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Report on LkSG (Supply Chain Due Diligence Act)

Reporting period from 01.01.2024 to 31.12.2024

Name of the organization: ArianeGroup GmbH

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A. Strategy & anchoring

A1. Monitoring of risk management & management responsibility

Which responsibilities for monitoring risk management were set forth in the reporting period?

ArianeGroup has created the new role of Human Rights Officer and appointed Ms Sarah Bois as Human Rights Officer of ArianeGroup with a view to the entry into force of the Supply Chain Due Diligence Act starting 1 January 2024.

The Human Rights Officer is directly responsible to the management of ArianeGroup GmbH.

In addition, the Human Rights Officer reports to the General Secretary of ArianeGroup. The Managing Directors of ArianeGroup GmbH report regularly to the Supervisory Board of ArianeGroup GmbH at least once a year and if necessary, on specific occasions.

The Human Rights Officer is supported by a core team consisting of the Purchasing, Legal, Compliance and Sustainability and Corporate Support departments.

A. Strategy & anchoring

A1. Monitoring of risk management & management responsibility

Has management established a reporting process to ensure that it is regularly informed, at least annually, of the work of the person responsible for monitoring risk management?

It is confirmed that management has established a reporting process that ensures that it is regularly informed, at least annually, of the work of the person responsible for monitoring risk management within the meaning of Section 4(3) LkSG.

Confirmed

Describe the process that ensures reporting to senior management regarding risk management at least annually or on a regular basis.

The Human Rights Officer, supported by the core team, is responsible for and oversees structures and processes that ensure respect for human rights and environmental protection in ArianeGroup and in the supply chains. This includes preparation of preventative measures, performing risk analyses, corrective measures and handling of complaints.

The aim is to identify, reduce and avoid possible negative effects at an early stage.

The Human Rights Officer reports annually and on occasion to the management of ArianeGroup GmbH on human rights and environmental risk management and on the fulfilment of their associated tasks.

A. Strategy & anchoring

A2. Statement of principles on human rights strategy

Is there a statement of principles that has been prepared or updated based on the risk analysis done during the reporting period?

The statement of principles has been uploaded.

<https://ariane.group/app/uploads/2025/05/eDocument-A4-Statement-of-Principles-EN-v05.pdf>

A. Strategy & anchoring

A2. Statement of principles on human rights strategy

Has the statement of principles for the reporting period been communicated?

It is confirmed that the statement of principles has been communicated to employees, the works council, where appropriate, the public and the direct suppliers who have been identified as posing a risk in the course of the risk analysis.

Confirmed

Please describe how the statement of principles was communicated to the relevant target groups.

The statement of principles was presented to the employees through the internal communication system. The statement of principles is also accessible to employees on the internal intranet, the ArianeGroup Company Management System (CMS).

A presentation on the most important points of the Supply Chain Due Diligence Act and the associated tasks for ArianeGroup was made to the General Works Council of ArianeGroup GmbH. The statement of principles was also published on the ArianeGroup website https://ariane.group/app/uploads/2025/03/Statement-of-Principles-EN_2024.pdf.

The suppliers are informed of the statement of principles in the order text and in the General Terms and Conditions of Purchase of ArianeGroup GmbH.

A. Strategy & anchoring

A2. Statement of principles on human rights strategy

What are the elements of the statement of principles?

- Establishing risk management
- Annual risk analysis
- Anchoring preventative measures in the company's own business unit, with direct suppliers and, if necessary, indirect suppliers and checking their effectiveness
- Remedial measures in the company's own business unit, for direct suppliers and, if applicable, indirect suppliers and their effectiveness review
- Providing a complaint procedure in the company's own business unit, for suppliers and their effectiveness review
- Documentation and reporting obligation

A. Strategy & anchoring

A2. Statement of principles on human rights strategy

Description of possible updates during the reporting period and the reasons for them.

The statement of principles was first drawn up during the reporting period.

A. Strategy & anchoring

A3. Anchoring the human rights strategy within the organization

In which relevant departments/business processes has the human rights strategy been anchored within the reporting period?

- Purchasing/Procurement
- Supplier management
- CSR/Sustainability
- Legal/Compliance

Describe how responsibility for implementing the strategy is distributed within the various departments/business processes.

At the top management level, ArianeGroup's sustainability commitments, which include environmental protection and human rights, have been confirmed by the Chief Executive Officer. The ArianeGroup Executive Committee has adopted and monitors a sustainability roadmap and conducts an annual review of ArianeGroup's sustainability priorities. The General Secretary of ArianeGroup is responsible for managing the implementation of ArianeGroup's sustainability commitments.

In the operational area, the Purchasing/Procurement, Supplier Management, CSR/Sustainability and Legal/Compliance departments are actively involved in the design, implementation and further development of human rights and environmental risk management. For this purpose, ArianeGroup has appointed contact persons for the topic in each of the above departments.

Describe how the strategy is integrated with operational processes and procedures.

ArianeGroup's key guidelines contain clear expectations for the company's own employees, operations (including subsidiaries) and suppliers, and include:

- Ethics Charter (Ethik-Charta)
- Supplier Ethics Charter (Ethik-Charta für Zulieferer)
- Health, Safety and Environment Policy (Sicherheit, Gesundheitsschutz und Umweltpolitik)
- Sustainability Commitments (Unser Engagement für Nachhaltigkeit)
- Whistleblowing Procedure (Whistleblowing Prozedur)

Based on these standards, enterprise requirements are integrated into the ArianeGroup Company Management System (CMS) and supported by methods, processes and guidance. Internal measures for capacity-building, including training and awareness-raising, support compliance with the standards.

Describe what resources and expertise will be provided for implementation.

The Enterprise Risk Management (ERM) and Internal Control departments monitor risk mapping and risk management.

The Human Rights Officer, who is jointly responsible for operational implementation, is supported by a corresponding organisational structure within ArianeGroup.

This is made up of experienced employees from the Purchasing, Legal, Compliance and Sustainability and Corporate Support departments.

B. Risk analysis and preventative measures

B1. Implementation, procedure and results of the risk analysis

Has a regular (annual) risk analysis been done during the reporting period to identify, weight and prioritize human rights and environmental risks?

- Yes, for your own business unit
- Yes, for immediate suppliers

Describe the period during which the annual risk analysis was done.

The risk analysis was done at the end of the 2024 financial year.

Describe the risk analysis procedure.

In the reporting year, the risk analysis was done once a year in accordance with Section 5(4) LkSG and on a case-by-case basis as follows.

In its own business unit, ArianeGroup produces a comprehensive risk map every year that covers all activities of the company, including human rights and environmental risks.

The Enterprise Risk Management (ERM) and Internal Control departments monitor risk mapping and risk management.

In the case of direct suppliers, both an abstract risk assessment and the concrete identification and assessment of risks are carried out.

The abstract risk analysis identifies the country and sector risks to human rights and environmental standards at the direct suppliers. This analysis takes into account the risks relevant to LkSG. The results of the country risk analysis and the sectoral risk analysis (based on the NACE codes) are merged into an abstract

risk assessment. This allows an overview of the existing abstract risks per topic area and the immediate suppliers. The risk categories thus identified are classified accordingly as “low risk”, “medium risk”, “high risk” and “very high risk”.

In the concrete risk analysis, a detailed examination of the identified abstract risks takes place at the immediate suppliers, which enables prioritization of the suppliers with increased risk. Self-reporting provides transparency as to the extent to which an immediate supplier reacts to the identified abstract risks. Based on the feedback, an assessment of the ability to ensure protection of human rights and compliance with environmental standards is made.

The results of the self-reporting are combined with the results of the abstract risk analysis to obtain an assessment of the actual risk in the “low risk”, “medium risk”, “high risk” and “very high risk” categories for a broad base of suppliers. The identified risk serves as an indicator of the likelihood of a human rights violation or a violation of an environmental standard occurring.

B. Risk analysis and preventative measures

B1. Implementation, procedure and results of the risk analysis

Were risk analyses conducted as the situation demanded during the reporting period?

No

Justify your answer.

During the reporting period, there was no reason to perform risk analyses as the situation demanded in addition to the continuous risk analysis. In particular, there was no factual evidence to suggest that a violation of a human rights or environmental obligation could occur with direct and indirect suppliers, e.g. through reporting channels such as ArianeGroup's whistleblowing system.

B. Risk analysis and preventative measures

B1. Implementation, procedure and results of the risk analysis

Results of risk assessment

What risks have been identified in the risk analysis/analyses in your own business unit?

- Disregard for health and safety at work and occupational health risks
- Prohibition of unequal treatment in employment

B. Risk analysis and preventative measures

B1. Implementation, procedure and results of the risk analysis

Results of risk assessment

What risks have been identified in the risk analysis/analyses of your own suppliers?

None

B. Risk analysis and preventative measures

B1. Implementation, procedure and results of the risk analysis

Were the risks identified during the reporting period, if any, weighted and prioritized and, if so, based on which adequacy criteria?

No

Justify your answer.

In the course of the risk analysis done in the company's own business unit or continuously, no situation was found during the reporting period in which there was a sufficient probability that one of the prohibitions listed in Section 2 (2 and 3) LkSG would be breached on the basis of actual circumstances.

B. Risk analysis and preventative measures

B2. Preventative measures in own business unit

What risks have been prioritized in your own business unit during the reporting period?

- Disregard for health and safety at work and occupational health risks
- Prohibition of unequal treatment in employment

Disregard for health and safety at work and occupational health risks

What is the specific risk involved?

Health, safety and environmental (HSE):

- Exposure to hazardous substances
- Safe work environment
- On-site HSE management by external contractors
- Prevention of psycho-social risks

Where does the risk occur?

Germany

Prohibition of unequal treatment in employment

What is the specific risk involved?

Equality and non-discrimination: Discrimination and harassment in the workplace

Where does the risk occur?

Germany

B. Risk analysis and preventative measures

B2. Preventative measures in own business unit

Which preventative measures have been taken for the reporting period to prevent and minimize the priority risks implemented in your own business unit?

- Provide training in relevant business units
- Other/additional measures: Internal communication

Provide training in relevant business units

Describe the measures implemented and in particular specify the scope (e.g. number, coverage/scope).

On-site training courses are conducted specifically for proper anchoring and implementation of human rights and environmental due diligence obligations according to LkSG for all employees in the procurement processes.

In the area of health, safety and the environment (HSE), ArianeGroup has developed a vigilance plan that enables continuous anticipation and thus prevention of these risks through appropriate prevention and remedial measures. These risks are managed by the Site Management directorates. The ArianeGroup HSE Performance System was certified as ISO 14001 equivalent in 2018. This situation persists. The HSE Performance System, which contributes to the management of, among other things, human rights and environmental risks, is one of the components of ArianeGroup's ERM (enterprise risk management) system.

Reports of risks can be made through the complaint procedure (whistleblower system) or directly to the departments concerned. With regard to discrimination, in addition to the complaint procedure, there is also the possibility of contacting the works council and the Human Resources department.

Describe how the training is appropriate and effective in preventing and minimizing the priority risks.

Training enables our staff to become familiar with the requirements of responsible business conduct and to develop an understanding of our human rights strategy so that they can then actively and effectively implement this in their various roles. This will help to prevent and minimize the priority risks. The special training courses on procurement processes enable our employees to identify and address potential conflicts between purchasing practices and risks related to human rights and the environment.

Other/additional measures

Describe the measures implemented and in particular specify the scope (e.g. number, coverage/scope).

Reference to "Provide training in relevant business units".

Describe how the measures are appropriate and effective in preventing and minimizing the priority risks.

For comments on the effectiveness review, please refer to section E "Review of risk management".

B. Risk analysis and preventative measures

B3. Preventative measures for direct suppliers

Which risks were prioritized for direct suppliers for the reporting period?

None

If no risks have been selected, please justify your response.

No priority risks were identified and therefore no specific preventative measures were taken.

B. Risk analysis and preventative measures

B3. Preventative measures for direct suppliers

Which preventative measures have been taken for the reporting period to prevent and minimize priority risks for immediate suppliers?

Development and implementation of appropriate procurement strategies and purchasing practices

Obtaining contractual assurance for fulfilment and implementation of supply chain expectations

Training and education to enforce the contractual assurance

Other categories:

Selected:

- Obtaining contractual assurance for fulfilment and implementation of supply chain expectations
- Training and education to enforce the contractual assurance

Describe how the measures are appropriate and effective in preventing and minimizing the priority risks.

In addition to contractual requirements and the Ethics Charter for Suppliers, which contain expectations for suppliers, development and implementation of appropriate procurement strategies is an effective measure to prevent or minimize risks at the supplier. Appropriate purchasing strategies and practices can, on the one hand, create incentives for a supplier to comply with human rights and environmental expectations. Failure to meet expectations can, in turn, be sanctioned. In addition, strategies and practices can be used to support the supplier in meeting human rights and environmental expectations and passing them on through their supply chain. In general, all measures respect the principle of proportionality by taking into account factors such as the industry, size and structure of the supplier.

Category: Procurement strategy & purchasing practices

Selected:

- Development and implementation of appropriate procurement strategies and purchasing practices

Describe the measures implemented and the extent to which setting of delivery times, purchase prices or the duration of contractual relationships have been adjusted.

In our contract templates, in the General Conditions of Purchase as well as in the order texts, and the contents of the Ethics Charter for Suppliers are a mandatory part of the contract. This means

that fundamental demands for human rights and environmental issues will be included on page 20 of the negotiations. It also calls for the possibility of verifying information and, for example, verifying certifications of suppliers to better assess their efforts. ArianeGroup works closely with suppliers in advance and attaches importance to long-term supply relationships. As a result of these advance measures, no adjustments were made to the delivery time, purchase prices or the duration of the contractual relationships in relation to the measures to be implemented.

Describe how adjustments to your own procurement strategy and purchasing practices will help prevent and minimize the priority risks.

Extensive risk analysis prior to awarding contracts to new suppliers and evaluation of appropriate supplier information on sustainability (ESG criteria) provide the basis for actively including these aspects in the final award decision.

In advance, the fundamental expectations of ArianeGroup with regard to human rights and environmental issues are communicated and guaranteed through contractual involvement with the suppliers.

This contributes to the identification of potential risks and the corresponding definition of risk-minimizing measures that can be implemented in cooperation with the suppliers.

B. Risk analysis and preventative measures

B5. Communication of results

Were the results of the risk analysis/analyses for the reporting period communicated internally to relevant decision-makers?

It is confirmed that the results of the risk analysis/analyses for the reporting period have been communicated internally to the relevant decision-makers, such as the Executive Board, the Management Board or the Purchasing department, in accordance with Section 5 (3) LkSG.

Confirmed

B. Risk analysis and preventative measures

B6. Changes in risk disposition

What are the changes in priority risks compared to the previous reporting period?

This report covers the first reporting period under LkSG, so there are no changes to a previous reporting period.

C. Identification of violations and remedial measures

C1. Identification of violations and remedial measures in own business unit

Were there any violations in the division during the reporting period?

No

Describe the procedures used to identify violations in your business unit.

Injuries in one's own business unit can be determined on the basis of reports through the complaint procedure (whistleblower system), the risk analysis itself, the compliance officer, the personnel department and the works council. The respective managers are also available as contact persons.

C. Identification of violations and remedial measures

C2. Identification of violations and remedial measures for immediate suppliers

Have any direct supplier violations been identified for the reporting period?

No

Describe the procedures used to identify violations at direct suppliers.

Violations at direct suppliers can be determined through the ArianeGroup complaint procedure. Furthermore, in the case of risk analysis and in the case of a notification to the competent purchasers.

C. Identification of violations and remedial measures

C3. Identification of violations and remedial measures for indirect suppliers

Have any indirect supplier violations been identified for the reporting period?

No

D. Complaint procedure

D1. Establishment or participation in a complaint procedure

In what form was a complaint procedure offered for the reporting period?

Company-internal complaint procedure

Describe the company's own process and/or the process in which your company participates.

In carrying out its daily activities and through its working methods, ArianeGroup promotes transparency, trust and mutual respect, and thus open communication, where everyone can express themselves freely. This follows the obligations and provisions of the Ethics Charter and is in accordance with the whistleblower system (complaint procedure). The ArianeGroup will not tolerate any form of retaliation or attempted retaliation, directly or indirectly, against any employee acting in good faith and without direct financial compensation.

Employees and other temporary or external workers within ArianeGroup and its subsidiaries are encouraged to report any situation or behaviour that violates the principles of the Ethics Charter and the Ethics Charter for Suppliers through the dedicated platform (<https://ag.1signal.net>). This was set up under the responsibility of the Group Ethics and Compliance Officer (GECO). This platform allows for collection and processing of reports, including those related to the duty of vigilance, in particular with regard to human rights, fundamental freedoms, health, safety of people and environmental protection, in a strictly confidential framework.

The ArianeGroup's reporting process is in line with current legislation and recent changes in the regulatory environment (implementation of the EU Whistleblower Protection Act/Directive (EU) 2019/1937. On the German side of ArianeGroup, the now applicable whistleblower protection law).

This platform is managed by an external provider and is subject to strict confidentiality. The platform is secured for storage and management of the data on the notices.

D. Complaint procedure

D1. Establishment or participation in a complaint procedure

Which potential parties have access to the complaint procedure?

- Internal employees
- Communities close to their own sites
- Supplier employees
- External stakeholders such as NGOs, trade unions, etc

How will access to the complaint procedure be ensured for the different groups of potential participants?

- Publicly accessible rules of procedure in text form
- Information on accessibility
- Information on responsibility
- Information on the process
- All information is clear and understandable

Publicly accessible rules of procedure in text form

Optional: Describe.

-

Information on accessibility

Optional: Describe.

-

Information on responsibility

Optional: Describe.

-

Information on the process

Optional: Describe.

-

All information is clear and understandable

Optional: Describe.

-

D. Complaint procedure

D1. Establishment or participation in a complaint procedure

Were the rules of procedure for the reporting period publicly available?

File uploaded

On the rules of procedure:

<https://ag.1signal.net/?lang=en>

D. Complaint procedure

D2. Complaint procedure requirements

Identify the person(s) responsible for the procedure and their position(s).

The person responsible for the system, who is appointed by the CEO after approval by the Executive Committee, is the Group Ethics and Compliance Officer (hereinafter GECO). In addition, a deputy speaker will be appointed to represent the GECO in the event of his or her absence or inability to attend. Other authorized presenters will be appointed to handle specific types of reports related either to a specific category or to a specific legal entity. The reporter can submit his or her concerns to GECO through the dedicated website <https://ag.1signal.net/?lang=en>

The GECO ensures that ArianeGroup companies comply with national and international regulations on data protection, anti-corruption and social responsibility, including non-binding agreements, memoranda of understanding or guidelines. The GECO develops and implements E&C (ethics and compliance) strategies and prevention plans, supports, advises and makes recommendations to employees and management regarding ethics and compliance risk management and strategy, and makes inspections.

The GECO acts as internal and external representative of ArianeGroup in regulatory matters, ensures relations with the parent companies and provides the interface with national authorities such as the Data Protection Authority and the French Anti-Corruption Authority (AFA). Tasks include developing governance principles, prevention plans, guidelines, standards and appropriate procedures and instruments, preparation of business risk maps and making risk assessments for companies and operations. The GECO promotes the E&C and speak-up culture (Trust) throughout ArianeGroup, communicates internally and externally, establishes and motivates an E&C network with Focal Points in the subsidiaries, organizes inspections to verify the effectiveness and stability of prevention plans and procedures, benchmarks, develops corrective actions and improvement plans, designs and conducts employee training, and reports annually to the ArianeGroup Executive Committee and Board.

It is confirmed that the criteria set forth in Section 8 (3) LkSG for the persons responsible are fulfilled, that is to say, that those persons offer the guarantee of impartial action, are independent and not bound by instructions and are bound by an obligation to confidentiality

Confirmed

D. Complaint procedure

D2. Complaint procedure requirements

It is confirmed that arrangements have been made for the reporting period to protect potential stakeholders from being penalized or punished as a result of a complaint.

Confirmed

Describe the arrangements made, in particular how the complaint procedure ensures confidentiality of the identity of whistleblowers.

Authorized representatives and people handling reports are subject to strict confidentiality. The information enabling the reporting person to be identified may not be disclosed without his consent, except to the judicial authorities. If the refusal makes it impossible to process the report, the reporter is informed.

The identity of the reporter, the subject of the alert and the identity of the persons concerned may only be communicated by the GECCO, the Deputy Speaker, the Deputy Speakers concerned or another member of the investigation team ("authorized staff") in order to process the report or take appropriate action. These persons are bound by a strict obligation to confidentiality.

Special measures will be taken to ensure confidentiality in the handling of the notice (written reminder of the confidentiality rules and possible sanctions in case of non-compliance, secure emails, etc.). In particular, access to the information shall be organized on a "need-to-know" basis, using a personal login and password, a two-factor authentication (2FA) login to the platform and a unique ID for each connection. Each authorized contributor agrees to comply with the internal procedure and to maintain confidentiality, neutrality and impartiality. If processing a notice requires the assistance of third parties, they must contractually agree not to use personal data for purposes other than those for which they were collected, to ensure their confidentiality and to destroy or return such personal data after processing has been completed.

Any information disclosed in connection with processing the alert shall be considered confidential and shall be protected by anyone who has access to that information. The identity of the person reporting the information and, where applicable, of the person(s) concerned by the information may be communicated to the judicial authority at its request. Subject to the document retention requirements set forth in local legislation, the elements of the notice shall be deleted or archived within a maximum of two months after the notice is fully processed. Where processing a notice results in disciplinary or judicial proceedings, the information relating to that notice may be stored for the duration of the proceedings until the limitation period for the right of appeal against that decision has expired.

Describe what arrangements have been made, in particular what further measures will be taken to protect whistleblowers.

A reporter who has made a report in good faith and without any interest on his or her part must not be excluded from a recruitment procedure, from access to a traineeship or from vocational training.

Any direct or indirect retaliation against an employee who has filed a report will not be tolerated, as will be guaranteed by a written internal procedure.

A person who considers himself or herself subject to retaliation for filing a report or other processing may contact the GECO. Any retaliation or threats by employees may result in disciplinary action by the company, subject to local regulations.

D. Complaint procedure

D3. Implementation of the complaint procedure

Has any information been received on the complaint procedure during the reporting period?

No

E. Review of risk management

Is there a process to cross-check the adequacy and effectiveness of risk management?

In which subsequent areas of risk management are adequacy and effectiveness assessed?

- Resources & expertise
- Risk analysis and prioritization process
- Preventative measures
- Complaint procedure

Describe how this assessment is done for each area and the results achieved, in particular with regard to the prioritized risks.

Within the General Secretariat, the Sustainability and Corporate Support team is responsible for coordinating sustainability issues at group level and reports every two months to the Sustainability Steering Committee, which is the most important decision-making body for sustainability issues at ArianeGroup including its subsidiaries.

ArianeGroup has formed cross-functional teams within all affected functions to develop and implement a harmonized, comprehensive sustainable management strategy. These various teams and functions also monitor and report on compliance with environmental and human rights aspects within their own area of responsibility and in cooperation with others through special networks or in the context of their daily work. They also implement appropriate preventative measures if necessary. Appropriate resources and expertise are thus available.

The effectiveness of the risk analysis shall be reviewed once a year and as the situation demands. In the first year of implementation of LkSG, the overall effectiveness of the risk analysis was reviewed by the central LkSG core team. One focus in the first year was to ensure the implementation of LkSG in the existing risk analysis. Basically, the existing risk management system is set up effectively. Where potential for improvement was identified, appropriate measures were taken (e.g. with regard to LkSG more specific analyses).

The complaint procedure is under the authority of the Compliance Department of ArianeGroup and is continuously reviewed by the latter and adapted accordingly.

E. Review of risk management

Are there processes or measures in place to ensure that the establishment and implementation of risk management takes due account of the interests of your employees, those within your supply chains and those who may otherwise be directly affected by the economic activities of your company or by the economic activities of a company in your supply chains in a protected legal position?

In which areas of risk management are processes or measures in place to take into account the interests of those potentially affected?

- Preventative measures
- Complaint procedure

Describe the processes or measures for the respective area of risk management.

In the company's own business unit, the interests of employees are generally protected, inter alia, by statutory regulations and collective agreements and/or company agreements. There are also various communication formats for dialogue. Employees are encouraged to report any situation or behaviour that does not comply with applicable health, safety, environmental and human rights regulations and obligations. Works meetings with the employees at the respective sites are held, as well as an exchange through joint committees with the General Works Council. In addition, anonymized employee surveys are regularly conducted. Potentially affected persons can use internal communication channels such as the works council or the human resources department as well as the complaint procedure (whistleblower system).

The complaint procedure, which is available for employees as well as for external parties, such as employees of suppliers, ensures that the interests of those concerned are fully identified and taken into account. Protection of whistleblowers against discrimination or punishment on the basis of reports made is an important part of our complaint procedure (see D2).