

# Statement of Principles, Code of Conduct & Corporate Policies

by Stuttgarter Gebäudereinigung Venter GmbH & Co.KG





### The whistleblower system at SGR

Information and violations of our mission statement, code of conduct, and policies can be reported by employees at any time through the confidential whistleblower system of SGR.

External parties and business partners also have the opportunity to report violations through the appropriate reporting channels if they have specific indications of misconduct.

Incoming reports will be reviewed and diligently pursued. The principle of a fair process to protect whistleblowers, affected individuals, and involved parties will be upheld.

Discrimination against individuals who contribute to promoting proper behavior at SGR will not be tolerated. The presumption of innocence applies to affected individuals until a violation is proven.

Reports will be handled with the utmost confidentiality.

#### To report a violation:

Submit a report of a compliance violation to the Compliance Department of SGR.

sgr.hinweisgeberschutz@gmail.com

or report the violation by phone under

0049 15154167813





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# Statement of Principles on Respect for Human Rights and Environmental Protection by Stuttgarter Gebäudereinigung Venter GmbH & Co. KG

#### 1. Commitment of Management to Respect for Human Rights and Environmental Protection:

The right of everyone to have their human rights respected and safeguarded, as well as acting in an environmentally compliant manner, are indispensable components of responsible corporate governance for us at the Stuttgarter Gebäudereinigung Venter GmbH & Co. KG.

Therefore, we make a clear commitment to the respect of human rights and environmental protection.

In our statement of principles, we define the essential requirements for our employees and our direct suppliers regarding compliance with human rights and environmental protection, and describe the responsibilities and measures to fulfill these requirements to the best of our ability.

This statement of principles supplements and clarifies the principles of our Code of Conduct regarding the protection of human rights and the environment, and obligates us as well as our suppliers to appropriate and lawful behavior.

Therefore, we expect both ourselves and our suppliers to commit to social responsibility in accordance with this statement of principles and to actively implement the described measures.

Renate Venter-Oepke



#### 2. Our Responsibility

Our statement of principles is essentially in alignment with the Universal Declaration of Human Rights of the United Nations (UN), the 10 Principles of the UN Global Compact, and the 5 Principles of the International Labour Organization (ILO).

#### Five core principles define the self-conception and actions of the ILO:

- Freedom of association and the right to collective bargaining
- Elimination of forced labor
- Abolition of child labor
- Elimination of discrimination in employment and occupation
- Workplace safety and health

#### The ten principles of the Global Compact:

- 1. Businesses should support and respect the protection of internationally proclaimed human rights.
- 2. Businesses should make sure that they are not complicit in human rights abuses.
- 3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
- 4. Businesses should support the elimination of all forms of forced and compulsory labor.
- 5. Businesses should support the effective abolition of child labor.
- 6. Businesses should support the elimination of discrimination in respect of employment and occupation.
- 7. Businesses should support a precautionary approach to environmental challenges.
- 8. Businesses should undertake initiatives to promote greater environmental responsibility.
- 9. Businesses should encourage the development and diffusion of environmentally friendly technologies.
- 10. Businesses should work against corruption in all its forms, including extortion and bribery.

#### 3. Fundamental Human Rights

In our business operations, we focus on the following fundamental human rights:

- Ensuring occupational safety and health protection
- Ensuring proper compensation
- The right to respect and equal opportunity
- Recognition of the freedom of association
- Protection from child and forced labor

We expect the respect of human rights within our own business as well as in the business operations of our suppliers. Therefore, the commitment of our suppliers to their social responsibility is indispensable for sustainable contractual relationships.



#### 4. Risk Management

To protect human rights and the environment, we have integrated a risk management system that includes risk analysis, preventive and remedial measures, documentation and reporting, as well as a grievance procedure.

We implement the resulting due diligence obligations to an appropriate extent, aiming to identify, prevent, or minimize human rights and environmental protection-related risks in our business operations and those of our direct suppliers, or to terminate the violation of human rights and environmental protection obligations.

Our risk management system is subject to repeated review and continuous development. Its contents are communicated to all relevant groups. Responsibility for effective implementation lies with management, the respective specialist departments, and our suppliers. To support and monitor these efforts, we have appointed Mr. Markus Andrade as the Human Rights Officer, who works closely with management and the specialist departments in his role.

The risk analysis of our own business area identified a low rating for human rights and environmental protection risks. We have identified and prioritized safety and health risks, discrimination in the workplace, and withholding of adequate wage payments as risks. Through clearly regulated internal responsibilities and control processes, an appropriate procurement strategy, and regular and mandatory training measures, we continuously keep these risks low.

In the risk analysis of our direct suppliers' business areas, we differentiate between goods suppliers and subcontractors. The analysis takes into account country- and industry-specific risks and identified a low rating for goods suppliers and a medium rating for subcontractors. We have identified and prioritized safety and health risks, discrimination in the workplace, and withholding of adequate wage payments as risks.

As appropriate preventive measures, we conduct annual integrity checks in the form of self-disclosures from our suppliers before contract conclusion and in ongoing contractual relationships. The information provided is reviewed for accuracy and completeness by the respective specialist departments.

In our own business area, we take immediate measures to prevent or terminate violations of human rights and environmental protection-related risks. In the event of concrete indications of human rights and environmental protection-related risks in our suppliers' business areas, we expect their full cooperation in clarifying and ending potential violations. We reserve the right to take legal action up to and including the termination of contractual relationships.

Everyone is encouraged to report known or suspected violations of the human rights and environmental standards described in this statement through the established complaint procedure, our whistleblower system

(via e-mail at sgr.hinweisgeberschutz@gmail.com or by phone at 0049 151 54 16 78 13).

As part of our business report, we report annually on the results of our risk assessment and our measures.

Renate Venter-Oepke



#### **Code of Conduct for Employees and Corporate Policies**

#### 1. Integrity and Ethical Behavior:

- a. All employees are required to act with integrity and ethical behavior both within and outside the company.
- b. We strictly reject bribery, corruption, fraud, and other illegal or unethical practices.

#### 2. Confidentiality and Data Protection:

- a. Employees must protect confidential information and maintain the confidentiality of business secrets.
- b. We respect the privacy and data protection of our customers, business partners, and employees.

#### 3. Conflict-Free and Avoidance of Conflicts of Interest:

- a. Employees must avoid conflicts between personal interests and company interests and disclose any potential conflicts of interest.
- b. We act in the best interest of the company and avoid actions that could compromise our reputation or independence.

#### 4. Equal Opportunity and Non-Discrimination:

- a. We treat all employees fairly and respectfully, regardless of gender, race, religion, age, sexual orientation, or other protected characteristics.
- b. Discrimination, bullying, and harassment are not tolerated.

#### 5. Working Conditions and Health Protection:

- a. We provide safe and healthy working conditions that comply with applicable laws and regulations.
- b. Employees are required to follow applicable safety guidelines and procedures and contribute to creating a safe working environment.

#### 6. Environmental Protection:

- a. We promote responsible use of resources, energy efficiency, and environmental protection in all corporate activities.
- b. Employees are encouraged to practice environmentally conscious behavior and contribute to reducing our environmental impact.

#### 7. Information Security and IT Usage:

- a. We protect company information, IT systems, and data from unauthorized access, misuse, or theft.
- b. The use of the company's IT resources must comply with applicable policies and regulations.

#### 8. Social Responsibility and Community:

- a. We support social responsibility and engage in community activities through voluntary efforts and donations.
- b. Employees are encouraged to actively participate in social initiatives and positively influence the company's reputation.



#### 9. Compliance with Laws and Regulations:

- a. All employees are required to comply with applicable laws, regulations, and company policies.
- b. In case of uncertainties or questions regarding legal matters, it is important to consult the appropriate authority in a timely manner.

#### 10. Reporting Violations:

- a. Employees are encouraged to report violations of the code of conduct or applicable laws without fear of retaliation.
- b. A transparent and confidential mechanism for reporting violations is provided (Whistleblower Officer).

All employees are required to understand and comply with this code of conduct and to contribute to its adherence through their own behavior. Each individual is responsible for embodying the company values and fostering a positive corporate culture.

#### Anti-Bribery and Anti-Corruption Policy

#### Objective:

Our company is committed to upholding the highest ethical standards and combating bribery and corruption in all business activities. This Anti-Bribery and Anti-Corruption policy aims to ensure that our company and all employees act with integrity to maintain fair and transparent business operations.

#### 1. Definition of Bribery and Corruption:

- a. Bribery is defined as the offering, giving, receiving, or soliciting of improper advantages, whether in money, gifts, services, or other forms, to gain undue influence or personal benefit.
- b. Corruption includes any actions that could compromise the integrity, credibility, or impartiality of the company, including abuse of position, misconduct, embezzlement, or illegal activities.

#### 2. Prohibition of Bribery and Corruption:

- a. The company prohibits any form of bribery and corruption in relation to business activities, whether in the public or private sector.
- b. Employees must not accept, offer, promise, or solicit bribes or other improper advantages, either directly or indirectly.

#### 3. Compliance with Laws and Regulations:

- a. The company commits to complying with all applicable laws, regulations, and international standards related to anti-bribery and anti-corruption.
- b. Employees should be informed about these laws and regulations and strictly adhere to them.

#### 4. Transparency and Record-Keeping:

- a. All business activities and transactions must be accurately and correctly documented to ensure transparency and accountability.
- b. Any irregularities or suspicious activities must be reported immediately to a supervisor.



#### 5. Reporting Violations:

- a. Employees are encouraged to report any potential violations of this policy or suspicions of bribery or corruption.
- b. The company ensures that such reports are treated confidentially and that no retaliatory actions are taken against whistleblowers.
- c. Whistleblower Officer

#### 6. Consequences of Violations:

a. Appropriate disciplinary measures will be taken in the event of violations of this policy, including employment-related consequences and, if applicable, criminal prosecution.

This Anti-Bribery and Anti-Corruption policy is designed to protect the integrity and reputation of our company. All employees are responsible for understanding, respecting, and implementing the rules and principles of this policy in their daily work.

#### Working Hours Policy

#### Objective:

Our company places great importance on the well-being and job satisfaction of our employees. This Working Hours policy is designed to ensure that appropriate working conditions are provided to promote a healthy work-life balance and enhance the productivity and engagement of our workforce.

#### 1. Working Time Agreements:

- a. Working hours are individually agreed upon between the employer and the employee and documented in a written employment contract or agreement.
- b. The agreed weekly working time is typically 39 hours.
- c. Flexible working models, such as flextime or part-time employment, are offered where possible, provided that operational requirements allow.
- d. Overtime is permitted only by prior arrangement and in accordance with applicable labor laws.

#### 2. Breaks and Rest Periods:

- a. Employees are entitled to appropriate breaks and rest periods during their working hours.
- b. A daily break of 60 minutes is granted and should be taken during the workday, in accordance with the collective bargaining agreement.
- c. The legally prescribed rest periods between working days and before/after overtime are respected.

#### 3. Vacation Time:

- a. Employees are entitled to paid vacation in accordance with applicable labor laws and individual agreements.
- b. Vacation days should be requested and approved in a timely manner to consider operational needs. The vacation should be taken and not paid out.
- c. Approved vacation should enable employees to rest from work and pursue personal interests.

These guidelines ensure that employees have a clear understanding of their rights and responsibilities regarding working hours, breaks, and vacation, thus contributing to a positive and productive work environment.



#### 4. Flexibility and Remote Work:

- a. In consultation with supervisors, remote work or flexible work arrangements may be allowed to accommodate employees' individual needs and promote a healthy work-life balance.
- b. For remote work, agreed-upon work hour regulations still apply, and employees must ensure that expected work goals are met.

#### 5. Time Monitoring:

- a. Working hours may be electronically recorded to ensure accurate compensation and adherence to work hour regulations.
- b. Employees are encouraged to accurately record their work hours and report any irregularities or deviations.

#### 6. Communication and Clarification:

- a. Employees are encouraged to discuss questions or concerns regarding their work hours or the work hour policy with their supervisors or the HR department.
- b. The company will actively listen to feedback and suggestions for improving the work hour policy and make adjustments as feasible within ongoing operations.

This work hour policy serves as a framework for addressing work hour issues within the company. It is important for all employees to familiarize themselves with and adhere to these provisions to ensure a positive work environment and the well-being of all.

#### **Combating Counterfeiting:**

Stuttgart Building Cleaning operates in the service industry, thus having minimal exposure to counterfeiting issues. However, we acknowledge the global significance of counterfeiting and condemn it in all its forms.

Our employees are already actively trained on this topic and are well-equipped to handle any potential role counterfeiting might play in our business in the future. For any questions or issues, we recommend contacting our dedicated reporting hotline (Whistleblower Officer) for swift resolution of the matter.

#### Harassment and Abuse:

Our company is committed to providing a safe and respectful work environment where all employees can work free from harassment and abuse. This policy aims to clarify that harassment and abuse in any form are unacceptable and will not be tolerated.

#### 1. Definition of Harassment and Abuse:

- a. Harassment is defined as unwanted behavior that, based on gender, race, ethnicity, religion, sexual orientation, disability, or other protected characteristics, creates a hostile, intimidating, or humiliating work environment.
- b. Abuse refers to the misuse of power dynamics to harm, threaten, or manipulate other employees.

#### 2. Prohibition of Harassment and Abuse:

- a. Every employee has the right to work in an environment free from harassment and abuse.
- b. Any form of verbal, physical, sexual, or psychological harassment or abuse is strictly prohibited.
- c. Harassment and abuse are not tolerated, regardless of whether they are perpetrated by supervisors, colleagues, customers, or third parties.



#### 3. Reporting Incidents:

- a. Employees are encouraged to report harassment or abuse if they witness or experience such incidents (whistleblower officer).
- b. The company will ensure that reports are treated confidentially and that no retaliation is taken against those who report.

#### 4. Investigation and Actions:

- a. All reported incidents will be thoroughly investigated, and appropriate actions will be taken to address the situation and establish suitable consequences for those responsible.
- b. Disciplinary actions, including warnings, suspensions, or terminations, may be applied if a violation of this policy is found.

#### 5. Responsibility of Leadership:

- a. Leaders are responsible for promoting a respectful work environment and ensuring compliance with this policy.
- b. They must take all reports of harassment or abuse seriously, respond appropriately, and take suitable measures.

This policy against harassment and abuse serves as a fundamental guide for workplace behavior. It is crucial that all employees understand, respect, and contribute to maintaining a positive and safe work environment for everyone.

#### **Discrimination**

#### 1. Introduction:

Our company is committed to a work environment free from any form of discrimination. We believe in the dignity of every individual and are dedicated to ensuring that all employees are treated fairly and equally. This policy aims to ensure that discrimination is not tolerated in our company and that every employee can work in a respectful and inclusive environment.

#### 2. Prohibition of Discrimination:

Our company prohibits any form of discrimination based on gender, race, color, ethnic origin, religion, sexual orientation, disability, age, or other protected characteristics. Discrimination also includes harassment, bullying, and any actions that make the work environment hostile or unpleasant for an individual.

#### 3. Equal Treatment and Opportunity:

We are committed to equal treatment and opportunity in all aspects of employment. All employees have the right to equal career opportunities, equal access to training and development, equal pay for equal work, and equal recognition of their achievements. We evaluate employees solely based on their abilities, performance, and qualifications.

#### 4. Complaint Procedure:

We ensure that all employees have access to a confidential and effective complaint procedure to report incidents of discrimination. All complaints are taken seriously, handled confidentially, and investigated appropriately. There will be no negative consequences for employees who file a complaint (whistleblower officer).

#### 5. Sanctions:

Any form of discrimination will not be tolerated in our company. Violations of this policy may lead to disciplinary actions, including warnings, suspension, or termination of employment, depending on the severity of the incident and applicable labor laws.



#### 6. Reporting and Review:

Our company values transparency and regular review. We continuously monitor and evaluate our policies, procedures, and practices to ensure they comply with applicable legal requirements and principles of equality.

This company policy on discrimination is binding for all employees, managers, and partners of our company. We strive to create an inclusive and respectful work environment where diversity is valued, and every employee has equal opportunities and rights.

#### Diversity

#### 1. Introduction:

Our company is committed to promoting and recognizing diversity and inclusion in all our business activities and within our employee community. This diversity policy is a fundamental part of our corporate culture and demonstrates our commitment to equal opportunity, respect, and fairness towards all employees, regardless of their ethnic origin, religion, gender, sexual orientation, age, disability, or other individual characteristics.

#### 2. Equal Opportunity and Freedom from Discrimination:

Our company treats all employees fairly and equally. Discrimination, harassment, or disadvantage based on gender, color, ethnic origin, religion, sexual orientation, gender identity, age, disability, or other personal characteristics will not be tolerated. Every employee has the right to work in a respectful and inclusive environment.

#### 3. Diversity and Inclusion:

We value the diversity of our employees' backgrounds, experiences, and perspectives as they enrich our company and strengthen our innovation capacity. We promote an inclusive corporate culture that supports dialogue and exchange between employees of different backgrounds and disciplines.

#### 4. Equal Opportunity in Hiring and Promotion:

When hiring and promoting employees, we consider their qualifications, skills, and performance, regardless of their personal characteristics. We are actively committed to ensuring a diverse workforce and providing equal opportunities for all.

#### 5. Complaint Procedure:

Our company has established an effective and confidential complaint procedure that allows employees to report discrimination, harassment, or other violations of this diversity policy. We are committed to thoroughly and fairly investigating all complaints and taking appropriate measures to address the situation.

#### 6. Accountability:

The management and leadership are responsible for the implementation and adherence to this diversity policy. They act as role models and promote an inclusive corporate culture where all employees are treated equally and can realize their potential.

#### 7. Communication:

We will make this diversity policy accessible to all employees and ensure it is regularly communicated and updated. Additionally, we will inform the public about our commitment to diversity and inclusion. This diversity policy takes effect immediately and applies to all employees of our company. It serves as a guide for our actions and decisions to ensure we create an inclusive and diverse work environment where every employee can reach their full potential.



#### Facility and Supply Chain Security

#### Objective:

Our company is committed to ensuring a safe and secure environment for our facilities and supply chains. This facility and supply chain security policy aims to ensure that appropriate security measures are taken to identify and mitigate potential risks and ensure business continuity.

#### 1. Risk Assessment and Security Planning:

- a. Regular risk assessments will be conducted to identify potential security risks related to our facilities and supply chains.
- b. Based on the risk assessment, security plans will be developed and implemented to take appropriate risk mitigation measures.

#### 2. Physical Security of Facilities:

- a. Access controls are implemented to prevent unauthorized entry to our facilities.
- b. Video surveillance systems and alarm systems are installed to enhance the physical security of the facilities.
- c. Emergency procedures and evacuation plans are developed and will be practiced with employees quarterly.

#### 3. IT and Data Security:

- a. Technical security measures are implemented to ensure the confidentiality, integrity, and availability of information and data.
- b. Security policies for handling sensitive data and using IT resources are established and must be adhered to by all employees.
- c. Our external data protection officer will be consulted in case of uncertainties.

#### 4. Emergency Preparedness and Response:

- a. Emergency plans are created to appropriately respond to various scenarios such as natural disasters, security incidents, or other crisis situations.
- b. Communication channels and procedures are established to effectively communicate and coordinate necessary actions in an emergency.

This facility and supply chain security policy is of great importance to ensure that our facilities are protected, our supply chains are secure, and we can adequately respond to potential security incidents. All employees are responsible for adhering to this policy and must actively contribute to the security of our facilities and supply chains.

#### Child Labor

Stuttgarter Gebäudereinigung operates exclusively within German territory. We strictly and unequivocally adhere to the Youth Employment Protection Act (JArbSchG), ensuring that child labor in our company is practiced only within the legal framework. We are aware of the global significance of this issue and therefore regularly sensitize our employees through training.

For any questions or issues, employees are encouraged to contact our dedicated whistleblower officer for such cases to ensure a prompt resolution of the matter.



#### **Conflict Minerals**

Stuttgarter Gebäudereinigung operates in the service sector and therefore has minimal contact with conflict minerals. We only source processed products and no raw materials. Nevertheless, we are aware of the global relevance of conflict minerals. Our procurement staff are actively trained on this topic and are well-prepared should conflict minerals become relevant in our business field (e.g., new battery technologies).

For any questions or issues, employees are encouraged to contact our dedicated whistleblower officer for such cases to ensure a prompt resolution of the matter.

#### Legal Import and Export of Goods

Our company is committed to complying with all applicable laws, regulations, and international standards related to the import and export of goods. This legal import and export policy aims to ensure that all business activities are conducted in accordance with relevant legal provisions and ethical standards.

All employees involved in procurement are trained on this topic to ensure responsible and lawful practices.

For any questions or issues, employees are encouraged to contact our dedicated whistleblower officer for such cases to ensure a prompt resolution of the matter.

#### Wages and Social Benefits

#### 1. Introduction:

Our company is committed to offering fair and adequate wages as well as social benefits. We believe in the dignity of every employee and strive to provide them with fair compensation and appropriate social security. This policy ensures that our wage and social benefits align with applicable laws, ethical standards, and industry practices.

#### 2. Fairness and Equal Treatment:

Our company is committed to fairness and equal treatment for all employees. Wage structures and systems are developed transparently and consistently, based on objective criteria such as experience, responsibility, performance, and market conditions. We do not discriminate based on gender, race, religion, nationality, or other protected characteristics.

#### 3. Minimum Wage:

We ensure that our employees receive a wage that is at least equal to the statutory minimum wage or the collectively agreed minimum wage, whichever is higher. We regularly review the applicable minimum wage regulations to ensure that our wages meet current requirements.

#### 4. Performance-Based Compensation:

Our company may implement performance-based compensation systems to motivate employees to achieve their individual and corporate goals. Such systems are designed to be transparent and fair, ensuring that performance is appropriately recognized and rewarded.

#### 5. Transparency and Communication:

Our company is committed to transparent communication regarding wages and social benefits. We ensure that our employees receive clear information about their compensation and benefits, including the criteria for wage increases, performance evaluations, and the use of additional benefits.

#### 6. Legal Compliance:

Our company is committed to complying with all applicable labor laws, including wage and social benefit regulations. We regularly review our policies and procedures to ensure they meet current legal requirements.



#### 7. Reporting and Review:

Our company values transparency and regular review. We conduct internal audits to ensure that our wage and social benefit systems comply with policies. We are open to feedback and complaints from our employees and take appropriate actions to resolve discrepancies. This company policy on wages and social benefits is binding for all employees, managers, and partners of our company. We strive to provide fair and adequate wages as well as appropriate social benefits to ensure the well-being and satisfaction of our employees.

#### Safety and Health Protection

#### Objective:

Our company places the highest importance on the safety and well-being of our employees. This safety and health protection policy aims to ensure that appropriate measures are taken to minimize accidents, injuries, and health risks in the workplace and to provide a safe working environment.

#### 1. Compliance with Laws and Regulations:

- a. The company is committed to complying with all applicable safety and health regulations, as well as labor laws.
- b. Regular reviews are conducted by our quality assurance team to ensure that all safety standards and regulations are met.

#### 2. Risk Assessment and Prevention:

- a. A comprehensive risk assessment is conducted to identify potential hazards and risks in the workplace.
- b. Based on the risk assessment, preventive measures are taken to prevent accidents, injuries, and health issues.
- c. All employees are informed about existing risks and required protective measures.

#### 3. Safety Equipment and Measures:

- a. The company provides appropriate personal protective equipment (PPE) and other safety-related equipment to ensure the safety of employees.
- b. All employees are required to use the provided safety equipment and follow the corresponding instructions.
- c. Regular maintenance and inspection of safety equipment are carried out to ensure their effectiveness.

#### 4. Training and Awareness:

- a. The company provides training and continuing education to raise awareness of safety issues and to train employees in safety-related procedures.
- b. All employees are required to participate in safety training and apply the knowledge gained in practice.

#### 5. Reporting of Incidents and Improvement Suggestions:

- a. Every incident, accident, or safety deficiency must be reported immediately to initiate appropriate investigation and improvement measures.
- b. Employees are encouraged to actively report safety concerns or improvement suggestions to management or the designated officers (whistleblower officer).



#### 6. Continuous Improvement:

- a. The company strives for continuous improvements in safety and health protection and is committed to eliminating potential workplace risks.
- b. Regular reviews, audits, and evaluations are conducted to ensure that safety policies are effectively implemented.

This safety and health protection policy serves as a framework for all employees to understand and implement safety-related procedures and measures. Every employee is responsible for complying with this policy to ensure a safe and healthy working environment for themselves and their colleagues.

#### **Environmental Protection**

#### Objective:

Our company is committed to protecting the environment and promoting sustainability in all business activities. This environmental protection policy ensures that we minimize our environmental impact, use resources efficiently, and uphold our environmental responsibilities.

- 1. Compliance with Environmental Laws and Regulations:
- a. Our company is committed to strict compliance with all applicable environmental laws, regulations, and standards.
- b. We take measures to ensure that all our activities meet environmental standards.

#### 2. Continuous Improvement:

- a. We aim for continuous improvement in our environmental performance and follow a systematic approach to identify environmental aspects, risks, and opportunities. We are certified under ISO 14001 (Environmental Management).
- b. We set quantitative and qualitative environmental goals to reduce our ecological footprint and contribute to climate protection, with the aim of achieving CO<sub>2</sub> neutrality.
- 3. Resource Efficiency and Waste Management:
- a. We strive for efficient use of resources such as energy, water, and raw materials.
- b. We promote recycling, reuse, and waste prevention to reduce waste and minimize environmental impact.
- 4. Emission Reduction and Climate Protection:
- a. We are committed to reducing greenhouse gas emissions and take measures to improve energy efficiency, use renewable energy, and promote a low-carbon economy.
- b. We support environmentally friendly transport and logistics solutions and aim to reduce emissions in our supply chain.
- 5. Nature Conservation and Biodiversity:
- a. We are committed to protecting ecosystems, biodiversity, and natural resources in our activities.
- 6. Environmental Awareness and Training:
- a. We promote environmental awareness among our employees and raise awareness of environmental issues.

This environmental protection policy ensures that our company actively contributes to environmental protection and operates sustainably. All employees are required to understand, follow, and contribute to this policy.



#### Freedom of Association and Collective Bargaining

#### Objective:

Our company is committed to respecting and promoting freedom of association and the right to collective bargaining. This policy ensures that our employees are free to join unions, represent their rights, and collectively negotiate working conditions.

#### 1. Freedom of Association:

- a. Every employee has the right to join a union of their choice, participate in union activities, and exercise union rights.
- b. The exercise of freedom of association must not be disadvantaged or hindered.
- c. Discrimination, reprisals, or retaliatory measures against employees based on their union membership or union activities are prohibited.

#### 2. Collective Bargaining:

- a. Our company respects the right to collective bargaining and recognizes unions as legitimate representatives of employees.
- b. We are open to dialogue and collaboration with unions to negotiate fair and reasonable working conditions together.
- c. Negotiations on working conditions, including wages, working hours, and other terms of employment, are conducted on the basis of reciprocity and respect.

#### 3. Communication and Collaboration:

- a. Employees are encouraged to openly address their concerns, suggestions, or questions regarding working conditions or union matters.
- b. The company will make reasonable efforts to respond to concerns or suggestions and find mutual solutions.

#### 4. Legal Compliance:

- a. Our company is committed to complying with applicable labor laws and regulations protecting freedom of association and the right to collective bargaining.
- b. In case of disputes or conflicts related to union matters, the company will work to find solutions through negotiations or other appropriate procedures.

This policy on freedom of association and collective bargaining serves as a guide for handling union issues within the company. It is important for all employees to familiarize themselves with the provisions and respect them to promote a harmonious work environment and uphold the rights of all.

#### Prevention of Illegal Boycotts

Our company is committed to complying with applicable laws and preventing illegal boycotts. This policy aims to ensure that our company is not involved in activities that violate international trade rules and lead to anti-competitive behavior.

We are aware of the global significance of this issue, and therefore, our employees are regularly sensitized through training sessions. In case of any questions or issues, employees are encouraged to contact our dedicated reporting channel (Whistleblower Officer) for swift resolution and clarification of the matter.



## These guidelines are binding for all employees of Stuttgarter Gebäudereinigung.

SGR commits itself and its suppliers to comply with these guidelines and reserves the right to cease future collaborations with companies that violate these guidelines.

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Thank you to all employees for their dedicated support!





# As a family-run business on the path from yesterday to TOMORROW

our goal has always been to be a reliable, flexible, and cost-effective partner in fulfilling our customers' basic need for cleanliness.

We

#### STRIVE

to continually improve in delivering our important and necessary services, and

TO BE

at the forefront of modernization and

#### **BETTER**

adjust to the requirements of a changing world.

Leveraging our decades of experience and our belief that people are more important

#### **THAN**

profit, we aim to convince more customers through a partnership-based, open collaboration and to always think about tomorrow, even TODAY.

