

HZB Policy Statement

relating to the Supply Chain Due Diligence Act (LkSG)

At Helmholtz-Zentrum Berlin (HZB), we combine cutting-edge research with the operation of complex modern infrastructures, which we also make available to the national and international research community and industry. As an institution for research in the public interest and as a publicly funded company, we recognise our social responsibility and the example we must set. We bear responsibility towards society, our funders, our employees, our business partners and our cooperation partners, as well as towards the environment.

1. Strategy for human and environmental rights

Responsible, sustainable and lawful behaviour is integral to the value system of HZB. In particular, this includes properly upholding our obligations to exercise due diligence with regard to human rights and the environment as envisaged in the LkSG. The following principles guide our actions:

- 1. We do not tolerate child labour, and we reject any form of slavery or forced labour (§ 2 para. 2 no. 1 to 4 LkSG).
- 2. We consistently abide by the applicable labour protection laws in order to ensure the safety of our employees and visiting guests with appropriate safeguard measures at our locations (§ 2 para. 2 no. 5 LkSG).
- 3. We recognise the freedom of association of all employees to form employee representative bodies as well as their right to collective bargaining to determine working conditions (§ 2 para. 2 no. 6 LkSG).
- 4. We ensure equal treatment of all employees regardless of national or ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, provided that the requirements of the job do not conflict with this (§ 2 para. 2 no. 7 LkSG).
- 5. We consider the payment of an appropriate wage an imperative (§ 2 para. 2 no. 8 LkSG).
- 6. We actively oppose the destruction of the natural basis of life by environmental pollution, and align our actions accordingly (§ 2 para. 2 no. 9 LkSG).
- 7. We condemn the unlawful violation of land rights, and reject the commissioning or use of private or public security forces that, due to a lack of instruction or control, could infringe a protected legal interest (§ 2 para. 2 no. 10 LkSG).
- 8. We expressly reject the employ of security forces that use excessive force (§2 para. 2 no. 11 LkSG).
- 9. We will not tolerate any action or inaction that is directly capable of impairing an aforementioned protected legal interest in a particularly serious manner and which is obviously unlawful based on a reasonable assessment of all circumstances in question (§2 para. 2 no. 12 LkSG).
- 10. We actively advocate compliance with prohibitions aiming to avoid environmental risks. This includes the prohibited production, use and/or disposal of mercury (Minamata Convention), the prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs) as well as the environmentally unsound handling of waste containing POPs and the prohibited import and export of hazardous waste within the scope of the Basel Convention (§ 2 para. 3 LkSG).

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11. Expectations

We expect our employees and suppliers in the supply chain in the sense of the LkSG to provide HZB with the best possible support in preventing the risks to human rights and the environment described in the Act and, if necessary, eliminating or mitigating these risks.

12. Risk analysis

With regard to the human and environmental rights protected by the LkSG, and in line the Act, our risk analysis is carried out regularly and as required, and this policy statement is likewise subject to regular review and updating.

The international sourcing of raw materials and products is a necessary prerequisite for conducting research at HZB. The concrete risks exist in the high complexity and diversity of the global supply chains.

In addition, the technologies involved in our research activities can involve a risk under certain circumstances. We will prioritise those risks that carry greater weight in terms of severity, reversibility and probability, and over which we have an influence.

13. Procedure for ensuring the appropriate safeguarding

In order to uphold the company rules and to safeguard the rights and obligations of employees, we have an established management system that is based on regulations and procedural instructions and which clearly defines the management of the research centre's organisational units. Internal controls, regulations and compliance requirements safeguard the work processes.

We furthermore have a tried and tested risk management system at our disposal. In each business area and in the supply chain, risk analyses are carried out annually and ad hoc in accordance with the LkSG. Based on the results of these risk analyses, appropriately weighted and prioritised risks are assigned preventive and corrective measures in accordance with the Act, the effectiveness of which is reviewed annually and on an ad hoc basis and updated as necessary. We also include indirect suppliers in the aforementioned analyses and measures, especially if we have factual indications that an indirect supplier could possibly have violated a human rights or environmental obligation (substantiated knowledge).

HZB has set up an internal and an external contact point for initiating a complaints procedure. These contact points can be found in the rules of procedure for the complaints procedure. We will document and report on our fulfilment of due diligence obligations in accordance with the law.

This policy statement and the measures are updated regularly.

Berlin, 21 February 2024

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