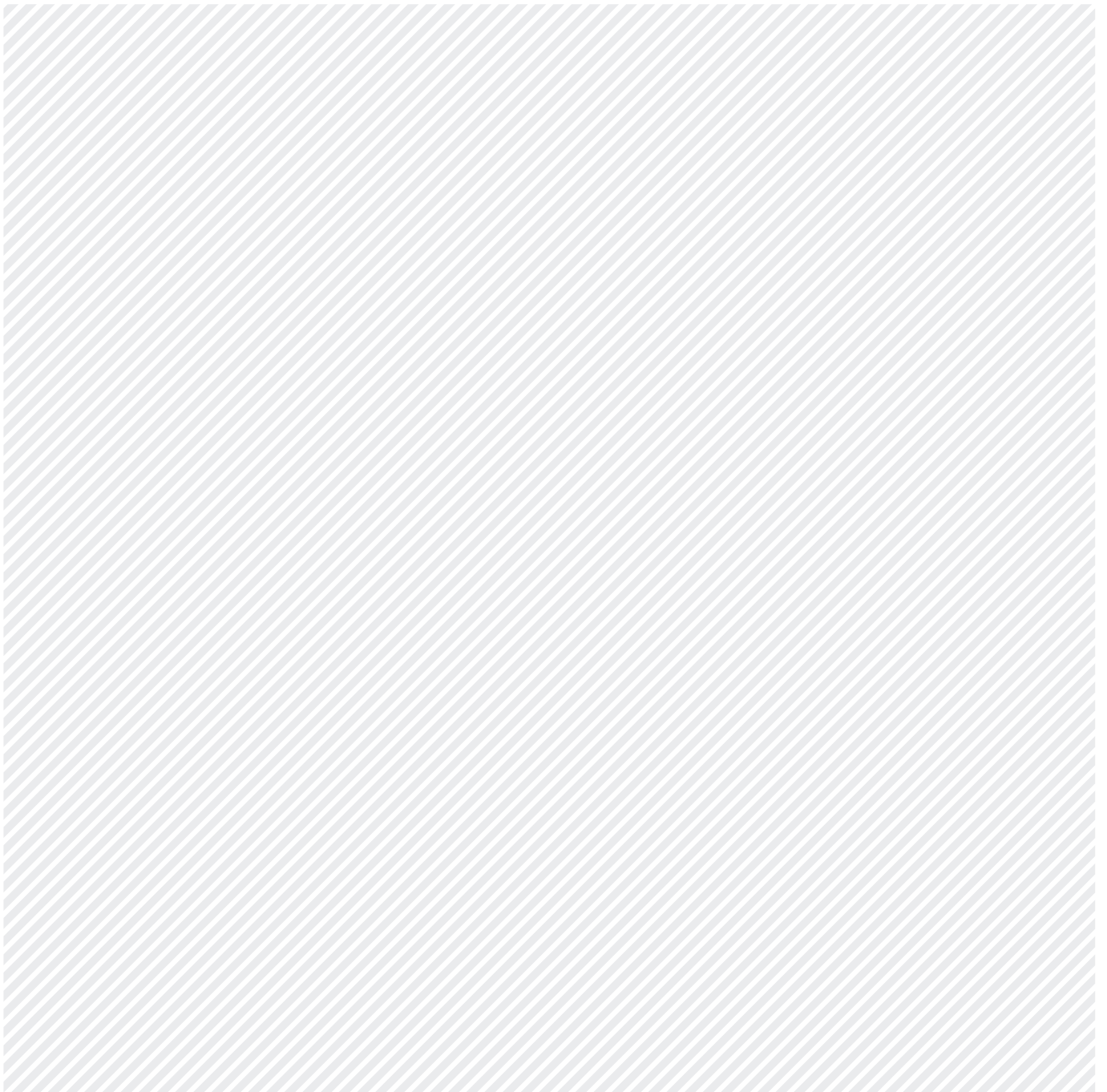


secunet Group policy statement

on human rights and environmental due diligence in
accordance with the German Supply Chain Due Diligence Act
(LkSG)

February 2024 | Version 1.0



1 Preamble

secunet Security Networks AG (secunet) is committed to respecting universal human rights and complying with human rights and environmental due diligence obligations in its own business area and in its supply chains.

We implement applicable law in the form of the Supply Chain Due Diligence Act (LkSG), respect internationally recognised human rights and take care to prevent human rights violations in the course of our business activities. This policy statement applies to the whole of secunet Group, including its subsidiaries.

The standards and obligations enshrined in the LkSG form a binding framework for our employees, business partners and suppliers. We encourage and support our employees as well as our business partners and suppliers to meet their due diligence obligations and avoid negative impacts and to pass on the due diligence obligations of the LkSG to their subcontractors.

To protect human rights and the environment, we base our actions on the following international standards and principles:

- United Nations (UN) Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- Fundamental principles of the International Labour Organization (ILO)
- The Ten Principles of the UN Global Compact (UNGC) and
- the Stockholm Convention on Persistent Organic Pollutants (POPs Convention).

As a participant and signatory of the UN Global Compact, we are committed to respecting and upholding human rights everywhere and at all times.

2 Risk analysis and implementation

secunet is obliged under the LkSG to carry out an LkSG risk analysis. This serves to identify and assess all actual or potential risks relating to human rights and environmental due diligence in our own business area and in the supply chain.

The risk analysis is carried out on an ad hoc basis or at least once a year for our own business area and for our direct suppliers. The risk analysis follows a systematic approach based on country and sector risks (abstract risk analysis). In a subsequent step, suppliers and companies that are exposed to an increased risk are specifically analysed for human rights and environmental risks using a questionnaire-based survey (specific risk analysis).

In addition, findings obtained through the complaints procedure are incorporated into the risk analysis.

Preparatory measures were initiated in the 2023 financial year. For example, the IT solution Integrity Next (INX) was procured. Guided by Integrity Next, the risk analysis was prepared to the extent that all secunet suppliers were uploaded to the tool and assessed using an automated country and sector analysis.

The abstract risk analysis revealed environmental (waste, problematic substances and greenhouse gas emissions) and social (freedom of association, collective bargaining and occupational safety) risks, particularly due to the country and sector risk. The suppliers concerned are currently being analysed specifically for these risks by means of a specific risk analysis.

Detailed results of the specific risk analysis for the 2024 financial year will be available to us in the course of the year and will be published with the next update of this policy statement.

3 Preventive measures

To ensure that we fulfil our responsibility to respect human rights, we rely on a combination of measures – both in our own business area and with our direct suppliers. Our primary objective is to protect potentially affected persons and to prevent or at least reduce negative impacts on their human rights and the environment.

We take this obligation very seriously and take appropriate measures. With the establishment of LkSG risk management, we have already implemented initial measures that help to promote human rights and minimise potential risks. These measures include in particular:

- the further development and implementation of suitable procurement strategies and purchasing practices,
- the integration of human rights and environmental expectations into the supplier selection process,
- the implementation of contractual assurances with regard to compliance and realisation of expectations along the supply chain,
- the agreement and implementation of risk-based control measures (audit rights) and
- the introduction of an environmental management system in accordance with DIN EN ISO 14001.

We are planning training and awareness-raising sessions for the responsible departments in 2024.

4 Remedial measures

A catalogue of measures is drawn up to serve as a guide for assessing the prospects of success of various remedial measures in each individual case.

In the event of a breach in the immediate business area, dialogue is first sought with the suppliers in order to work out a solution together. If this is unsuccessful, a detailed improvement plan is drawn up, containing timelines, specific measures and areas of responsibility. Further steps may include conducting audits, temporarily interrupting the supplier relationship and, as a last resort, terminating the business relationship.

We intend to incorporate the experience gained into the design and adaptation of remedial measures in order to be able to react appropriately to new incidents.

5 Complaints procedure

Complaint mechanisms play a particularly important role in detecting and preventing human rights-related and environmental risks and violations. For this reason, the Group-wide whistleblower system has been expanded to include the requirements of the LkSG.

This enables employees and other potentially affected groups of people to report violations of human rights and environmental concerns at any time, both in our own business area and at our direct and indirect suppliers.

The whistleblower system can be found on our website in the section “About us / Company” and, with the electronic whistleblower system BKMS, also offers the possibility of submitting reports in anonymised form. Whistleblowers can also contact the Compliance Officer in confidence at any time by e-mail, telephone or letter.

The employees in charge of the Reporting Office are obliged to maintain confidentiality. Confidentiality and whistleblower protection are our top priority.

Further information on the Group-wide whistleblower system / complaints procedure can be found in the [rules of procedure for secunet Group's whistleblower system](#).

6 Responsibilities

secunet has defined clear responsibilities in order to fulfil and comply with human rights and environmental due diligence obligations.

Responsibility for implementing this policy statement and respecting human rights in our own business area and in the upstream supply chain lies with the Management Board of secunet Security Networks AG and the managing directors of the subsidiaries.

The Human Rights Officer (Compliance Officer) of secunet Security Networks AG is responsible for monitoring risk management in relation to the obligations pursuant to the LkSG. She coordinates the implementation of the LkSG within secunet Group. In her role as Human Rights Officer, she will be reporting to the Management Board on the status of LkSG risk management and any special incidents on an annual and ad hoc basis from the 2024 financial year.

7 Reporting and further development

secunet defines the handling of human rights and environmental protection issues and the implementation of a corresponding risk analysis as a continuous process that must be constantly adapted and further developed. The various measures are adapted and scrutinised as new results or findings emerge. Part of the development process is the annual review and update of this policy statement.

We continuously document our compliance with human rights and environmental due diligence obligations. The documentation is kept for seven years. From 2025, a report will be published on the secunet website and also sent to the German Federal Office of Economics and Export Control (BAFA). In addition, we publish a non-financial statement every year that discloses our social and environmental impact.

8 Contact

You can contact our Human Rights Officer by e-mail at compliance@secunet.com.

You are also welcome to contact us by telephone or post:

secunet Security Networks AG
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Stephanie Ventz
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You can access the electronic whistleblower system at:
<https://www.secunet.com/ueber-uns/hinweisgebersystem>