

Policy on Working Conditions and Human Rights

This Code defines and explains how sbp | sandmair boehler partner GmbH & Co. KG promotes and implements working conditions and human rights in its business operations.

We are committed to respecting internationally recognized human rights and advocate for these rights to apply equally to all individuals, regardless of gender, age, origin, political or religious beliefs.

We create fair working conditions for our employees that support and promote them in their roles. Our managers actively demonstrate to their teams that this working policy is an integral part of our company. As such, it is binding for everyone and contributes to the success of the company.

I. Working Conditions

1. Child Labor and Young Workers

We do not tolerate child labor in any of our business areas.

The policy on handling child labor is based on:

- The UN Convention on the Rights of the Child
- The Conventions No. 138 (Minimum Age for Employment) and No. 182 (Elimination of Child Labor) adopted by the International Labour Organization (ILO)
- The Principles on Children's Rights and Business

sbp | sandmair boehler partner GmbH & Co. KG must ensure that young workers under 18 years of age:

- Do not work overtime
- Do not work night shifts
- Are protected from working conditions that could harm their health, safety, morals, or development

2. Compensation and Social Benefits

The compensation paid by sbp | sandmair boehler partner GmbH & Co. KG for a standard workweek is at least equal to the legally mandated and guaranteed

minimum wage.

As we are not bound by collective labor agreements, we base compensation, social, and/or additional benefits on both industry standards and local practices.

This ensures that our employees have a reasonable standard of living.

3. Working Hours

We ensure that working hours comply with at least the legal requirements or the minimum standards applicable in the respective country.

Work hours and break arrangements take both operational and individual needs into account and are based on occupational science criteria, including physical and psychological stress factors.

We promote a balance between work and private life by offering various work-time models, remote work, compensatory time off, or leaves of absence.

4. Ethical Recruitment

We guarantee fair treatment of applicants, employees, and anyone who interacts with S&B.

We ensure a transparent recruitment and hiring process and equal treatment of all candidates.

Respect and honesty form the basis of every stage of the recruitment process, particularly in candidate selection and conducting interviews.

5. Occupational Health and Safety

The safety and well-being of our employees are essential to our economic success.

We therefore place great emphasis on compliance with our occupational health and safety policy and strive to promote the physical and mental well-being of our staff in a sustainable way.

To this end, we provide a healthy and hazard-free work environment by complying with workplace safety laws and ensuring that appropriate procedures

and protective measures are in place.

Regular training for our safety officers and employees is a fixed component of occupational health and safety.

6. Qualification

sbp | sandmair boehler partner GmbH & Co. KG is committed to long-term employment and supports the development of individual skills.

Employees are assigned according to their qualifications, previous experience, and competencies.

Regular training offerings help employees perform their tasks, prevent overload, and enhance equal opportunity for all.

In addition to professional qualifications, we place special emphasis on the personal development of our employees.

7. Freedom of Association

Our employees are free to peacefully and lawfully establish, join, assemble, and associate with trade unions or employee representations at all levels to protect their interests or individual rights.

II. Human Rights

We are guided by the principles of the United Nations and respect the personal rights of our employees and business partners.

Our collaboration at all levels is shaped by the principles of economic, ecological, and social responsibility.

Mutual respect, trust, transparency, appreciation, accountability, and openness are fundamental prerequisites in our company and are exemplified by our management.

1. Harassment and Non-Discrimination

sbp | sandmair boehler partner GmbH & Co. KG strongly rejects any form of harassment and discrimination.

No one may be discriminated against or disadvantaged on the basis of nationality, gender, marital status, ethnic origin, age, disability, religion, sexual orientation, or any other grounds prohibited by law.

The essential criteria for the selection and development of our employees are their skills and qualifications. We do not tolerate violence, harassment at work, bullying, or discrimination, and such behaviors will be prosecuted within the limits of legal possibilities.

We promote an open and inclusive corporate culture.

2. Women's Rights

sbp | sandmair boehler partner GmbH & Co. KG explicitly emphasizes that all human rights also apply to women.

To enable women to fully exercise these rights, women and girls should receive political, civil, economic, social, and cultural support.

To achieve real everyday equality between men and women, existing barriers must be removed.

This is particularly urgent in the context of violence against women and unequal educational opportunities for girls.

Overcoming traditional gender roles is an important corporate goal, as is promoting development opportunities for all female employees.

3. Diversity, Equality, and Inclusion

sbp | sandmair boehler partner GmbH & Co. KG is committed to diversity, equality, and inclusion.

This applies both to the non-discrimination of all individuals and to the appreciation and inclusion of diverse perspectives.

We value different points of view and see only benefits in diversity.

To ensure diversity, equality and inclusion are of high priority for us.

We aim to create pathways that demonstrate progress and remove barriers.

We are committed to actively promoting and establishing diversity, equality, and inclusion as standard within our company.

4. Minority Rights

Building on our commitment to non-discrimination and the promotion of women's rights, diversity, equality, and inclusion, we protect the rights of minorities.

We view the right to an independent identity and the right to effective equality as foundational.

Another key measure in protecting minorities is intercultural dialogue, which is based on tolerance and openness.

5. Slavery and Human Trafficking

sbp | sandmair boehler partner GmbH & Co. KG rejects the use of forced and compulsory labor as well as human trafficking.

Any form of modern slavery, debt bondage, or involuntary prison labor is strictly prohibited.

Our employment relationships are based solely on free will and may be terminated by our employees at any time in accordance with legal notice periods.

6. Privacy and Protection of Confidential Information

We use and protect all information in accordance with the General Data Protection Regulation (GDPR).

Data is collected, processed, secured, and deleted professionally according to its classification.

We expect our employees and business partners not to disclose or share confidential information without authorization.

Each individual has the right to access, correct, block, or delete their personal data in accordance with legal requirements.

Regular training by internal and external data protection officers ensures greater awareness in the handling of sensitive data.

7. Transparent Business Relationships

The general terms and conditions of sbp | sandmair boehler partner GmbH & Co. KG oblige suppliers to respect human rights and, in particular, to observe the ILO Declaration on Fundamental Principles and Rights at Work.

We select our business partners carefully and expect them to comply with the law regarding working conditions and strictly uphold human rights.

Friedberg, 01 February 2023



Michael Boehler (Managing Director)



Martin Weber (Managing Director)