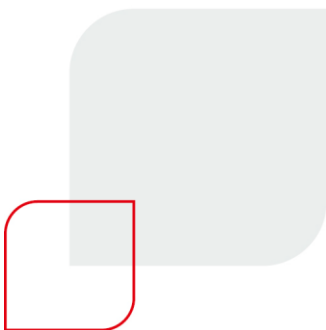
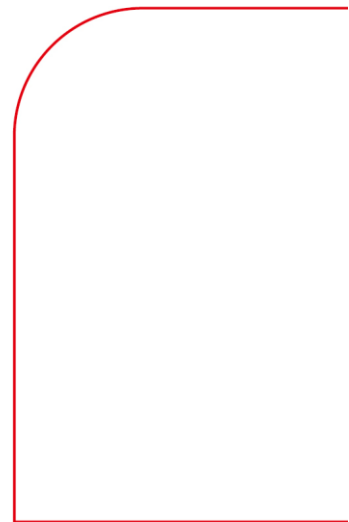


# Zollner Human Rights Policy

Policy Statement on Human Rights



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## Our Fundamental Stance – Preface

As an electronics and mechatronics service provider, Zollner offers fast, flexible, cross-sector system solutions along the entire product life cycle with a high level of personal support.

Alongside our own manufacturing expertise, we also have a highly developed pool of suppliers with more than 8,000 vendors and suppliers. Founded in 1965, it has grown organically to become a global player with around 13,000 and the time-intensive task of finding employees at 24 locations around the globe.

As an international acting company, we affirm our commitment to social responsibility. Particularly from an entrepreneurial view, we place great value on respect for human rights and environmental laws both well as in our company as in our supply chain. We ensure the maintenance of relevant standards in our working conditions and respectful treatment of one another because the wellbeing of all participants is of utter importance to us.

Team spirit, motivation and passion are the foundation of our success. We are thoroughly convinced that economic progress and innovation wealth are inseparable from respect for human rights and the environment. The policy statement at hand reflects this conviction and supplements the Zollner Code of Conduct lived corporate-wide, which was created on the basis of international standards like the basic principles of conduct of the Responsible Business Alliance (RBA), the DIN ISO 26000 guideline for social responsibility and the Global Compact of the United Nations.

We review this policy statement routinely for validity and update it as needed.

A handwritten signature in blue ink, appearing to read "Ludwig Zollner".

Ludwig Zollner,

Board Spokesman

## Our Responsibility – Area of Application

The policy statement for human rights describes our efforts to act ethically and responsibly and supplements our existing guideline for the fulfillment of statutory due diligence.

With that our corporate management positions itself clearly to particular attention and support for adherence to the following obligations regarding human rights and the environment:

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- **Free choice of employment, prohibition of child labor**

We refuse every kind of forced labor or child labor without exception and avow ourselves expressly to the ban on modern slavery or human trafficking.

- **Fair working conditions– working times, wages and benefits**

We ensure fair working conditions, equitable compensation and working times applicable to the currently valid national and international laws and guidelines for our companies. Working times are arranged such that work accidents resulting from physical and intellectual fatigue are avoided and the health of our employees is maintained.

- **Prohibition on Discrimination and Unequal Treatment**

We ensure equal opportunity and condone no harassment or illegal discrimination and unequal treatment. We do not engage in discrimination against any employee based on the following characteristics: race, color, age, gender, sexual orientation, gender identity and expression of gender identity, ethnicity or national origin, disability, pregnancy, religious or political affiliation, union membership, former military allegiance, protected genetic information or marital status in hiring and employment practices such as promotions, rewards or access to advanced training opportunities.

- **Freedom of Association and the Right of Collective Bargaining**

We respect the right of all workers to form or join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly or to refrain from such activities. All employees and/or their representatives are able to openly communicate and share grievances with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment and to talk about ideas and concerns related to working conditions and management practices. We prevent security personnel from being deployed for the impairment of the freedom of association.

- **Humane Treatment, Deployment of Security Personnel**

Our employees will not be subjected to excessively harsh or inhumane treatment, including violence, gender-related violence, sexual harassment, sexual abuse, physical punishment (corporal punishment), mental or physical coercion, public exposure or verbal abuse. This also applies to the threat of any such treatment.

We hire no private or public security personnel for the protection of any corporate projects to intimidate, harass or do physical harm to individuals, including employees and members of the community. We ensure that our deployed security personnel adhere to applicable laws and regulations and respect human rights.

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#### ▪ **Health and safety at the workplace**

Health protection and work safety have utmost priority for us. We adhere worldwide to applicable labor protection laws and establish in addition to that our own work safety and health standards at all of our locations. Wherever employees are exposed to potential safety hazards, these are reduced through proper equipment design, technical and administrative control mechanisms, preventive maintenance, safe work procedures and ongoing safety training. If hazards cannot be adequately monitored by such measures, employees will be provided with appropriate, well-maintained personal protective equipment and training materials on the risks they are exposed to due to the hazard.

#### ▪ **Prohibition of unlawful evictions**

We obligate ourselves to not take part in land grabs. We practice no illegal forced evictions and no illegal dispossession of land, forests and waterways during the acquisition, development or other use of the land, forests and waterways, the use of which ensures the natural resources for another person.

#### ▪ **Prohibition of causing harmful changes to the soil, waterway pollution, air pollution, harmful noise emission or excessive water consumption as well as any kind of human rights violation due to environmental damage**

Negative impacts on the community, the environment and natural resources are continually minimized in our manufacturing processes, and we refrain from causing harmful changes to the soil, waterway and air pollution as well as harmful noise emissions or excessive water consumption.

The health and safety of the public are safeguarded at the same time.

Chemicals, waste or other materials that represent a hazard to the environment upon their release are ascertained, identified and handled such that safety is guaranteed when handling, transporting, storing, using, recycling, reusing and disposing of these substances.

Specifications from conventions for the use of hazardous substances are followed, for example, The Minamata Convention (use of mercury), the Stockholm Convention (persistent, organic pollutants) as well as the Basel Convention (cross-border shipment of hazardous waste and its disposal).

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## **Our approach – implementation of due diligence**

### **Risk Management**

We have implemented appropriate and effective risk management to ensure due diligence in the Zollner Group of companies. The goal here is to recognize and minimize the risks associated with human rights and the environment as well as preventing, ending or minimizing violations of our obligations related to human rights and the environment. The risk management system sets up processes for implementation of due diligence and defines areas of responsibility, responsibilities and reporting paths.

### **Responsibilities**

Responsible people have been named in the company to monitor risk management.

The Corporate Compliance Team (Compliance Officer Global) monitors implementation of risk management, coordinates execution of the complaint process at all company locations around the globe and informs the Managing Board at least one time each year on human rights topics and any occurrences.

### **Risk analysis**

Relative to the adherence to human rights and environmental obligations, we perform risk analyses within each business division at our immediate vendors and suppliers. In doing so we rely on internal and external expertise. The complexity and scope of our international supply chain require the use of technical solutions, which support us in the identification, verification, weighting and prioritization of risks. Our risk analysis system makes determination of the individual risks of each business partner possible. Taking the general supplier information - especially, country of origin and sector - a risk analysis is made based on myriad recognized indexes and studies by external experts. On the basis of verified certifications and our own insights from monitoring or business processes, we subsequently review our business partners for concrete human rights or environmental risks. We weight and prioritize risks in that we set the typically to be expected severity of a possible violation of rights and their irreversibility in ratio to the probability of occurrence. In doing so we also take into consideration several possible contributing causes as well as the degree of our influential capacity to prioritize risks and become active in a targeted manner where there is a threat of realization of risks. With the aid of a risk matrix, we identify our need for action and trigger prevention and corrective actions there where they are needed.

### **Preventative measures**

Upon determination of risks in our own business divisions or our immediate suppliers, appropriate preventative measures are introduced (e.g.: training courses, agreements) to either eliminate or minimize risks.

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In our own business divisions, an internal company code of conduct applies, which summarizes the rights of employees clearly and comprehensibly. We require from our business partners to pass along our human rights and environmental expectations in the supply chain and to routinely review them for adherence. To this purpose, our code of conduct for suppliers provides the basis for entering into a new business relationship.

We conduct training courses for managers and employees to implement our developed guidelines, procedures and goals for improvements and to meet common statutory and regulatory requirements. Within the scope of orientation, employees are informed at regular intervals of the current contents of our corporate values, the Zollner Code of Conduct and other guidelines (e.g.: anti-corruption guidelines) and trained in them.

### **Corrective actions**

If violation of human rights or an environmental obligation becomes apparent in a business division or an immediate supplier, appropriate corrective action will be taken to either end or minimize the violation. Every corrective action has a concrete time schedule and can be given intermediate goals.

### **Complaint process**

An appropriate complaint process has been established to make it possible for people to point out violations against human rights and environmental obligations. The respective reporting options and contact addresses can be seen in the [Zollner Code of Conduct](#) and in the [Zollner SpeakUp Policy](#)

### **Indirect suppliers**

Upon presentation of actual indication that possibly exposes a violation against a human right or an environmental obligation, a risk analysis is performed, and appropriate preventative measures may be introduced.

### **Documentation and reporting obligation**

Fulfillment of due diligence is continuously documented and retained as prescribed by law. An annual report on the fulfillment of due diligence obligations for the previous year is created and published.

### **Determined priority risks**

Relative to the business activities of the Zollner Group of companies, the risk analysis identifies a main risk potential in the category of environmental risks, excessive water consumption as well as soil and air pollution.

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#### **Expectations of employees and suppliers**

Our Zollner Code of Conduct imparts the content of our compliance activities to relevant shareholders (employees and partners). It describes the critical legal and business policy basic principles to which we orient ourselves in our relationships with our business partners as well as in our internal collaboration.

It defines standards to ensure that working conditions in the supply chain are safe, that employees are treated with respect and dignity and manufacturing processes show awareness for the environment and people are aware of their responsibility.

The Zollner Group of companies is committed to the observance of the rules and regulations listed in the Zollner Code of Conduct. In all of our activities, we act in full compliance with all applicable laws, regulations and directives of the countries in which we are doing business. As the basis for long-term and trusting collaboration, we also expect adherence to these basic principles of conduct and that they appropriately address this along the entire supply chain.