

Group Policy on Universal Human Rights

Brief description

The Apleona Group Policy on Universal Human Rights provide a condensed overview of the Group's clear stance with regard to respecting, observing and ensuring human rights.

This applies not only to Apleona's own business operations, but also to all actors in the entire upstream and downstream value chain or supplier chain who directly or indirectly produce or supply goods on behalf of Apleona or provide services to Apleona.

The Group Policy on Universal Human Rights refer to other existing governance documents at Apleona that define human rights and environmental minimum standards at Apleona. These regulate specific issues in greater detail.

The Group Policy on Universal Human Rights will be reviewed regularly every two years. New human rights or environmental issues that come to our attention in the course of day-to-day business operations are also taken into account.

Creation and responsibility

Jörg Niescher

Name

+49 173 666 13 63

Phone number

CEO Office

Corporate Department

joerg.niescher@apleona.com

E-mail address

Approval

Dr. Jochen Keysberg

Name

Group CEO

Position

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The Supply Chain Due Diligence Act (German: Lieferkettensorgfaltspflichtengesetz [LkSG]) was passed by the German Bundestag in June 2021. The law is intended to improve the international human rights situation by setting requirements for responsible management of supply chains. As of 01.01.2023, the law is applicable to companies based in Germany and companies with a branch pursuant to Section 13 d of the German Commercial Code (HGB) with at least 3,000 employees in Germany (approx. 600 companies). From 01.01.2024, companies with at least 1,000 employees in Germany are also covered (approx. 2,900 companies).

Companies are obliged to implement their human rights due diligence in line with the UN Guiding Principles on Business and Human Rights. This includes

- a clear commitment to respect human rights,
- the establishment of a system for identifying, prioritizing, and addressing or preventing risks of negative human rights impacts; and
- transparent reporting, effective grievance mechanisms, and systematic stakeholder engagement.

1.3 Human rights key topics

From Apleona's point of view, human rights can be summarized into the six following groups of topics. This enables a company to analyze these focus topics in a structured manner with regard to their human rights relevance:

- **Freedom from violence**
 - Prevention and elimination of torture or inhuman punishment, protection of all persons from enforced disappearance, abolition of the death penalty, etc.
- **Civil rights**
 - Right to life and liberty, work, education, social security, food, privacy, equality before the law, freedom of expression, etc.
- **Children's rights**
 - Rights of the Child, Fight against the Involvement of Children in Armed Conflict, Fight against the Sale of Children and against Child Prostitution and Child Pornography).
- **Social standards**
 - Health (right to the highest attainable standard of health).
 - Equal opportunities (elimination of racial discrimination, elimination of discrimination against women, rights of persons with disabilities).
 - Diversity and protection of vulnerable groups
- **Labour standards**
 - Right to fair and decent working conditions, minimum age, wages, working and break times, occupational health and safety, protection of the rights of migrant workers and their family members, etc.) as well as
- **Environmental standards**
 - Nature and environmental protection, waste management, etc.

The human rights aspects of "Freedom from violence" and "Civil rights" are primarily a task for the respective states and their constitutional bodies. The influence of Apleona is very limited here. The influence of Apleona is limited here only to the decision not to purchase goods or products in the value chain from countries in which the aforementioned human rights aspects "Freedom from violence" and "Civil rights" are not ensured.

The human rights aspects "Children's rights", "Social standards", "Labour standards" and "Environmental standards", on the other hand, can be agreed upon and verified by Apleona in its own operations and in its contracts with service providers, suppliers and subcontractors in the value and supplier chain. Apleona has defined minimum standards in this regard, which all companies in its value and supplier chain must comply with (see following chapter 2.).

2 Human rights at Apleona

2.1 Human Rights Officer and Human Rights Committee

The management has appointed a human rights officer:

Apleona GmbH
Heinrich Beck
Human Rights Officer
An der Gehespitz 50
63263 Neu-Isenburg (Germany)
Phone +49 6102 45-3550
E-mail: heinrich.beck@apleona.com

At the same time, a Human Rights Committee was also established to monitor and manage the legally compliant implementation of all requirements of the Supply Chain Due Diligence Act in Germany (LkSG) and the mandatory reporting to the German Federal Office of Economics and Export Control (BAFA). The Human Rights Committee includes individuals from the following functions and departments:

- Chief Executive Officer (CEO)
- Human Rights Officer
- Head of Legal and Compliance / General Counsel / Compliance
- Head of Human Resources
- Head of Procurement
- Head of Internal Audit

2.2 Memberships and declarations

2.2.1 Membership of the UN Global Compact

Apleona has been a member of the UN Global Compact since September 2017 and has also committed to respecting and promoting human rights, among other things.

Membership link: <https://unglobalcompact.org/what-is-gc/participants/120401>

Human Rights

1. Companies should support and respect the protection of international human rights.
2. Companies should ensure that they are not complicit in human rights abuses.

Labour standards

3. Companies should uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. Companies should advocate the elimination of all forms of forced labour
5. Companies should advocate the abolition of child labour.
6. Companies should advocate the elimination of discrimination in employment and occupation.

Environment

7. Companies should follow the precautionary principle in dealing with environmental problems.
8. Companies should take initiatives to promote greater environmental awareness.
9. Companies should accelerate the development and dissemination of environmentally friendly technologies.

Corruption prevention

10. Companies should work against all forms of corruption, including extortion and bribery.

2.2.2 Signatory of the Diversity Charter

Apleona has been a signatory of the Diversity Charter since March 2008.

<https://www.charta-der-vielfalt.de/ueber-uns/die-unterzeichner-innen/liste/zeige/apleona-gmbh/>

The aim of the Diversity Charter initiative is to promote the recognition, appreciation and inclusion of diversity in the world of work in Germany. In Germany, 4,900 companies and institutions with 14.7 million employees have signed the Diversity Charter so far and are committed to an appreciative and prejudice-free working environment.

Companies' commitment to diversity is also a commitment to an open and discrimination-free society. In this way, companies actively support the cohesion of society and a tolerant approach to other social groups.

As a matter of principle, companies should create a working environment that is free of prejudice. All employees should be valued - regardless of age, ethnic origin and nationality, gender and gender identity, physical and mental abilities, religion and world view, sexual orientation and social origin. Employees can be sure that, as a matter of principle, no one is disadvantaged on the basis of the aforementioned aspects.

2.3 Sustainability reporting

2.3.1 Group Policy on Corporate Social Responsibility

Apleona has integrated key human rights issues into its Group Policy on Corporate Social Responsibility. These are an integral part of our corporate values. They are ensured through clear management responsibilities as well as specific Group policies and instructions on key topics.

The Group Policy on Corporate Social Responsibility are reviewed by the management every three years and supplemented or modified as necessary. They serve as a guide for the actions of all Apleona business units. However, other stakeholders and interest groups can also find out about our social responsibility activities.

German: <https://www.apleona.com/ueber-apleona/verantwortung/>

English: <https://www.apleona.com/en/about-apleona/responsibility/>

The individual human rights topics of the aforementioned document on item 2.3.1 are presented in an overview in the **Annex** to these Corporate Principles.

2.3.2 Status Report on Sustainability

Apleona publishes an annual Status Report on Sustainability that describes all relevant economic, ecological, social and organizational aspects of our business activities.

The Status Report for the respective past fiscal year is publicly available as a download on our website and can be downloaded by our stakeholders, such as owners, banks, customers, business partners, suppliers, service providers, non-governmental organizations or the professional public, using the following link:

On the first page, the Status Report contains a **Statement by Corporate Management** to promote and actively support the 10 principles of the UNGC initiative at Apleona within our sphere of influence and to continuously integrate the goals of the pact into the daily company processes.

German: <https://www.apleona.com/ueber-apleona/verantwortung/>

English: <https://www.apleona.com/en/about-apleona/responsibility/>

Apleona guarantees employment conditions for its employees that comply with the legal requirements in the respective countries without exception and are observed as a minimum standard. These minimum standards relate, among other things, to the equipment of the workplace, daily working and break times, vacations and the level of remuneration. The exploitation of people is incompatible with our ethical values. We also pass on our commitment to fair employment conditions to suppliers, subcontractors and service providers in the supply or value chain by signing a "Code of Conduct for Subcontractors and Suppliers".

The individual human rights topics of the aforementioned document on item 2.3.2 are presented in an overview in the **Annex** to these Group Principles.

2.4 Commitments by suppliers to minimum social and environmental standards

Apleona commits its service providers, suppliers and subcontractors to minimum social and environmental standards and requires compliance with applicable laws, rules and standards without exception.

All business partners can find out about these minimum standards transparently in advance of a business relationship on our website. These minimum standards become an integral part of the contract.

German: <https://www.apleona.com/ueber-apleona/dienstleister-lieferanten-und-nachunternehmer/>

English: <https://www.apleona.com/en/about-apleona/information-for-service-providers-suppliers-and-subcontractors/>

In this context, service providers, suppliers and subcontractors are required to ensure compliance with the principles of the Global Compact initiative and minimum social and ecological standards in their own company, but also to agree on and enforce these in writing with their subcontractors and suppliers. Apleona requires all contractors to comply with applicable law in relation to contract performance, including applicable international agreements on human rights and environmental protection, in the relevant supply and service chains. In this respect, Apleona's contractors are obligated to observe human rights due diligence both in their own area of business and in their supply chains on the basis of legal regulations in order to prevent human rights or environment-related risks, to minimize them or to put an end to the violation of human rights-related or environment-related obligations. The following documents are particularly relevant in this regard:

2.4.1 Code of Conduct for Subcontractors and Suppliers

The Code of Conduct is available for download on the Apleona website:

English: https://www.apleona.com/fileadmin/apleona.com/ueber-uns/Code_of_Conduct_for_Subcontractors_and_Suppliers.pdf

The individual human rights topics of the aforementioned document on item 2.4.1 are presented in an overview in the **Annex** to these Corporate Principles.

2.4.2 Declaration of commitment to minimum working conditions

The declaration of commitment is available for download on the Apleona website:

German: https://www.apleona.com/fileadmin/user_upload/2011_Verpflichtungserklaerung_Mindestarbeitsbedingungen_DE_1453_.pdf

The individual human rights topics of the aforementioned document on item 2.4.2 are presented in an overview in the **Annex** to these Corporate Principles.

2.4.3 Declaration of Commitment on Due Diligence, Human Rights and Environmental Protection in Supply and Service Chains

The declaration of commitment is available for download on the Apleona website:

English: <https://www.apleona.com/fileadmin/apleona.com/ueber-uns/Declaration-of-Committment-LkSG.pdf>

The individual human rights topics of the aforementioned document on item 2.4.3 are presented in an overview in the **Annex** to these Group Principles.

2.4.4 General Terms and Conditions (GTC)

English: https://www.apleona.com/fileadmin/apleona.com/ueber-uns/2302_Apleona_Einkaufsbedingungen_EN_Terms_and_Conditions_of_Purchase.pdf

The individual human rights topics of the aforementioned document on item 2.4.4 are presented in an overview in the **Annex** to these Group Principles.

2.4.5 Facility Services - General Subcontractor Terms and Conditions (GDL NUB)

The subcontractor conditions are available for download on the Apleona website:

German: https://www.apleona.com/fileadmin/user_upload/2011_Nachunternehmerbedingungen_fuer_Allgemeine_Gebaeuedienstleistungen_NUB_GDL_DE_1140_.pdf

The individual human rights topics of the aforementioned document on item 2.4.5 are presented in an overview in the **Annex** to these Group Principles.

2.4.6 HSEQ regulations for subcontractors - Health, Safety, Environment and Quality

The HSEQ regulations are available for download on Apleona's website:

English: https://www.apleona.com/fileadmin/user_upload/HSEQ_Regulations_Subcontractors.pdf

The individual human rights topics of the aforementioned document on item 2.4.6 are presented in an overview in the **Annex** to these Group Principles.

3 Procedures and reporting

3.1 Complaint and reporting system

The following e-mail addresses are available for submitting hints and complaints regarding human rights violations:

- German: lieferkettensorgfaltspflichten@apleona.com
- English: supply-chain-due-diligence@apleona.com

Alternatively, whistleblowers can write us a letter addressed to:

Apleona GmbH
Compliance/Human Rights
An der Gehespitz 50
63263 Neu-Isenburg (Germany)

The aforementioned contact details can also be accessed on Apleona's website via the following links:

- German: <https://www.apleona.com/ueber-apleona/compliance-und-menschenrechte/>
- English: <https://www.apleona.com/en/about-apleona/compliance-and-human-rights/>

Subcontractors and suppliers of Apleona are held to report

- own violations of the Code of Conduct, insofar as these affect the business relationship with Apleona as well as
- any findings of misconduct on the part of Apleona employees.

3.2 Review of business relationships in case of a breach of due diligence obligations

In its Declaration of Commitment on Due Diligence, Human Rights and Environmental Protection in Supply and Service Chains, Apleona reserves the right to review existing business relationships in the case of human rights or environmental due diligence violations by the contractor or actors in the value chain or supplier chain.

If there is reasonable suspicion of a violation of the Code of Conduct by a subcontractor or supplier or if a subcontractor or supplier does not sufficiently comply with its obligation to clarify and cooperate in case of suspicion, Apleona may terminate the business relationship with the subcontractor or supplier concerned with immediate effect on the basis of existing contractual or legal rights. Apleona reserves the right to take further legal steps, in particular claims for damages, in the case of a violation of the Code of Conduct.

Temporary suspension of business relations

- Temporary suspension of business relations with its supplier during the preparation of a concept for concrete remedial measures in the case of human rights or environmental violations (Declaration of Commitment on Due Diligence, Human Rights and Environmental Protection in Supply and Service Chains)
- Prohibition to work until cured of identified deficiencies in occupational health and safety (HSEQ regulations for subcontractors § 6 item 1).

Termination of business relations

- In the case of very serious violations of a human rights or environmental due diligence obligation
- No remedy for the violations after implementation of the measures specified in the concept.
- No availability of milder means or if an increase of the influence possibilities does not seem promising

3.3 Cooperation obligations of contractors, subcontractors and suppliers

In its Declaration of Commitment on Due Diligence, Human Rights and Environmental Protection in Supply and Service Chains, Apleona makes it clear that the above list is not exhaustive and that, in principle, all human rights violations in the value and supply chain are prohibited and will not be tolerated. This applies to any activity, active action or omission in breach of duty that is directly capable of violating the legally protected human rights positions in a particularly serious manner and the illegality of which is obvious when all relevant circumstances are reasonably assessed.

Apleona therefore also requires its contractors to take active action.

Preventive measures

- Training and further education of the employees deployed to raise awareness on the subject of human rights
- Careful selection of suppliers and service providers to ensure human rights-related and environmental due diligence (Declaration of Commitment to Due Diligence, HSEQ regulations § 4 item 3).

Acute measures

As soon as human rights or environmental due diligence violations and their causers by the contractor or actors in the value chain or supplier chain become known:

- Immediately take appropriate remedial action to prevent, end, or minimize the extent of human rights or environment-related due diligence violations
- Development of a concept as well as a concrete time schedule for ending or minimizing human rights or environment-related due diligence violations together with the causers, if these cannot be ended in the foreseeable future
- Anchoring appropriate preventive measures towards the causers, such as the implementation of control measures or support in the prevention and avoidance of a risk
- Implement industry-specific or cross-industry initiatives that the contractor has joined or will join to increase the ability to influence the causer

Passing on the obligations to service providers, suppliers and subcontractors of the contractor

- Compliance with the Code of Conduct for Subcontractors and Suppliers, the obligations from the Declaration of Commitment on Due Diligence, Human Rights and Environmental Protection in Supply and Service Chains as well as the HSEQ regulations for subcontractors also by service providers, suppliers and subcontractors of the contractor

- The obligation to pass on the minimum standards to subcontractors in the supply chain is contained in numerous documents that must be signed by service providers or suppliers when contracts are concluded. The corresponding document names and references are listed transparently in the **Annex** "Overview of human rights topics".

Reporting and mandatory reporting

- Written report by the contractor on all measures with which the contractor implements its contractual and/or legal obligations to fulfill and enforce human rights and environmental due diligence obligations (on an ad hoc basis or at the request of Apleona)
- Immediate written notification by the contractor if the human rights or environmental risks related to the cooperation of the parties have changed or expanded significantly (also without separate request by Apleona)

Obligation to cooperate, provide evidence and audit

- Consent of the contractor that Apleona, Apleona's customers as well as any competent (regulatory) authority are entitled themselves or through commissioned third parties to conduct comprehensive reviews, tests, audits or inspections of the contractor and/or its suppliers and subcontractors with regard to compliance with human rights-related and environmental due diligence obligations (Declaration of Commitment on Due Diligence Obligations, Item 5; General Terms and Conditions, Item 29)
- Consent to the inspection and examination of books, records and other documents
- Obligation to cooperate, to provide further information and documents without delay upon request by Apleona or competent authorities, which prove the corresponding compliance with the obligations (Declaration of Obligation on Due Diligence, Item 5)
- In the case of a breach, the contractor undertakes to cooperate fully in connection with any audit conducted and to ensure that the contractor's business partners also cooperate fully if such an investigation concerns their performance.
- The obligation to actively participate in audits is contained in numerous documents that must be signed by service providers or suppliers when contracts are concluded. The corresponding document names and references are listed transparently in the **Annex** "Overview of human rights topics".

3.4 Analyses of human rights risks

In accordance with legal requirements, Apleona analyses risks in the area of human rights in its own operations as well as those of its direct contractors (e.g. service providers and suppliers) and, if necessary, takes effective measures to ensure human rights. The analysis of human rights and environmental risks and impacts is carried out annually and on an ad hoc basis in the case of significant changes or expansions of the risk situation in the supply chain.

This analysis therefore concerns not only Apleona's own business operations, but also all direct and indirect actors in the value chain or supplier chain involved in the production of goods and services in Germany and Europe, but also in developing and emerging countries, on behalf of Apleona.

This analysis results in regular reports on the human rights situation in Apleona's supplier chain.

3.5 Annual report on human rights due diligence

Apleona will publish an annual human rights due diligence report as required by law. The first report will be published during 2024 for fiscal year 2023.

4 Annex

[Overview of human rights issues](#)

	Governance document Apleona								
			Focus: Subcontractors and suppliers						
Human Rights Focus topic	Group Policy on Corporate Social Responsibility	Status Report on Sustainability	Code of Conduct for Subcontractors and Suppliers	Declaration of commitment to minimum working conditions	Declaration of Commitment on Due Diligence, Human Rights and Environmental Protection in Supply and Service Chains	Facility Services - General Subcontractor Terms and Conditions (GDL NUB)	General Terms and Conditions (GTC)	HSEQ regulations for subcontractors - Health, Safety, Environment and Quality	Comment
Freedom from violence									
Prohibition of the use of uncontrolled private or public security forces					X				Prohibition of the unauthorized commissioning or use of private or public security forces for the protection of the company's project if, due to a lack of instruction or control on the part of the company, the use of the security forces threatens torture, cruel, inhuman or degrading treatment or violence against life and limb, as well as preventing the freedom of association and union (due diligence obligations)
Civil rights									
Prohibition of unlawful forced eviction or displacement					X				Prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters in the acquisition, construction or other use of land, forests and waters, the use of which secures the livelihood of a person
Children's rights									
Fight against child labour	X								Chapter 3.6: Fair employment conditions and fight against child labor
Fight against child labour	X								Chapter 4.8: Human rights / fight against child labour
Fight against child labour					X				Prohibition of the employment of children under the minimum permissible age
Fight against child labour					X				Prohibition of all forms of slavery or similar forms of slavery, such as prohibition of child trafficking, sale of children, debt bondage and serfdom, and forced or compulsory labour
Fight against child labour					X				Prohibition of forced or compulsory recruitment of children for use in armed conflicts
Fight against child labour					X				Prohibition of the use, procuring or offering of children for prostitution, for the production of pornography or for pornographic performances
Fight against child labour					X				Prohibition of attracting, procuring or offering children for illicit activities, in particular for the production of and trafficking in drugs
Fight against child labour					X				Prohibition of work by children which, by its nature or the circumstances in which it is performed, is likely to be harmful to the health, safety or morals of children
Social standards									
Social interaction in the company	X								Chapter 3.3: Social interaction within the company and equal opportunities
Social interaction in the company			X						Principle of respectful, fair and non-discriminatory behavior
Equal opportunities	X								Chapter 3.3: Social interaction within the company and equal opportunities
Equal opportunities		X							Chapter 4.3: Diversity / employee diversity / equal opportunities
Equal opportunities					X				Prohibition of unequal treatment in employment, e.g. on the basis of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, unless this is justified in the requirements of the employment
Equal opportunities					X				Prohibition of unequal treatment in the payment of unequal remuneration for work of equal value.
Diversity	X								Chapter 3.4: Diversity Management / Diversity
Diversity		X							Chapter 4.3: Diversity / employee diversity / equal opportunities
Women's quota	X								Chapter 3.5: Proportion of women in management positions

	Governance document Apleona								
			Focus: Subcontractors and suppliers						
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Women's quota		X							Chapter 4.4: Proportion of women in management positions / overall
Further training offers	X								Chapter 3.7: Sustainable personnel policy
Further training offers		X							Chapter 2.1: Securing skilled labor / Operational excellence / Further training
Social engagement		X							Chapter 4.5: Social commitment
Labour standards									
Arbeitssicherheit	X								Chapter 3.1: Occupational safety
Arbeitssicherheit		X							Chapter 4.1: Occupational safety and health protection
Occupational safety					X			X	Prohibition of disregarding the applicable duties of occupational health and safety, in particular the prohibition of disregarding the duties of occupational health and safety applicable under the applicable national law, if this results in the risk of accidents at work or work-related health hazards (Declaration of Commitment on Due Diligence, HSEQ regulations § 2)
Health protection	X								Chapter 3.2: Health protection
Health protection		X							Chapter 4.1: Occupational safety and health protection
Health protection			X						Health, safety and personal rights of employees
Attractive workplace		X							Chapter 4.2: Attractive workplace / Wellbeing
Fair employment conditions	X								Chapter 3.6: Fair employment conditions and fight against child labor
Fair employment conditions		X							Chapter 4.6: Employment conditions
Fair employment conditions					X				Prohibition of withholding adequate wages in accordance with the regulations of the place of employment and the legally established minimum wage
Fair employment conditions			X			X		X	Employment and remuneration on the basis of fair and legally compliant contracts and international minimum labor standards as well as payment of the statutory minimum wage to its employees and any subcontractors of the contractor (Code of Conduct, Subcontractor Conditions, Item 17.1, HSEQ Regulations § 5 Item 2)
Freedom of association		X							Chapter 4.7: Freedom of Association / Right to Collective Bargaining
Freedom of association					X				Prohibition of disregarding the right of employees to freely form or join trade unions and prohibition of unjustified discrimination or retaliation for forming or joining a trade union
Freedom of association					X				Prohibition of disregard for the right to form and freely exercise trade unions in accordance with applicable national law, such as the right to strike and the right to collective bargaining
Prohibition of forced labour					X				Prohibition of the employment of persons in forced labor, i.e., prohibition of any labor or service which is required of a person under threat of punishment and for which he or she has not volunteered, such as a result of debt bondage or human trafficking
Prohibition of forced labour					X				Prohibition of all forms of slavery, slave-like practices, servitude, or other forms of domination or oppression in the workplace environment, such as through extreme economic or sexual exploitation and humiliation

Human Rights Focus topic	Governance document Apleona								Comment
	Group Policy on Corporate Social Responsibility	Status Report on Sustainability	Focus: Subcontractors and suppliers						
			Code of Conduct for Subcontractors and Suppliers	Declaration of commitment to minimum working conditions	Declaration of Commitment on Due Diligence, Human Rights and Environmental Protection in Supply and Service Chains	Facility Services - General Subcontractor Terms and Conditions (GDL NUB)	General Terms and Conditions (GTC)	HSEQ regulations for subcontractors - Health, Safety, Environment and Quality	
Minimum workplace standards		X							Chapter 2.9: Sustainable supply chain / minimum social standards
Environmental standards									
Environmental protection	X								Chapter 4.: Environment
Environmental protection		X							Chapter 3.3: Environmental protection / environmental management
Environmental protection			X						Compliance with all applicable relevant environmental laws and permits
Environmental protection					X			X	Prohibition of causing harmful environmental changes, e.g. through contamination of soil, water, air or harmful noise emissions, which may also harm the health of persons (Declaration of Commitment on Due Diligence, HSEQ regulations § 3 items 1-3)
Environmental protection			X						Minimization of unavoidable environmental pollution
Environmental protection					X				Prohibition of unlawful handling of mercury or mercury-added products pursuant to Article 4(1) and Annex A, Part I of the Minamata Convention on Mercury of October 10, 2013 (BGBl. 2017 II pp. 610, 611), as amended ("Minamata Convention")
Environmental protection					X				Prohibition of the use of mercury and mercury compounds in manufacturing processes as defined in Article 5(2) and Annex B, Part I of the Minamata Convention from the phase-out date specified for the respective products and processes in the Convention
Environmental protection					X				Prohibition of the treatment of mercury waste contrary to the provisions of Article 11(3) of the Minamata Convention.
Environmental protection					X				Prohibition of unlawful production and use of chemicals pursuant to Article 3(1)(a) and Annex A of the Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants (Federal Law Gazette 2002 II pp. 803, 804), as amended ("POPs Convention")
Resource conservation		X	X						Chapter 3.1: Resource Conservation and Climate Protection
Climate protection		X							Chapter 3.1: Resource conservation and climate protection
Sustainable building operation		X							Chapter 3.2: Promotion of environmentally friendly technologies and sustainable building operation
Waste management		X							Chapter 3.4: Waste management / recycling
Waste management			X						Waste prevention
Waste management					X			X	Prohibition of non-environmentally sound handling, collection, storage and disposal of waste in accordance with the regulations in force in the applicable jurisdiction under the terms of Article 6(1)(d)(i) and (ii) of the POPs Convention
Waste management					X				Prohibition of unlawful export or import of hazardous wastes as defined in Article 1(1) and other wastes as defined in Article 1(2) of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Federal Law Gazette 1994 II pp. 2703, 2704), as amended ("Basel Convention")

		Governance document Apleona							
			Focus: Subcontractors and suppliers						
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Water management		X							Chapter 3.5: Water / Wastewater
Water management					X				Prohibition of excessive water consumption that is likely to significantly impair the natural basis for the preservation and production of food, deny people access to safe drinking water or impede access to sanitary facilities.
Ecological minimum standards		X							Chapter 2.9: Sustainable supply chain / Ecological minimum standards

Consent to supplier audits									
					X				Ziffer 5, Seite 5
						X			Ziffer 29, Seite 12
							X		Ziffer 20, Seite 3
Compliance with the Code of Conduct as well as the Declaration of Commitment on Due Diligence Obligations									
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