

# Declaration of Principles On Human Rights

## 1 Introduction

DMB Dr. Dieter Murmann Beteiligungsgesellschaft mbH and all associated groups of companies (hereinafter referred to as the DMB Group) act on the basis of integrity, fairness and reliability. Respect for human rights is a fundamental component of our corporate responsibility in all our business areas and in internal and external relationships with employees, shareholders and suppliers. This Declaration of Principles On Human Rights serves as a guideline and supplements our globally applicable Code of Conduct and Compliance.

As a globally active Group, we operate in various countries where laws, business practices and customs may differ considerably. Compliance with local legal provisions is a fundamental principle of responsible conduct for us. We observe the applicable legal obligations and requirements and act in accordance with high ethical standards. In this context, we are committed to respecting the following international conventions:

- The Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The United Nations Guiding Principles on Business and Human Rights

This Declaration of Principles has been adopted by the management of DMB together with the managing directors of its subsidiaries. It represents a binding basis for the human rights due diligence obligations in the DMB Group in accordance with the German Act on Corporate Due Diligence Obligations in Supply Chains (German abbreviation: LkSG). Our employees are obliged to be familiar with these principles and to comply with them in their daily work. We expect our business partners to follow the principles contained in this Declaration of Principles.

## 2 Human rights

The DMB Group is committed to protecting the following human rights in particular within the scope of its own business activities and also expects this of its direct suppliers:

Prohibition of child labor: We in the DMB Group reject any form of illegal child labor and demand the same from all our suppliers. We respect the right to education and take into account the minimum age for employment in accordance with ILO Convention 812 (Child Labor Convention).

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Prohibition of forced and compulsory labor: We reject all forms of forced and compulsory labor. We are committed to ethical and lawful employment in accordance with ILO Convention 29 (Forced Labor Convention).

Right to health and safety at work: Occupational health and safety for our employees is a key concern for us at the DMB Group. We are committed to safe and healthy working conditions and regularly train our employees accordingly. Compliance with environmental, health and safety regulations is mandatory for all employees.

Freedom of association, right to collective bargaining and right to strike: We recognize the right to freedom of association, the right to join or join trade unions, the right to collective bargaining and the right to strike of our employees in accordance with the law of the respective place of employment.

Equal opportunities and protection against discrimination: At the DMB Group, we are committed to a policy of equal opportunities, mutual trust and mutual respect. We treat all employees and business partners equally, regardless of gender, age, skin color, national origin, sexual orientation, restrictions, religious affiliation or ideology and regardless of the phase of the employment relationship.

Remuneration and benefits: In the DMB Group, we ensure that the remuneration and other benefits paid in the context of employment at least comply with the legal requirements of the countries in which we operate and that regular payments are made. The remuneration paid should make it possible to finance a living standard for all employees.

Climate and environment: Climate and environmental protection are important corporate goals for us in the DMB Group. We are committed to the climate protection goals of the United Nations and use resources responsibly. We are strongly committed to environmental friendliness, resource conservation and energy efficiency in everything we do. We are committed to complying with the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, the Minamata Convention on Mercury and the Stockholm Convention on Persistent Organic Pollutants (POPs).

Protection of local communities and indigenous peoples: We consider the local impact of our business activities in all countries in which we operate and respect the rights of local communities and indigenous peoples.

Human rights protection when deploying security forces: If the DMB Group deploys private or public security forces to protect our operations, they must be obliged to respect internationally recognized human rights in all their actions. We strictly reject torture, inhumane treatment or harm to life and limb.

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### **3 Implementation of the due diligence obligations**

#### **3.1 Own business division and direct suppliers**

##### **3.1.1 Risk management and responsibility**

We have established an effective risk management system to ensure compliance with due diligence obligations within the DMB Group and directly along the supply chain. The responsibility for risk management and its further development lies with the respective DMB stakeholdings.

The managing directors / managers of the local units in the DMB Group are responsible for fulfilling the human rights due diligence obligations to high ethical standards at the respective location. Managers are obliged to inform their employees about the contents of this Declaration of Principles.

##### **3.1.2 Risk analysis**

We carry out an annual and ad hoc risk analysis to determine the human rights and environmental risks in the DMB Group in our own business area and at our direct suppliers.

To this end, the abstract risks are first presented using country indices and a business model risk categorization. The criteria "scale" (severity), "scope" (extent) and "remediability" (remedy), in accordance with the UN Guiding Principles, as well as the probability of occurrence are used for the concrete assessment of the identified human rights and environmental risks.

As a globally operating and producing group, we have identified the following topics with a medium risk for our own business division: Equal treatment, health and safety in the workplace and environmental risks involving human rights violations. We have already minimized the likelihood of these risks occurring by implementing measures such as the Code of Conduct and Compliance and adhering to national legal requirements.

In our supply chain, we have identified country- and sector-specific areas with medium to high risk potential. Our risk analysis has shown that particular attention is required in the following areas: child labor, forced labor, equal treatment in the workplace, environmental risks with possible human rights violations, illegal and forced displacement and abuse of power by state or private security forces. These risks are largely attributable to data that cannot be determined in the international supplier context and are being investigated further.

From now on, the respective results must be communicated to the DMB management at least once a year.

##### **3.1.3 Preventive measures**

We have implemented various measures in the DMB Group to prevent possible violations of human rights due diligence. These include training on this Declaration of Principles in the relevant areas and adapting the procurement strategy. In addition, further specific measures

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are implemented based on the risks identified. For example, we are examining the extent to which awareness-raising measures can reduce the risk of unequal treatment in the workplace.

In order to address environmental risks, the need for an environmental protection policy is being examined. In addition, measures are planned for the priority risks in the individual investments as required.

With regard to direct suppliers in the DMB Group, compliance with human rights due diligence obligations in the selection of suppliers and the corresponding contractual structure of the supply relationship is mandatory as part of the preventive measures. This includes the development of a Group-wide Supplier Code of Conduct. It forms the central basis for the protection of human rights. The measures serve to ensure compliance with the duty of care and help to promote our expectations of a responsible and sustainable supply chain.

The preventive measures are evaluated annually and checked for their effectiveness.

#### 3.1.4 Remedial measures

If it is determined that a violation of the duty of care or a violation of human rights has already occurred within the DMB Group or one of our direct suppliers, we are entitled to remedy this or have it remedied within a reasonable period of time by means of appropriate remedial measures.

To date, there have been no specific incidents that would have given rise to corresponding investigations. The remedial measures are subject to an annual, risk-oriented review with regard to their effectiveness. In this context, we take particular account of any changes in risk that arise in our own business operations or at our suppliers.

Should violations occur in a supplier's area of responsibility, we expect them to provide prompt and thorough clarification and to make a committed effort to remedy the respective grievances in close cooperation with the DMB Group company concerned.

The remedial measures introduced are evaluated annually and checked for their effectiveness.

#### 3.1.5 Complaints procedure

All known deviations and violations or suspected violations of human rights and environmental standards within the business activities of the DMB Group, but also within the business activities of our suppliers, must be reported immediately. We encourage our employees to report ethical concerns in direct communication with the person concerned, their line manager and the Compliance Officer or anonymously via our SpeakUp channels. To protect against retaliation, we ensure that the identity of the reporting person is treated confidentially and that the facts are investigated accurately. We therefore also comply with the EU Whistleblower Protection Directive.

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The reporting procedure is publicly available in the SpeakUp Policy our websites, posted in all our companies and publicly accessible.

The complaints procedure is evaluated annually and its effectiveness reviewed.

### **3.2 Indirect suppliers**

In the DMB Group, we are working to identify our indirect suppliers in order to fulfill our responsibility.

If we have significant indications that a violation of a human rights-related or environmental obligation by indirect suppliers is possible, we immediately carry out a risk analysis within the DMB Group. Based on this analysis, a concept is drawn up to prevent, stop or minimize the violation at the originator.

### **4 Documentation, communication**

All activities carried out in accordance with Chapter 3 are adequately documented.

This Declaration of Principles is made available to all our employees in a suitable form, published, regularly updated and further developed.

### **Contact and links**

Human Rights Officer DMB: Katrin Ahlich, [compliance.dmb@dmb-holding.com](mailto:compliance.dmb@dmb-holding.com).

Further e-mail addresses and links can be found on the websites of the DMB corporate groups.

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This document is valid without signatures.