

BAUER GROUP

HUMAN RIGHTS AND WORKING CONDITIONS

Munich, February 2023



Dear Colleagues,

Interest and awareness of human rights has grown in recent decades. In 1948, the United Nations released the Universal Declaration of Human Rights, which has become the most important document of what should be considered the standard for basic equality and human dignity.

One of the ways that we recognize the fundamental worth of every person is by acknowledging and respecting their human rights. Human rights are a set of principles concerned with equality and fairness. They recognize our freedom to make choices about our lives and to develop our potential as human beings. They are about living a life free from fear, harassment or discrimination.

The BAUER Group takes its social responsibility very seriously. Respect for human rights and fair working conditions are an integral part of our culture. BAUER Group is committed to responsible corporate practices in the area of human rights and working conditions and aligns with practices recommended by industry standards. BAUER's human rights expectations apply to all of our personnel, business partners and other parties directly linked to our operations, products or services

BAUER Group fully supports the United Nations Universal Declaration of Human Rights. We are committed to uphold fundamental human rights and respect those rights in conducting the Group's operations throughout the world. In this document, BAUER's commitment to the respect of Human Rights and Working Conditions is described in more detail.

Dr. Monika Bayat & Philipp Bayat
President and CEO of BAUER GROUP

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BAUER GROUP
PROMOTING
HUMAN RIGHTS
AND
FAVORABLE
WORKING
CONDITIONS

NO CHILD LABOR

The BAUER Group does not tolerate child labor of any kind. We undertake not to employ children in violation of conventions 138 and 182 of the International Labor Organization (ILO). BAUER will apply the age of 18 as the minimum age for employment, except in the framework of internship- or vocational training programs, organized in co-operation with schools and training institutes or approved by the competent authority. Special care will be taken that these young people, with a minimum age of 15, are fully protected and have received adequate safety training and instructions.

BAUER supports the use of legitimate workplace learning programs that comply with all laws and regulations, provided that these laws and regulations are aligned with international standards.

The BAUER Group will ensure proper management of student workers through effective maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations. In any case, appropriate support and training shall be provided to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

NO FORCED LABOR

The BAUER Group does not tolerate forced or compulsory labor of any kind.

In accordance with ILO conventions 29 and 105, the BAUER Group will under no circumstances make use of forced or bonded labor, such as forced labor by persons placed in an institution, or compulsory labor including labor as a means of political coercion or education.

FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

The BAUER Group recognizes the rights of its employees to form representative bodies and participate in collective bargaining regarding working conditions. In accordance with ILO conventions 87 and 98, the BAUER Group recognizes and respects the freedom of its employees to choose whether to establish or to associate with any employee organization of their own choosing (including labor unions) without BAUER's prior authorization.

The employment of a worker is not contingent upon the condition that he/she joins or not joins a union or be forced to relinquish trade union membership. Furthermore, union membership shall not be the cause for the dismissal of - or otherwise prejudice against - a worker. The BAUER Group will not interfere with or finance labor organizations or take other actions with the intent of placing such organizations under its control.

The BAUER Group subscribes to the principles of ILO Convention 135 and Recommendation 143 and recognizes the right of its employees to be represented by labor unions and other employee organizations to collectively bargain on employment conditions. BAUER and the respective employee organizations will co-operate constructively in a spirit of good faith. Even in cases of dispute the goal shall always be to maintain viable co-operation in the long term. This implicates, amongst others, the mutual respect of agreed commitments.

HEALTH AND SAFETY AT WORK

The BAUER Group does not compromise on a safe and healthy working environment for all employees and is committed to offering safe and healthy workplaces in accordance with national legislation.

BAUER consistently complies with applicable environmental, safety and health (ESH) regulations as well as customer, community and other requirements. The BAUER Group furthermore commits to continual improvement of its operations, progressively reducing the potential ESH impact of its activities, by focusing on: the health, safety and productivity of employees and processes; efficient use of natural resources; and prevention of pollution. The BAUER Group sets and reviews relevant ESH objectives and targets for its operations worldwide and on a regular basis.

In line with applicable legislation, the managers responsible take their duties very seriously. They ensure that all employees concerned are regularly instructed on the relevant aspects of occupational health and safety. In addition, the BAUER Group actively promotes the physical and psychological wellbeing of its employees through health management initiatives.

By implementing adequate security measures, the BAUER Group also makes every effort to keep employees and visitors safe at all of its sites. Site-specific risk analyses are carried out and measures are implemented in accordance with applicable legislation.

REMUNERATION

It is acknowledged and agreed that all employees of the BAUER Group are entitled to adequate remuneration (ILO Convention No. 100). Remuneration and all the other benefits are based on the principle of fairness and comply with the individual national legal standards or the standards of the national branches or company collective labor agreements.

Employees are remunerated fairly by both internal and external standards. Uniform principles provide the foundation for a well-balanced global rewards system. Where legislation exists, the BAUER Group pays its employees at least the legal minimum wage applicable in the economic area concerned.

All use of temporary, dispatch and outsourced labor will be within the limits of the local law. Imported and migrant workers are to be provided equal wages, benefits and working conditions.

RIGHT TO PRIVACY – PROTECTION OF PERSONAL DATA

To uphold the rights of individuals (e.g. employees, customers) to determine how their own personal information is used, the BAUER Group maintains high data protection standards to ensure personal rights are safeguarded as best as possible, in every BAUER legal entity worldwide.

When it comes to dealing with personal data in day-to-day business, innovative information technologies and increasing media connectivity can represent major challenges. The BAUER Group makes every effort to ensure that the use of such personal data complies with legislation and that the impact on privacy is as little as possible and the rights of the individuals are guaranteed, including their right to access, correct, block or delete information.

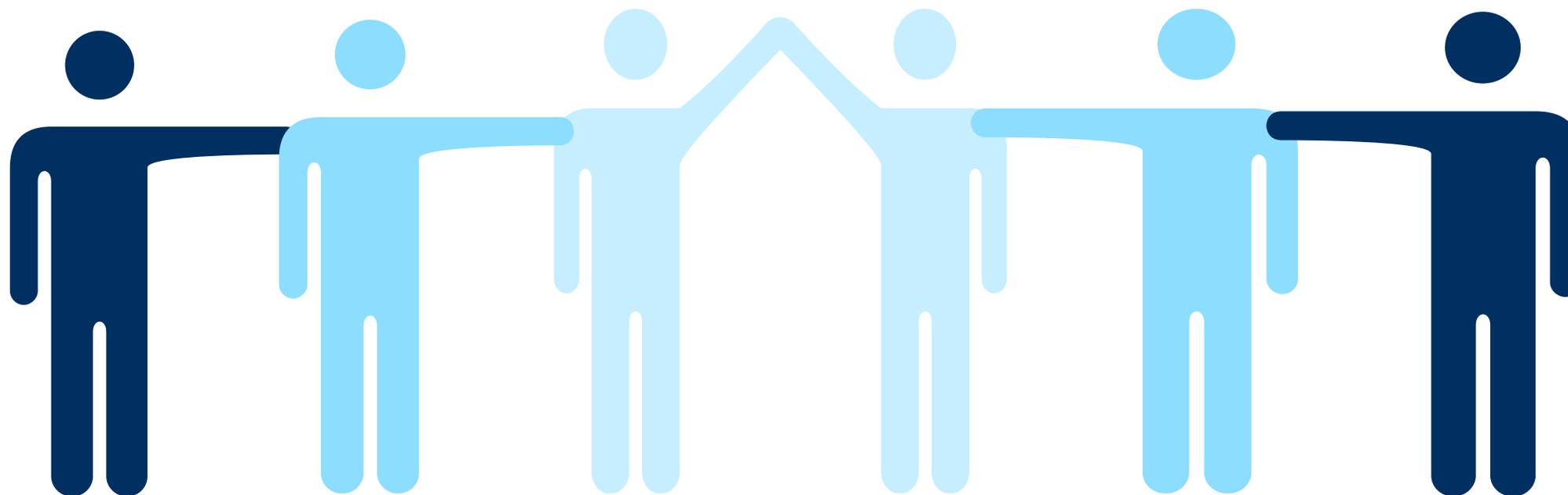
BAUER GROUP
RELATIONSHIP TO
BAUER GROUP'S
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RELATIONSHIP TO BAUER GROUP'S CORPORATE CODE OF CONDUCT

This Code is intended to supplement and strengthen the BAUER Group's commitment to human rights under its existing Corporate Code of Conduct.

To support compliance with this Code, the BAUER Group encourages its employees to report any concerns regarding potential violations of this Code, or any related law or regulations directly to the management board of BAUER COMP Holding GmbH.

BAUER GROUP



CODE ON HUMAN RIGHTS AND WORKING CONDITIONS