

Techem Group Policy Statement on Respect for Human Rights

Commitment to recognized human rights standards

Respect for human rights and the environment is an important part of our company culture, both within our company and along our supply and value chain. Therefore, Techem is committed to respecting internationally recognized human rights and preventing human rights abuses. We act in accordance with the following internationally applicable standards and frameworks:

- United Nations Guiding Principles on Business and Human Rights (UNGP)
- Universal Declaration of Human Rights of the United Nations (UN)
- Principles of the United Nations Global Compact (UNGC)
- Core Labor Standards of the International Labor Organization (ILO)
- OECD Guidelines for Multinational Enterprises

We also comply with all relevant legal requirements and binding obligations in the area of environmental protection. This is regulated in our Environmental Policy, which can be found on our [website](#).

Techem's responsibility and requirements for our partners

The standards and principles set out in the standards and frameworks listed above are reflected in our own requirements¹ for our employees, business partners and suppliers and form the basis for our daily actions:

- [Techem Code of Conduct](#)
- [Techem Procurement Guidelines](#) (national / international)
- [Supplier Code of Conduct \(BME\)](#)

We expect our employees and suppliers to comply with all listed standards and requirements and to follow applicable laws. In addition, we expect our suppliers to commit to holding subcontractors to these standards.

Risk analysis and measures

We constantly develop our risk management, which is embedded in all relevant business processes. This enables us to identify and minimize human rights risks and prevent, end or reduce the extent of violations of human rights obligations. More specifically, we already use a risk management tool to conduct risk analyses and derive measures at our suppliers and service providers in accordance with the requirements of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG). In addition, internal processes are constantly developed further in order to be able to respond to possible grievances and violations in our supply chain at an early stage.

¹The guidelines and policies listed represent the status as of January 2023.

We take fundamental preventive measures to minimize risks in advance. We communicate to suppliers our expectations of suppliers to comply with human rights in their own operations and in their supply chain. Among other things, training for employees and the introduction of controls at suppliers are also planned.

If we determine that a violation of a human rights-related duty has already occurred or is imminent at our company or at a supplier, we take appropriate remedial action to prevent, end or minimize the extent of such a violation.

Complaint mechanism

Techem has set up an online reporting system for employees and (external) third parties. Via this reporting channel, employees, customers, suppliers and other stakeholders can securely and, if necessary, anonymously report illegal or inappropriate behavior at Techem. This serves in particular to expose compliance violations, such as human rights-related risks, at an early stage and to uncover actual violations and initiate countermeasures. Confidential handling of the reports is guaranteed and every tip is followed up on. In addition, Techem does not tolerate retaliation or adverse behavior against individuals who report observed or suspected illegal or unethical behavior or violations with the best of intentions.

Responsibilities

Management is responsible for the implementation of and compliance with the Group Policy Statement on Respect for Human Rights. Human rights due diligence is implemented by Procurement & SCM in coordination with the Human Rights Committee, consisting of the Group Compliance Officer, the Head of Sustainability and the Group Risk Manager.

Outlook

We are aware that implementing human rights due diligence is a continuous process. Therefore, we review our strategy and measures regularly and implement our planned projects. Techem has also positioned itself cross-functionally to drive the implementation of the LkSG. The law will apply to Techem from January 1, 2024. In light of this, the Policy Statement will be validated by the end of 2023 and be published in an LkSG-compliant version.

In addition, we provide transparent information on the status of implementation and the targets achieved at least once a year as part of our sustainability reporting.

Matthias Hartmann

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