

# **Human Rights Policy**

of hep global Group

Version 1.0

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# **Human Rights Policy**

## **1. Introduction**

The Management Board of hep global GmbH (hereafter 'hep global') and all other signing entities have concluded the following Human Rights Policy complementing the Code of Conduct and other internal guidelines on sound and compliant business practices. It describes the main obligations, duties and stakeholders with respect to Human and Labor Rights promotion and protection, corruption prevention and environmental protection and innovation related to the protection of human and labor rights in internal and external business relations. Environmental protection is thereby understood as a form to complementing the efforts to promote and enhance decent human development while guaranteeing the adherence to human and labor rights.

This Human Rights Policy is the result of a materiality analysis of the main human rights impacts of the business model. The analysis was conducted using internal resources.

### **1.1 Scope**

The Human Rights Policy applies to all hep entities in Germany and abroad. The circle of recipients includes all employees, executive and entities' corporate bodies. The principles of this Human Rights Policy also apply to supervisory board mandates held by hep employees in other companies.

### **1.2 Objective**

hep group pursues a green business model by aiming to generating sustainable returns for their investors and shareholders. At the same time, hep group has itself committed to thinking and acting sustainably, thereby recognizing the responsibility for the environment, for society and for employees as well as employees in the supply chain.

It is thus the objective of this policy to declare the commitment of hep group to the following principles and frameworks: i) UN Global Compact, ii) Sustainable Development Goals, iii) Universal Declaration of Human Rights, iv) International Labour Organization's Declaration on Fundamental Principles and Rights at

Work. Furthermore, it is a declared objective to strive towards the recognition of the v) OECD Guidelines for Multinational Enterprises and vi) UN Guiding Principles on Business and Human Rights.

### **1.3 Announcement and Implementation**

Responsibility for the announcement and the implementation of the Human Rights Policy lies with the management of the individual entities. It is the responsibility of management boards of hep global group entities to report on the progress of the implementation on a regular basis. Certain events may also require a reporting obligation on an ad-hoc basis

Contact persons for all questions regarding the Human Rights Policy are the respective supervisor and the Compliance Officer. The Human Rights Policy is published on the intranet and on the hep global website for all hep entities. All employees are obliged to inform themselves regularly about internal regulations and to comply with them.

All employees of hep group entities are responsible for supporting the Management Board in implementing and developing this policy, to report on potential or factual violations using communication channels designated by the respective management board and to contribute to the implementation and development of that Human Rights Policy in the sphere of each employee's responsibility.

## **2 Human Rights**

The human and labor rights set out under this section constitute the synthesis of a materiality analysis of human and labor rights potentially affected by business activities of hep group entities. They have been identified as the rights significantly affected by the business conduct.

### **2.1 Prohibition of forced labor**

hep group opposes any form of forced or compulsory labor. None of the entities of hep group shall benefit, participate, or tolerate in any form of forced or compulsory labor. hep group advocates in favor of free employment. Working persons are free to abandon their work at any time or may terminate their contracts without fearing threat or other disadvantages. It is the intention of hep group to spread this conduct towards its supply chains.

Where legislative effort to prevent or ban forced or compulsory labor is insufficient, all entities of hep group are responsible to take decisive action in order not to violate any of the principles laid down in this section.

## **2.2 Prohibition of child labor**

hep group opposes any form of child labor. None of the entities of hep group shall benefit, participate, or tolerate in any form of child labor. Child labor is any form of labor of individuals younger than 15 years of age designated to earn remuneration in cash or in kind. Child labor in the sense of this paragraph comprises also employment of individuals younger than 15 years whose contractual relationship is designated as apprenticeship or under a fixed-term contract.

Where legislative effort to prevent or ban child labor is insufficient, all entities of hep group are responsible to take decisive action in order not to violate any of the principles laid down in this section. It is the intention of hep group to spread this conduct towards its supply chains.

## **2.3 Enabling equal opportunities**

hep group is a fair and equal opportunity employer enabling the same chances and perspectives for all employees on all levels. hep group opposes any form of discrimination irrespective of religion, human race, color, nationality, disability, pregnancy, political activism, union affiliation, ethnicity, sexe, perception, age, or sexual identity in contracts, remuneration or employment-related practices such as promotions, bonuses, access to training, dismissal, or retirement. It is the intention of hep group to spread this conduct towards its supply chains.

Where legislative effort to prevent or ban discrimination is insufficient, all entities of hep group are responsible to take decisive action in order not to violate any of the principles laid down in this section.

## **2.4 Enabling Corporate Codetermination**

hep group ensures strict neutrality towards the rights granted by the respective applicable laws on corporate codetermination, thereby including the right of unionization, collective bargaining, forming or dissolving associations or to elect other formal representatives of the workforce. It is the intention of hep group to spread this conduct towards its supply chains.

Where legislative effort to enable the above-named rights is insufficient, all entities of hep group are responsible to take decisive action in order not to violate any of the principles laid down in this section.

## **2.5 Compliance with working conditions**

hep group shall comply with the respective applicable laws on working conditions, including regulation on the number of workdays per week, overtime, rest breaks, leaves and vacations. Unlimited labor contracts shall be given priority over fixed term contracts. The latter shall only be used for justified cases and in overall limited numbers. Direct employment with full command of social security benefits shall be given priority over employee leasing. Every employee receives a formal and non-handwritten employment contract before starting to work. It is the intention of hep group to spread this conduct towards its supply chains.

Where legislative effort to safeguard compliance with working conditions is insufficient, all entities of hep group are responsible to take decisive action in order not to violate any of the principles laid down in this section.

## **2.6 Promotion of workplace safety and health**

hep group will ensure that workplace safety and health is guaranteed for all employees, including a systematic risk and hazard assessment for identified categories of employees, the provision of relevant health and safety equipment as well as recurring trainings of all employees on workplace health and safety issues. hep group is committed to working to achieve the goal of zero accidents, incidents and fatalities related to their business. It is the intention of hep group to spread this conduct towards its supply chains.

## **2.7 Protection of indigenous peoples**

hep group acknowledges the rights of property owners and pursues the objective to achieve no land ownership conflict. For this purpose, hep group ensures that land property and use rights are sufficiently clarified before signing any land lease or purchase contract. In case of identified land use conflicts, hep group will ensure a transparent conflict clearance process where concerned stakeholders were involved and participated in developing resolution or compensation mechanisms.

hep group shall guarantee that economic, environmental, social as well as cultural allowances of indigenous population groups affected by the business activity of hep group were respected. Furthermore, hep shall safeguard that environmentally related human rights of stakeholders were affected in the least possible way. hep group will continuously assess potential negative environmental effects of its business activities and deduct appropriate mitigation measures. In case of conflicts, hep will engage in conflict resolution. This shall include enabling access to grievance mechanisms and a timely

processing and response of claims made by indigenous population groups or other stakeholders.

## **2.8 Environmental protection**

hep group is particularly committed to the protection and preservation of healthy and diverse ecosystems as well as ecosystem services and to using natural resources in a way that does not overexploit them to the extent that natural resource regeneration is prevented. hep group assesses whether planned or actual business activities affect natural habitats and biodiversity-sensitive areas and commits to respecting and implementing all necessary mitigation measures to compensate or prevent negative impacts on ecosystems or biodiversity-sensitive areas.

## **3 Main principles of conduct**

The implementation of this Human Rights Policy constitutes a continuous effort of all units of hep group. It is thus in the responsibility of the Management Board of hep group entities to take appropriate and coherent action to ensure that the principles laid out in this Human Rights Policy are being implemented throughout all business processes and procedures. It is within the responsibility of management boards to create an internal culture of respecting the principles laid out in this policy for all employees and stakeholders of hep group. In addition, it is in the responsibility of all professionals of hep group to strictly respect the human rights set out under this policy as well as those granted by law, particularly in countries where institutions to respecting and guaranteeing these rights are weakly developed.

Due diligence procedures shall be installed across all segments where granted rights under that policy are likely to be directly or indirectly affected. This shall include the deployment of appropriate measures in case of human rights violation. Additionally, hep group shall define due diligence practices to identify and monitor business activities.

Where appropriate, hep group will enter in exchange with affected stakeholders on business practices to investigate allegations of potential violation of human rights that were raised by persons or organizations outside of hep group. Exchange shall also comprise the identification of emerging human right issues within the scope of business activities. hep group will report on the extent of allegation of potential human right violation and the result of internal investigation shall be reported on a regular basis.

#### **4 Implementation and update**

This policy marks the framework which outlines the main principles for business conduct and respect of human rights defined under this policy while complementing other business conduct policies. It will be updated on a regular as well as on an ad-hoc basis as business activities and emerging aspects relating to human rights emerge.