



The People Operating System

# Declaration of principles on respect for human rights and the environment

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## 1. Our commitment to respect human rights and the environment

Personio SE & Co KG and all subsidiaries (hereinafter "Personio") are committed to respecting human rights and the environment and to taking responsibility for their supply and value chain. We are therefore committed to respecting human rights and environmental concerns within our own business activities and in our global supply chains and to ensuring that human rights and environmental violations are prevented and that those affected have access to remedy. This declaration of principles expresses our responsibility within our value and supply chain.

### Standards and guidelines

In accordance with the United Nations Guiding Principles on Business and Human Rights (UNGP), we are committed to the standards of the following internationally recognized human and environmental rights reference instruments:

- United Nations Universal Declaration of Human Rights
- Principles of the United Nations Global Compact (UNGC)
- Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- International Covenant on Political and Civil Rights of the United Nations
- Core labor standards of the International Labor Organization (ILO) on labor and social standards
- Charter of Fundamental Rights of the European Union
- Diversity Charter
- European Convention for the Protection of Human Rights and Fundamental Freedoms
- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants (POPs Convention)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes

In addition to these standards, our company has the following bodies that reinforce our actions and successful and fair business practices:

- Procurement Code of Conduct
- Sustainability Committee
- Diversity, Equity & Inclusion Partner
- Code of conduct for suppliers
- Plan A Carbon Accounting
- Reporting system for the supply chain
- EcoVadis platform for managing risks in the supply chain

We strive to meet the highest standards at all times. This declaration of principles applies to all employees in all divisions and subsidiaries. By complying with these standards, all employees worldwide undertake to treat colleagues, business partners and suppliers in an appropriate and lawful manner. We assume that our business partners and suppliers are also committed to human rights, undertake to establish appropriate due diligence processes and pass on these expectations to their own suppliers.

### Groups of people affected

In our efforts to ensure respect for human rights, we pay particular attention to the following groups of people along our supply and value chain:

- Personio employees at national and international locations, including interns, working students and freelancers. This includes all vulnerable groups of people.
- Employees of direct suppliers

### Human rights issues

We oppose any disregard for internationally recognized human and environmental rights. In particular, we stand up for the following rights:

- 1) The prohibition of child labor and forced labor
- 2) The prohibition of all forms of slavery and discrimination
- 3) Strengthening the freedom of association
- 4) Mutual appreciation, regardless of age, disability, religion or social background,
- 5) ethnic or cultural diversity, gender or sexual orientation and identity
- 6) Compliance with occupational health and safety (labor rights and occupational safety)
- 7) The payment of appropriate wages
- 8) The ban on environmental pollution

In addition, we are convinced that human rights and environmental rights are closely linked. We therefore strongly condemn any form of negative impact on and destruction of the environment. We regard sustainability as a fundamental principle. We are firmly convinced that long-term profitability is only possible if we take our responsibility towards people and the environment seriously. We therefore strive to contribute to a sustainable future through our actions that meet the needs of society, the economy and the environment.

Personio has already introduced a number of measures to reduce the risks of human and environmental rights violations. In collaboration with various stakeholders, additional needs for action have been identified and further preventive measures have been implemented.

## 2. Our approach and measures to comply with human rights and environmental due diligence obligations

Respecting human and environmental rights is an ongoing process. The implementation of specific measures is subject to continuous review and development, depending on changing conditions and our business activities. We have decided to apply the measures listed below to fulfill the requirements of the Supply Chain Due Diligence Act (LkSG):

### Structure and responsibility

Personio has defined clear responsibilities in risk management for the exercise of and compliance with all human rights and environmental due diligence obligations. At the top management level, our CEO Hanno Renner and our senior management are responsible for respecting human rights and the environment in our business activities and in the upstream and downstream supply and value chains. In addition, violations in the supply chain can be reported to our Procurement Team ([procurement@personio.de](mailto:procurement@personio.de)) as part of our [complaints system for the supply chain](#). The Procurement Team monitors risk management within the framework of the LkSG and ensures operational implementation through coordination and monitoring activities. The team reports to our Managing Director and top management at least once a year.

Our *Diversity, Equity and Inclusion* office is responsible for the internal implementation of suitable measures, as is our *Sustainability Committee*, a voluntary association of employees who deal with environmental issues and report regular updates to our Managing Director. Our Workplace Team is responsible for managing our Plan A program, a carbon accounting tool used to manage our emissions.

### Risk analysis, action plans and prevention

A key component of our due diligence is knowledge of potential and actual adverse human rights risks and the impact of our business activities on people along the entire value chain. We have identified critical suppliers and, with the help of our EcoVadis tool, we can target our supply chain to the various categories:

- Environmental risks
- Labor and human rights risks
- Ethics risks
- Sustainable procurement risks

and initiate and take countermeasures with the help of action plans. This platform also gives us the opportunity to scan potential suppliers in advance in order to weed out unsuitable suppliers at an early stage as part of prevention. From January 2024, we will also require new suppliers to sign our Supplier Code of Conduct, which is also a suitable preventive measure. This risk analysis is not a static value, but a dynamic process that is reviewed at regular intervals.

In the event that our company is directly responsible for human rights violations, we take immediate action to end the business activities that caused them or to bring them into line with human rights. If we have substantial knowledge of human rights violations in our supply and value chain, we work with the relevant bodies and our business partners to develop a corrective action plan to remedy the human rights violation. Depending on the severity of the violation, we reserve the right to take appropriate action.

### Complaints procedure

People should be able to use our complaints procedure to report actual or potential problems in the area of human or environmental rights. These can be problems in our supply chains, but also in our own business area. An appropriate and effective grievance and reporting procedure is an important part of our due diligence processes. We encourage all stakeholders to come forward with concerns about suspected violations of our business practices, including this statement. This procedure describes the issues that can be reported, how they can be made and what happens after a report is made.

Our priority is confidentiality and the protection of whistleblowers. Insofar as it is within our sphere of influence, we ensure that people who submit reports or complaints are protected from discrimination and punishment. We have defined, documented and internally communicated clear processes for our complaints system, as set out in the "Rules of Procedure for the Complaints Mechanism". These rules of procedure are available on our website.

The procedure and rules of procedure for the complaints system can be viewed at the following [link](#).

### Effectiveness control

The effectiveness of all due diligence processes is reviewed at least once a year and as required. This is done in order to continue to be in a position to identify, prevent, remedy or reduce adverse human rights or environmental impacts. The effectiveness of the various measures is regularly reviewed within Personio.

### Reporting

Addressing the issue of human/environmental rights and carrying out a corresponding risk analysis is an ongoing process at Personio.

We record our progress in implementation and development on our website at <https://www.personio.de/>. In addition, we will publish an LksG report by the deadline of 01.06.2024. As of 01.01.2024, we are required to report to the Federal Office of Economics and Export Control (BAFA).

### **Further development of due diligence processes**

Respecting human rights and integrating human rights and environmental due diligence into our operational processes are important steps for us in promoting human rights and environmental standards along the global supply and value chains. We are committed to continuously improving our processes for respecting human rights.

### **3. Contact for questions and information**

If you have any questions about this policy statement or other human rights or environmental law related issues, please email our Procurement Team at [procurement@personio.de](mailto:procurement@personio.de). To report questionable behavior or a possible violation, you can also submit a report at any time through our confidential [complaint system](#).

### **4. Final provision**

The Declaration on respect for human rights for social responsibility and compliance with human rights and environmental risks comes into force on the day it is signed.

Munich, December 21, 2023