

Policy

Human Rights

The deugro group is committed to conducting business in a responsible manner and respecting human rights across all our activities. This policy complements deugro group's Code of Ethics and Compliance, which is the basis for how we operate as a business.

Our commitment is lived top down from our C-Suite, Presidents, and Senior Management, and by each employee worldwide. Our policy is based on all internationally recognized human rights referenced in the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. In addition, deugro group commits to the United Nations Global Compact principles, including Human Rights and Labor principles.

We have analyzed potential human rights risks and the impact related to our business and operations. Based on our risk mapping analysis, we focus on several Human Rights including, but not limited to, the following :

- **Child labor:** We prohibit all forms of child labor and do not employ workers below the legal minimum age of employment in any country or local jurisdiction. We apply a legal minimum working age of 15 years, even where local law permits younger children to be employed.
- **Working conditions**
 - **Health and Safety:** The health, safety, and well-being of our employees is our top priority. We support health-conscious behavior at all levels and continuously work to enhance the safety of our operations.
 - **Living wage:** Timely payment to our employees is a priority. We align our employee compensation with the prevailing standards in the local industry and labor market, as well as in compliance with minimum wage legislation and the terms outlined in relevant collective bargaining agreements, if applicable. In addition, we work toward paying all our employees a living wage.
 - **Working hours:** We comply with all local laws regulating working hours and rest periods and strive to go beyond these requirements, particularly in regions where regulations may not be as stringent.
- **Forced Labor:** All labor must be voluntary. We do not tolerate any forms of forced labor including bonded labor, indentured labor, military labor, modern forms of slavery and any form of human trafficking. No fees may be charged for employment, and withholding of personal identification documents, such as passports or work permits, is strictly forbidden.
- **Freedom of Association and Collective Bargaining:** We respect our employees' right to join or not to join a trade union or employee representation of their choice, free from threat or intimidation. We recognize and respect the right to collective bargaining in accordance with applicable local law. Employees who act as representatives are neither disadvantaged nor favored in any way.
- **Diversity, Equality, and Inclusion:** We nurture a diverse and inclusive environment that enables the right experts with the required skills to succeed. We are committed to equal opportunity and do not tolerate any kind of discrimination or harassment in the workplace based on gender, ethnic origin, nationality, social origin, religion, age, disability, sexual orientation and identity, or any other characteristics protected by applicable law.

We recognize that human rights due diligence is a dynamic process and strive to continuously improve by regularly assessing our human rights impacts, reviewing our human rights due diligence processes, monitoring their effectiveness, and communicating our efforts.

As a globally operating group of companies, we respect the authority of each local jurisdiction where deugro group companies and offices are located. This means that we are committed to complying with all local laws and regulations. In case of a divergence between local laws and deugro group's regulations, the more restrictive shall be applied.

This Policy first took effect in July 2024 and is reviewed annually.

Thomas C. Press
Chairman and Co-CEO

Klaus Strahmann
Co-CEO

Pfaeffikon SZ, September 2024

