

HENSOLDT Group

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# Human Rights Policy

## **I. Scope**

This policy applies with immediate effect to HENSOLDT AG and all its subsidiaries and participations, in which HENSOLDT AG directly or indirectly holds > 50%.

## **II. Purpose**

We at HENSOLDT exist to pioneer technologies and human potential that promote the protection of all kind of species worldwide. Our activities shall serve the higher purpose of securing the freedom and future of our planet, our nature, and our lives.

Our company is positioned in the field of sensor solutions for defence and security applications. As a technology leader, HENSOLDT also continuously expands its Cyber portfolio and develops new products to combat a wide range of threats based on innovative approaches to data management, robotics and cybersecurity. HENSOLDT helps to avert threats to armed forces and society and to protect our customers from them.

The purpose of this policy is to confirm our strong commitment towards the respect of human rights in the conduct of all our business activities under full or direct control of the company. It shall further serve to implement an efficient mechanism to ensure the highest standard level of human rights protection.

Furthermore, this policy shall demonstrate our approach to identify all types of behaviour that may involve a violation of human rights and to establish oversight, due diligence and training mechanisms, as well as communication and grievance mechanisms to promote and protect human rights involving all relevant sectors of the company.

## **III. Our Commitment**

We are committed to maintaining a strong company culture and upholding our fundamental tradition of integrity. This entails a deep respect for each individual as well as its human rights.

We ensure high standards of labour conditions and respectful conduct towards one another. The well-being of all people involved is key to us.

Human rights standards hereby refer to the rights set out in the Universal Declaration for Human Rights by the United Nations (UN), the International Labour Organization's Declaration on Fundamental Principles and Rights at Work (ILO), the European Convention for the Protection of Human Rights and Fundamental Freedoms (ECHR) and recognized regional and national systems to enhance the promotion and protection of human rights.

Since 2020, we are signatory of the UN Global Compact and thereby fully committed to the principles regarding the respect of human rights.

For further information, please refer to our sustainability report and Standards of Business Conduct.

#### **IV. Our Human Rights Programme**

##### **Our People**

- **People Development, Training, and Education:** We encourage our people to grow personally and professionally and pave the way for pioneers and inventive spirits. We embrace joyful and individual learning experiences throughout all stages of life.
- **Equal Opportunities:** We secure equal opportunities and value each individual because uniqueness in an inclusive work environment nurtures creativity, ingenuity, and high performance.
- **HENSOLDT Group is a transnational organization and considers cultural diversity as one of its greatest strengths.** Additionally, we support diversity in race, gender, religion, national origin, political opinion, sexual orientation, social origins, age and physical or mental character. Therefore, discrimination against protected personal characteristics shall not be tolerated. Any form of harassment in the workplace, whether physical, visual or verbal is strictly prohibited.
- **Freedom of Association and Collective Bargaining:** We respect our employees' rights to join or build a labour union. Moreover, we are committed to participate in dialogues and strongly engage with such councils. Where legally permissible, we

see collective bargaining agreements as foundation for our labour conditions and contracts.

- **Health & Safety:** We ensure high standards in working conditions and always treat each other with respect. The well-being of our employees is our top priority. We protect people and the company through health and safety measures as well as ethics and compliance processes and regulations. We must familiarize ourselves with and follow all external health and safety laws and internal health and safety policies and procedures. We also recognize our responsibility to uphold health and safety standards across its extended enterprise with suppliers, business partners and contractors.
- **Work-Life-Balance:** We have a range of programmes and policies in place, to combine personal and work life and ensure a healthy balance.
- **Modern Slavery:** We prohibit any kind of modern slavery, human trafficking, forced or child labour. For further information please refer to our modern slavery act statement.
- **Local Communities:** In an effort to foster and strengthen relationships with communities near our locations, we support local organizations around the globe and also encourage our employees to volunteer.

## Our Supply Chain

- We protect the environment, ensure high standards in working conditions and always treat each other with respect along the value chain. We also expect our business partners to recognize their environmental and social responsibility and to follow certain basic ethical principals in their operations.
- Our Supplier Code of Conduct formulates HENSOLDT's expectations of its suppliers and the entire supply chain. Recognizing differences in cultures and legal requirements, all business must be conducted in a manner consistent with this Code, regardless of the location of the supplier. The content of the Code is based on the Aerospace and Defence Industry's International Forum on Business Ethical Conduct (IFBEC).

- Relevant suppliers are required to submit a comprehensive self-disclosure. In the first step, suppliers with high sales and importance were considered. The geographical distribution did not play a role in the prioritization and thus results from the procurement context of HENSOLDT in the high-tech defence and security industry.
- In addition, an adverse media review will be conducted with the aim of including all relevant inventory suppliers in such continuous monitoring process.
- The supplier creation and pre-qualification process has been adapted to ensure ESG screening early in the initiation of new business relationships.
- The supplier assessment is based on a detailed survey with up to 25 different topic-related questionnaires. The core topics are environmental protection, human and labour rights, occupational safety, anti-corruption and anti-bribery, and responsibility in the supply chain. In addition, all suppliers must regularly provide the required certificates. A final risk analysis takes place on the basis of this data.

## Our Business and Products

- Our products detect threats, guarantee security, and also protect all those, who work every day to protect us. We strongly believe that security builds the foundation for a sustainable future. We achieve our goals thanks to continuous improvement in security, consistent materials management and the promotion of innovation.
- HENSOLDT has an obligation to ensure that its products are able to perform their intended purposes without causing unacceptable risk of harm to persons, the environment or damage to property over the product life cycle. This is both an ethical and legal responsibility to which HENSOLDT is committed at the highest level. The 'Office of System Safety' (OSS) is tasked with the establishment and maintenance of the HENSOLDT governance related to ensuring System Safety and Environmental Compliance.

- In addition, we fully recognize the human right to a safe, clean, healthy and sustainable environment. Therefore, we use our technologies to protect our nature and contribute to the development of our society. In several use cases, our technology has been able to protect endangered species. Products developed for education and safety can furthermore also be used for species protection.
- By means of internal guidelines, processes, and its own export control organization, HENSOLDT ensures that HENSOLDT's products are only exported in compliance with all applicable national, European and international export regulations. So-called end-use declarations ensure that HENSOLDT products are only passed on to recipients approved by the respective authorities. Through our strict compliance with export regulations, we take responsibility for the use of our products.
- Compliance matters to all of us. HENSOLDT stands for integrity and for compliance with the rules and values on which we base proper corporate governance. Our Compliance Programme seeks to ensure that our business practices conform to applicable laws, regulations and ethical business principles, as well as developing a culture of integrity.
- We have developed and implemented a comprehensive Compliance Programme that we have designed with specific regard to our individual risk profile taking into account, for example, our industry, our product portfolio, our international sales into countries with increased corruption risks, and the background of our customers.
- As part of our comprehensive Compliance Programme, we have implemented monitoring and control activities designed to ensure that our Compliance standards and requirements are fulfilled in day-to-day operations. At the same time, we also regularly conduct a risk analysis to refresh our risk assessments and to identify areas where we could improve our Compliance mechanisms.
- In cases where severe risks have been identified, an informed decision on the business opportunity is required. HENSOLDT is willing to decline a business opportunity, even if legally permissible, in case it involves an imminent risk of affecting human rights.

## Our Planet and Resources

- We are committed to reducing the impact of our operations on the environment, conserving our natural resources, and also developing solutions that help protect our environment.
- For further information on our HSE (Health, Safety & Environment) organization, our initiatives, and ambitions, please refer to our annual sustainability report.

## V. Oversight, Trainings, and Communications

### Oversight

- Our Standards of Business Conduct provides guidance for all our employees on their behaviour.
- Our business compliance and export compliance officers are in place to guide our business entities and colleagues worldwide.
- Our General Counsel has been appointed as Human Rights Officer, supported by several functions like ESG, procurement, HR, and Compliance. The role of the Human Rights Officer contains to be the main point of contact for all human rights matters, develop respective guidelines and policies as well as monitor the implementation of such processes. Furthermore, its role is to provide consultation and participate in final decision process with respect to major-risk cases.

### Trainings

- We offer a comprehensive and diverse training academy covering topics like sustainability, health and safety, environment, equal opportunities, and many more.
- Our trainings programme also contains a mandatory training on our Standards of Business Conduct for all employees as well as various other compliance trainings.
- In addition, we continuously work to expand our trainings portfolio.

## Communications

- Whistleblowing Mechanism: We fundamentally promote open communication. The first point of contact for this is the respective manager, the responsible HR department or the Compliance department. Hensoldt also provides an anonymous reporting mechanism, thus, if employees do not wish to disclose their identity, we also accept anonymous questions or report.
- We follow up on all reports and do not tolerate any discrimination against persons who reports to us. This also applies if, upon closer examination, the information does not prove to be justified or substantiated, unless such information was provided in a blatantly defamatory manner.
- Every employee is required to keep his or her eyes open, to address any breaches of the rules or dishonesty, and to ask for advice if there is any uncertainty about his or her own behaviour or that of his or her colleagues.
- Our goal is to identify potential weaknesses at an early stage so that we can make improvements in good time. In the end, it is irrelevant how and in what form the relevant information reaches us. Even a question can reveal a need for improvement.
- Reporting: In our group-wide sustainability report, we demonstrate our progress and ambitions on all ESG (Environmental, Social, and Governance) matters on an annual basis.



## VI. Supporting Documents

- UK Modern Slavery Act Statement
- Annual Report and Group Sustainability Report
- Anti-Corruption Policy
- Standards of Business Conduct
- Supplier Code of Conduct
- Sponsorship and Donations Policy

This policy was approved by the Chairman of the HENSOLDT AG as well as the Board of Management and applies to those companies.