

Policy Statement on Human Rights Strategy of the Piepenbrock Group

The Piepenbrock Group is a family-owned company now in its fourth generation. In addition to our headquarters in Osnabrück, we maintain 70 branch offices and approximately 800 locations nationwide. As a full-service provider of facility services, Piepenbrock offers comprehensive solutions across four key business areas: facility management, commercial cleaning, maintenance, and security. These are complemented by specialized services in cleanroom cleaning, winter services, grounds maintenance, energy management, equipment testing, and FM consulting. In addition to our service business, Piepenbrock also operates an industrial division focused on packaging machinery and the production of cleaning chemicals.

As an experienced and forward-looking company, we have a clear understanding of how we want to conduct ourselves, toward both the environment and the people around us. At Piepenbrock, we share a collective responsibility to ensure that our actions are legally compliant and ethically sound. Protecting human rights throughout our entire value chain is therefore a fundamental part of our human rights strategy.



Arnulf and Olaf
Piepenbrock,
Managing Directors

Our human rights strategy

As the Piepenbrock Group, we are fully committed to upholding and promoting human rights throughout our supply and value chain. In doing so, we adhere to internationally recognized guidelines and principles. We support the United Nations 2030 Agenda for Sustainable Development, including its Sustainable Development Goals (SDGs), and are signatories of the Diversity Charter – an employer initiative promoting diversity in the workplace. Our Policy Statement on Human Rights Strategy is based on the following:

- Principles of the United Nations Global Compact (UNGC)
- Core Labor Standards of the International Labour Organization (ILO)
- Universal Declaration of Human Rights of the United Nations (UN)
- UN Guiding Principles on Business and Human Rights (UNGPs)
- United Nations Convention on the Rights of the Child (UN CRC)
- United Nations Convention on the Elimination of All Forms of Discrimination against Women (UN CEDAW)
- United Nations Sustainable Development Goals (SDGs)

At the national level, the Piepenbrock Group complies with the standards and principles of the German Supply Chain Due Diligence Act (LkSG) to uphold and respect human rights.

Scope

This statement supplements the Code of Conduct, the Supplier Code of Conduct, as well as all other existing corporate principles, policies, and directives of the Piepenbrock Group, and applies:

- to all employees, salaried and wage-based, as well as individuals acting on behalf of the Piepenbrock Group
- at all sites and branch offices
- to all affiliated companies
- in all work-related and business activities
- to suppliers of products or services (including subcontractors in this context)

This Policy Statement obliges all employees to act lawfully and with integrity toward colleagues, contractual partners, and third parties. We expect our suppliers to likewise ensure that all applicable laws are observed throughout their supply chains, including international human rights and environmental protection agreements.

Suppliers are required to pass on the obligation to respect human rights to their own business partners, so that they too act ethically and with integrity.

Human rights and environmental due diligence

Prohibition of child labor

The Piepenbrock Group does not tolerate any form of child labor.

Child labor is strictly prohibited. Without prejudice to more favorable provisions for adolescents and aside from limited exceptions, the minimum age for entering the workforce must not be lower than the age at which compulsory schooling ends. Children and young people must be protected from any work that could endanger their safety, health, physical, mental, moral, or social development, or interfere with their education. In accordance with the ILO Core Labor Standards, we adhere to the minimum age for employment and strictly reject all forms of child labor.

Prohibition of forced labor

The Piepenbrock Group rejects all forms of forced or compulsory labor.

No one may be coerced into performing forced or compulsory labor. In accordance with the ILO Core Labor Standards, Piepenbrock opposes the

use of forced or unlawful compulsory labor in any of its business activities.

Freedom of association and the right to collective bargaining

The Piepenbrock Group respects the right to freedom of association. All employees have the right to form or join trade unions or other types of employee representation and to engage in collective bargaining to regulate working conditions.

A relationship built on trust and constructive dialogue is the foundation of the company's success. Piepenbrock is therefore committed to maintaining a solid and cooperative working relationship with trade unions and employee representatives for the benefit of both the company and its employees. No one shall be favored or disadvantaged because of their membership or non-membership in a trade union or employee representative body.

Protection against discrimination and unequal treatment

Piepenbrock strictly prohibits all forms of discrimination and unequal treatment in hiring and employment within the company.

We do not tolerate discrimination against any of our employees. No individual may be favored or harassed on

the basis of characteristics such as gender, skin color, religion, nationality, political or other beliefs, ethnic origin, disability, age, sexual orientation, or any other traits protected by local law. Physical abuse, threats of violence, sexual or other harassment, verbal insults, or any form of intimidation are strictly forbidden within the Piepenbrock Group.

Right to health and safety in the workplace

Protecting and promoting the health of our employees is a top priority at the Piepenbrock Group.

Our employees are our most valuable asset. That's why the well-being and health of our workforce are of special importance to us. The daily work of our employees can involve certain risks. For example, handling cleaning agents, machinery, and equipment, or specific conditions in the workplace, requires targeted occupational health and safety measures. To minimize workplace accidents and safeguard employee health, we have implemented comprehensive occupational health and safety protocols, which we review regularly through internal and external audits. All employees receive regular training on health and safety practices relevant to their roles. In addition, the

company actively supports both physical and mental well-being through ongoing health management initiatives.

Remuneration

The Piepenbrock Group offers its employees competitive, performance-based pay supplemented by additional benefits

We ensure fair compensation for all employees, both in internal and external comparison. Uniform principles form the foundation of a balanced global remuneration system. Wages and salaries paid are at least in line with the statutory or collectively agreed minimum standards, or the rates specified in applicable collective bargaining agreements. Deductions from wages as a disciplinary measure or deductions not permitted under national law are not allowed.

Working hours

The Piepenbrock Group complies with at least the applicable national regulations on working hours.

Beyond that, we strive to design working hours and breaks in ways that respect both operational needs and individual circumstances. Through various working time models, Piepenbrock

promotes a healthy work-life balance, enabling employees to maintain a balanced lifestyle throughout all phases of their careers and personal lives.

Recruitment and qualification

The Piepenbrock Group hires new employees based on their individual qualifications and supports long-term employability through training and development.

We are committed to equal opportunity and actively foster the development of employee skills and talents through forward-looking education and training programs, aiming to ensure lasting employability and strong performance. These programs focus not only on professional skills but also on personal and individual growth.

Rights of local communities

The Piepenbrock Group respects the human rights of local communities at all locations and takes into account the potential impact of our business operations.

We are committed to the protection and support of particularly vulnerable groups, including children, refugees, women, migrant workers, and ethnic or religious minorities. We oppose the unlawful seizure of lands, forests, and water resources, as well as displacement and the inappropriate use of security forces.

Environmental protection

The Piepenbrock Group complies with all applicable environmental regulations and fully embraces its corporate responsibility toward the environment. With our “Piepenbrock Goes Green” initiative, we are committed to making internal processes, services, and products more environmentally friendly across all areas of our business. In doing so, we actively contribute to environmental protection.

In our operations, we adhere to international agreements and conventions such as the Minamata Convention on Mercury, the Stockholm Convention on Persistent Organic Pollutants, and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal. We integrate eco-friendly practices into every aspect of our activities with the goal of reducing emissions, waste, and our carbon footprint, expanding the use of renewable energy, promoting recycling and reuse, and protecting the health of our employees. We also encourage our employees to adopt sustainable behaviors both in the workplace and at home. Regular training and continuing education support this effort.

Our approach and measures for implementing the Policy Statement

Piepenbrock's risk management system encompasses the entire process from risk identification and analysis to assessment and response. This process is subject to continuous review and ongoing improvement. Risk analysis within our own operations and among our direct suppliers serves to identify, evaluate, and prioritize human rights and environmental risks. It provides the basis for defining and prioritizing measures for prevention and/or remediation.

The Piepenbrock Group conducts ongoing risk analyses in order to detect, assess, and address human rights and environmental risks at an early stage and to take appropriate countermeasures. If there is a significant change or expansion in the risk will be carried out. Where we become aware of concrete indications suggesting that a human rights or environmental risk may exist at one of our indirect suppliers, we will extend the scope of our risk analysis accordingly. The results of the risk analysis are communicated internally to our procurement teams and executive management. Through our management systems certified to ISO 9001, ISO 14004, ISO 45001 and AMS BAU standards, human rights considerations are integrated

into and monitored within our organizational processes. Implementation is reviewed annually through audits.

Risk analysis within our own operations

Based on the nature of our business activities, all potential human rights and environmental risks are identified in accordance with the areas of concern defined in Sections 2(2) and (3) of the LkSG. The topics identified as potential risks for Piepenbrock through this assessment are then evaluated, weighted, and prioritized through a qualified risk assessment process.

The results of the analysis indicate that human rights and environmental risks fall within a low-risk category. Given the relative significance of this risk category, we place increased emphasis on occupational health and safety. Through comprehensive measures, we aim to continue minimizing any potential risks.

Risk analysis of direct suppliers

For the initial risk analysis of direct suppliers, classification is carried out based on the areas of concern defined in Sections 2(2) and (3) of the LkSG, taking into account risk categories such as country, industry, and financial leverage. To assess risk at the country level, a variety of indices are used, including the Childhood Index, Global Slavery Index, and Global Rights Index.

These indicators are used to assign a risk classification to each country. Combined with industry-specific risk factors, an overall risk score is determined. Suppliers categorized as medium or high risk undergo a detailed assessment. The risk analysis is supported by an integrated software system. Through continuous, proactive risk monitoring and alerts, the software ensures ongoing compliance checks. Based on the findings of the detailed review, the overall risk of each supplier is determined, and appropriate preventive and corrective measures are defined.

Our country-level risk analysis of direct suppliers placed them in the low to medium risk range. Where risks are deemed significant, we place particular focus on freedom of association and collective bargaining, unlawful violations of land rights, and environmental protection.

Preventive measures

The results of our risk analysis are integrated into relevant business processes and into our supplier management system. Our procurement procedures for both suppliers and purchasing itself include various measures for risk assessment and mitigation, including a multi-stage supplier qualification process as well as ap-

proval workflows within supplier management and the purchasing system. Piepenbrock has implemented a Supplier Code of Conduct and has clearly defined its requirements and expectations in contractual agreements. These are primarily ensured by those responsible for procurement. All suppliers are required to respect internationally recognized human rights, which are also embedded in our contractual terms. It is our objective to set and communicate these expectations for all suppliers. We require our direct suppliers to uphold our standards regarding human rights, working conditions, and environmental protection, to communicate these standards to their employees, and to pass them along throughout their upstream supply chains while ensuring compliance. Our procurement organization systematically monitors compliance with these sustainability standards.

Within our own operations, we have implemented the following key measures regardless of risk level:

- Publication of this Policy Statement, which meets the requirements of Section 6(2) of the LkSG
- Mandatory Code of Conduct for all employees
- Appointment of a Human Rights Officer as the responsible party for monitoring risk management

- Regular employee training on the protection of human rights and the environment

With respect to our direct suppliers, we have implemented the following key measures:

- Introduction of a risk management system
- Dispatch of a questionnaire covering human rights and environmental topics
- Consideration of human rights and environmental expectations when selecting direct suppliers, based on the Supplier Code of Conduct
- Inclusion of contractual commitments requiring suppliers to uphold and implement our expectations throughout their supply chains

In addition, case-specific preventive measures may be taken in response to particular risk situations or categories.

Remedial measures

If there is a substantiated suspicion or an actual or imminent violation indicating that our business activities may be causing or contributing to human rights and/or environmental breaches, we will investigate the reported concerns and take appropriate remedial measures.

Within our own operations, if we become aware of a substantiated suspicion or specific indication of potential human rights or environmental violations, we will immediately initiate clarification measures and, if necessary, implement appropriate remedial actions to prevent or stop the violation.

We expect our suppliers to fully cooperate in clarifying and addressing potential human rights and environmental violations. In the case of very serious breaches, if suitable remedial measures have not been implemented after a defined deadline or if no less severe alternatives are available, we reserve the right to take legal action, including termination of the business relationship.

Complaints mechanism

An appropriate and effective complaints and reporting mechanism is a key component of our due diligence process. We encourage all stakeholders and rights holders to raise concerns regarding potential violations of our policies, including this declaration. We have implemented a corporate-level whistleblower and complaints system that is available to all individuals, both inside and outside our company. The system serves as a confidential and anonymous channel for reporting suspected illegal or unethical

cal behavior. Reported cases are reviewed and followed up by an external ombudsperson. The ombudsperson forwards a summary of the report, a recommendation for further action, and all necessary information, while maintaining confidentiality, to the Compliance and Human Rights Officer of the Piepenbrock Group. If the information suggests a potential violation or risk, the Compliance and Human Rights Officer reviews the ombudsperson's recommendation, proposes remedial measures, and documents the subsequent handling and implementation. The whistleblower receives a response within three months of the initial acknowledgment, including a summary of the planned and already implemented remedial measures as well as the reasoning behind them.

Governance

We have clearly defined responsibilities for ensuring compliance with our human rights and environmental due diligence obligations. A dedicated Human Rights Officer has been appointed to oversee these obligations company-wide. The Human Rights Officer provides regular reports to the management board and discusses necessary measures whenever required. The Human Rights Officer is supported by designated representatives from the Procurement Organiza-

tion and the Sustainability Management team. This structure ensures that human rights and environmental responsibilities are appropriately monitored and integrated.

Effectiveness review

The effectiveness of our measures to prevent human rights and environmental violations is reviewed at least once per year, as well as on an ad hoc basis when required. Responsibility for these reviews lies with the Human Rights Officer.

For our direct suppliers, we verify compliance with human rights and environmental due diligence obligations through supplier assessments, supplemented by in-depth supplier audits where appropriate, based on risk. Additional reviews may be carried out as needed.

Documentation and reporting

We continuously document and retain records of our due diligence activities. In accordance with legal requirements, we submit an annual report to the Federal Office for Economic Affairs and Export Control (BAFA) and make this report publicly available on our website. Our annual Sustainability Report also provides further details.