



# Supply Chain Due Diligence Act

Declaration of principles as per § 6 para. 2

## A. Introduction

As one of the world's leading companies in the field of development services, focusing on mobility and rendering services to forward-looking sectors such as energy, medical technology and electronics for mechanical and plant engineering, Bertrandt AG, along with all companies within the Bertrandt Group, commits itself to upholding and protecting human rights and the associated obligations to the environment. This includes the obligation to orient our business activity by the principle of sustainable and resource-saving management.

Our commitment to respecting and upholding human rights and ecological and social standards is more than a voluntary obligation placed on ourselves. The high requirements we make of ourselves in connection with upholding human rights and conserving and sustainably handling ecologically relevant resources do not apply solely within our own field of operations. We transmit them throughout the supply chain and ensure compliance with our standards through suitable measures.

The present declaration of principles is a supplement to other principles of corporate activity that are firmly anchored within the Bertrandt Group, alongside compliance with legal and ethical standards. Compliance with human and environmental rights is a non-negotiable component of the corporate culture at the Bertrandt Group, and all employees are obliged to orient their activity by it. It is the task of the management to require compliance with the applicable standards and monitor their enforcement.

**Ehningen, 01.01.2023**

**The board**

**Hans-Gerd Claus**

*Member of the  
Management Board*

**Michael Lücke**

*Member of the  
Management Board*

**Markus Ruf**

*Member of the  
Management Board*

## B. Compliance with human and environmental rights

### **Child labour and forced labour**

We respect human rights within the sphere of our influence and expressly commit ourselves to the prohibition and abolition of all forms of forced labour and child labour.

### **Equality of opportunity**

We decisively confront every form of discrimination on the basis of gender, race, age, skin colour, religion, familial status, sexual orientation, origin, physical or mental disability or any other personal characteristic that is subject to special protection under applicable legislation or regulations.

### **Remuneration and working hours**

We not only ensure our employees are well remunerated, we also guarantee that this remuneration for their work respects the principles of equal treatment across the workforce. We also comply with the rules on working hours as defined in law and considered standard for our sector.

### **Health and occupational safety**

Taking into consideration the economic, legal and social conditions, we constantly work to implement preventive measures in the field of occupational health and safety. Occupational health and safety are a fixed part of our corporate processes.

### **Freedom of association**

We respect the fundamental right of our employees, as enshrined in the constitution, to freedom of association and collective bargaining.

### **Protection of personal data**

We protect the personal data of our employees and business partners in compliance with the applicable laws and other standards in force. To ensure this we have established suitable technical and organisational measures as part of our business processes. Our data protection officer also ensures compliance with the law regarding the protection of personal data.

### **Lawful deployment of private and public security services**

Regardless of whether we use external or internal security services, we ensure that they uphold human rights and do not engage in illegal activity.

### **Upholding land rights**

We condemn all forms of illegal land theft in contravention of human rights law. This applies to forced clearances or the appropriation of land, forests and bodies of water for personal advantage which could rob people and communities of their means of subsistence. The same applies to the indirect destruction or impairment of the subsistence of local communities, e.g. by pollution.

### **Environmental protection**

We commit to protecting the environment. Our particular desire in this, but not our sole one, is to handle natural resources such as energy, water, soil and air conscientiously, which means controlling the use of raw materials, consumables and fuel. Wherever possible, negative consequences for people or the environment should be avoided in the extraction or use of raw materials.

# C. Implementation of the due diligence obligations in with compliance with human and environmental rights

## I. Introduction

Safeguarding and protecting recognised human rights, protecting the environment and saving natural resources are an essential component of our business activity. In this regard, we recognise international standards and recommendations as guidelines: the Universal Declaration of Human Rights of the United Nations, the International Labour Organization's Conventions and Recommendations on labour and social standards, the Organisation for Economic Cooperation and Development's Guidelines for Multinational Enterprises and the Charter of Fundamental Rights of the European Union.

## II. Risk management

### 1. Defining responsibilities

The board of Bertrandt AG and management of the companies in the Group are responsible for compliance with human rights and preservation of the environment in our business activities, including in the supply chain. We have defined clear responsibilities within the Group for recognising and upholding human rights and environmental due diligence obligations. This applies to the implementation, coordination and monitoring of the effectiveness of the measures taken as part of our obligation to uphold and defend human rights and the associated environmental rights.

### 2. Risk analysis

In fulfilling our due diligence obligations, the analysis of various risks relating to the violation of human rights and the negative effects of our activity on the environment is an essential component. Every year, without specific reason, we check and assess our direct suppliers based on goods and country groupings. The same applies to our own departments with regard to any specific risks that might be in place. If a change to our business activity or procurement behaviour gives cause, we will carry out a new risk analysis. Within our business activity as an international leader in engineering service provision that does not produce its own products to any notable extent, no increased risk has been identified. In procuring durable goods, the principles named here are used as a basis; here too, there has been no increased risk of the violation of human rights and associated environmental rights detected.

### 3. Prevention and remedies

In our Code of Conduct, we set out our understanding of human rights and demand for environmentally sensitive, resource-saving action for our suppliers. We expect our suppliers not only to commit to this, but also to enforce it in their own supply chains. If, in our operations or among our direct or indirect suppliers, we determine that human rights or associated environmental rights have been violated or their violation is imminent, we will take immediate measures to remedy this. If any kind of abuse is not eliminated in good order and good time, we retain the final remedy of terminating the business relationship.

#### **4. Checking effectiveness**

At least once a year, and whenever there is reason, the effectiveness of all processes connected with the fulfilment of due diligence obligations to uphold human rights and associated environmental rights should be assessed, in order to detect, prevent, eliminate or at least minimise any remaining detrimental effects on human rights and the environment.

#### **5. Reporting and documentation obligations**

We report annually to Germany's Federal Office for the Economic Affairs and Export Control on the fulfilment of legally mandated due diligence obligations to protect human rights and associated environmental rights. These reports are published on our internet site. Further information can be found in the CSR report that forms part of our annual audit.

#### **6. Complaint management**

We have set up a whistleblower system that allows people inside and outside our organisation to report risks to human rights and the environment or violations of human rights and environmental law. You can find our electronic whistleblower system at <https://hinweis.bertrandt.com/>. You can make a report via it and be assured of your anonymity. You can also reach the compliance officer at Bertrandt by telephone at the compliance hotline +49 7034 656 10100, or by email to [compliance@bertrandt.com](mailto:compliance@bertrandt.com).

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