



Human Rights Policy

April 22

Scope	Adler Group
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Approved by	Executive Board
Responsible divison	Executive Department Sustainability
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Version history

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V 01	20 January 2022	Executive Department Sustainability	preparation	

Inhalt

1. *Scope of application*..... 4

2. *Objective of the Policy*..... 4

3. *Commitment of the Adler Group* 4

1. Scope of application

This policy applies to all companies and employees of the Adler Group as well as to business partners of the Adler Group and its companies.

2. Objective of the Policy

As a developer, owner and manager of real estate, the Adler Group complies with internationally recognised conventions such as the United Nations Charter on Human Rights (**Universal Declaration of Human Rights**), the **Declaration on Fundamental Principles and Rights at Work** of the International Labour Organization (ILO) and the **UN Guiding Principles on Business and Human Rights**.

3. Commitment of the Adler Group

Diversity and non-discrimination

The Adler Group respects and values the diversity of its workforce, its customers and its suppliers. The Adler Group creates an inclusive environment for all team members. It is one of the Adler Group's principles to value all persons regardless of gender, nationality, ethnic background, religion or worldview, disability, age, and sexual preference and identity.

Respectful treatment

All employees of the Adler Group are expected to treat their colleagues and the employees, customers and suppliers of the Adler Group with dignity and respect. The Adler Group does not tolerate harassment of employees, either inside or outside the company. The Adler Group creates a working environment that is free from ethnic, religious, racial or sexual harassment. All complaints of harassment will be promptly investigated and treated with appropriate confidentiality.

Child labour and forced labour

The Adler Group does not tolerate child labour and does not employ anyone younger than the minimum legal employment age. All employees are treated fairly and employed in safe workplaces so that any form of unethical or illegal working conditions (e.g. harassment, physical and psychological violence, undeclared work, forced labour, child labour) is avoided. The Adler Group also expects its suppliers to comply with these standards.

Working hours and minimum wages

Working hours are in accordance with all applicable laws and regulations. The Adler Group requires that employee compensation comply with all applicable wage and compensation requirements as set

forth in applicable labour laws for regular work, overtime, maximum hours, leave, piece rates and for other elements of employee compensation and benefits.

Freedom of association and collective bargaining: The Adler Group complies with applicable laws regarding freedom of association and collective bargaining.

Safety and security: The Adler Group creates a safe and secure business environment for employees, customers and suppliers as well as for products, systems and information. The Adler Group minimises potential security risks. To this end, relevant risks are identified, assessed and minimised by developing and implementing measures and procedures.

Infringements and reporting system

Employees are required to comply with all Adler Group policies, procedures and practices at all times. They are responsible for contacting their managers in the event of questions or suspected violations. Alternatively, employees may also contact the Compliance Department or the AGG Officer.

Company employees and external parties can also report suspected violations via the Adler Group's electronic whistleblowing system (<https://adler.integrityline.org>) or contact the Adler Group's external lawyer of confidence. More detailed information is available to our customers and suppliers on the Adler Group website and to company employees on the Adler Group intranet.

Accompanying documents to this document are the Code of Conduct and the Diversity Charter.

Other relevant references include:

<https://www.un.org/en/about-us/universal-declaration-of-human-rights>

<https://www.unglobalcompact.org/>

<http://ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang--en/index.htm>

<https://www.ohchr.org/en/issues/discrimination/pages/lgbtunresolutions.aspx>

<https://www.un.org/youthenvoy/2013/07/un-women-the-united-nations-entity-for-gender-equality-and-the-empowerment-of-women/>

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