

# Policy Statement concerning our Corporate Human Rights Strategy

of noventic group companies

## Outline overview

I.	Foreword	3
II.	Policy Statement	4
	1. Our Commitment to Respect for Human Rights and to Environmental Protection	
	2. Adherence to International Human Rights Standards	
III.	Responsibility of the noventic group and dealings with partners	6
IV.	Dealing with Sector- and Company-specific Risks/Risk Analysis	7
V.	Description of measures and responsibilities	
VI.	Prevention/Internal and External Communication	8
VII.	Complaints Mechanism	9
VIII.	Reporting	10
IX.	Responsibilities at noventic	

# noventic group Policy Statement concerning our Corporate Human Rights Strategy

## I.

### Foreword

When implementing our human rights and environment-related due diligence obligations, the noventic group is subject to the requirements of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG) (hereinafter referred to as Supply Chain Act). Pursuant to Section 6 (2) of the Supply Chain Act, companies are required, among other things, to publish a policy statement setting out their strategies for the protection of human rights and fulfilment of their environment-related obligations.

The key elements of this Policy Statement are a description of the procedures by which the noventic group, represented by noventic GmbH (hereinafter referred to as noventic), fulfils its legal obligations, as well as a statement, based on our annual risk analysis, of the human rights and environment-related risks facing our employees and suppliers, and what is expected of them in these respects.

Risk analysis is a central requirement of the Supply Chain Act, and as such it forms for us an important basis for continuous progress in the field of our human rights and environment-related due diligence. We conducted a risk analysis of our suppliers, which did not reveal any serious risks according to the Supply Chain Act. This finding is also reflected in the content of the report, which has been prepared in line with our obligation to furnish public reports in accordance with the periods laid down in the Supply Chain Act. If we make any changes to our suppliers a new risk analysis will be carried out. In this case, we will update the Policy Statement as necessary on the basis of the analysis findings.

This Policy Statement applies to noventic GmbH as the holding company and to all its affiliated companies within the noventic group.

# II.

## Policy Statement

### 1. Our Commitment to Respect for Human Rights and to Environmental Protection

The noventic group is committed to respecting human rights and protecting the environment, and acknowledges its responsibility for its supply and value chain.

We can only achieve long-term success if the consequences of both our own business activities and those of our suppliers are in harmony with people and the environment. Accordingly we aim to respect human and environment-related rights within our own business operations and in our supply chains, as well as ensuring that violations of those rights are prevented, or minimized where applicable, and that those affected are given access to remedies.

Responsibility for implementing this Policy Statement is in the hands of the management of noventic GmbH, the managing directors of the individual group subsidiaries and group-level managers with personnel responsibilities. This ensures that every area of our group is aware of its own responsibility for respecting human rights and protecting them on a day-to-day basis.

### 2. Adherence to International Human Rights Standards

Respecting human rights is a core value of the noventic group. We respect, protect, promote and comply with applicable laws and respect all internationally recognised human rights that are relevant to our business operations. Specifically, we base our Corporate Human Rights Policy Statement on

- the Ten Principles of the UN Global Compact,
- the Universal Declaration of Human Rights,
- Convention No. 29 of the International Labour Organization of 28 June 1930 concerning Forced or Compulsory Labour (Federal Law Gazette 1956 II pp. 640, 641) (ILO Convention No. 29),
- Protocol of 11 June 2014 to Convention No. 29 of the International Labour Organization of 28 June 1930 concerning Forced or Compulsory Labour (Federal Law Gazette 2019 II pp. 437, 438),
- Convention No. 87 of the International Labour Organization of 9 July 1948 concerning Freedom of Association and Protection of the Right to Organise (Federal Law Gazette 1956 II pp. 2072, 2071) as revised by the Convention of 26 June 1961 (Federal Law Gazette 1963 II pp. 1135, 1136) (ILO Convention No. 87),
- Convention No. 98 of the International Labour Organization of 1 July 1949 concerning the Application of the Principles of the Right to Organise and to Bargain Collectively (Federal Law Gazette 1955 II pp. 1122, 1123) as revised by the Convention of 26 June 1961 (Federal Law Gazette 1963 II pp. 1135, 1136) (ILO Convention No. 98),
- Convention No. 100 of the International Labour Organization of 29 June 1951 concerning Equal Remuneration for Men and Women Workers for Work of Equal Value (Federal Law Gazette 1956 II pp. 23, 24) (ILO Convention No. 100),

- Convention No. 105 of the International Labour Organization of 25 June 1957 concerning the Abolition of Forced Labour (Federal Law Gazette 1959 II pp. 441, 442) (ILO Convention No. 105),
- Convention No. 111 of the International Labour Organization of 25 June 1958 concerning Discrimination in Respect of Employment and Occupation (Federal Law Gazette 1961 II pp. 97, 98) (ILO Convention No. 111),
- Convention No. 138 of the International Labour Organization of 26 June 1973 concerning the Minimum Age for Admission to Employment (Federal Law Gazette 1976 II pp. 201, 202) (ILO Convention No. 138),
- Convention No. 182 of the International Labour Organization of 17 June 1999 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Federal Law Gazette 2001 II pp. 1290, 1291) (ILO Convention No. 182),
- the International Covenant of 19 December 1966 on Civil and Political Rights (Federal Law Gazette 1973 II pp. 1533, 1534),
- the International Covenant of 19 December 1966 on Economic, Social and Cultural Rights (Federal Law Gazette 1973 II pp. 1569, 1570),
- the Minamata Convention on Mercury of 10 October 2013 (Federal Law Gazette 2017 II pp. 610, 611) (Minamata Convention),
- the Stockholm Convention on Persistent Organic Pollutants of 22 May 2001 (Federal Law Gazette 2002 II pp. 803, 804) (POPs Convention), as last amended by the Decision of 6 May 2005 (Federal Law Gazette 2009 II pp. 1060, 1061),
- the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Federal Law Gazette 1994 II pp. 2703, 2704) (Basel Convention), as last amended by the Third Ordinance amending Annexes to the Basel Convention of 22 March 1989 of 6 May 2014 (Federal Law Gazette II pp. 306/307),
- the OECD Guidelines for Multinational Enterprises;
- the UN Guiding Principles on Business and Human Rights,
- the United Nations Sustainable Development Goals,
- the European Convention for the Protection of Human Rights and Fundamental Freedoms, and
- the Basic Law for the Federal Republic of Germany.



## Responsibility of the noventic group and dealings with partners

In order to uphold our commitment to the recognition and respect of human rights within the noventic group, we have implemented group-wide provisions that set forth our stance both for ourselves and for our business partners. These provisions form the basis of our daily actions. They focus not only on our own employees and suppliers, but also on employees in our supply chains, our service providers and our customers.

Specifically, these comprise the following provisions:

- Code of Conduct for companies of the noventic group
- Code of Conduct for Suppliers of companies of the noventic group (in short: Supplier Code)

We take responsibility for our employees and want to adhere to our commitment to minimise the impact of our business activities on the environment. Social responsibility and responsible procurement in accordance with the noventic group's Supplier Code are key elements of our self-image. The principles of this Policy Statement are enshrined in the two codes mentioned above.

This Policy Statement applies to all employees of noventic group companies. Accordingly, we require our employees at home and abroad to conduct themselves appropriately and lawfully towards colleagues, business partners and suppliers. The companies of the noventic group and their employees comply with all applicable national and international laws and are bound by them. We regard it as self-evident that we must comply with all applicable laws and provisions. Doing so safeguards our business success. Violations of applicable laws or provisions may have serious consequences for both the company and employees.

We also expect our business partners and suppliers to undertake to respect human rights, establish appropriate due diligence processes and also have the same expectations of their own suppliers.

## IV.

### Dealing with Sector- & Company-specific Risks/ Risk Analysis

We acknowledge that our business activities in the supply chain could potentially have a negative impact on human rights and environmental protection. In the course of the risk analysis we carried out, we identified the following human rights and environmental protection issues as material for noventic, and consequently focus on them in our human rights and environmental due diligence activities:

- Occupational health and safety
- Fair treatment of employees
- Consumer interests and product safety
- Climate and energy
- Environment and waste
- Use of resources
- Emissions from production operations.

According to our risk analysis, the primary at-risk groups to be considered are:

- Employees of companies of the noventic group
- Employees of direct suppliers
- Consumers, insofar as they are end customers.

## V.

### Description of measures and responsibilities

We regard implementing and complying with our due diligence obligations regarding human rights and environmental protection as an ongoing process that is being continuously refined in response to prevailing conditions and our evolving business activities. Against this background, we carry out appropriate due diligence concerning human rights and environmental issues in order to identify, assess and address potential and actual negative impacts our business activities and supply chain may have on human rights and the environment.

Within the noventic group, a core team has been set up at the level of the management holding company to establish and ensure implementation of the Policy Statement and provide ongoing support with the issue of supply chain management, while an extended management team has been set up at group level to carry out the risk analysis and risk assessment. The direct contact person and coordinator of the topic area is the noventic human rights officer. The human rights officer provides management with regular annual reports, as well as reporting on an ad hoc basis.

The analysis of human rights and environmental risks is subjected to both regular annual reviews and ad hoc reviews in response to significant changes in business operations or to the group structure. In the past, both environmental and human rights-related risks have been addressed and taken duly into account by noventic's subsidiaries through the creation of working groups. If there is found to be a risk that our business activities may cause or contribute to adverse human rights impacts, we have put in place a procedure for the evaluation and, if necessary, modification, discontinuation and/or correction of the activity.

## VI.

# Prevention/ Internal and External Communication

We encourage our employees to use the existing complaints procedure (see below under point VII) to report suspected violations of this Policy Statement concerning our Corporate Human Rights Strategy, as well as any other irregularities or abuses within the Group and its suppliers. Our business partners and third parties have the option of reporting potential violations of this Human Rights Policy Statement via our Complaints Office (see point VII) at <https://noventicgroup.integrityline.app>

In order to meet our responsibility regarding human rights and environmental protection issues we apply various preventive measures both within our own scope of business and that of our direct suppliers. Our primary goal is to protect those potentially affected and to identify, and prevent or minimise, any adverse human rights or environmental impacts they might suffer.

For example, at noventic we run specific employee training courses and inform employees of the provisions of the Supply Chain Act and other corporate values. These are reflected in the Policy Statement, the Code of Conduct, the Supplier Code of Conduct and other documents. These training courses take place internally, for example employees may take them via the company's own Intranet.

We also provide our suppliers with informational documents, for instance lists of FAQ catalogues on our homepage, as well as providing them with our Supplier Code of Conduct, along with a request to accept it. Through this group-wide communication we aim to raise awareness of the issue among both our employees and our partners. We develop standardised processes and procedures to ensure that the subject is adequately covered. Our sustainability reporting is regularly carried out in accordance with the requirements of the German Sustainability Code (Deutscher Nachhaltigkeitskodex, DNK).



# VII.

## Complaints Mechanism

We regard an appropriate and effective complaints management system as an integral part of our due diligence processes, as well as being vital to preventing and remedying violations within our company and our supply chain. noventic takes violations of human rights and environmental protection seriously and has therefore set up a company complaints management system that is accessible both internally and externally and provides confidential reporting channels. These enable anybody, at any time, to report actual or suspected violations by noventic or its partners and suppliers.

Once a complaint is received, the matter in hand will be dealt with promptly by a team of case officers working under the direction of the human rights officer, who is impartial, independent and bound to secrecy. In addition, the management of noventic will be informed of the complaints received. The facts of any case will be examined neutrally, without regard for the persons named or their position within the company hierarchy. The persons involved will be listened to, any further investigations necessary will be conducted and a solution to the matter will be found.

The complaints management system is designed as a portal solution. Access is via this link: <https://noventicgroup.integrityline.app>.

Das Beschwerdeverfahren und läuft wie folgt ab.

- The complainant accesses the portal via the noventic website, the direct link or the Group's own Intranet.
- In the portal, a form is available under "Submit a complaint about the supply chain" in which the matter in hand can be described and further information about the case can be provided. Details can also be submitted anonymously.
- The Complaints Office personnel are informed of any incoming complaints and can view and process them on the portal.
- The people handling complaints operate at group level in order to ensure a neutral initial check and, if desired, to maintain contact with the complainant.
- In the case of company-specific issues, personnel at the level of the company concerned will subsequently be consulted.
- Once the case has been processed and a complaint has been confirmed, action will be taken to remedy the matter and subsequently the case will be closed.

We have laid down, documented and internally communicated the complaints procedure, which has been incorporated into the procedural rules applied by the Complaints Office. These procedural rules are available on our website and in the complaints portal.

The efficacy of our complaints procedure is regularly reviewed, at least once a year, as well as on an ad hoc basis. Moreover, dealing with complaints and the knowledge thus gained enables us to continuously improve our human rights and environmental due diligence processes.

## VIII. Reporting

noventic discloses information relating to human rights and environmental due diligence obligations as follows:

- in the form of an annual, voluntarily published sustainability report in line with the principles laid down in the German Sustainability Code (DNK),
- via a report to the Federal Office of Economics and Export Control (Bundesamt für Wirtschaft und Ausfuhrkontrolle, BAFA), to be published pursuant to Section 10 (2) sentence 1, 12 Supply Chain Act,
- through publications on the appropriate pages of our website.

## IX. Responsibilities at noventic

Within noventic we have specified clear responsibilities concerning meeting and complying with our human rights and environmental due diligence obligations.

The central contact person for internal and external enquiries in this regard is noventic's human rights officer,

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Hamburg, 9 November 2023



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