

Human Rights in Business Policy

Background

In 2011, the United Nations published the Guiding Principles on Business and Human Rights (“UNGP”) as a part of their ‘Protect, Respect and Remedy’ framework. The document prescribes a voluntary framework for the standard of conduct expected of the member states with regard to international human rights obligations encompassing the duty to protect against human rights abuse by third parties, including businesses.

Responsible businesses wishing to act with the utmost integrity should have a clear position with its stakeholders concerning its practises towards the upholding and reinforcing of human rights in the workplace.

Scope

This Human Rights in Business Policy (the “Policy”) is intended to apply to the operations and activities of Piller Group GmbH and all subsidiaries directly or indirectly controlled by Piller Group GmbH (hereinafter collectively referred to as “Piller”). Consequently, all Piller directors, employees and agents are required to comply with this Policy and Piller requests and expects their sub-contractors, suppliers, external consultants and third-party representatives to share its commitment to respect human rights and to apply the principles of this Policy within their own businesses. Piller is committed to applying this Policy in the selection of and transactions with its main business partners and to uphold the principles of this Policy within its own operations.

Policy Overview

The Directors of Piller, consider that respecting human rights in business is a fundamental objective that any responsible organisation should uphold. This Policy is orientated towards the principles of the UNGP as a guiding framework to help define Piller’s corporate role and responsibility to respect human rights in business.

Through communication, education and collaboration, the aim of this Policy is to promote and where practicable, improve standards with regard to certain human rights insofar as they may be impacted by Piller’s daily activities including the activities of its operations around the world and those of its business partners.

Nothing contained in this policy shall serve to diminish the mandatory obligations of Piller with regard to applicable laws relating to human rights, employment, discrimination and health and safety practises.

This Policy in relation to Piller employees is not contractual.



This Policy may be amended from time to time at the discretion of Piller.

The Managing Director – Operations at Piller Group GmbH is responsible for overseeing the ongoing implementation of this Policy for Piller’s operations in Germany and across all other Piller companies through the local Managing Director or any other locally nominated person with specific responsibilities for overseeing the implementation of this Policy and its respective local procedures.

Policy statements

1. Modern Slavery

For the purposes of this Policy, “Modern Slavery” means slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking.

For the purposes of this Policy, “child labour” is considered to be sustained labour of any person under the age of 16 years except where such labour is part of a structured apprenticeship scheme or similar and the person is aged 15 years and legally allowed to work.

Piller does not accept or condone the use of Modern Slavery in its operations and supply or sub-contract chains. Piller is committed to implementing systems and controls aimed at ensuring that Modern Slavery is not taking place anywhere within Piller and strives to determine insofar as it is reasonably able to do so, that no such Modern Slavery is taking place in any of its supply or sub-contract chains. Piller expects that its suppliers and sub-contractors will hold themselves and their own suppliers and sub-contractors to the same high standards.

Piller is committed to taking the following measures in an effort to safeguard against Modern Slavery:

- i. a zero-tolerance approach to Modern Slavery within Piller and its sub-contract and supply chains. The prevention, detection and reporting of Modern Slavery in any part of Piller or its supply and sub-contract chain is the moral responsibility of all those working for Piller or on its behalf. Individuals should not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this Policy.
- ii. training relevant employees in Modern Slavery, how to identify it in practice and how to respond.
- iii. engaging with its direct suppliers and sub-contractors where reasonably practicable, to address the risk of Modern Slavery in their operations and their supply and sub-contract chains.
- iv. to the extent reasonably practicable, as part of its contracting processes, Piller shall negotiate with its key suppliers and sub-contractors including recruitment agencies and third parties supplying workers, to include a specific prohibition of the use of Modern Slavery and an ability to audit the supplier’s or sub-contractor’s organisation for compliance.



2. Discrimination

Piller does not accept or condone willful discrimination within its working environment, business transactions and recruitment processes. Discrimination includes but is not necessarily limited to discrimination on the basis or bases of race, colour, ethnicity, gender, sexual orientation, age, health, disability, political affiliation, marital status, or religion.

Piller expects its suppliers, sub-contractors and other stakeholders to conduct business without wilful discrimination and with all due respects for human rights.

3. Harassment

Piller does not accept or condone unlawful harassment of any nature by its employees within the workplace or any location where the business of Piller is conducted and will take appropriate disciplinary action in cases of proven harassment.

4. Health and Safety

Piller is committed to preserving, so far as is reasonably practicable, the health, safety and welfare of employees while they are at work and of those who may be affected by its undertakings or activities, whilst complying with relevant statutory duties.

Piller is committed to:

- i). ensuring that all its relevant processes and systems of work are designed to take account of health and safety and to the extent practicable are adequately supervised.
- ii). complying with all mandatory health and safety laws and regulations.
- iii). providing the necessary information, instruction and training to employees and others in its direct control, to ensure their competence with respect to health and safety.
- iv). encouraging regular feedback from its employees regarding health and safety in the workplace.

In addition, Piller expects every employee and business partner representative to play an active role in minimising health and safety risk for themselves and those around them.

Reporting

Piller shall have in place in each of its operations, appropriate procedures for the governance of this Policy along with the recording of any identified breaches and associated remedial actions.

Employees should notify Piller in accordance with Piller's local company Whistleblowing policy as soon as possible if they have any reason to believe that Modern Slavery or discrimination of any form, may exist within Piller or within its wider stakeholders.

Piller aims to encourage openness and will support anyone who raises genuine concerns in good faith under this Policy, even if those concerns are determined to be unfounded. Piller is committed to using its best efforts to ensure that no one suffers a detrimental consequence insofar as is within its control,





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as a result of reporting in good faith their concern that Modern Slavery or discrimination of whatever form, or a breach of health and safety standards is, or may be taking place, in any part of its business or in any of its supply or sub-contract chains.

By order of the Boards of Directors of Piller.
