



Policy Statement

Human Rights and the Environment

Münster, July 2024



Policy Statement

1 Objective

At zeb, we are conscious of our corporate responsibility for human rights and the environment. We therefore take a stand against human rights violations of any kind as well as any damage to the environment. True to our claim of being “partners for change”, we believe that we can only shape a successful future if we drive these issues forward in collaboration with our suppliers and business partners.

This Policy Statement, in which we commit ourselves to the [German Supply Chain Due Diligence Act \(SCDDA\)](#) and the due diligence obligations stipulated therein regarding human rights and the environment as well as all conventions listed in the annexes, is subject to continuous further development.

2 Subject

In terms of content, this Policy Statement covers all human rights and environment-related risks covered by Section 2 SCDDA.

- Child labor
- Slavery and forced labor
- Disregard for occupational safety and work-related health hazards
- Disregard for freedom of association and the right to collective bargaining
- Objectively unjustified unequal treatment in employment
- Withholding of appropriate wages
- Destruction of the natural basis of existence through environmental pollution
- Unlawful violation of territorial law
- Violation of the prohibition on hiring security personnel who may, for example, cause harm to life and limb due to lack of instruction or control

It also covers environment-related risks in connection with the improper emission of

- mercury,
- persistent organic pollutants (POPs) or
- hazardous waste.

3 Scope of due diligence obligations

This Policy Statement applies to the zeb group's own business area as well as its suppliers. The group's own business area includes

- zeb.rolfes.schierenbeck.associates gmbh, Münster
- zeb.rolfes.schierenbeck.associates gmbh, Vienna
- zeb.rolfes.schierenbeck.associates gmbh, Zurich
- zeb.rolfes.schierenbeck.associates sp. z o.o., Warsaw
- zeb.rolfes.schierenbeck.associates TOV, Kyiv
- zeb.rolfes.schierenbeck.associates gmbh, Luxembourg
- zeb Consulting s.r.l., Milan
- zeb/rolfes.schierenbeck.associates s.r.l., Milan
- zeb.consulting AB, Stockholm
- zeb.rolfes.schierenbeck.associates AS, Oslo
- zeb.rolfes.schierenbeck.associates Ltd., London
- zeb.rolfes.schierenbeck.associates B.V., Amsterdam
- zeb.move business coaching gmbh, Münster
- zeb.information.technology gmbh & co. kg, Münster
- zeb.information.technology gmbh, Münster
- findic gmbh, Münster
- findic gmbh, Zurich
- zeb.connect gmbh, Münster
- zeb.applied gmbh, Münster

We expect our employees as well as our direct suppliers to comply with the due diligence obligations under the SCDDA. Consequently, we expect our direct suppliers to comply with their due diligence obligations in their own supply chain, too.

4 Risk management

zeb has an appropriate and effective risk management system for compliance with due diligence obligations, which is anchored in all relevant business processes by means of appropriate measures.

The aim of our risk management system is to identify potential human rights and environment-related risks at an early stage, reduce their likelihood of occurrence and prevent the occurrence of a violation of due diligence obligations. Should a breach of duty nevertheless occur, our primary objective is to minimize the extent and remedy the breach that has occurred.

5 Risk analysis and measures

We carry out an adequate risk analysis once a year and on an ad hoc basis to determine the human rights and environment-related risks in our own business area and at direct suppliers. In a first step, an abstract risk analysis based on sector and country of the supplier in question is carried out using defined parameters to identify potential human rights and environment-related risks. If risks are identified, a specific risk analysis follows in a second step. It may be necessary to obtain further information for a conclusive risk analysis. The risk analysis also involves the prioritization of suppliers based on the type and scope of their business activities, zeb's causal contribution and zeb's ability to influence the supplier.

If zeb identifies a risk as part of the risk analysis, appropriate preventive measures are taken immediately to mitigate the risk. Should zeb determine that a violation of a human rights or environment-related duty has occurred or is imminent in its own business area or at a direct supplier, zeb will immediately take appropriate remedial measures to prevent or end this violation or to minimize its extent. zeb reviews the effectiveness of the measures once a year and on an ad hoc basis, taking into account findings from the processing of information reported. If necessary, the measures are updated immediately.

6 Identified risks

zeb has not identified any high risks either in its own business area or with its direct suppliers.

7 Complaints procedure

zeb has an appropriate internal and external complaints procedure. All information on the external complaints procedure as well as contact options is available on our website: [Sustainability at zeb](#)

8 Documentation and reporting obligations

zeb continuously documents the fulfillment of the due diligence obligations, e.g. the identification of risks and the measures taken, and ensures that the documents are retained for seven years.

zeb prepares an annual report on the fulfillment of our due diligence obligations in the past financial year, submits it to the German Federal Office for Economic Affairs and Export Control and makes it publicly available free of charge on our website for a period of seven years.

9 Data protection

All activities in connection with this Policy Statement and the contents of the SCDDA are carried out in compliance with data protection regulations.

10 Contact

We have defined relevant responsibilities in order to carry out and comply with our human rights and corporate due diligence obligations. The Legal Desk is responsible for the internal coordination of SCDDA implementation processes. It analyzes material findings of the due diligence process and submits an annual report to the management team regarding defined internal responsibilities within the framework of the SCDDA.

If you have any questions about the SCDDA, please contact the Legal Desk: speakup@zeb.de.