

GOLDBECK GMBH

DECLARATION OF PRINCIPLES ON RESPECTING HUMAN RIGHTS

1 FUNDAMENTAL POSITION

Since the foundation of the company in 1969, we at GOLDBECK have held shared values. They form the basis of our decisions. Humanity, responsibility and a passion for performance are our pillars. These three core values shape our company and how we deal with our customers, business partners, suppliers and employees. We take responsibility for the sustainability of our business in the corporate, environmental and social areas. We act conscientiously with respect to our colleagues and business partners, as well as society and the environment.

We at GOLDBECK are dedicated to respecting human rights and to protecting the environment, and we are aware of our responsibility as part of our global supply and value creation chains. We acknowledge the responsibility of companies to respect all internationally recognised human rights and to avoid any violations thereof. It is the duty of the state to protect and to guarantee human rights. Together with our employees, business partners and stakeholders, we work to promote human rights and advocate for business practices characterised by partnership as well as for good working and living conditions.

The principles on respecting human rights and the environment set out in this declaration apply throughout the entire sphere of GOLDBECK's operations, including its subsidiaries in Germany and abroad, and are to be complied with by the Executive and Management Board and all employees in carrying out their duties. The GOLDBECK company expects compliance with human rights and environmental obligations from all of its business partners. Respect and preservation of human rights and the environmental obligations are the fundamental requirements for working together with GOLDBECK.

The following international regulatory frameworks to which GOLDBECK has committed form the basis of human rights and environmental due diligence:

- Universal Declaration of Human Rights of the United Nations (UN UDHR)
- United Nations Guiding Principles on Business and Human Rights (UN GP)
- Conventions and Recommendations of the International Labour Organization (ILO) on Labour and Social Standards
- United Nations Convention on the Rights of the Child (UN CRC)
- United Nations Convention on the Elimination of All Forms of Discrimination Against Women (UN CEDAW)
- Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD)

2 RESPONSIBILITY AND AMBITION OF GOLDBECK

GOLDBECK respects the human rights of employees and also expects this respect for human rights from its business partners and suppliers. In this context, compliance with the respective highest applicable standard of local laws and requirements of the ILO core labour standards is essential. One component of our strategy for respecting human rights and the fundamental requirement of working with us is the [GOLDBECK Code of Conduct for Business Partners](#). This document is the foundation of our partnership.

In this context, the following principles apply in particular:

1. Labour and human rights

The company upholds the human rights of its employees and treats them with dignity and respect. This applies to all employees, including temporary and project workers, working students and subcontracted workers. This includes compliance with the following points defined in the Code of Conduct: permissible working hours, employment relationship, appropriate compensation, occupational health and safety, freedom of association, prohibition of child labour, protection of minors, free choice of employment, no discrimination and humane treatment.

2. Health and safety

The company is committed to maintaining a work atmosphere that ensures the safety and health of their employees in their workplace. This includes compliance with the following points defined in the Code of Conduct: safety at work, regulated emergency prevention, prevention of industrial accidents and occupational diseases, hazard prevention, compensation for physically demanding work, machine safeguarding and employee information on health and safety.

3. Environmental and climate protection

The company is always aware of its responsibility towards the environment and has the ambition to protect the environment in the long term and thus preserve it for future generations. This includes compliance with the following points defined in the Code of Conduct: resource consumption and avoidance of environmental pollution, hazardous substances, animal welfare, product life cycle, environmental permits, climate protection and reduction of packaging waste.

4. Fair market conduct

The company is aware of the following ethical standards and aligns its business activities accordingly. This includes compliance with the following points defined in the Code of Conduct: ethical business, behaviour in competition, complaint mechanism, data protection and data security and conflicts of interest.

These principles are laid out in the Code of Conduct and are a part of our contractual agreements with our business partners. We demand that our direct business partners comply with and disseminate our expectations regarding human rights and the environment in the supply chain, and that they monitor compliance on an ongoing basis. To this end, our Code of Conduct for Business Partners also is the foundation for forming new and maintaining existing business relationships. For us, respecting human rights is a fundamental requirement for every partnership.

Compliance with human rights in global supply chains requires dedication in the long term and a step-by-step process. Our objective is to continuously improve respect for human rights and the prevention of violations thereof.

3 RISK ANALYSIS AND MEASURES

GOLDBECK carries out risk analyses with regard to compliance with human rights and environmental obligations within its own business operations and at its direct suppliers. Internal and external data is used to assess risks in this regard. The complexity and scope of our international supply chain demand the use of technical solutions that support us in the identification, verification, weighing and prioritisation of risks.

Our risk analysis system enables us to determine the individual risks of an individual business partner, both for existing as well as new suppliers. On the basis of general supplier information – in particular country of origin and sector – we conduct an abstract risk analysis based on a number of recognised indexes and studies from external experts. This data results in a risk rating for each business partner. We use self-assessments of suppliers, an AI-controlled media analysis tool, proven certifications and our own findings from control and business processes to review business partners for specific risks related to human rights or the environment. As part of this process, not only the country of origin and the sector, but also the individual context of the business partner are taken into account.

We weigh and prioritise risks by relating the typically expected severity of a potential rights violation and its irreversibility to the probability of occurrence. We also take the ways in which we potentially contribute to the cause and the degree of our ability to influence into account to prioritise risks so that we can take action where there is a threat of occurrence of a risk. With the help of a risk matrix, we identify our action areas and initiate preventive and corrective measures wherever necessary.

3.1 HANDLING PRIORITY RISKS

GOLDBECK acknowledges that the purchasing of construction services from subcontractors – in particular occupational safety (e.g. noise, collapse or dealing the potentially harmful materials), illegal employment and non-compliance with minimum wages – is associated with risks related to human rights and must be addressed through appropriate and effective measures. For this reason, the GOLDBECK Standard Occupational Health and Safety, which has been contractually agreed and serves to protect employees of both subcontractors as well as those employed by GOLDBECK, applies at construction sites and in production areas. New employees are always given initial occupational health and safety training when they first start working at the company. This is followed by further online sessions over the course of their employment, plus a supplementary annual occupational health and safety meeting. Occupational health and safety at construction sites is coordinated by site management, while it falls under the responsibility of the HSEQ department at our plants; at the central locations, it is monitored by an employee responsible for occupational health and safety. Measures to minimise risks related to illegal employment and non-compliance with statutory minimum wages include the mandatory obligation of a minimum wage declaration on the part of business partners to GOLDBECK.

Furthermore, GOLDBECK is aware that the construction sector belongs to a resource-intensive branch of the economy around the world and that it is associated with specific environmental risks. These risks include,

among others, CO₂ emissions generated by the business operations and those of customers which, to date, have often been unavoidable. For this reason, since the foundation of the company, GOLDBECK has worked towards optimising construction elements and processes to conserve resources as much as possible.

Thanks to industrial prefabrication, GOLDBECK manages to reduce the use of resources compared with conventional construction as well as to reduce construction and other waste (e.g. by reusing construction materials). This enables GOLDBECK to significantly reduce its consumption of materials, saving around 25 per cent on CO₂ emissions compared to conventional construction techniques for the average office building, for example. In addition to this, noise pollution at the construction site is also reduced. Along the way, the potential to reduce resource and energy consumption is continuously advanced.

Our aim is to use sustainability certifications to make our building designs more environmentally friendly by drawing on measurable, and thus comparable, criteria.

You will find further detailed information on the protection of human rights and environmental measures in the [GOLDBECK Sustainability Report](#).

On the basis of the risks determined as priorities, GOLDBECK derives corrective measures immediately after a violation has been identified. In doing so, we develop suitable corrective measures for each situation and each direct supplier to rectify violations in a targeted manner.

For every corrective measure, we define a process, success goals and a clear internal responsibility within the company. Each corrective measure includes a specific schedule and can be supplemented with interim targets. The system-supported measure processes network all relevant players.

4 GRIEVANCE MECHANISM

A functional complaint procedure that is accessible to all relevant parties in the supply chain – from employees and suppliers through to third parties which are impaired by our activities or those of our suppliers – plays an important role in the identification of risks and violations in the supply chain. In this context, it is important that complaints can be submitted anonymously and confidentially.

- Submitting a complaint can be done via the following link:

Whistle-blower system: Violations of the Code of Conduct and the GOLDBECK Compliance Guidelines <https://prod.osapiens.cloud/portal/portal/webbundle/supplier-os-hub/supplier-os-hub/public-access-app/complaint.html#/public/goldbeck/goldbeck/complaint/new>

Our web-based whistle-blower system is multilingual and takes the complexity of our supply chain into account. Any thresholds to access have been set low to make it as simple as possible to submit complaints and tips.

Complaints are dealt with confidentially and quickly. The employee involved in the processing of complaints is not subject to any instructions as part of complaint management, so their neutrality is ensured. Each complaint initiates an assessment and measure process which concludes with the end of the reported violation or the minimisation of a recognised risk. Submitted complaints and tips are taken into account as part of the risk analysis.

5 RESPONSIBILITIES

GOLDBECK has appointed an LkSG steering committee which consists of the Legal and Compliance, Central Purchasing, Group Sustainability and Process Management departments. The steering committee coordinates the risk analysis with regard to respect for human rights for its own business operations and the supply chain, monitors compliance with the regulations and, in future, will carry out regular effectiveness tests. The steering committee regularly informs the Executive and Management Board about the results.

Within GOLDBECK, due diligence is anchored across the entire breadth of the organisational structure. All relevant departments are involved in the implementation steps. Overall responsibility for human rights due diligence falls under the GOLDBECK Executive and Management Board. Responsibility for the implementation of human rights due diligence lies with the respective head of the functional departments in the company and has been implemented according to the specific tasks. GOLDBECK will regularly subject its position and implementation to a critical review and develop them on an ongoing basis.

Furthermore, due diligence is anchored through the definition of supervisory and coordination responsibilities at the Executive and Management Board level. Overall responsibility for the implementation of human rights due diligence lies with the Executive and Management Board.

6 DOCUMENTATION AND REPORTING

The implementation of all due diligence is documented on an ongoing basis. Using a central risk management system, we interconnect all information available to us about recognised risks and preventive and corrective measures taken.

Additionally, we undertake to communicate with transparency regarding the human rights and environmental challenges which GOLDBECK is exposed to. By publishing the results of the risk assessment of suppliers and our own business operations, we communicate identified risks, measures taken to reduce the recognised risks and the effectiveness generated at least once per year.

7 OUTLOOK

GOLDBECK undertakes to continuously review, develop and improve its own guidelines and measures. Effectiveness tests are carried out on an ad hoc basis and at least once per year.

Bielefeld, 31 July 2023

A handwritten signature in blue ink, appearing to read 'Jörg-Uwe Goldbeck', written over the printed name.
Jörg-Uwe Goldbeck