

A background image showing a pair of hands holding a glowing globe of the Earth. The globe is semi-transparent and shows the continents. The hands are positioned as if supporting the globe from below. The background is a soft-focus outdoor scene with sunlight and greenery. The words 'Human Rights' are overlaid in a large, light blue, sans-serif font, with 'Human' on the top line and 'Rights' on the bottom line.

# Human Rights

## **Policy Statement on the Human Rights Strategy**

**of Stadtwerke München GmbH, SWM Services GmbH  
and Münchner Verkehrsgesellschaft mbH (MVG)**

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## Introduction

For more than 100 years, the residents of Munich have placed their trust in Stadtwerke München. Our services are an essential base for people's daily lives and the success of businesses in Munich and the surrounding region. We work on solutions to the major challenges of our time and assume responsibility for people, resources and the environment.

Stadtwerke München are committed to complying with legal requirements and value-oriented corporate governance in all contractual relationships and actions with and towards their business partners and customers. Stadtwerke München also expect their suppliers to conduct their business activities with integrity and responsibility and to observe all applicable laws relating to human rights and environmental concerns of the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, hereinafter referred to as "**LkSG**").

Since January 2023, Stadtwerke München GmbH is a company belonging to the SWM core group that is obligated to comply with the LkSG and since January 2024 SWM Services GmbH and Münchner Verkehrsgesellschaft mbH (MVG) will have the same obligation. Given that the companies of the SWM core group are managed together by the Management Board / Group Management Board of Stadtwerke München GmbH, the LkSG has been implemented consistently for these three SWM companies since January 2023.

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According to Section 2 (6) clause 3 LkSG, the own business area of Stadtwerke München GmbH currently includes all companies of the SWM core group (hereinafter referred to collectively as “**SWM**”, “**SWM core companies**” or “**SWM core group**”) as well as 46 shareholdings in Germany and abroad.

With this proviso, the Management Board of Stadtwerke München GmbH/Group Management Board of the SWM Group submits the following policy statement on its human rights strategy in accordance with Section 6 (2) LkSG for the SWM core companies and the shareholdings decisively influenced by Stadtwerke München GmbH according to the LkSG.

**The Management Board of Stadtwerke München GmbH/  
Group Management Board of the SWM Group hereby declares that it  
attaches unrestricted importance to human rights without qualification.**

The Management Board of Stadtwerke München GmbH/  
Group Management Board of the SWM Group

**Dr. Florian Bieberbach**  
Chief Executive Officer

**Ingo Wortmann**  
Director, Mobility

**Helge-Uve Braun**  
Director, Technology

**Dr. Karin Thelen**  
Director, Regional  
Energy Transition

**Dr. Gabriele Jahn**  
Director, Human Resources,  
Real Estate and Public Pools

<sup>1</sup> The SWM core group currently includes Stadtwerke München GmbH as the parent company and SWM Services GmbH, SWM Infrastruktur GmbH & Co. KG, SWM Infrastruktur Verwaltungs GmbH, SWM Versorgung GmbH, SWM Kundenservice GmbH and Münchner Verkehrsgesellschaft mbH (MVG) as its subsidiaries.

# Description of the procedure

In order to ensure comprehensive adherence to human rights in the own business area and at suppliers, the Management Board of Stadtwerke München GmbH/ Group Management Board of the SWM Group has defined the following procedures for ensuring compliance with the subsequent obligations in accordance with the specification in Section 6 (2) clause 3 no. 1 LkSG:

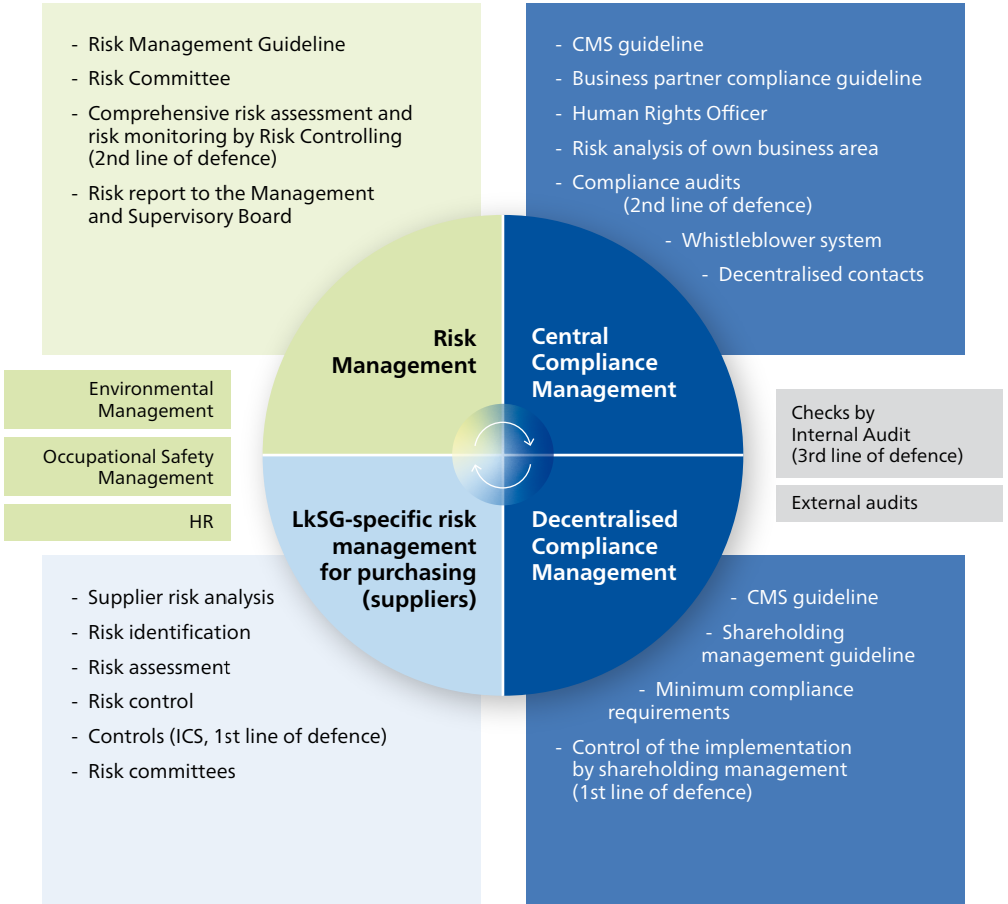
## 1. LkSG risk management

In accordance with the SWM Group Compliance System Guideline (hereinafter referred to as the "**CMS Guideline**"), the Human Rights Officer monitors LkSG risk management (Section 4 (1) LkSG). The Compliance Officer takes on the role of Human Rights Officer.



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LkSG Risk Management essentially consists of comprehensive risk management, central compliance management, decentralised compliance management as well as the LkSG-specific risk management of the Central Purchasing department:



**Legend**

- Activity refers to suppliers only
- Activity refers to the own business area only

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This is supplemented by risk management measures of further specialist departments responsible for implementation, for example with regard to the own business area in the fields of environmental management, personnel (HR) and occupational safety and with regard to suppliers in the areas of trade, treasury and real estate.

In their role as Human Rights Officer, the compliance officer reports to the Management Board of Stadtwerke München GmbH/Group Management Board of the SWM Group and the Supervisory Boards bodies of the SWM companies as part of the annual compliance report, i.a. on their activity as Human Rights Officer. Every year, the Human Rights Officer checks the effectiveness of the preventive measures, the remedial action and the complaints procedure on an ad hoc basis and monitors the LkSG risk management. They are supported in this endeavour by the Governance and Compliance Unit, which checks the effectiveness of the preventive measures, the remedial action and the complaints procedure in accordance with the LkSG annually on an ad hoc basis. The Governance and Compliance Unit can perform compliance audits itself or commission an external service provider to carry out the audits. In addition, the effectiveness of the LkSG risk management of the SWM companies is also checked by means of tests carried out by Internal Audit and possibly also by means of external audits.

## 2. Compliance risk analysis in line with the LkSG

In order to determine the human rights and environmental risks in the scope of the LkSG, risk analyses are performed for the own business area as well as the direct suppliers. The focus is on risks for the rights holders and not on risks for the respective company. Findings from the processing of reports from the complaints procedure are taken into account.

### 2.1. Risk analysis of own business area

#### 2.1.1. Comprehensive risk assessment by risk controlling

Continuous identification, assessment, monitoring and control of corporate risks including compliance risks is performed as part of systematic risk inventories in accordance with the Risk Management Guideline via the risk management system of risk controlling. In this process, LkSG risks are also assessed at the SWM core group companies as part of the compliance risks.

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The head of the respective organisational department is always responsible for the identification, assessment, monitoring, control and reporting of the risks in an organisational department. LkSG risks are entered into the recording tool of Risk Controlling both centrally by the head of Governance and Compliance and in a decentralised fashion by the individual organisational departments in which compliance risks occur.

In the SWM core group, Risk Controlling is responsible for carrying out the risk inventory, risk reporting to the committees of the SWM companies and recipients of the Group's internal risk reports as well as ongoing risk monitoring.

Every compliance risk that is material from a Group perspective is assessed and justified both gross (i.e., before risk-reducing measures are taken into account) and net (i.e. after risk-reducing measures have been taken into account). In addition, countermeasures – if available – are specified for each compliance risk. The risk report is presented to the Management Board of Stadtwerke München GmbH/Group Management Board of the SWM Group at least twice per year. Once per year, a report on the risks in the current financial year is submitted to the Supervisory Board.

### 2.1.2. Specific compliance risk analyses in line with the LkSG

Specific compliance risk analyses in line with the LkSG regarding the own business department are carried out in a comprehensive and systematic manner by Governance and Compliance Unit in accordance with the compliance risk analyses concept. The Governance and Compliance Unit can perform compliance risk analyses itself or commission an external service provider to carry them out. The LkSG risks in the own business area were assessed for the first time in 2022, before the LkSG took effect. Since 2023 risk analyses have been performed once a year and on an ad hoc basis. Findings from the processing of reports from the complaints procedure will be taken into account accordingly.



## 2.2. Risk analysis of direct suppliers

The risk analysis of direct suppliers takes a risk-based approach and as of now covers the SWM core group. As from 2024, it is to be extended successively to include direct suppliers of decisively influenced shareholdings as well.

At the SWM companies, the specialist departments carry out risk analyses relating to the direct suppliers as part of the business partner compliance check in accordance with the Guideline on Business Partner Compliance and for the Prevention of Money Laundering and Terrorist Financing. Before entering into a business relationship, they are subjected to a specific and risk-based LkSG check carried out with test software. In the case of long-term business relationships, these suppliers must be subjected to a further LkSG check after twelve months at the latest.

The following risk factors are relevant for determining the overall risk of a supplier (low, medium or high): country (main office), industry and order volume. Indexes are used for the classification in the country and industry categories. In the further course of the check, a risk-oriented media check (adverse media) and questionnaires are used and evaluated. Depending on the individual case, preventive measures are planned, or remedial concepts must be developed.

### 3. Preventive measures

The purpose of the preventive measures that were developed is to integrate the human rights strategy specified in this policy statement in the everyday company processes and decisions, in particular the procurement process, and establish them as a permanent element.

#### 3.1. Companies of the SWM core group

##### 3.1.1. Preventive measures in the own business area

- ▶ In the SWM core group, existing internal and external rules of conduct have already been further developed on the basis of the human rights strategy included in this policy statement and were put into effect again on 1 January 2023 by the Management Board of Stadtwerke München GmbH/Group Management Board of the SWM Group. These are the Code of Conduct and the Business Partner Code of Conduct of Stadtwerke München.



Both documents can be downloaded from [www.swm.de](http://www.swm.de):

- ▶ [Code of Conduct](#)
- ▶ [Business Partner Code of Conduct](#)

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The Code of Conduct is the primary compliance guideline of the SWM companies. It describes the applicable behavioural standards and becomes a binding contractual basis upon entering into an employment relationship. The SWM Business Partner Code of Conduct contains the most important principles for legally correct, responsible and ethical behaviour that the SWM companies require of business partners and is an essential basis of our cooperation as partners. It is required by direct suppliers as a binding contractual basis if the SWM companies are able to exert influence and there are abstract or concrete LkSG risks otherwise it is brought to the attention of the direct suppliers.

When selecting direct suppliers, the relevant organisational departments are encouraged by way of specifications in the Guideline on Business Partner Compliance and for the Prevention of Money Laundering and Terrorist Financing as well as substantiating business and work instructions to identify LkSG risks as part of the IT-based business partner compliance check prior to entering into a business relationship and, for example, in case of abstract risks, to have a compliance questionnaire on the supply chain be completed.

- ▶ The SWM companies procure supplies and services from third parties in accordance with the specifications and principles of the Guideline on the Procurement of Supplies and Services. Suitable companies are commissioned in line with the supplementary rules of procurement of the Central Purchasing department. Decisions as part of the procurement process must be taken in line with the Guideline on the Procurement of Supplies and Services and with the requisite diligence. This also encompasses compliance with human rights and environmental requirements at direct suppliers. The individual procurement strategies and purchasing practices are further developed successively and in line with this policy statement and the human rights strategy contained therein to ensure that human rights and environmental aspects are given appropriate consideration while adhering to the statutory framework conditions (i.a. public procurement law). Corresponding evidence must be requested in service descriptions and/or assessed as award criteria. By way of a restriction, an assessment may be necessary in individual cases where the security of supply, which constitutes the highest priority of the SWM companies, may be at risk.

Procedural and organisational measures were taken in order to ensure the suppliers' suitability with regard to LkSG requirements. Awareness-raising and qualification measures are carried out in for employees in the Central Purchasing department in the context of risk identification.

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- ▶ The Governance and Compliance Unit is responsible for the conceptual design, preparation, implementation and documentation of compliance training. The SWM companies already carry out e-learning on compliance to ensure that the employees are familiar with the corresponding compliance guidelines such as the Code of Conduct or the Business Partner Code of Conduct of the SWM companies. In addition to the e-learning courses, the acquired knowledge is strengthened in on-site training by means of risk-based case simulations with certain employees. Information on applying the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) is provided for the employees on the intranet. The existing compliance training model of the SWM companies and compliance e-learning are being continuously expanded to incorporate the human rights and environmental concerns of the LkSG. Awareness-raising measures such as compliance newsletters and special awareness-raising events and training courses with the employees of relevant organisational departments are carried out with the aim of familiarising the employees with the human rights strategy, the LkSG guidelines and LkSG processes so that they can ultimately implement them in practice.

Along with the general compliance training, employees of the Central Purchasing and Logistics Organisational Departments within the organisation are trained such that they are able to apply the embedded standards in day-to-day business and the individual processes.



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In addition to the training mentioned above, the SWM companies offer occupational safety training and an environmental training program that includes training on waste management and water protection for the relevant areas.

- ▶ Suitable risk-based control measures are being expanded at the level of the organisational departments involving procurement processes as well as the areas of environmental management, personnel (HR) and occupational safety. They are designed to check whether the human rights strategy is integrated in the everyday company processes and whether the specified human rights and environmental expectations are actually put into practice. This also includes regularly updating the developed procedural guidelines and the internal specifications at the specialist department level.

#### 3.1.2. Preventive measures for direct suppliers

- ▶ When selecting their direct suppliers, the SWM companies take into account their human rights and environmental expectations. In organisational departments with procurement processes, suppliers are subjected to a general compliance check as well as a specific and risk-based LkSG check carried out with test software. If necessary, according to a risk-based approach, direct suppliers are requested to complete a compliance questionnaire containing human rights and environmental questions on the supply chain after the test result has been ascertained.

In the case that new suppliers obviously do not meet the human rights and environmental expectations of the SWM companies, the SWM companies will check the option of not entering into a contractual relationship with these suppliers provided that such a step would not be unreasonable when taking into account the relevance of the direct supplier's service for the business purpose of the SWM companies and the causal contribution (e.g., single-source suppliers). In any case, the SWM companies will endeavour to address and reduce the identified risks and assert their human rights and environmental expectations as far as possible at the supplier in question.

- ▶ The Business Partner Code of Conduct of Stadtwerke München is integrated in the business relationships with direct suppliers as follows: The Business Partner Code of Conduct of Stadtwerke München is brought to the knowledge of existing and new direct suppliers. Depending on the human rights and environmental LkSG risks that were identified, the causal contribution and the ability of the SWM companies

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to exert influence as a client, the Business Partner Code of Conduct of Stadtwerke München – or an equivalent code of the supplier – becomes a binding element of the contract and is supplemented by LkSG-specific substantiating contractual obligations, e.g. downstream compliance agreements. Direct suppliers are required to comply with the human rights and environmental specifications in the own business area and address them in an appropriate manner towards their suppliers, i.e., the upstream suppliers.

- ▶ Depending on the LkSG risks arising, suitable training instruments will be developed in the Central Purchasing and Logistics Organisation Department since 1 January 2023. The same procedure is also applied in the other organisational units with procurement processes.



- ▶ In the case of commissioning via the Central Purchasing and Logistics Organisational Department and the Electricity and Heat Generation Organisational Department, the SWM companies reserve the contractual right to perform compliance checks (audits) according to a risk-based approach at all direct suppliers.

If the Business Partner Code of Conduct of Stadtwerke München is a binding element of the contract and is supplemented with LkSG-specific substantiating contractual obligations, (additional) specific obligations to provide information (e.g., regarding the participation in interviews and audits) on human rights and environmental LkSG topics are contractually agreed.

Risk-based control measures for ensuring compliance with the policy statement (e.g., performance of audits at suppliers with a focus on human rights and environmental protection) are developed.

### **3.2. Decisively influenced shareholdings according to the LkSG**

The following shall apply as regards embedding the human rights strategy indicated in this policy statement in the everyday company processes and decisions of the shareholdings decisively influenced by Stadtwerke München GmbH according to the LkSG by means of preventive measures in the own business area and towards direct suppliers:

If a shareholding is also subject to the scope of the LkSG itself, it is responsible for ensuring that the statutory obligations are met in the own business area and along its supply chains. Stadtwerke München GmbH requests corresponding reports on the implementation of the minimum compliance requirements. If the shareholding is not subject to the scope of the LkSG, it must take suitable measures for the operational and organisational structure that are necessary to ensure that Stadtwerke München GmbH can comply with its obligations in accordance with the LkSG. The Governance and Compliance Unit addresses corresponding requirements to the respective shareholding via Shareholding Management.

## 4. Remedial action

The following representation refers to the SWM core group. The information provided in Section 3.2 applies accordingly in the decisively influenced shareholdings according to the LkSG.

### 4.1. Remedial action in the own business area

After a (imminent) violation of human rights or environmental obligations has been identified, the affected specialist department immediately prepares suitable remedial action that leads to the termination or prevention of the violation depending on the type and scope of the violation of the obligation in the individual case. It is up to the discretion of the specialist department responsible to decide which concrete remedial action to take in the individual case.

The measures and the follow-up thereof are to be documented accordingly by the relevant specialist departments depending on the situation.

### 4.2. Remedial action for direct suppliers

Should the SWM companies determine that a direct supplier is violating human rights or environmental obligations or such violations are imminent, the SWM companies will use the means available to them to work towards helping the direct supplier to prevent, terminate or minimise the violation of an obligation in a multi-stage process. If a direct supplier is unable to end the violation of an obligation in the foreseeable future, the SWM companies will use the means available to them, to ensure that so-called remedial concept (including a schedule) is immediately drawn up with the direct supplier to end or minimise the violation of the obligation and implemented by the direct supplier. This multi-stage process ensures that the SWM companies enter into a dialogue with the direct supplier due to a (imminent) violation of an obligation in an effort to find a solution and terminate the business relationship only in exceptional cases.

Such exceptional cases include cases where the SWM companies consider the violation of the obligation to be particularly severe, the violation of the obligation was not minimised at the end of the schedule defined in the remedial concept and there are no other more lenient means available to the SWM companies.



## 5. Complaints procedure

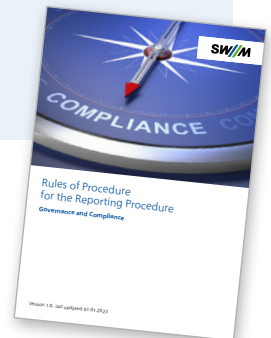
The SWM companies have an internal reporting procedure that also includes the complaints procedure as per Sections 8, 9 LkSG. The possibility to submit reports regarding potential violations of laws and rules is available not only to employees and temporary workers, but also to customers, suppliers, other business partners of the SWM companies and the general public. The reporting procedure is designed for reporting possible violations of applicable laws or internal sets of regulations of the SWM companies, including for reporting

- ▶ a possible violation of employee rights, in particular possible violations of regulations on the protection of health or safety at the workplace,
- ▶ human rights and/or environmental risks and
- ▶ possible violations of human rights and/or environmental duties.

Reports are received by the Internal Whistleblower's Point of Contact (Compliance Officer or Human Rights Officer) or the external Ombudsman (lawyer for criminal law) of the SWM companies. Detailed regulations on responsibilities, principles and procedures are specified in the CMS Guideline, the group works agreement on the Whistleblower system and the rules of procedure for the reporting procedure.

Access to the complaint and reporting procedures is ensured as follows:

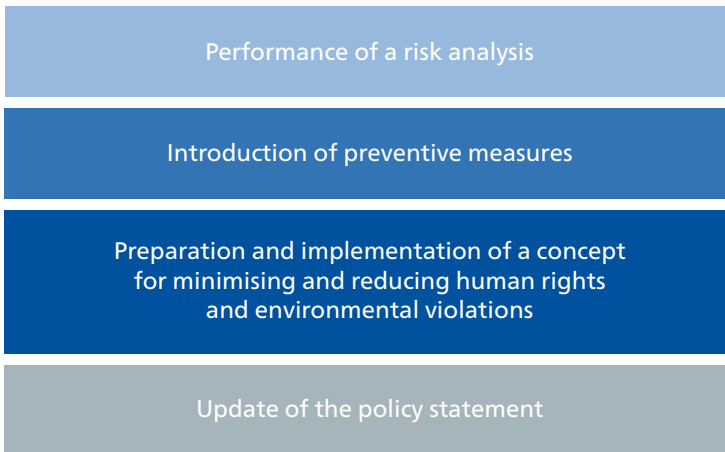
The personal contacts, including the contact details for the Internal Whistleblower's Point of Contact and the Ombudsman, as well as the rules of procedure specifying responsibilities and procedures are each published in German and English in the company intranet as well as on the German and English websites of Stadtwerke München GmbH, SWM Infrastruktur GmbH & Co. KG and Münchner Verkehrsgesellschaft mbH (MVG).



The Rules of Procedure for the Reporting Procedure can be downloaded [here](#).

## 6. Measures concerning indirect suppliers

We are currently not aware of violations of any human rights or environmental obligations at the indirect suppliers of the SWM companies. If substantiated knowledge of a possible violation of human rights or environmental obligations at indirect suppliers is gained, the following measures are established in a way that is appropriate for the individual case and as needed:



## 7. Documentation and reporting obligation

### 7.1. Documentation obligation

The fulfilment of the due diligence obligations is continuously documented at the SWM companies. For example, the information that an LkSG risk analysis was performed at suppliers and the result of the analysis are documented and archived. The comprehensive risk assessment and monitoring performed by Risk Controlling is also carried out using special software. It documents the entire assessment and approval process.

If no specific software is in use, compliance with the due diligence obligations is ensured by other suitable means, for example by filing documents or e-mails.



## 7.2. Reporting obligation

### 7.2.1. Companies of the SWM core group

Stadtwerke München GmbH, SWM Services GmbH and Münchner Verkehrsgesellschaft mbH (MVG) fulfil their reporting duty in accordance with Section 10 LkSG by means of the questionnaire provided for this purpose by the Federal Office for Economic Affairs and Export Control (BAFA) no later than four months after the end of the financial year in question. Due consideration is given to the protection of business and trade secrets.

The reports of SWM Services GmbH and Münchner Verkehrsgesellschaft mbH (MVG) make reference to the reporting of Stadtwerke München GmbH as far as possible or it is adopted independently.

Due to the inclusion in Stadtwerke München GmbH (parent company), SWM Services GmbH and Münchner Verkehrsgesellschaft mbH (MVG) are also mentioned in the reporting of Stadtwerke München GmbH with regard to the fulfilment of the due diligence obligations in shareholdings.

### 7.2.2. Shareholdings that are decisively influenced and specifically obligated according to the LkSG

Shareholdings of the SWM Group that are not part of the SWM core group but are independently subject to the scope of the LkSG while also being decisively influenced by Stadtwerke München GmbH according to the criteria of the LkSG publish their own annual report. They can make reference to or adopt the reporting of Stadtwerke München GmbH independently.

Due to the inclusion in Stadtwerke München GmbH (parent company), such shareholdings are also mentioned in the reporting of Stadtwerke München GmbH with regard to the fulfilment of the due diligence obligations in shareholdings.

## Identified priority human rights and environmental risks

The LkSG risk analysis carried out in 2023 in SWM's **own business area** revealed that the SWM companies have a very good overview of relevant human rights and environmental risks and that established processes are in place to monitor and reduce these risks. Priority risks generally exist with regard to unequal treatment in employment, violations of the constitutional prohibition of discrimination, deficiencies in occupational health and safety and harmful environmental impacts as well as with regard to the rights of indigenous people in the vicinity of wind farms. The above risks are largely minimised through established measures.

The LkSG risk analysis carried out in 2023 regarding the **direct suppliers** of the SWM core group showed that the majority of the suppliers have minor abstract country risks, which corresponds to the regionality of SWM's suppliers. The top five risk sectors represented at the SWM core group are the provision of information technology services, wholesale (excluding motor vehicles), manufacture of electrical equipment, mechanical engineering and retail (excluding motor vehicles). Specific priority risks were identified in relation to a direct supplier in terms of harmful environmental impacts due to illegal waste disposal and non-compliance with occupational health and safety regulations.

In addition, the risk analysis of an **indirect supplier** revealed specific risks regarding potential unlawful eviction, deprivation of land, forests and water, harmful environmental impacts, non-compliance with the prohibition of slavery / the prohibition of forced labour, non-compliance with occupational health and safety regulations and freedom of association.

# Specification of human rights and environmental expectations

The SWM companies have specified the following human rights and environmental expectations for their employees and suppliers in the supply chain. The expectations are derived from sources which include the Ten Principles of the United Nations' Global Compact, the Core Labour Standards (Conventions) of the International Labour Organization (ILO), the United Nations' Universal Declaration of Human Rights (UDHR), the Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG) and the Code of Conduct of the German Association for Supply Chain Management, Procurement and Logistics (Bundesverband Materialwirtschaft, Einkauf und Logistik e.V.).



## 1. Human rights

Our employees and suppliers respect the internationally recognised human rights, in particular those set forth in Guiding Principle 12 of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises and to which reference is made below. They shall neither violate nor contribute to violations of these human rights. If stricter national regulations exist, they shall take precedence.

### **1.1. Child labour, slavery, serfdom, forced/compulsory labour**

Any form of child labour and slavery, serfdom as well as any form of forced or compulsory labour (for example in the form of human trafficking) is strictly rejected. The applicable laws regulating the prohibitions are observed. The principle of freely chosen employment is respected and no involuntary work and services are tolerated.

### **1.2. Occupational health and safety**

The laws applicable at the respective place of employment for a safe and hygienic working environment are complied with as a minimum. Appropriate measures (e.g., by operating an occupational health and safety management system) are taken to ensure health and safety in the workplace. Care is taken to ensure that employees have obtained safety-relevant qualifications; the safety of products and services is ensured in order to minimise potential accidents and health hazards.

### **1.3. Freedom of association and collective bargaining**

The applicable rights with respect to the freedom of association and collective bargaining are respected and protected.

### **1.4. Diversity and equal treatment**

Diversity is promoted. No discrimination or unjustified unequal treatment, in particular due to ethnic origin or nationality, social origin, age, gender, religious, political or sexual orientation is tolerated, both in the recruitment and employment of staff.

### **1.5. Remuneration, working time and other working conditions**

Wages comply at least with the laws on minimum wages applicable at the place of employment. The payment of equal remuneration for work of equal value is promoted. The remuneration and other benefits are to enable employees and their families to have an appropriate standard of living. The applicable laws related to working time and statutory vacation, sickness and termination regulations are observed.

### **1.6. Eviction**

The applicable laws prohibiting unlawful eviction or unlawful taking in the acquisition, development or other use of land, forests and waters the use of which secures the livelihood of a person are observed.



## 2. Ecological responsibility

### 2.1. Environmental protection and consumption of natural resources

The applicable laws on the protection of the environment are observed. Effects on the environment are kept to a minimum. Resources are treated with care and conserved. The processes, operating facilities and supplies comply with the applicable legal requirements and standards for environmental protection. Production processes are developed on an ongoing basis, the consumption of natural resources and impairments of natural resources is reduced, no harmful environmental impacts (harmful soil change, water pollution, air pollution, harmful noise emission or excessive water consumption) are caused and business is conducted in an environmentally friendly and sustainable manner.

### 2.2. Waste, mercury and chemicals

The generation of waste and emissions in the context of business activities is kept to a minimum. When exporting and importing hazardous waste the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal of 22 March 1989 is observed. The prohibitions of the Minamata Convention on Mercury of 10 October 2013 in the manufacture of mercury-added products, the use of mercury and mercury compounds in manufacturing processes and the treatment of mercury waste are observed. In addition, the applicable laws on the handling, collection, storage and disposal in a manner that is environmentally sound as well as the prohibition of the production and use of chemicals (e.g., Stockholm Convention on Persistent Organic Pollutants of 23 May 2001) are observed.



### 2.3. Raw material procurement

All efforts to ensure responsible raw material procurement are supported. In particular, the procurement and use of raw materials from conflict-affected areas (see Regulation (EU) 2017/821) is avoided. To ensure this, we expect our suppliers to check their products/supply chains with regard to the use of raw materials from conflict-affected areas and take precautions in line with the statutory provisions.





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