

## **Girsberger Declaration of Principles Ethics and Human Rights**

Respecting and honouring human rights has always been of central importance to Girsberger. We are convinced that sustainable business activity in harmony with our responsibility for people, the environment and society is only possible by acting ethically and with integrity. The Girsberger Declaration of Principles on Ethics and Human Rights expresses our traditional values as well as our ongoing responsibility and commitment to strengthen human rights and prevent human rights violations.

### **Subject and objective**

The aim of this policy statement is to formalise and describe in more detail the commitment to society described in the corporate mission statement "WE ARE GIRSBERGER". It is intended to create a framework for our company's attitude and responsibility for human rights due diligence that applies both to our own business activities and to our suppliers and business partners.

This policy statement explains:

- The relevant international human rights standards to which Girsberger is committed.
- Specific human rights that Girsberger identifies as particularly relevant.
- The framework for our company's human rights due diligence, in particular the corresponding guidelines and processes for implementing this declaration of principles.

### **Purpose**

As described in the corporate mission statement, Girsberger is committed to respecting international human rights and labour standards. We recognise that companies have a responsibility to respect human rights in their supply and value chains and to prevent human rights violations, while it is the duty of the state to protect human rights. Because we are aware of this corporate responsibility, we have been observing the basic principles of responsible management in our business activities for many years.

### **Frame of reference**

Girsberger is committed to high standards of business ethics and integrity, including supporting and respecting international human rights and labour standards. We base our business activities on the following international standards and guidelines:

- Universal Declaration of Human Rights of the United Nations (UN)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- Declaration of Principles of the International Labour Organization (ILO) on Multinational Enterprises and Social Policy (MNE Declaration)

- Conventions and recommendations of the International Labour Organization (ILO) on labour and social standards (ILO core labour standards)
- UN Convention on the Rights of the Child (CNC)
- United Nations Convention on the Rights of Women (CEDAW)
- and the principles of the United Nations Global Compact (UNGC), to which we are a signatory.

Girsberger complies with the laws and regulations in the markets in which it operates. Where local laws are less stringent than the company guidelines and the above-mentioned internationally recognised human rights and labour standards, Girsberger complies with the stricter guidelines and standards and requires its suppliers and business partners to follow these standards and principles as well.

### Focus and serious human rights issues

Girsberger is committed to respecting internationally recognised human rights and does not attach more importance to one human right than another. To implement this declaration of principles, we continuously review where there are particular risks of human rights violations along our value chains and prioritise the most serious human rights issues. In doing so, we rely on individual risk analyses and identify the impact of our actions on human rights.

We have identified the following areas as particularly sensitive:

- Occupational health and safety
- Equal treatment, equal opportunities, and equal pay
- Discrimination or harassment
- Consumer interests and product safety

By prioritising these issues, Girsberger recognises that negative human rights impacts can be particularly severe for certain groups due to their vulnerability or marginalisation. Girsberger recognises that the assessment of the severity of potential impacts may change and that other issues may become more important over time. The most serious issues are therefore regularly reassessed on the basis of further assessments and regular dialogue with internal and external stakeholders<sup>1)</sup>, paying particular attention to the human rights of external stakeholders.

In addition to the most serious human rights issues, we pay particular attention to the following topics in addition to the "Girsberger values" in our corporate mission statement:

- Working conditions (secure employment, working hours, fair pay, health and safety)
- Employer-employee relationship (dialogue)
- Fair and inclusive working environment (equal treatment and equal opportunities)
- Information security
- Respect for freedom of association & the right to collective bargaining.

<sup>1)</sup> Stakeholder groups: Investors and banks, customers, employees, intermediaries (architects, designers, planners), suppliers, partners and collaborations

## Human rights due diligence

For Girsberger, the key importance of human rights due diligence lies in anticipating, preventing, or minimising potential and actual negative impacts on the human rights of people who come into contact with the company's activities.

### The process of human rights due diligence at Girsberger



#### 1. Declaration of Principles on Ethics & Human Rights

As stated in this declaration, Girsberger recognises human rights in accordance with the UN Guiding Principles.

Girsberger's commitment to respect human rights extends to everyone in the company and, as far as we can influence, along the value chain. We use our relationships with independent suppliers and other business partners to promote the principles of this policy statement throughout our network. Girsberger believes it can influence others by leading by example and therefore communicates proactively about its commitment.

The process consists of the six core elements: (1) Policy statement on ethics and human rights, (2) analysis of potential and actual risks, (3) integration of the results of the analysis and taking appropriate measures, (4) embedding in the company, (5) monitoring and reporting, (6) grievance mechanism and remediation.

#### 2. Analysing potential and actual risks

Girsberger has identified its most serious human rights issues in accordance with the UN Guiding Principles and will reassess its human rights risks every two years based on feedback from internal and external stakeholders, as the most serious human rights issues may change over time.

Through this continuous process, the company focuses on proactive stakeholder engagement as a tool for identifying and mitigating potential risks.

### **3. Integration of the analysis results and implementation of suitable measures**

Based on the findings of the risk analysis, Girsberger develops preventive and remedial measures that are integrated into operational processes, training programmes, guidelines, and management systems. This is achieved by developing and implementing objectives and priorities with clear responsibilities and annual monitoring, updating and revision.

Girsberger is committed to an ongoing dialogue with internal and external stakeholders in order to continuously improve its human rights due diligence. Where the company's ability to influence potential human rights issues is limited, it strives to increase its influence by working with key stakeholders, including employees, suppliers, civil society organisations and business partners, to prevent or mitigate negative impacts on human rights.

### **4. Embedding in the company**

The Girsberger mission statement "WE ARE GIRSBERGER" and this "Declaration of Principles on Ethics & Human Rights" form the framework for human rights due diligence at Girsberger. Girsberger attaches great importance to ensuring that these are embedded throughout the company and in particular in the relevant guidelines and departments. We encourage and support our employees, suppliers and business partners to fulfil their duty of care and avoid negative impacts.

In order to fulfil our responsibility, we rely on a variety of measures: We train employees and formulate specific requirements for suppliers and business partners. All of Girsberger's business partners are strongly encouraged to comply with minimum requirements such as internationally and nationally applicable laws and the core labour standards of the International Labour Organization (ILO).

Based on the policy statement, the identified human rights risks, and negative impacts as well as the international standards mentioned, we have derived guidelines and policies for Girsberger or revised existing documents. They form the binding framework for action for all employees, suppliers and business partners and define specific measures and objectives:

- Girsberger employment regulations
- Code of Conduct for Business Partners of the Girsberger Group
- Supplier evaluation: Form for the selection of suitable procurement sources
- Employee appraisal / supervisor appraisal

### **5. Monitoring and reporting**

Girsberger reviews the effectiveness of its measures to monitor compliance with human rights in the value chain and the implementation of the human rights roadmap. This is done using a system with clearly defined quantitative and qualitative targets and performance indicators. Where possible, quantitative targets (i.e. target values) are set for the most serious risks and communicated in the sustainability report. Wherever possible, Girsberger endeavours to measure the actual impact of its actions on the human rights of potentially affected rights holders.

Respect for human rights is an integral part of Girsberger's sustainability strategy. In accordance with the value of "credibility" set out in our corporate mission statement, we say what we do and do what we say. Accordingly, Girsberger regularly reports transparently on the implementation of its policy statement, actual and potential impacts and how it is addressing them in its annual sustainability report.

## **6. Complaints mechanism and remedy**

Girsberger attaches great importance to an open corporate culture in which all employees are encouraged to raise issues, incidents, risks and compliance risks. This also includes issues relating to human rights. Our employees are encouraged to utilise the reporting channels outlined in the Girsberger Quality Commitment.

In addition, Girsberger ensures that employees have access to an anonymous, confidential and secure whistleblowing investigation process operated by independent third parties. Girsberger does not retaliate or allow retaliation against anyone who raises questions or concerns about company activities in good faith. The company is committed to thoroughly investigating such submissions and providing appropriate responses and remediation.

If adverse effects on human rights are identified as a result of the company's business activities or direct connection, Girsberger undertakes to take prompt and transparent measures to remedy the situation in a fair and equitable manner in accordance with the UN Guiding Principles.

### **Area of application**

This policy statement covers the activities of the Girsberger group and applies to all employees.

It also regulates the principles for dealing with suppliers and business partners and applies to the entire supply chain. Specific regulations are described in the Code of Conduct for Business Partners. Wherever and whenever Girsberger identifies adverse impacts that are directly related to its business relationships, it will use its influence to promote respect for human rights among suppliers and business partners, whether through corrective action plans or the termination of the business relationship in individual cases.

### **Validity**

This declaration comes into force on 1 June 2022 and remains valid until further notice.

### **Responsibility and competences**

This declaration was drawn up by an internal Girsberger project group (CEO Girsberger Holding AG, Managing Director Product Range and Brand Development Girsberger Holding AG, Managing Director Girsberger AG, Managing Director Girsberger GmbH, Head of Production, Logistics, Quality and Environmental Management Girsberger AG, Head of Human Resources Girsberger AG and Girsberger GmbH and the Head of Sustainability), in collaboration with and with the support of focusright, Zurich. All questions relating to the content can be sent to the e-mail address [tabea.briellmann@girsberger.com](mailto:tabea.briellmann@girsberger.com).

The management of Girsberger Holding AG is responsible for the implementation of and compliance with this declaration of principles. The Sustainability Officer and the Managing Directors monitor the operational implementation of the declared corporate principles.

The Managing Director Product Range and Brand Development of Girsberger Holding AG is responsible for updating this declaration. This declaration will be reviewed at least every two years and updated as necessary in order to adapt it to changes in business processes, regulatory requirements, and political and social expectations.

### **Communication and implementation**

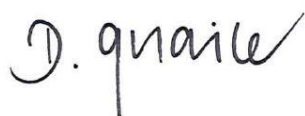
This declaration is made publicly available to the company's external stakeholders on the Girsberger website.

The managing directors and HR departments are responsible for ensuring that all employees have knowledge of the declaration.

### **Release and approval**

For Girsberger, respect for human rights is an important contribution to achieving the United Nations Sustainable Development Goals. We are aware that the implementation of human rights due diligence in our own business activities and in supply and value chains is an ongoing process. We accept this challenge and regularly review our strategic approaches and measures every two years with the aim of continuous improvement.

Girsberger Holding AG

A handwritten signature in black ink, appearing to read 'D. Quaile', with a stylized flourish at the end.

Danielle Quaile  
CEO

The generic masculine is used in this document to improve readability. Female and other gender identities are explicitly included where this is necessary for the statement.