

S IMMO AG
Organisational Policy OP 6
Human Rights

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1. INTRODUCTION

S IMMO AG (hereinafter "S IMMO") is committed to respecting, protecting and promoting international human rights through this organisational policy.

This includes, on the one hand, the avoidance of and dealing with human rights impacts that arise from its own business activities and, on the other hand, efforts to prevent or mitigate negative impacts on human rights that arise in the course of direct business relationships.

2. OBLIGATION OF EMPLOYEES AND GOVERNING BODIES OF S IMMO

Against this backdrop, the employees and members of the governing bodies of S IMMO are obliged to observe the principles of this organisational policy and the rights and principles set out therein in their daily activities. This also includes all subsidiaries that are under the controlling influence of the parent company. Annual training is provided on the content and implementation of this organisational policy and the digital whistleblower system, which plays a central role in the anonymous reporting of human rights violations.

3. COMMITMENT OF SERVICE PROVIDERS AND SUPPLIERS

Furthermore, S IMMO expects its external service providers and suppliers, regardless of their size, to comply with the contents of this organisational policy. All persons who provide services directly to S IMMO will be informed of this organisational policy without delay. S IMMO reserves the right to conduct random checks on compliance with this organisational policy and to take corrective measures in the event of non-compliance.

Direct service providers and suppliers are required to ensure that their subcontractors also comply with this organisational policy to the greatest extent possible. The organisational policy is publicly accessible and can be downloaded from the S IMMO corporate website at www.simmoag.at/en/sustainability/social.

4. INTERNATIONAL HUMAN RIGHTS

S IMMO is committed to safeguarding all human rights and explicitly refers to

- the International Bill of Human Rights, including the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights,

- the Fundamental Principles and Core Labour Standards of the International Labour Organization (ILO),
- the UN Guiding Principles on Business and Human Rights, and
- the OECD Guidelines for Multinational Enterprises

as frameworks for the definition of this organisational policy. In addition, S IMMO is committed to upholding Austria's fundamental rights.

However, the implementation of human rights does not always fall within the company's active sphere of influence, as most of the prerequisites must be created and maintained at the state level. S IMMO has therefore identified human rights issues that it considers particularly relevant to its business activities and supply chains and actively addresses them. These are listed below in accordance with S IMMO's scope of application and briefly defined from the company's perspective.

4.1 Equality and prohibition of discrimination

All human beings are equal and therefore enjoy equal rights and protection. Any discrimination based on ethnic origin or nationality, language, social origin, age, gender, gender identity, sexual orientation, religion, political or other belief, mental or physical ability or other status is prohibited.

4.2 Rights of ethnic, religious and linguistic minorities

Persons belonging to recognised ethnic, religious or linguistic minorities shall not be deprived of the rights to cultivate their own cultural life, to profess and practise their own religion or to use their own language.

4.3 Prohibition of sexual harassment

Any kind of sexual harassment, whether verbal, non-verbal or physical, is prohibited without exception.

4.4 Prohibition of hatred and war propaganda

The advocacy of national, racial or religious hatred, inciting to discrimination, hostility or violence is prohibited. There is also a ban on war propaganda.

4.5 Prohibition of slavery, torture, forced and compulsory labour

Everyone has the right to life, personal liberty and security of person. No one shall be held in slavery or servitude, or subjected to cruel, inhuman or degrading treatment. No one shall be compelled to perform forced or compulsory labour.

4.6 Prohibition of child labour

The economic and social exploitation of children and young people is prohibited. This includes, in particular, employment in work that is harmful to their morals or health, endangers their lives or impedes their normal development. Furthermore, the paid employment of children under the respective national age limit is prohibited. All children, both legitimate and illegitimate, enjoy the same protection.

4.7 Protection of the individual's sphere of freedom

No person shall be subjected to arbitrary or unlawful interference with his or her private life, family, home and correspondence, or to impairment of his or her honour and reputation.

4.8 Freedom of thought, conscience and religion

Everyone has the right to freedom of thought, conscience and religion. This right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.

4.9 Freedom of expression, assembly and association

All people enjoy unimpeded freedom of opinion and expression and have the right to assemble peacefully and to form associations. No one may be forced to belong to an association.

4.10 Right to just and favourable conditions of work and social security

Everyone has the right to a free choice of occupation and to safe and healthy working conditions. He is entitled to an adequate wage and equal remuneration for work of equal value. Remuneration must be adequate and must ensure a livelihood for him and his family in accordance with human dignity, supplemented, where necessary, by other social protection measures. Equal opportunities for career advancement must be guaranteed.

4.11 Right to recreation and leisure

Everyone has the right to work breaks, rest and leisure and, in particular, to reasonable limits on working hours and regular paid holidays and compensation for public holidays.

4.12 Trade unions, right to collective bargaining and right to strike

All people have the right to form and join trade unions to protect their interests. Trade union membership must not have a negative impact, for example in the form of unequal treatment.

Measures must also be taken to promote the possibility of collective bargaining to the widest extent possible. In addition to the right to collective bargaining, all persons shall enjoy the right to strike in accordance with national law.

4.13 Special protection for mothers

Mothers enjoy special protection during a reasonable period before and after childbirth. Working mothers receive paid leave or leave with appropriate benefits from social security during this period.

4.14 Right to physical and mental health

Everyone has a right to the highest attainable standard of physical and mental health. This includes, among other things, the improvement of all aspects of environmental and occupational hygiene and the prevention of epidemic, endemic, occupational and other diseases.

4.15 Right to complain and enforcement

All people have the right to lodge a complaint in the event of a violation of human rights. Legal protection must be guaranteed and, if the complaint is upheld, it must be enforced by the competent authorities.

5. ORGANISATIONAL AND OPERATIONAL ANCHORING OF HUMAN RIGHTS

The Management Board of S IMMO has adopted and supports this organisational policy. The operational implementation and continuous assurance of human rights due diligence is the responsibility of S IMMO's Compliance Management, a Group-wide function currently performed by one of the members of the Management Board.

This includes the ongoing identification and assessment of actual and potential human rights violations as well as the initiation and follow-up of preventive, mitigating and remedial measures within the company's sphere of influence, if necessary in coordination with the rest of the Management Board and insofar as this is within the company's sphere of influence. In order to identify and address specific issues in the best possible way, Compliance Management coordinates closely with the Group departments or local management of the S IMMO subsidiaries as required. In addition, all relevant human rights issues form an integral part of Group-wide risk management.

6. GRIEVANCE MECHANISMS

The central point of contact for all complaints and suspicious activity reports regarding actual and potential human rights violations is S IMMO's Compliance Management, which can be contacted by email to compliance@simmoag.at. In addition, local management in the subsidiaries can also be contacted in the first instance. An anonymous report can also be submitted via the Group's digital whistleblower system at www.simmoag.at/whistleblower-system. All three channels are always open to internal and external persons alike. All reported incidents are received by Compliance Management and are treated confidentially and with an assurance of anonymity; if confirmed, possible countermeasures are identified. At least one (additional) member of the Management Board is involved.

If several human rights violations occur at the same time, those with serious and time-critical impacts are prioritised. These grievance mechanisms aim to meet the requirements of legitimacy, accessibility, predictability, equitability, transparency and human rights compatibility at all times. The type of measures taken is entirely case-dependent and is determined individually in accordance with applicable law and, where possible, in dialogue with the parties concerned.

7. EFFECTIVENESS MONITORING AND DISCLOSURE

S IMMO's Compliance Management continuously documents identified actual and potential human rights violations, complaints lodged, and measures implemented. This also includes measures for the active promotion of human rights away from complaints and suspicious activity reports, as well as the general further development of this organisational policy. This information, in particular the number of complaints lodged, the number of complaints confirmed, and the measures taken, is published annually in anonymised form as part of the Non-financial Report in the Annual Report. Likewise, the cases are processed internally as learning examples in accordance with the confidentiality principle in order to avoid the repetition of similar cases as best as possible.