



# Declaration of Principles

ON RESPECT FOR HUMAN AND ENVIRONMENTAL RIGHTS

Zeppelin Group, 2023



## Declaration of Principles on Respect for Human and Environmental Rights

### 1. Foreword by the Group Management

Zeppelin<sup>1</sup> is a globally active company with strong values. As a foundation company, Zeppelin is committed to ecologically and socially responsible corporate governance. The foundation of our values is the integrity and excellence of our employees. Appreciation, mutual respect and fairness characterize our daily interactions and are an integral part of our corporate DNA. Respect for human rights, environmental rights and the responsible treatment of our environment is a fundamental element of our corporate governance. Our aim is to ensure that these rights are respected in all our Group companies and also by our partners and suppliers.

This policy statement on respect for human and environmental rights expresses our responsibility within our value and supply chain. We implement applicable laws and regulations, respect internationally recognized standards and take care to prevent human rights and environmental risks and violations in the course of our business activities and to provide those affected with access to remedies and complaint channels. These guiding principles of our business activities are specified in our internal code of conduct (including the [Code of Conduct for Business Ethics and Compliance](#)). The requirements we place on our business partners in the supply chain are formulated in the [Code of Conduct for Partners, Suppliers and Service Providers](#).

Zeppelin (hereinafter also referred to as "We") will only be successful in the long term if we are equally committed to respecting human and environmental rights both locally and globally. This Declaration of Principles and the measures set out herein are another important step in this direction. All Zeppelin employees are called upon to apply the contents of this declaration of principles in their daily practice. Thank you for your support at this point.

This policy statement is adopted by the management of Zeppelin GmbH as the Group parent company with decisive influence within the meaning of the Supply Chain Due Diligence Act ("LkSG") for all Group companies.

### 2. Commitment: What we stand for as Zeppelin

Acting responsibly, sustainably and lawfully is one of our core values and is firmly anchored in our corporate strategy.

Zeppelin respects the dignity and rights of both individuals and societies. We respect the sovereignty of states and their role in enacting laws. It is the duty of states to protect human rights and it is a matter of course for us as a company to follow the law and respect human rights.

We are therefore expressly committed to respecting human rights in our own business activities and to promoting them along our value chain in cooperation with our suppliers.

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<sup>1</sup> In this context, "Zeppelin" refers to Zeppelin GmbH and all companies in which Zeppelin GmbH directly or indirectly holds a majority interest.



On this basis, we are committed to the following international standards:

- UN Human Rights Charter;
- The ten principles of the UN Global Compact;
- the International Covenant on Civil and Political Rights;
- the International Covenant on Economic, Social and Cultural Rights;
- the ILO core labor standards (= Conventions No. 29, 87, 98, 100, 105, 111, 138, 182, based on the principles of freedom of association and the right to collective bargaining, elimination of forced labor, abolition of child labor and prohibition of discrimination in respect of employment and occupation), including the Protocol to Convention No. 29 on Forced or Compulsory Labor;
- UN Guiding Principles on Business and Human Rights

### **3. Scope of application: Who we are addressing**

This policy statement applies to our employees in all areas of the company worldwide. With these standards, we emphasize our understanding and expectation of our employees worldwide to behave respectfully, appropriately and lawfully towards colleagues and suppliers. As we rely on our direct suppliers, such as vendors, in our business activities and they in turn rely on trusting cooperation with other suppliers along the value chain, we also expect our direct suppliers to comply with these standards and to pass on our commitment to respecting human rights to their suppliers.

### **4. Identified risks: Which risks we have identified**

#### **Prioritization in our own business area**

Based on our risk analysis in our own business area, which we carried out at Group company level, we identified country-specific risks as our priority human rights-related risks in line with

our global activities and checked their plausibility as part of a specific risk analysis, and the following areas were prioritized: Right to health and safety at work.

### **Prioritization in our supply chains**

We recognize that due to our business activities, human rights risks in the countries and sectors of our direct suppliers are unlikely, but cannot be completely ruled out. Accordingly, we have identified a certain number of suppliers that are located in countries with a fundamentally higher risk and suppliers that operate in sectors that could potentially pose an increased risk. We checked the plausibility of these as part of a specific risk analysis. The following areas were prioritized: Health and safety in the workplace, appropriate remuneration.

These suppliers were reviewed in accordance with our specified processes and additionally qualified where necessary.

## **5. Implementation: What we do**

### **5.1 Risk analysis**

In order to review the impact of our actions on human rights, we carry out a risk analysis annually and on an ad hoc basis, particularly when introducing new products, projects or a new business area. As part of this analysis, one or more of the following measures are carried out if necessary: Commissioning of external screening services, monitoring of contracts, supplier surveys using questionnaires, media research, internal and/or external on-site audits, discussions with (potentially affected) stakeholders such as employees, works councils or local residents. The human rights risks identified are assessed and prioritized. We communicate the results of our risk analysis to the relevant decision-makers and take them into account appropriately.

### **5.2 Preventive measures**

In order to avoid or mitigate identified human rights risks, we have introduced various preventive measures, the effectiveness of which we monitor on an ongoing basis and adapt as necessary:

These preventive measures include our own rules and regulations, which provide a binding framework for action for our employees and suppliers:

- [Code of Conduct for Business Ethics and Compliance](#);  
The Code of Conduct for Business Ethics and Compliance sets out the ethical and legal framework within which we act. It defines the fundamental principles for our conduct within Zeppelin and in relation to our partners and the public. It sets out the principles of our business conduct and is an expression of our corporate values.
- [Code of Conduct for partners, suppliers and service providers](#)

Our [Code of Conduct for Partners, Suppliers and Service Providers](#) is part of our standard procurement contracts and General Terms and Conditions of Purchase. This is intended to oblige our direct suppliers to respect human rights. Our standard procurement contracts also provide for the possibility of internal on-site inspections and external audits in order to regularly monitor compliance with the standards set out in this declaration of principles. In addition, we also oblige our direct suppliers to demand compliance with human rights from their respective suppliers.



We actively work towards compliance with and implementation of these standards along the value chain. The commitment of our direct suppliers to comply with these standards is important to us.

Respect for human rights is an important evaluation criterion when selecting our direct suppliers.

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We also offer training courses for our direct suppliers in which participants are made aware of human rights and labor standards and informed about our requirements.

We also endeavor to ensure compliance with the standards with regard to indirect suppliers. If we gain substantiated knowledge of a (possible) violation at an indirect supplier, we carry out a risk analysis and take appropriate preventive and remedial measures.

With regard to the prioritized risks, all active suppliers of the German Group companies were sent our [Code of Conduct for Partners, Suppliers and Service Providers](#), as well as the opportunity to report violations of defined standards via our complaints procedure and to actively request information in the event of violations. A letter was also sent to certain suppliers from potentially high-risk sectors in which the identified risks were addressed in detail. In addition, framework agreements were concluded with certain suppliers, which stipulate the control options described above in individual contracts and also include an assurance of compliance with certain defined criteria.

We also continuously train our employees in our own business area. We also regularly check compliance with the standards set out in the regulations and this policy statement and take them into account as part of preventive due diligence for planned investments in locations.

### 5.3 Remedial measures

If we identify imminent or existing violations in our own business area, we will prevent or stop them. The same applies - where possible - to breaches at one of our suppliers. If a breach at one of our suppliers is of such a nature that we cannot prevent it or end it in the foreseeable future, we immediately implement a minimization concept based on our procedural instructions for preventive and remedial measures.



## 6. Structure and responsibilities: Who is responsible

In December 2022, we appointed the Group General Counsel, Mr. Ingo Sommer, who reports directly to the CFO/Group Managing Director, Mr. Christian Dummler, as well as to the entire Group Management Board on this topic, to monitor the LkSG-related risk management system. At regular meetings, the impact of our business activities on human rights and possible preventive and remedial measures are discussed and human rights-related activities and guidelines are adopted. The relevant departments, in particular our legal, quality management and CSR departments as well as our purchasing departments, are closely involved in this process.

## 7. Complaints procedure: Where can I turn to

We have set up an [online whistleblower system](#) for our stakeholders for complaints and reports of human rights violations. Everyone has access to this complaints system, regardless of the existence or type of contractual or business relationship with us. Critical questions, concerns and complaints are always heard there. We ensure that all reported concerns are investigated by our impartial LkSG team.

Our online [whistleblower system](#) works like an electronic mailbox where reports can be submitted around the clock. The most important difference to the other contact options is that the whistleblower can be guaranteed anonymity. The electronic platform is located on an external server - it is not possible to trace the information provided. We expressly encourage our employees in particular to report suspected violations of this policy statement there.

In addition, Mr. Ingo Sommer, Group General Counsel, can be contacted by e-mail ([lksg@zeppelin.com](mailto:lksg@zeppelin.com)) for questions and reports. All questions and reports will be treated confidentially.

## 8. Documentation and reporting: Where can I find up-to-date information?

Every year, we publish up-to-date information - particularly with regard to identified risks, measures taken and their assessment as well as conclusions from the assessment for future measures - in our Sustainability Report and in our Annual Report under the LkSG. The reports can be accessed free of charge at [www.zeppelin.com](http://www.zeppelin.com).

We also review the procedures and this policy statement regularly, at least once a year and on an ad hoc basis, and update them on an ongoing basis, taking into account the findings from the processing of information from the complaints procedure.

Garching near Munich, December 31, 2023

Group Management, Zeppelin GmbH

Peter Gerstmann  
CEO, Chairman of the Management Board

Christian Dummmler  
CFO, Managing Director

Fred Cordes  
COO, Managing Director

Alexandra Mebus  
CHRO, Managing Director

\* \* \*

Zeppelin Baumaschinen GmbH

Holger Schulz  
Chairman of the Management Board  
Managing Director

Thomas Weber  
Vice Chairman of the Management Board  
Managing Director

Andreas Kamm  
CFO, Managing Director

Philip Wolters  
CHRO, Managing Director



Zeppelin Power Systems GmbH

Eva-Maria Graf  
Managing Director

Zeppelin International AG

Stanislav Chládek  
CEO, Chairman of the Management Board

Leonid Jasvain  
CFO, Managing Director

Frank Janas  
COO, Managing Director

Zeppelin CZ s.r.o

Stanislav Chládek  
Managing Director

Zeppelin Österreich GmbH

Stephan Bothen  
Chairman of the Management Board

Michael Härtel  
CFO, Managing Director

Zeppelin Danmark A/S

Volker Poßögel  
Managing Director

Henrik Stordal  
Managing Director

Zeppelin Sverige AB

Volker Poßögel  
Managing Director

Zeppelin Rental GmbH

Arne Severin  
Chairman of the Management Board

Peter Schrader  
Managing Director

Zeppelin Systems GmbH

Markus Vöge  
CEO, Chairman of the Management Board

Ralf Boschert  
CFO, Managing Director



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