

Declaration of principles on human rights and the environment

Implementation of the duty of care according to § 6 para. 2
Supply Chain Due Diligence Act (LkSG)

Grundsatzerklärung Menschenrechte und Umwelt

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1 Commitment to respecting human rights and the environment

Responsible and lawful behaviour are core principles that guide us in our business activities. Compliance with applicable laws and regulations and adherence to internationally recognised standards for the protection of human rights and the environment are part of our self-image.

The United Nations 2030 Agenda for Sustainable Development is based on the principles of human rights and environmental protection. As a company, we are aware of our social responsibility for shaping a sustainable economy, environment and society and, with this declaration of principles, we expressly commit to complying with and monitoring our human rights and environmental due diligence obligations. This includes both our own business operations and all supply chains in which q.beyond AG and its Group companies are involved.

The declaration of principles applies to q.beyond AG and all affiliated companies within the meaning of Section 15 AktG. The Management Board of q.beyond AG is responsible for implementing the Declaration of Principles in accordance with the German Supply Chain Duty of Care Act (LkSG). The aim of the Management Board is to ensure the implementation of the principles of the LkSG through clear structures and responsibilities and to anchor these in the corporate processes and risk management of q.beyond AG.

2 Human rights and environmental strategy

Respect for human rights, labour and social standards and environmental protection are a key component of responsible and sustainable corporate governance at q.beyond.

We respect internationally recognised human rights and work to ensure that these are observed in our business activities, including the value chains, in particular

- the ban on child labour and forced labour,
- the prohibition of all forms of slavery and discrimination,
- the strengthening of freedom of association,
- mutual respect, regardless of age, disability, religion, social background, ethnic or cultural diversity, gender or sexual orientation and identity,
- compliance with occupational health and safety regulations,
- the payment of appropriate wages,
- compliance with data protection and privacy,
- the prohibition of corruption and bribery, and
- the ban on environmental pollution.

We are aware that every activity along our value chain can have a positive or negative impact on the environment and society. With this in mind, we focus our sustainability management on areas of activity in which our business model is particularly effective and efficient in generating additional environmental and social benefits. As an IT service provider, we support our customers in achieving sustainability goals in addition to their digitalisation goals. Our solutions are therefore the contemporary answer to current economic, ecological and social challenges.

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2.1 Ecological, social and societal challenges

At the heart of the sustainability process is the materiality analysis of sustainability issues, taking into account the perspective of relevant stakeholders, which we describe in detail in our sustainability reporting. In the materiality process, sustainability aspects are assessed according to the strength of their positive or (potentially) negative economic, environmental and social impact in the context of our business activities (impact materiality) and set in relation to the associated opportunities or risks for the company's business performance and financial position (financial materiality).

We have identified the following human rights and environmental risks and opportunities as part of our materiality analysis:

Innovative portfolio that promotes sustainability: The accelerating pace of digitalisation is a lever that enables our customers to use resources more economically and effectively in their production and business processes, reduce consumption and cut CO₂ emissions. Our solutions therefore offer opportunities to mitigate climate change and the scarcity of resources.

Energy efficiency and climate protection: the volume of data is increasing with digitalisation. Increasingly sophisticated applications and algorithms require exponential growth in storage and computer capacities. The operation of our high-performance data centres is associated with high energy consumption. Our ecological endeavours therefore focus on reducing consumption factors, primarily electricity consumption. Energy efficiency measures also help to compensate for rising energy costs. We are one of the first German medium-sized IT service providers to participate in the EU code of conduct for energy-efficient data centres and rely on its extensive recommendations for action: We virtualise infrastructures and applications, use efficient air conditioning technology and power our data centres with 100% renewable energy.

Adaptation to climate change: Inadequate adaptation to climate change can lead to its physical effects (particularly extreme weather conditions such as heat and storms) causing damage to and failure of our data centre infrastructure and overheating of the data centres. Impacts on our employees in terms of their health and safety cannot be ruled out either. We therefore implement preventative climate control measures.

Conservation of natural resources and circular economy: Our purchasing policy commits us to a far-sighted and considerate use of natural resources. We obtain the electricity for our data centres exclusively from renewable energy sources and purchase hardware that meets the latest energy efficiency standards. We bundle purchases and prioritise domestic suppliers in order to shorten transport routes and reduce packaging. Our commitment to national legislation also ensures compliance with social standards. Used appliances are reconditioned in a certified process in cooperation with partners and marketed by third parties. In this way, we make a valuable contribution to conserving resources.

Information security and data protection: Information technology has an impact on people's personal rights, such as data protection. As a digitaliser, we therefore bear a special responsibility for the reliable protection of data and the security of the infrastructures and systems we use - also to prevent increasing cybercrime. One of our core competences as an IT service provider is to consistently protect the personal and business data of our customers, partners, employees, shareholders and suppliers. With q.beyond's cybersecurity concept, our customers also benefit from protection against cybercrime.

Company identification, employee retention, talent management and employee development: this is how we create the conditions for our entrepreneurial success. In the "war for talent", we compete with other

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market players for specialists and managers. Our employer brand addresses all the social aspects that make us an attractive employer. The focus is on work-life balance, health protection and a corporate and management culture characterised by trust, in which we specifically promote the initiative of our employees.

Human rights and environmental impacts at nearshoring and offshoring locations: The unintentional departure of key performers, knowledge carriers and key employees can lead to a loss of expertise, loss of sales and higher replacement and start-up costs. The shortage of skilled labour can also jeopardise the implementation of our business plans. We are therefore increasingly focussing on the talent pool at our nearshoring and offshoring locations, particularly software developers and IT specialists. Respecting human rights and ecological standards also plays an important role for us in this context. Within the EU, strict national regulations and laws generally protect against violations of human and environmental rights. At non-European locations, we pay particular attention to compliance with relevant human rights and environmental guidelines, especially with regard to corruption, occupational health and safety, working hours, discrimination and environmental protection.

Ethical business practices and compliance: they are the cornerstones of q.beyond's corporate and social perception. In addition to compliance with legal requirements, our customers and business partners expect compliance and integrity. Appropriate training for our employees ensures the necessary level of sensitivity.

Human rights and environmental impacts in the supply chain: Last but not least, human rights or environmental violations can also result from the upstream supply chain. For example, they can occur in the manufacturing process of our purchased infrastructure components for equipping our data centres or affect employee rights in the supply chain. In an initial risk analysis of the direct suppliers in our supply chain, we identified the topics of "occupational health and safety", "working hours", "discrimination", "respect for freedom of association" and "environmental protection" as significant risk areas. However, following a cautious risk assessment, we do not consider the risks to be exceptionally high. It is particularly important to us to prevent potentially adverse human rights and environmental impacts in the context of our business activities and to give those affected the opportunity to report actual violations. It is also important to us to use our influence to work towards remedying grievances as quickly as possible.

We describe our procedure for protecting human rights and complying with our environmental obligations in this policy statement.

2.2 Commitment to international standards

In implementing our human rights and environmental strategy, we align our business activities primarily with the globally recognised United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. We therefore also implement the requirements of the National Action Plan for Business and Human Rights. These standards help companies to determine and continuously improve their approach to human rights. They emphasise the importance of a due diligence process that proactively identifies, assesses and avoids or at least minimises potential human rights or environmental abuses in order to protect rights holders.

In addition, our understanding and processes for respecting human rights and the environment are based on the following international reference instruments:

- the United Nations Universal Declaration of Human Rights,

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- the principles of the United Nations Global Compact (UNGC),
- the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises,
- the core labour standards of the International Labour Organisation (ILO) on labour and social standards,
- the Charter of Fundamental Rights of the European Union,
- the Diversity Charter,
- the UN Convention on the Rights of the Child,
- the European Convention for the Protection of Human Rights and Fundamental Freedoms,
- the REACH Regulation, RoHS Directive and POP Regulation, and
- the Stockholm Convention on Persistent Organic Pollutants (POPs Convention).

2.3 Expectations of employees and business partners

We expect our employees to comply with applicable laws and regulations and to observe the principles and legal positions set out in the international standards mentioned in this declaration of principles in their daily work.

Under the title "Strong principles and a fair culture", our [Code of Conduct](#) therefore summarises all rules of conduct, guidelines and compliance principles for the business activities of q.beyond AG and offers our employees guidance in their daily decisions. We have also established these principles in our corporate guidelines and in our management systems, which anchor sustainable management and behaviour in our corporate processes. These include, for example, the following:

- Quality management system (in accordance with ISO 9001) and management systems for data protection and information security (in accordance with ISO 27001),
- Emergency management (in accordance with the principles of standard 100-4 of the German Federal Office for Information Security and ISO standard 22301:2012) and our service-related internal control system to prevent damage to our customers (in accordance with ISAE 3402),
- Energy efficiency management (in accordance with EDI-G and DIN EN 16247-1), TÜV-certified data centres (high availability level 3 and energy efficiency class A, Trusted Site Infrastructure TSI V4.3 Level 3 [extended]),
- Systems for compliance, process management, IT service management, risk and occupational safety management and personnel development, as well as
- Purchasing guidelines.

We also expect our business partners who are directly or indirectly involved in our value creation processes for the provision of our services to commit to complying with the principles we consider important and to implement appropriate processes to respect human rights and protect the environment.

We have summarised our requirements on the subject of "human rights" and "environmental protection" in our Supplier Code of Conduct and made it part of our general purchasing processes. We also expect our business partners to pass on our requirements and expectations to subcontractors involved in the provision of their services. We reserve the right to review implementation in individual cases.

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3 Our approach to complying with human rights and environmental due diligence obligations

In the following, we describe our procedure for protecting human rights and complying with our environmental obligations.

3.1 Risk management / risk analysis

In our risk management process, which has been established for many years, we continuously identify, analyse and evaluate all risks relating to respect for human rights and the environment, not only those within our own business area, but also those of our business partners.

- When analysing risks within the q.beyond Group's own business division, gross and net risks are assessed. In contrast to gross risks, net risks already take into account the effects of all established controls and measures implemented to deal with the identified risk. The assessment of net risks is based in particular on the factors of probability of occurrence and extent of damage.
- We use a risk analysis tool to analyse the risks associated with suppliers. This tool automatically assesses the country/location and industry-specific risk of suppliers. In addition to this abstract risk analysis, the fulfilment of internally defined requirements/criteria, such as the signing of the Supplier Code of Conduct and compliance with the Minimum Wage Act (MiLoG), are also included in the risk assessment. Taking into account the risk values of the individual suppliers, a decision is made on any preventive measures to be taken. Independently of this, we also carry out ad hoc risk assessments of suppliers.

Under 2.1 "Environmental, social and societal challenges", we have already described the risks and opportunities within our own business area and in relation to our supply chains that we have identified as significant in our risk analyses.

- Based on an initial risk analysis in our own business division, we have identified risks of information security and data protection breaches due to cyberattacks and risks from inadequate adaptation to climate change with consequential damage to the data centre infrastructure as abstract risks to be prioritised. In addition, there are abstract human rights-related risks from the topics of "corruption", "occupational health and safety", "working hours", "discrimination" and "environmental protection".
- In our supply chains, we have identified the human rights-related topics of "occupational health and safety", "working hours", "discrimination", "respect for freedom of association" and "environmental protection" as particularly sensitive areas.

We respond to risks that become known by introducing suitable and appropriate measures to prevent and/or counteract them.

In the coming years, we will continue to expand our risk management in order to continuously improve our understanding of specific human rights and environmental risks in our business area and our supply chains.

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3.2 Preventive measures

The risk analysis forms the basis for identifying appropriate preventive and corrective measures. We incorporate the results of our risk analyses into relevant business processes and our supplier assessment process. We recognise that comprehensive protection of human rights can only be guaranteed if human rights risks of any kind are not only tracked, but also avoided before they arise through preventative measures.

We have already implemented the following measures in particular, depending on the risks involved: In addition to the publication of this policy statement and the compliance principles ([Code of Conduct](#)), which are mandatory for all employees, other company guidelines support our actions and provide our employees with process security and guidance in their day-to-day work. These include guidelines on the topics of "Information security and data protection", "Purchasing", "Travel" and "Hospitality". In-depth knowledge transfer and sensitisation of our employees, particularly on the topics of human rights, climate and environmental protection, information security and data protection, occupational safety and unconscious bias, is carried out through training courses, among other things.

Our company also has a works council and involves this body in all personnel and co-determination matters at an early stage. In addition, the youth and trainee representatives, the representatives for severely disabled employees and the employee representatives on the Supervisory Board ensure that employee interests are protected.

Before entering into a supplier relationship, our direct suppliers undergo an evaluation process that includes an initial assessment of risks relating to human rights and the environment.

If a specific risk situation requires it, preventive measures are initiated on a case-by-case basis. Such preventive measures include, in particular, the agreement of appropriate contractual control mechanisms and the contractual assurance of a direct supplier that it will comply with the human rights and environmental expectations demanded by the company's management and address them appropriately along the supply chain.

3.3 Remedial measures

If there is a reasonable suspicion or an actual or imminent violation that our business activities are causing or contributing to human rights and/or environmental violations, we will investigate the complaints made and take appropriate remedial action to prevent, stop or minimise the extent of the violation.

If there is reasonable suspicion or a specific indication within the q.beyond Group, we take immediate action to prevent further abuses and put a lasting end to them.

We expect our direct suppliers to cooperate fully in clarifying, ending or minimising possible violations of human rights and environmental due diligence. It is our principle to enter into dialogue with the supplier as a first step in order to achieve an effective solution to the problem. If the dialogue with our supplier does not lead to a result, we strive to cooperate with other affected companies, industry associations and sector and multi-stakeholder initiatives in order to develop and initiate suitable remedial measures. However, we reserve the right to terminate the business relationship if the remedial measures agreed with the supplier are not implemented (in a timely manner) or if milder measures have not led to the termination or minimisation of the breach of due diligence.

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3.4 Whistleblower and complaints mechanism

q.beyond has established an appropriate and effective whistleblowing and complaints process. All stakeholders are encouraged to raise concerns about suspected violations of applicable law, our corporate policies, including this policy statement.

Our SAFE CHANNEL whistleblower and complaints system is available to anyone inside or outside our company at any time and free of charge. The whistleblower and complaints procedure is a confidential way to report any suspicion of illegal and unethical behaviour, even anonymously. All reported cases that are not proven to be the deliberate disclosure of false and/or misleading information will be investigated and followed up by trained experts. The matter is dealt with immediately and the facts are clarified neutrally, regardless of the person or their hierarchical position. The persons involved are consulted during the clarification process and involved in resolving the cause of the complaint.

3.5 Responsibility

Responsibility for the fulfilment of and compliance with our human rights and environmental due diligence obligations lies with the Management Board of q.beyond AG. The Management Board has appointed a Human Rights Officer and set up a Compliance Committee to monitor and ensure compliance with due diligence obligations throughout the Group. The heads of the relevant departments - Compliance, Legal, People & Culture, Central Purchasing, Corporate Social Responsibility and q.beyond's Human Rights Officer - are represented on the Compliance Committee. The committee regularly analyses the findings from the due diligence processes, reports these to the Management Board and advises it in particular on decisions regarding remedial measures.

3.6 Effectiveness control

The effectiveness of our measures to prevent violations of human rights and environmental due diligence is reviewed at least once a year and on an ad hoc basis. Responsibility for monitoring effectiveness lies with the Compliance Committee, supported by Internal Audit if necessary.

For direct suppliers, compliance with human rights and environmental due diligence obligations is monitored through regular or ad hoc supplier assessments, supplemented by in-depth supplier audits if necessary. The effectiveness of this process is monitored by Internal Audit.

3.7 Documentation and reporting

We will document the fulfilment of due diligence obligations internally on an ongoing basis. The documentation is kept for 7 years.

Our annual report on this is submitted to the Federal Office of Economics and Export Control (BAFA) no later than 4 months after the end of the respective financial year and is also made available to the public on our website.

Further information can also be found in our annual sustainability report.