

2024

# GETEC GROUP Declaration of Human Rights and Environmental Principles

**OUR COMMITMENT TO HUMAN RIGHTS AND  
ENVIRONMENTAL DUE DILIGENCE  
POLICY**

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# 1. FOREWORD

The GETEC GROUP is a leading energy specialist operating across Germany and Europe through approximately 50 companies. We provide comprehensive energy solutions including area grid construction and operation, energy trading, contracting services, and renewable energy development. Through our four regional platforms in Germany, Benelux, Switzerland, and Italy, we serve customers across eight European countries. Each platform features a dedicated Competence Center offering specialized expertise in areas such as AI-based energy solutions, district development, renewable energy sourcing, and residual material conversion.

This policy statement applies to all GETEC GROUP companies and affiliates. As of January 1, 2024, we are required to implement human rights and environmental due diligence practices under the German Supply Chain Due Diligence Act (LkSG). In accordance with Section 6(2) of the LkSG, we must publish this declaration outlining our human rights and environmental strategy. This document details our compliance processes with §4(1), §5(1), §6(3-5), and §§7-10 of the Act, and presents our identified human rights and environmental risks, along with expectations for our employees and suppliers.

We acknowledge our corporate responsibility to uphold human and environmental rights throughout our operations and supply chain. We commit to providing remedy when violations occur and adhering to international standards outlined below.

## 2. COMMITMENTS TO STANDARDS

### 2.1. Commitments to human rights standards

The GETEC Group joined the UN Global Compact in 2021. In addition, both our German and Italian organizations have signed the Diversity Charter. In addition, The GETEC GROUP maintains the following commitments:

- Member of the UN Global Compact (since 2021)
- Signatory to the Diversity Charter (German and Italian organizations)
- Adherence to:
  - United Nations Universal Declaration of Human Rights
  - UN International Covenant on Economic, Social and Cultural Rights
  - ILO Declaration on Fundamental Principles and Rights at Work
  - UN Guiding Principles on Business and Human Rights
  - Ten Principles of the UN Global Compact
  - OECD Due Diligence Guidance for Responsible Business Conduct

Our human rights commitment is documented in our 2022 "Declaration of Human Rights" and integrated into our Code of Conduct and Supplier Code of Conduct.

### 2.2. Commitments to environmental standards

Our environmental commitment is governed by comprehensive regulations covering resource management and climate protection through decarbonization. The Group's Health,

Safety and Environment (HSE) policy provides the foundation for our environmental measures across all platforms.

We recognize the increasing importance of Environment, Social, Governance (ESG) considerations. Our commitment to sustainable ecosystems drives our promotion of decarbonization and decentralized energy supply, aiming to reduce CO2 emissions and energy costs through collaboration with industries, real estate, governments, and communities. Detailed ESG information is available in our annual ESG report.

### **2.3. Obligations to observe risks within the scope of the Supply Chain Due Diligence Act**

Under the German Supply Chain Due Diligence Act (LkSG), which expanded to companies with over 1,000 employees as of January 1, 2024, we maintain the following fundamental principles:

#### **Child Labor Prevention**

We prohibit all forms of child labor as defined by ILO conventions, including child trafficking, prostitution, and practices endangering children's freedom and development.

#### **Forced Labor and Slavery Prohibition**

We reject all forms of forced labor, compulsory labor, and modern slavery, including political subjugation, debt bondage, serfdom, human trafficking, and sexual exploitation.

#### **Non-Discrimination**

We maintain workplaces free from harassment based on gender, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identity, or other protected statuses. All employment decisions are based on merit, qualifications, and performance.

#### **Fair Compensation**

We provide industry-competitive compensation aligned with local standards and applicable laws and collective agreements.

#### **Labor Rights and Safety**

We prioritize workplace health and safety, maintaining environments free from violence, harassment, and unsafe conditions. We support open communication and comply with all applicable labor laws.

#### **Freedom of Association**

We respect employees' rights to form or join trade unions without reprisal and engage in good-faith dialogue with elected representatives.

## Environmental Protection

We actively oppose environmental destruction and endangerment, recognizing the interconnection between human rights and environmental preservation.

## 3. ESTABLISHMENT OF RISK MANAGEMENT, § 4 LKSG

The GETEC GROUP maintains clear group-wide responsibilities through our "Risk Management Policy" for managing corporate risks, including LkSG protected assets. Our management structure ensures appropriate and effective risk management systems (RMS), early risk detection, and internal controls (ICS) across all operations.

Our decentralized approach empowers divisions and locations to manage their specific risks and opportunities, including identification, assessment, documentation, reporting, and mitigation. Central risk management provides support tools and expertise for risk evaluation, while Group Risk Management coordinates the overall framework on behalf of the Executive Board.

Key functional areas responsible for human rights and environmental due diligence include:

- Human Resources (HR)
- Occupational Health and Safety
- Environmental Approval departments
- Purchasing department (supply chain oversight)

## 4. RISK ANALYSIS PROCEDURES, § 5 LKSG

### 4.1. Risk analysis in our own operations

Our group-wide risk assessment system operates across all platforms and functional areas, including HR, IT, Finance, Sales, Environmental Protection, Energy Management, and Operations. This systematic approach ensures:

- Continuous monitoring of potential risk scenarios
- Structured documentation of risk inventories
- Quantitative evaluation of cause-and-effect scenarios
- Regular employee engagement surveys
- Immediate reporting of unsafe conditions
- Regular safety inspections

### 4.2. Risk analysis in the operations of our suppliers and service providers

Our supply chain risk analysis, initiated in 2023, employs a risk-based approach focusing on suppliers with annual revenue exceeding €50,000. Using the "Integrity Next" platform, we evaluate suppliers across key areas:

- Anti-corruption practices
- Environmental protection measures

- Human and labor rights compliance
- Occupational safety standards
- Supply chain responsibility

Suppliers identified with elevated risk exposure undergo specific analysis through personal discussions and on-site inspections. As of 2024, this analysis extends to all GETEC country organizations.

## 5. EXPECTATIONS CONCERNING LKSG RISKS

The GETEC Group has the following expectations of our employees and suppliers with regard to compliance with human rights and environmental due diligence obligations.

### 5.1. Expectations of employees

Our workforce, predominantly based in EU member states and Switzerland, operates under our comprehensive Code of Conduct, which:

- Applies to all employees and organizational bodies
- Requires annual formal confirmation from top management
- Promotes safe, ethical work practices
- Ensures compliance with applicable laws and regulations

### 5.2. Expectations of suppliers and service providers

We require our suppliers, service providers and all business partners to:

- Accept and comply with our Supplier Code of Conduct (SCoC)
- Extend these requirements to their employees and contractors
- Maintain ethical, social, and ecological standards
- Participate in regular compliance assessments.

## 6. PREVENTIVE AND REMEDIAL MEASURES, §6, 7 LKSG

In order to fulfill our responsibility towards human and environmental rights, we rely on various preventive and remedial measures. Our aim is to protect those potentially affected and to identify, prevent or minimize adverse effects.

### 6.1. Preventive and remedial measures in own operations

The relevant prevention measures in our own operations include:

- Publication and implementation of this policy statement
- Definition of an internal responsibility to ensure the due diligence
- Compliance with our Code of Conduct
- Employee training and awareness programs
- Implementation of risk-based control measures
- Enforcement of sanctions in the event of violations
- Implementation of our standard for sustainable procurement
- Compliance with the "Declaration of Human Rights"

- Compliance with the "Diversity, Equity & Inclusion" policy
- Compliance with the "GETEC Group HSE Policy"

## **6.2. Preventive and remedial measures at our suppliers and service providers**

In addition, we implement appropriate preventive measures with direct suppliers. These include

- Consideration of human rights and environmental requirements when selecting new suppliers and service providers and their contractual assurance
- Contract clause for suppliers and service providers
- Risk-based control measures
- Risk analyses for potential new suppliers and service providers

In future, we will review the effectiveness of our measures to prevent and minimize LkSG risks at least once a year and on an ad hoc basis. We will also check whether our requirements are being met.

In the event that we as a company have directly caused or contributed to a violation of human or environmental rights, we will work immediately to stop the actions that caused them and to minimize their impact, and compensate accordingly.

## **7. COMPLAINTS PROCEDURE, §8 LKSG**

An appropriate and effective grievance procedure is an important part of our due diligence processes to effectively prevent and remedy potentially adverse human rights and environmental impacts in our business and supply chain.

Violations of human rights or related applicable laws can be reported easily and anonymously by employees or third parties.

We maintain an accessible grievance mechanism through:

- Anonymous whistleblower system ("Whistleblower Expert")
- Direct reporting channels to management and HR
- Protection against retaliation
- Thorough investigation procedures
- Corrective action implementation

There are no negative repercussions for individuals who report human rights violations in good faith. GETEC will investigate, address and respond to such reports and take appropriate corrective action in response to a violation. Identified adverse human rights impacts will be subject to a process of mitigation and learning.

## **8. REPORTING OBLIGATIONS, §10 LKSG**

We document the implementation of our due diligence obligations internally. We provide external information as part of our annual reporting.

Our reporting framework includes:

- Internal documentation of due diligence processes
- Annual non-financial ESG report publication
- Public disclosure of identified risks and impacts
- Regular stakeholder updates

In accordance with legal requirements, we will also publish the answers to the Federal Office of Economics and Export Control's (BAFA) questionnaire on our website after the end of each financial year.

## 9. EFFECTIVENESS CONTROL

The effectiveness of all LkSG-relevant due diligence processes is reviewed at least once a year and on an ad hoc basis in order to identify, prevent, remedy or mitigate adverse human rights or environmental impacts.

We conduct:

- Annual reviews of all LkSG-relevant processes
- Ad hoc assessments as needed
- Regular policy statement updates
- Continuous improvement of preventive measures

This policy statement undergoes annual review and revision as needed.



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Markus Hauck

Chief Financial Officer

GETEC Group