

Techem Verwaltungsgesellschaft 671 mbH Policy Statement on Respect for Human Rights and the Environment

Commitment to recognized human rights standards and environmental protection

Respect for human rights and the environment is an essential part of our corporate culture, both within our company and along our supply and value chain. Techem Verwaltungsgesellschaft 671 mbH ("TVG 671") is therefore committed to respecting internationally recognized human rights and environmental standards and to preventing human rights and environmental violations.

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
- UN-Convention on the Rights of the Child
- UN-Convention on the Elimination of All Forms of Discrimination Against Women
- Minamata Convention
- Stockholm Convention
- Basel Convention

We are also committed to complying with the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichten-gesetz, LkSG) and the associated human rights and environmental due diligence obligations. We also comply with other relevant legal requirements and binding obligations in the area of environmental protection.

Responsibility of TVG 671 and requirements for our partners

For the efficient use of the resources of the Techem Group and thus also to increase the effectiveness of measures within the meaning of the LkSG, TVG 671 has delegated its LkSG obligations to the operationally active Techem Energy Services GmbH ("TES"), insofar as legally permissible and unless otherwise agreed.

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

- [Techem Code of Conduct](#)
- [Techem Procurement Guidelines \(national / international\)](#)
- [Environmental Policy](#)
- [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 accountable to these standards.

Risk management and responsibilities

The management of TVG 671 is responsible for the implementation of and compliance with the Declaration of Principles on Respect for Human Rights and the Environment. The Procurement and Supplier Quality department at TES is responsible for implementing the human rights and environmental due diligence obligations for suppliers. The Sustainability department at TES is responsible for compliance with due diligence obligations in TVG 671's own business area. It also provides support on

general issues relating to respect for human rights. The two divisions regularly report on identified risks as part of a Group-wide Sustainability Council. The Human Rights Committee (HRC), consisting of the Group Compliance Officer, the Head of Sustainability and the Group Risk Manager, monitors the fulfillment of human rights and environmental due diligence obligations across all divisions.

Risk analysis

We have developed a risk management system that is anchored in all relevant business processes. This enables us to identify and minimize human rights and environmental risks at our direct suppliers and in our own business area and to prevent, end or reduce the extent of violations of environmental and human rights obligations. We identify, analyze and evaluate risks in annual and ad hoc risk analyses.

Our supplier risks are analyzed in accordance with the requirements of the LkSG using a risk management tool. The risks identified in the risk analysis are prioritized and evaluated based on the country risk and the respective product group as well as their severity and probability of occurrence. They are then prioritized based on risk exposure and influence.

In addition, we regularly review potential human rights and environmental breaches of duty in our own business area, as well as on an ad hoc basis. To this end, we have defined risk factors, their weighting and other criteria that enable us to identify risks and respond appropriately. The findings from the **complaints procedure** are also incorporated into the risk analysis. The exact procedure and the assessment of results are set out in the guideline on human rights and environmental risk analysis in our own business area. Our internal processes are constantly being developed in order to be able to respond to potential grievances and violations in our operations and in our supply chain at an early stage.

An overview of the prioritized risks in our supply chain, namely occupational health and safety, equal treatment and environmental protection, can be viewed **online**.

Control and prevention measures

We have established various measures to fulfill our responsibility to respect human rights and the environment. In this way, we protect ourselves and our employees as well as our direct suppliers from violations of due diligence obligations.

Regular control measures have been established to ensure compliance with human rights and environmental standards. These include the continuous monitoring of existing suppliers by TES. Secondly, new suppliers are obliged to recognize the Supplier Code of Conduct (BME) and our declaration of principles on respect for human rights and the environment when concluding a contract or to present their own regulations, which must not fall short of the requirements of our regulations. In our own business area, we also conduct regular and ad hoc surveys of individual due diligence obligations. If violations or increased risks are identified as part of the risk analyses, we take **corrective measures** to reduce and eliminate the risks.

We take basic preventive measures to minimize risks in advance. We communicate our expectations of suppliers to comply with human rights and environmental protection in their own operations and in their supply chain. We also attach great importance to ensuring that our employees and managers are aware of the impact of our business activities on human rights and the environment and can meet the requirements of the LkSG. To this end, employees in relevant areas receive specific training. In addition, regular training for our employees on bribery and corruption, Group-wide training on equal treatment, sustainability, data protection and occupational health and safety as well as guidelines on antitrust and competition law serve to prevent potential breaches of due diligence. Human rights and environmental issues are an integral part of our purchasing guidelines.

Remedial measures

If we determine that a violation of a human rights or environmental due diligence obligation has already occurred or is imminent at our company or at a supplier, we take appropriate remedial measures to prevent, end or minimize the extent of such a violation. Our remedial measures are applied depending on the risk area breach. To this end, we differentiate between measures taken at direct suppliers and in our own business area. If suppliers are found to have breached their duty of care, the Procurement and Supplier Quality department at TES takes a closer look and initiates measures in consultation with the relevant stakeholders. Procedures and escalation levels are documented in an internal guideline on risk management in accordance with the LkSG. These include audits and specific questionnaires to identify breaches of duty more precisely.

In the event of a violation of human rights or environmental standards in our own business area, we immediately initiate measures to remedy and minimize the violation. We expect support from violating employees and suppliers in the implementation of remedial measures. We review the effectiveness of our measures in regular and ad hoc risk analyses.

Complaint mechanism

Techem GmbH ("T") has set up an **online reporting** system for employees and (external) third parties. TES participates in the complaints procedure set up and operated by T, also for TVG 671. Employees, customers, suppliers and other interest groups can use this reporting channel to submit information on illegal or inappropriate behavior at Techem securely and, if necessary, anonymously. This serves in particular to find out about compliance violations, but also human rights and environmental risks, at an early stage and to uncover actual violations and initiate countermeasures. Confidential handling of reports is guaranteed and every report is followed up. In addition, Techem does not tolerate retaliation or adverse behavior towards individuals who report observed or suspected illegal or unethical behavior or

violations with the best of intentions. A procedure for handling the complaints is publicly available.

Documentation and Reporting

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. We continuously document our human rights and environmental due diligence measures and report on them annually in a **LkSG report**. In addition, we report once a year to the German Federal Office for Economic Affairs and Export Control (BAFA). We also provide regular information on the status of implementation and the targets achieved as part of our sustainability reporting.