

## Policy of principles on the human rights strategy

This policy of principles on human rights strategy of the Amadeus Fire Group sets out its commitment to respecting human rights and protecting the natural environment. In this context, it describes preventive and remedial measures to ensure compliance with these obligations. The expected behaviour of Amadeus Fire Group employees is described in the "Code of Conduct" and that of suppliers in the "Supplier Code of Conduct". The way we expect our employees to treat the environment is summarised in our environmental policy.

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## 1. Introduction

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The Amadeus Fire Group complies with human rights and environmental protection. The stated mission of the company management is to respect, protect and promote human rights and the natural environment throughout the entire value chain. Breaches of international human rights and national and international environmental protection regulations will not be tolerated.

The basis of the human rights and environmental due diligence obligations is formed by the following international regulations to whose provisions the Amadeus Fire Group is committed:

- International Bill of Human Rights
- Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW)
- UN Guiding Principles on Business and Human Rights (UNGP),
- Core Labour Standards
- The United Nations Convention on the Rights of the Child (CRC)

The principles of human rights and environmental strategy outlined in this policy apply throughout the Amadeus Fire Group, including its subsidiaries, and must be recognised by management and employees in the performance of their duties. The Amadeus Fire Group therefore expects all business partners to comply with human rights and environmental obligations. Respecting and maintaining human rights and environmental obligations is the essential requirement for any cooperation with the Amadeus Fire Group.

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## 2. Company

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The Amadeus Fire Group is a service provider operating exclusively in Germany and focusses on Personnel Services and Training.

The Amadeus Fire Group comprises Amadeus Fire Aktiengesellschaft (Amadeus Fire AG), the holding company, and its subsidiaries. Its headquarters are in Frankfurt am Main, Germany.

For more than 35 years and currently at 22 locations, Amadeus Fire AG specialises in personnel services for specialists and managers in the commercial and IT sectors. This includes specialised temporary staffing, permanent placement and interim and project management services.

In the Training segment, the Amadeus Fire Group offers training and retraining opportunities in the commercial and IT sectors. Depending on the focus, the core brands Comcave College and GFN as well as Steuer-Fachschule Dr. Endriss, Akademie für Internationale Rechnungslegung and TaxMaster offer publicly funded training (B2G), open or in-house seminars as training for corporate clients (B2B) and training and study programmes for private customers (B2C).

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### **3. The German Supply Chain Due Diligence Act**

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The German Supply Chain Due Diligence Act (LkSG) is intended to guarantee human rights and environmental standards along the entire supply chain. For this purpose, it defines a range of legally protected positions, whose imminent violation is to be prevented by extensive duties of care.

According to Sec. 6 (2), every company covered by the LkSG must adopt a policy statement on human rights strategy. This describes the process a company uses to fulfil its due diligence obligations in its own business sector and throughout the entire supply chain. It is necessary to state the human rights and environmental risks that have been identified as priorities in the risk analysis. Finally, the policy statement on the human rights strategy defines the expectations that a company has of its employees and suppliers in the supply chain with regard to human rights and the environment.

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### **4. Protection of human rights and the natural environment throughout the supply chain**

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The Amadeus Fire Group implements adequate and effective measures to identify and verify risks related to human rights and the environment in its own business units and throughout the supply chain and to prevent risks from materialising. If a breach of a human rights or environmental obligation is determined to have occurred or to be imminent, a targeted remediation process takes effect, during which individual measures are taken to end a breach and minimise its consequences.

All measures implemented as defined by our human rights and environmental responsibility follow the principle of "empowerment before retreat": We are committed to providing our business partners with support in preventing and ending violations of human rights or environmental regulations before we terminate business relationships or switch to alternative sources of procurement.

#### **4.1. Measures for effective risk management**

The due diligence obligations are implemented for the Group's own business area and the entire supply chain as part of a risk management system. Through the horizontal and vertical integration of due diligence obligations into all relevant business processes, the Amadeus Fire

Group ensures that risks are recognised and preventive and remedial measures are implemented in a focused manner.

#### **4.1.1. Effective risk management**

The Amadeus Fire Group has defined a risk management system in which processes for the performance of due diligence are set out. This is described in more detail in the corresponding annual report and reviewed and certified by the annual audits.

Due diligence obligations are vertically integrated by defining supervisory and coordination responsibilities at executive board level. The executive board has ultimate responsibility for the implementation of human rights and environmental due diligence obligations.

The Investor Relations department, in cooperation with the internal audit department, is responsible for monitoring risk management for the Group's own business area and the entire supply chain as well as regular effectiveness reviews. The results are reported directly to the executive board.

#### **4.1.2. Identifying, weighting and prioritising risks**

The Amadeus Fire Group implements extensive risk analyses with regard to compliance with human rights and environmental obligations within its own business area and at its direct suppliers. We rely on internal as well as external expertise. The complexity and scope of our international supply chain requires the use of technical solutions to support identification, verification, weighting and prioritisation of risks.

The risk analysis system determines the individual risks of each business partner. Based on general supplier information - in particular country of origin and industry - an abstract risk analysis is performed according to a number of recognised indices and studies by external experts. Using supplier self-assessments, an AI-driven media analysis tool, verified certifications and our own findings from inspections or business processes, we subsequently review business partners for specific human rights or environmental risks. This involves analysing more than the country of origin and industry of the business partner. Furthermore, we analyse product risks, trading level related risks, the complexity of upstream supply chains and a wide range of other data in order to isolate, localise and identify risks at an early stage.

We weight and prioritise risks by correlating the typically expected severity of a possible violation of the law and its irreversibility with the probability of occurrence. We also consider our own potential causal contributions and the extent of our influence in order to prioritise risks and implement targeted measures where a risk is likely to materialise. Taking into account our risk matrix, we identify our requirements for action and initiate preventive and corrective measures where necessary.

#### **4.1.3. Taking preventive action**

The detailed risk analysis is complemented by appropriate and effective preventive measures.

A code of conduct applies in our own business area, which clearly and comprehensibly summarises the expectations of employees and their rights.

The Amadeus Fire Group offers a wide range of educational and training programmes that employees are encouraged to take part in. The employees in charge of implementing the human rights and environmental due diligence obligations regularly participate in training programmes in order to be able to implement the international requirements for human rights and environmental protection throughout the entire supply chain. We offer our business partners training programmes to enable them to ensure human rights and environmental protection in their business activities.

We maintain periodic and ad hoc controls in our own business area in order to identify and minimise risks at an early stage. We monitor business partners in accordance with the applicable laws and regulations.

We expect our business partners to communicate our human rights and environmental expectations in the supply chain and to monitor their compliance on an ongoing process. Therefore, our Supplier Code of Conduct is the basis for any new business relationship.

#### **4.1.4. Provide a remedy**

Effective remedy measures must be taken if a violation of a human rights or environmental obligation occurs or is imminent.

The Amadeus Fire Group initiates remedy measures immediately after identifying a corresponding violation. We develop customised remedy measures for every situation and every direct or indirect supplier in order to terminate violations in a targeted manner. Furthermore, we defined a range of framework measures according to a modular principle that can be activated immediately and filled with specific content in response to violations.

For all remedy measures, we define a process, success targets and clear internal company responsibilities. Each of them contains a concrete timetable and can be customised with interim targets. The system-based action processes link all relevant participants.

#### **4.1.5. Follow up on information**

An important aspect of identifying risks and violations in the supply chain is a complaints procedure that is accessible to all those involved in the supply chain - from employees and suppliers to third parties who are affected by our activities or those of our suppliers. It is essential that information can be submitted discreetly and anonymously.

Our online whistleblowing system is multilingual and recognises the complexity of the supply chain. Any access threshold is minimised to keep the whistleblowing process as simple as possible.

Complaints are handled in confidence and swiftly. The employees involved in processing complaints are not under any instructions as part of complaints management; their neutrality is guaranteed. Every complaint initiates an evaluation and action process, which results in the termination of the reported violation or the minimisation of an identified risk.

Information and complaints submitted are also automatically considered as part of the risk analysis.

#### **4.1.6. Responsibility throughout the entire supply chain**

The Amadeus Fire Group is committed to its responsibility for the entire supply chain. Consequently, we extend our risk analysis to suppliers with which we do not maintain a business relationship directly, but are part of our supply chain.

The long-term objective is to attain full transparency in the supply chain. Despite comprehensible conflicting interests of certain business partners, we aim to identify indirect suppliers and include them in the risk analysis. We therefore collaborate closely with our direct business partners in order to increase transparency in the supply chain in a constructive manner for the benefit of all.

#### **4.1.7. Documentation and reporting**

The implementation of all due diligence obligations is constantly being documented. A centralised risk management system ensures that we integrate all available information on identified risks and the preventive and corrective measures taken.

We furthermore recognise our commitment to transparent communication on the human rights and environmental challenges to which the Amadeus Fire Group is exposed. Through our public reporting, we disclose identified risks, measures taken and the progress made at least once a year.

## **4.2. Focus: Human rights and natural environment**

The Amadeus Fire Group as a service provider for Personnel Services and Training poses specific challenges. Identified human rights-related risks - in particular the risk of unequal treatment in employment - are addressed through appropriate and effective measures. We set specific targets that have to be achieved in a measurable way within a fixed schedule. Measures to minimise risks comprise, for example, the application of the industry bargaining agreement

entered into between Interessenverband Deutscher Zeitarbeitsunternehmen e.V. (iGZ) and Deutscher Gewerkschaftsbund (DGB). In this context, regular trainings are offered on the topics of employment and collective bargaining law, in particular to avoid incorrect classification of external employees. An internal audit department also monitors and ensures compliance with a range of laws and regulations, the collective labour agreement, the above-mentioned industry bargaining agreement, the industry surcharge agreements for temporary staffing and compliance with the Group's internal guidelines.

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## **5. Outlook**

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The Amadeus Fire Group is obliged to review, develop and improve its own measures on an ongoing basis. The effectiveness and efficiency of all human rights and environmental due diligence obligations must be guaranteed throughout. Assessments of effectiveness are made on an ad hoc basis at least once a year.