidiary company, Planol, which manufactures cleaning agents.

### Policies and procedures

The Piepenbrock Group is implementing a number of measures with a view to forestalling potential risks, fulfilling our responsibilities and ensuring that the value-added chain in which the Group delivers its services operates fully within the scope of international standards and principles of business practice. We are pursuing ecological and social projects and have drawn up specific requirements for our employees, suppliers and service providers. We also participate in various networks and associations, with the aim of involving as many stakeholders as possible and working together to develop future-proof concepts, which create meaningful links between ecological, social and economic systems.

The main corporate guidelines for the Piepenbrock Group are set out in its **Code of Conduct**. We undertake in this Code of Conduct to comply with current law, observe social and ethical standards and act sustainably. These basic principles include, among other things, respecting human rights and equal opportunities and taking a clear position in the fight against discrimination. The principles set out in the Code of Conduct must be adhered to by all Group employees, as well as the managers at all company levels, including the executive board, in the course of all their business activities. The Piepenbrock Group as a whole ("We") undertakes to adhere to the Code of Conduct. We regard it as a fundamental duty to improve the health and safety of all Group employees on a continual basis. Our employees receive training in occupational health and safety and environmental protection when they first join the company and then annually thereafter, and they are also offered occupational health checks. The company-wide occupational health and safety management system fulfils the requirements of systematic and effective health and safety management based on AMS Bau (an industry-specific German occupational health and safety management system) and DIN ISO 45001.

Business-to-business collaborations involving the Piepenbrock Group are subject to the basic principles of this policy statement and the **Supplier Code of Conduct**. We expect suppliers to meet the requirements associated with the Code of Conduct and to integrate them into the supply chain. We ask our suppliers to implement appropriate and reasonable measures to ensure that the entire supply chain complies with the legal provisions and internationally recognised standards regarding respect for human rights, in particular the prohibitions on child labour, forced labour and discrimination, the regulations concerning minimum wages, safety and the basic rights of workers, and environmental protection.

In our own environmental guidelines, we undertake to supply only products that have been tested with regard to environmental protection and occupational health and safety. The Piepenbrock Group has measures in place for this purpose, including a materials management task force. This task force defines, plans and controls established processes for the procurement, provision and storage of materials, and also screens new products for potential hazards and subsequently lists them. Hazardous products are exchanged for less dangerous products where possible. An ISO 14001 environmental management system has been introduced for a number of business areas.

In the event that the Piepenbrock Group finds that its own business activities, business partners or suppliers are causing or contributing to potential or actual human rights violations, we will seek appropriate remedial action as quickly as possible from the responsible parties. To this end, we are continuously refining internal processes which determine how to respond upon the discovery of grievances, and how to define appropriate remedial and mitigating action within our own business operations and with direct and indirect suppliers. If the Piepenbrock Group has good reason to suspect or actual evidence of possible human rights violations within its own business operations, it will immediately take steps to rectify the violation or eliminate the risk of one occurring. Such action can range from stopping the behaviour causing the violation through to preventative measures in the form of training and audits. We also encourage our employees to report suspected violations via the established complaints procedure. Business partners and suppliers, too, are

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required to initiate appropriate remedial measures. Implementation of such measures is a prerequisite for further collaboration with Piepenbrock. The Piepenbrock Group stipulates a number of appropriate responses to a violation, depending on its severity, with possible action ranging from requesting immediate rectification of the violation through to legal action or even termination of the business relationship. We reserve the right to monitor compliance with these obligations ourselves or to have an independent third party do this on our behalf.

In each case, the processes and findings are appropriately documented and stored, and included in our annual reporting. The report is published on the company website.

Internal audits play a key role in the monitoring and continuous improvement of the management system. Regular internal audits evaluate the effectiveness of the implemented systems with regard to achievement of the company's defined remit and corporate goals and compliance with operationally relevant laws, regulations and requirements.

We expect suppliers and business partners of the Piepenbrock Group also to conduct or establish processes, which ensure that the due diligence obligations are given adequate consideration. This can include offering training and further education to their own workforce, taking into account human rights-related and environmental due diligence obligations when selecting sub-suppliers and service providers, establishing pre-emptive measures to prevent and avoid risks and taking immediate and effective remedial action in the event of human rights-related or environmental violations within their own business operations or on the part of a sub-supplier.

## Complaints procedure

The Piepenbrock Group has implemented a **complaints system**, which can be used at any time by employees and any other potentially affected groups of people to report human rights violations and environmental concerns. A report can relate to the company's own business operations, a business partner or a supplier. The system guarantees the reporting person's anonymity and protects them against discrimination and punishment. Irrespective of where the complaint originates from, it is documented, checked for reliability and forwarded to the relevant divisions within the company. The complaint is then investigated – for instance, through discussions with suppliers, industry initiatives or NGOs, through on-site visits or by means of interviews with those affected. Depending on the findings, effective measures are subsequently identified, introduced and monitored. As a result of this systematic handling of complaints and the insights gained from them, the Piepenbrock Group is able to keep continually improving its due diligence processes with regard to human rights.

In addition to the complaints procedure, an appointed Human Rights Officer is available to assist with concerns, complaints and questions on the topic of human rights. The **Human Rights Officer** can be contacted by telephone, e-mail or in person.

## Responsibilities and communication

The management board of the Piepenbrock Group is ultimately responsible for the implementation of and compliance with the policy statement on respect for human rights.

Regular and ad-hoc internal reporting to the board regarding human rights-related and environmental findings obtained from the ongoing risk analysis process, concerns received through the complaints mechanisms, and information on the effectiveness of the remedial and preventative steps taken, allow informed decisions to be made at all times. The central Human Rights Officer for the Piepenbrock Group is tasked with monitoring the risk management system, along with other duties. The Human Rights Officer is responsible for, among other things, ensuring that external reporting on human rights-related due diligence obligations is carried out and that the management of human rights-related and environmental due diligence

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is continually reviewed and improved. The operational implementation of human rights-related due diligence processes is the responsibility of the relevant divisions, in particular the Purchasing department and the Sustainability team. They receive assistance from other specialist departments.

The Piepenbrock Group will continue its commitment to respecting and observing human rights in the future and will publish its progress in the annual sustainability report, which is modelled on the GRI (Global Reporting Initiative) standards.

Osnabrück, Germany, 07/02/2023

Signatures of the Management Board