

# Policy statement on respect for human rights





We are committed to  
respecting human rights  
along our entire value chain.



# About the Dussmann Group

With 65,000 colleagues in 21 countries, Berlin-based Dussmann Group provides services for people, by people.

The family-owned company is active in three business fields: Dussmann (Facility Management, Food Services and Technical Solutions), Care & Kids (care and nursery for the elderly as well as corporate child-care) and the media retailer "Dussmann das KulturKaufhaus".

We implement our values in our business activities through sustainable management, consistent compliance with the law and permanent exchange with our stakeholders.

This policy statement on the respect of human rights supplements the code of conduct and the sustainability policy of the Dussmann Group. We communicate it to our employees and business partners.

The Executive Board of the Dussmann Group and the management of the Group companies control and monitor the implementation of the content of this policy statement within the Group. In this way, we ensure to accept and implement our corporate responsibility for the protection of human rights throughout the Group.

- p. 3 About the Dussmann Group
- p. 4 Our responsibility
- p. 5 Frameworks and standards
- p. 6 Basic and primary human rights, Implementation of due diligence obligations, Risk management
- p. 7 Risk analysis in own business, Preventive measures in own business, Risk analysis for direct suppliers, Preventive measures for direct suppliers
- p. 8 Remedial measures, Complaints procedure
- p. 9 Further information Contact



# Our responsibility

We take responsibility for our employees and take our responsibility to minimize the impact of our business on the environment seriously.

The Dussmann Group respects the dignity of every human being. We are committed to respecting human rights along our entire value chain. We take responsibility for our employees and take our responsibility to minimize the impact of our business on the environment seriously.

This policy statement obliges all employees of the Dussmann Group worldwide to behave appropriately and lawfully towards colleagues, business partners and communities. We also require ethical and compliant behavior from our business partners. We expect them to demand the implementation of these standards on respect for human rights also from their business partners.

It is our principle to always comply with the applicable legal regulations in all regions and countries in which we operate. If national laws and international human rights standards differ, we ensure to comply with national laws as a minimum standard. Together with our local colleagues and partners, we are looking for ways to comply with these human rights standards as far as possible.



## Our policy statement is in line with the following standards:

- Universal Declaration of Human Rights (UDHR) by the United Nations General Assembly
- International Covenant on Civil and Political Rights (ICCPR) by the United Nations General Assembly
- International Covenant on Economic, Social and Cultural Rights (ICESCR) by the United Nations General Assembly
- Conventions and Recommendations on Social and Labour Standards by the International Labour Organisation (ILO)
- Tripartite Statement of Principles concerning Multinational Enterprises and Social Policy by the International Labour Organisation (ILO)
- OECD Guidelines for Multinational Enterprises
- Principles of the United Nations Global Compact (UNGC)
- United Nations Sustainable Development Goals (SDGs)
- Charter of Fundamental Rights of the European Union (CFR)



In line with the United Nations Guiding Principles on Business and Human Rights, we base our policy statement on the principles of the internationally recognized human rights frameworks and standards.



### **Basic and primary human rights**

We consider the following fundamental human rights as essential for our business activities:

- Ensuring occupational health and safety
- Granting of an appropriate wage
- Equal treatment in employment and compliance with the ban on discrimination
- Recognition of freedom of association
- Compliance with the prohibition of forced labor
- Compliance with the ban on child labor

### **Implementation of due diligence obligations**

The Dussmann Group exercises appropriate due diligence with the objective of preventing or minimizing human rights or environmental risks or ending violation of human rights or environmental obligations. The Group

Compliance department is responsible for coordinating the Dussmann Group's human rights risk management. It checks the introduction of suitable preventive and remedial measures, prioritizes activities and monitors Group-wide efforts to uphold human rights. The responsibility for implementation lies with the management of the subsidiaries, which ensure the implementation of minimum standards in their local processes. As part of our sustainability reporting, we monitor the implementation of this policy statement and report on the current status.

### **Risk management**

Human rights risk management is integrated into the Dussmann Group's Enterprise Risk Management and includes risk identification, risk assessment, documentation and reporting, as well as the implementation of risk mitigation measures. This process is subject to constant review and ongoing development.

## **Risk analysis in own business**

The risk analysis involves evaluating, prioritizing and documenting risks to essential human rights on the basis of a qualified assessment. Our risk analysis showed a low classification for human rights and environmental risks. Weighing in their relevance, we consider the topics of occupational health and safety, working hours and equal treatment in employment to be prioritized for our Facility Management, Food Services, Technical Solutions, Care & Kids and Kulturkaufhaus divisions.

## **Preventive measures in own business**

Through comprehensive measures, we continuously strive to minimize potential risks. As part of our integrated management system, we train managers and relevant groups of people on identified risks and how to deal with them appropriately according to our internal processes and standards. The effectiveness of our processes and measures is monitored through regular audits and management reviews. Our Dussmann Group code of conduct is binding for all employees.

## **Risk analysis for direct suppliers**

The basis for the risk analysis of our direct suppliers is the entirety of essential suppliers in the assessment period. We identify suppliers with an increased abstract risk by evaluating country and industry risks. A detailed assessment is carried out for these suppliers. This includes an assessment of the supplier's

specific risk potential based on information from a supplier self-assessment, as well as our ability to influence the supplier based on the share of revenue and our causal contribution in accordance with the contractually agreed conditions. The results of our risk analysis are transferred into the relevant business processes and our supplier management.

We are a service providing company that primarily sources locally. Consequently, our initial risk analysis for all our business divisions shows a very low risk in connection with suppliers of products and services. In contrast, we have identified a low to medium risk for temporary employment agencies and subcontractors. For those, we identified the topics of occupational health and safety, working hours, wages and equal treatment in employment as priorities.

## **Preventive measures for direct suppliers**

Appropriate preventive measures are derived from the supplier's total risk. We have established the following measures for our direct suppliers: consideration of human rights and environmental expectations when selecting suppliers on the basis of our code of conduct for business partners, obtaining contractual assurances for adherence to and implementation of expectations of our suppliers along the supply chain, conducting supplier meetings, carrying out supplier audits and trainings, supplier evaluations, purchasing guidelines and approval processes. In addition, preventive measures can be taken on a case-by-case basis that relate to a specific risk situation.

## Remedial measures

In our own business, we take appropriate remedial measures to prevent or end violation in the event of reasonable suspicion or concrete evidence of possible human rights and environmental violation. From our suppliers, we expect full cooperation in investigating and ending possible human rights and environmental violation. In the event of very serious violation, if suitable remedial measures have not been implemented after an agreed implementation period has expired or if no other milder means are effective, we reserve the right to take legal action up to and including termination of the business relationship.

## Complaints procedure

We encourage our employees to report suspected violations of this policy statement on the protection of human rights through the Dussmann Group whistleblower system. All incoming reports are treated confidentially and in a fair process in order to exclude any disadvantage. Our business partners and third parties also can report possible violations of this policy statement. The complaints procedure is set out in the [Dussmann Group's rules of procedure](#).

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Wolf-Dieter Adlhoch  
CEO



Renato Spotti  
Member of  
the Executive Board



Hakan Lanfredi  
Member of  
the Executive Board



Dieter Royal  
Member of  
the Executive Board



**Further information:**

<https://en.dussmanngroup.com/responsibility>

[www.dussmanngroup.com/code-of-conduct](http://www.dussmanngroup.com/code-of-conduct)

[www.dussmanngroup.com/code-of-conduct-business-partners](http://www.dussmanngroup.com/code-of-conduct-business-partners)

[www.dussmanngroup.com/sustainability-policy](http://www.dussmanngroup.com/sustainability-policy)

[www.dussmanngroup.com/sustainability-report](http://www.dussmanngroup.com/sustainability-report)

[www.dussmanngroup.com/complaints-procedure](http://www.dussmanngroup.com/complaints-procedure)

**Contact:**

Dussmann Group

Compliance

Friedrichstraße 90

10117 Berlin

Germany

[compliance@dussmanngroup.com](mailto:compliance@dussmanngroup.com)