

Declaration of principles on respect for human rights

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Hager Group, Zum Gunterstal, 66440 Blieskastel, Germany

1. Introduction

Hager Group (hereinafter referred to as “Hager”) is a leading provider of solutions and services for electrical installations in residential, commercial, and industrial buildings. Our range of solutions and services extends from energy distribution to cable management and from wiring accessories to building automation and security systems. Our components and solutions are produced at 22 locations around the globe and customers in more than 100 countries all over the world trust in them. We owe our success to their trust. We are also working on future topics such as electro-mobility with charging stations for residential buildings as well as for public infrastructures, building automation and on the networking of energy-efficient housing, which will provide greater comfort while requiring less energy consumption.

At Hager, we are unwavering in our commitment to upholding Human Rights.

We are committed to being a company that lives ethical, social, and ecological responsibility internally and in our dealings with our business partners and stakeholders. Therefore, respect for human rights is a fundamental part of Hager’s corporate responsibility and we expect our employees, business partners, and all our stakeholders, to respect and not infringe upon all human rights and will respond appropriately where necessary.

Compliance with the law is a fundamental principle of responsible behaviour for us at Hager. We respect the applicable legal obligations and requirements and act in accordance with ethical principles. Within this framework, we are committed to respecting the following international standards:

- The Universal Declaration of Human Rights
- The International Covenant on Civil and Political Rights
- The International Covenant on Economic, Social and Cultural Rights
- The Convention on the Rights of the Child
- The International Labour Organization’s fundamental conventions
- The United Nations Guiding Principles on Business and Human Rights
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

Additionally, we actively participate in the United Nations Global Compact initiative. This policy statement on respect for human rights incorporates and complements our guidelines in the Hager Code of Purchasing Conduct

→ <https://hagergroup.com/en/the-group/supplier/downloads-and-privacy>

It was adopted by Hager's executive management and represents a binding basis for Hager's human rights due diligence obligations in accordance with the German Supply Chain Due Diligence Act (hereinafter referred to as "LkSG").

2. Human rights

Hager is particularly committed to protecting the following human rights in its own business activities and expects the same of its direct suppliers:

Prohibition of child labour:

We at Hager are committed to respecting the United Nations Convention on the Rights of the Child. Child Labor is **strongly prohibited** in all aspects of our value chain and considered a breach for which the company has zero tolerance. We respect the right to education and take into account the minimum age for employment in accordance with national legislation and internationally recognised standards.

Prohibition of forced and compulsory labour:

At Hager, we prohibit any form of forced or compulsory labour as defined by the International Labor Organization. It is strongly prohibited in all aspects of our value chain and considered a breach for which the company has zero tolerance. This especially extends to purchased products that may contain conflict minerals.

Right to health and safety in the workplace:

Hager is deeply dedicated to the principle of proactive risk prevention, and upholds stringent health and safety standards to ensure the well-being of our valued employees in their day-to-day operations, as delineated in our Safety Charter.

Freedom of association, right to collective bargaining and right to strike:

Hager acknowledges and respects the right to freedom of association, the right to join or form trade unions, the right to collective bargaining and the right to strike of our employees within the appropriate national legal framework. We respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference, or reprisal. We support collective bargaining and recognise the importance of open social dialogue with freely appointed employee representatives, employee representative bodies, and organisations.

Equal opportunities and protection against discrimination:

A culture of equal opportunities and equal treatment is essential for us at Hager. We treat all employees, partners, and customers equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, pregnancy, religious affiliation, political ideology, or any other status. We provide an environment that does not allow discrimination and we maintain a respectful and dignified relationship with our employees, free from harassment, bullying, or intimidation.

Freedom of expression and of thought, belief, and religion:

We at Hager are committed to developing a culture where all individuals are treated with respect, dignity, and equity. We are resolute in cultivating a diverse and inclusive workplace where every individual is valued and respected. We consider diversity as an asset both for individuals and for the company's success. We value the fundamental human rights of freedom of expression and of thought, belief, and religion.

Remuneration and benefits:

We at Hager are committed to fostering a work environment that values and supports our employees. Terms and conditions of employment within our organisation include key principles, benefits, and guidelines that ensure a positive and productive working relationship for both employees and our company. We comply with the provisions of applicable laws and regulations pertaining to working hours, leave policies, wages, and benefits.

Right to education:

Hager is committed to the professional growth and continuous development of our employees. Our dedication to providing opportunities for career advancement and continuous learning, creating a positive and enriching work environment, and supporting employees in reaching their full potential is embedded in our Hi! University strategy.

Right to privacy and data protection:

Hager is committed to safeguarding the privacy and data of our employees, customers, and stakeholders. All personal and sensitive information will be handled in strict accordance with applicable data protection laws and regulations. We will ensure transparency in data collection and use, seeking explicit consent where necessary.

Human rights and the environment:

Environmental and climate protection are important corporate goals for us at Hager. We are committed to reduce the carbon footprint of our operations, as well as lowering our consumption of natural resources. In all our business activities, we commit to providing solutions that can be realised with a minimum impact to our environment regarding among others the use of raw materials, product design, energy, and transportation.

Protection of local communities and indigenous peoples:

At Hager, we consider the local impact of our business activities. We recognise our responsibility to engage with and support the communities in which we operate and are committed to being a responsible player, making a positive contribution to their well-being while respecting their cultural, social, and economic rights. There is also a focus on the local communities associated with the mining of conflict minerals that may be contained in our products.

Human rights protection when deploying security forces:

If we at Hager deploy private or public security forces to protect our operations, internationally recognised human rights must be respected. We at Hager reject the use of private or public security forces for torture, inhumane treatment or harm to life and limb. This extends to our suppliers, particularly in relation to the purchase of products that may contain conflict minerals.

3. Implementation of the due diligence obligations

3.1 Own business division and direct suppliers

3.1.1 Risk management and responsibility

We have established a risk management system to ensure compliance with due diligence obligations at Hager and directly in our supply chain. The Group Human Rights Officer is responsible for risk management and its further development. Every manager at Hager is responsible for the fulfilment of human rights due diligence obligations in the relevant area. Managers are obliged to inform their employees about the contents of this policy statement.

3.1.2 Risk analysis

In order to determine the human rights, environmental, social and economic risks at Hager and its direct suppliers, we carry out an annual and ad hoc risk analysis. Country risks and business model risks are taken into account. When assessing the identified human rights and environmental risks, the criteria of scale, scope and remediability, in accordance with the UN Guiding Principles, as well as the probability of occurrence are used. Based on our business model and the countries in which we operate, we have identified the following risks for our own business area:

- Health and Safety
- Environmental protection
- Freedom of association and collective bargaining

For our direct suppliers we identified, based on the countries in which they are located, the following risks:

- Forced Labour
- Health and Safety
- Environmental protection

In the event of specific indications, we also extend our risk analysis to indirect suppliers and examine necessary measures. With respect to Conflict Minerals a separate risk assessment is conducted for relevant suppliers. Results of the risk analysis, regularly or ad-hoc, are continuously communicated to the management of the Hager.

3.1.3 Preventive measures

- Various measures have been implemented in the company to take preventative action against possible violations of human rights due diligence obligations. For our own business division, these include measures such as the implementation of human rights due diligence obligations as part of the procurement strategy, employee training, and the adoption of relevant policies.
- With regards to Hager's direct suppliers, human and environmental rights are considered in the selection of suppliers as part of the preventive measures. Further, the contractual clauses were adapted and expanded accordingly. Hager uses digital solutions to systematically screen international press releases for potential violations of the legal positions specified in the LkSG in its supplier base.
- As preventive measures in the due diligence process for conflict minerals, Hager collects the Conflict Minerals Reporting Templates (CMRT) of relevant suppliers.
- Based on the risk analysis, no additional specific preventive measures were deemed necessary.
- The preventive measures are evaluated annually and checked for their effectiveness.

3.1.4 Remedial measures

If we become aware that a breach of due diligence or a violation of human rights has already occurred at Hager or at one of our direct suppliers, we will endeavour to put an end to it by taking appropriate remedial measures.

3.1.5 Complaints procedures

- Hager will maintain transparency and accountability regarding its Human Rights performance. All employees of Hager, all external or temporary workers, and all business partners are requested to report any practice, activity, or request that they consider to be inappropriate, or which could breach the principles of this policy, the Ethics Charter or the compliance guidelines.
- Complaints regarding potential or actual human rights or environmental violations can be reported internally to the Ethics Team, one of the global Ethics Ambassadors, the Group Ethics Officer, respective managers, or employee representatives. In addition, breaches can be reported externally via our "Let's Talk" integrity whistleblowing system. Breaches can be reported via the online reporting form in different languages (→ <http://www.safecall.co.uk/clients/hagergroup>) or via an email address (ethics@hagergroup.com). The degree of anonymity can be chosen by the alerts or authors of a report.
- During the treatment of a Human Rights breach, we guarantee the right to a fair hearing, including but not limited to the right to be presumed innocent until proven guilty and the right to equality before the law.
- The complaints procedure guarantees impartial, independent and confidential action without fear of retaliation. The service is assured through a third-party independent agency guaranteeing data protection.
- Our procedural instructions on our complaint's procedure is publicly available on our website and is also displayed in all our companies.
- The complaints procedure is audited by an external expert regularly and its effectiveness is monitored on an ongoing basis.

3.2 Indirect business partners/suppliers

At Hager, we work to identify our indirect suppliers in order to fulfil our responsibility. If Hager has significant indications that a violation of a human rights-related or environmental obligation by indirect suppliers is possible, Hager will immediately carry out a risk analysis. Based on this analysis, a concept for prevention, termination or minimisation at the originator will be drawn up.

4. Documentation and reporting

We continuously document the fulfilment of our due diligence obligations, and we publish our report on the fulfilment of human rights due diligence obligations in accordance with the LkSG annually on our company website. This report is also submitted to BAFA for review.

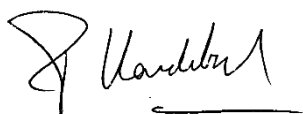
5. Communication

This policy statement is available to all our employees and their representatives in an appropriate form and published. The Corporate Social Responsibility Director, the Compliance Committee and the Group Ethics Officer are responsible for ensuring adherence to the above stated commitments and have responsibility for overseeing their implementation. They review this policy every two years, taking into account the evolution of human rights standards and our stakeholders' expectations.

6. Contact

Angela Durand
Group Human Rights Officer
angela.durand@hagergroup.com
T +33 (0)6.49.86.95.48

Franck Houdebert
Chief Human Resources
Officer



Matthieu Alexandropoulos
Director Corporate Social
Responsibility



Ralph Fürderer
Chief Technical Officer

