



DATAGROUP

Policy Statement

DATAGROUP¹ is aware of its corporate responsibility to respect human and environmental rights.

We² are committed to appropriately heeding due-diligence obligations relating to human rights and environmental concerns, both in our own business operations and in our supply chains, and we work continuously to fulfill this responsibility to the best of our ability.

This Policy Statement describes the key steps and measures that we take in the course of our business activities to identify and avoid potential human-rights and environmental risks in the course of our business activities. This is how we are implementing the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains.

Respect for human and environmental rights

We uphold the international principles regarding the protection of human rights and the environment.

In particular this includes:

- Compliance with the prohibition of slavery, child labor, and forced labor;
- Compliance with regulations on occupational health and safety and working hours;
- Recognition of the right of all employees to form employee representative bodies, to strike, and to engage in collective bargaining;
- Equal treatment of all employees, free from any form of discrimination;
- Paying an appropriate wage at least equal to the minimum wage stipulated by applicable laws;
- Compliance with the ban on causing harmful soil changes, water pollution, air pollution, harmful noise emissions, or excessive water consumption;
- Compliance with the ban on unlawful eviction or deprivation of land, forests, and bodies of water;
- Compliance with the ban on the use of private and public security forces if this threatens to cause a violation of human rights;
- Compliance with the ban on infringing human rights in a particularly serious manner by other conduct;

¹ In this Code of Conduct, DATAGROUP stands for DATAGROUP SE and all affiliated enterprises within the meaning of Section 15 of the German Company Law (AktG).

² "We" always includes all employees, management staff, and members of management bodies of DATAGROUP, including the Executive Board.



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- Compliance with the ban on the manufacture of mercury-added products and the use of mercury and mercury compounds in manufacturing processes as well as unauthorized treatment of mercury waste;
- Compliance with the ban on the production and use of banned chemicals;
- Compliance with the ban on the environmentally non-compliant handling, collection, storage, and disposal of waste and the unauthorized export and import of hazardous waste.

To firmly establish these principles in our daily activities we have implemented measures that integrate this commitment, such as our internal code of conduct for employees and the code for suppliers.

Risk management, annual and ad-hoc review of risks

By establishing a risk management system and carrying out annual and ad-hoc risk analyses in relation to human rights and our environmental obligations, we are able in a timely manner to identify, analyze, and prioritize violations in our own business area and along our supply chains and to take appropriate measures.

In our own business area, risks are evaluated with the support of the relevant technical departments.

Analyzing risk along our supply chains is based on a multi-stage analysis of our direct suppliers. Evaluating direct suppliers is based in particular on evaluation based on their country of origin. The results obtained are validated for plausibility. In addition, the evaluation is checked on a random basis in individual cases. If the risk analysis reveals an increased human-rights or environmental risk, the suppliers concerned are subjected to a more in-depth review. Appropriate remedial and preventive measures are taken if necessary.

Preventive and remedial measures in case of violations, and appropriate correction

DATAGROUP expects all employees and suppliers in the supply chain (within the meaning of the law) to support DATAGROUP to the best of their ability and to prevent the human-rights and environmental risks described in the law in an appropriate manner and to minimize or eliminate them as needed. In addition, employees and suppliers in the supply chain (within the meaning of the law) are expected to support DATAGROUP in risk management, risk analysis, preventive and remedial measures, and the complaints procedure.

If a human-rights or environmental violation is identified, we take immediate and appropriate remedial action to end the violation or minimize the extent of the violation.

We review the effectiveness of our measures at least once a year and on an ad-hoc basis to prevent adverse human-rights and environmental impacts.



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Complaints procedure

DATAGROUP has expanded the electronic whistleblower system to satisfy the requirements of the Supply Chain Due Diligence Law. This whistleblower system enables both our employees and third parties to report violations in our own business area as well as at our direct and indirect suppliers.

The whistleblower can be involved in the process through the system in case further information is needed. At the end of the process, the whistleblower is usually informed of the result in writing.

All reported information and substantiated suspicions of possible violations of human rights and environmental laws are processed as part of a procedure that is transparent for everyone involved (see Rules of Procedure).

Further links

- [DATAGROUP Code of Conduct](#)
- [DATAGROUP Supplier Code of Conduct](#)
- [DATAGROUP Sustainability Report](#)
- [DATAGROUP whistleblower system](#)