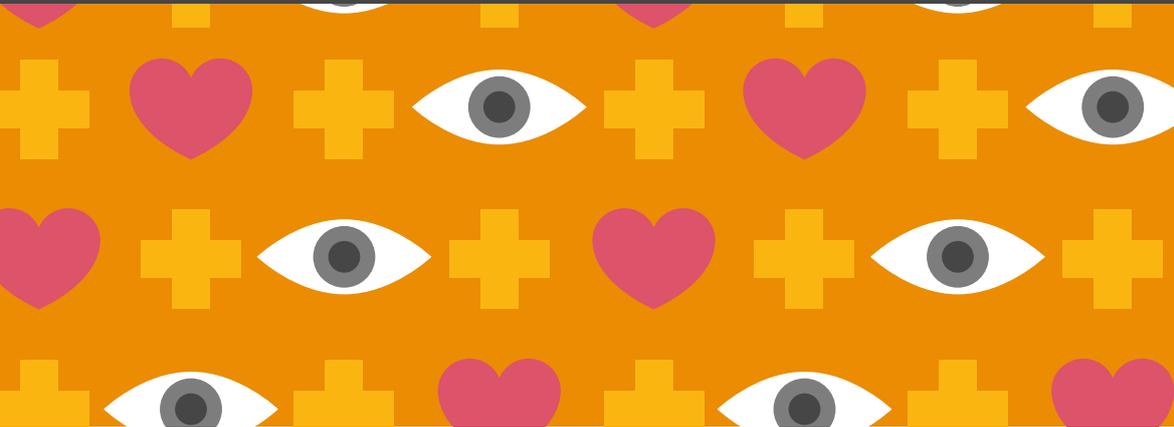


Revised Human Rights Statement



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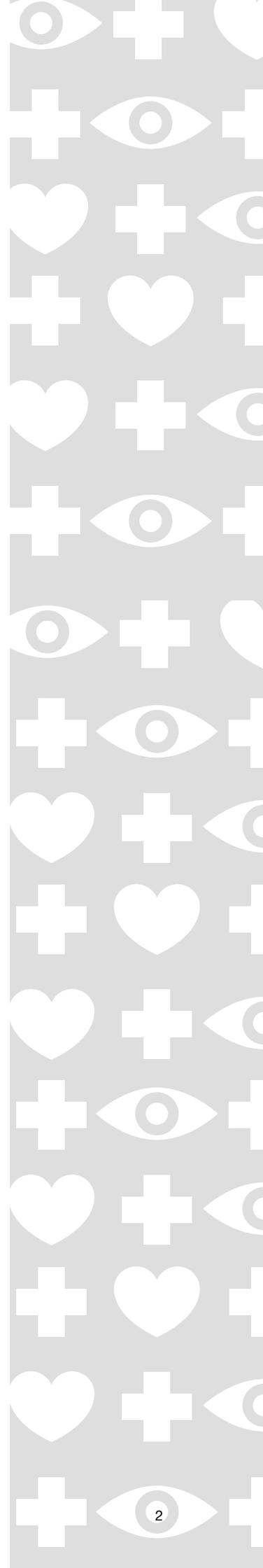
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Our commitment to respecting human rights

We are aware of our corporate responsibility to respect human rights. We are therefore committed to respecting human rights in our own business operations and in our global supply and value chains, and to providing access to redress for those affected by human rights violations.

We align our business activities with the internationally recognised Guiding Principles on Business and Human Rights¹ produced by the United Nations (UN) and implement the requirements of the German Act on Corporate Due Diligence to Prevent Human Rights Violations in Supply Chains (the Supply Chain Act – Lieferkettensorgfaltspflichtengesetz, or LkSG).

In addition, our understanding of human rights and our human rights due diligence processes are based on the following international reference works:

- The UN Universal Declaration of Human Rights (UDHR (A/RES/217, UN doc 217/A-(III)))
- The principles of the UN Global Compact
- The OECD Guidelines for Multinational Enterprises
- The core labour standards of the International Labour Organization (ILO), including the ILO's five basic principles on freedom of association and the right to collective bargaining, the elimination of forced labour, the elimination of child labour, the elimination of discrimination in employment and occupation, and occupational health and safety
- The European Convention for the Protection of Human Rights and Fundamental Freedoms

The PwC network has made the following human rights-related guidelines mandatory for all member firms, and they also form the foundation of our activities:

- PwC's Human Rights Statement
- PwC's Code of Conduct
- PwC's Third Party Code of Conduct

PwC Germany is also committed to the UN Sustainable Development Goals (SDGs) and has identified five of the SDGs as particularly important. All our prioritised SDGs are related to human rights issues:

- SDG 4 – quality education
- SDG 5 – gender equality
- SDG 8 – decent work and economic growth
- SDG 12 – responsible consumption and production
- SDG 13 – climate action

We expect our business partners to follow suit and commit to respecting human rights, complying with environmental obligations and establishing appropriate due diligence processes. We also require them to apply these expectations to their own suppliers.

¹ UN Guiding Principles on Business and Human Rights (UNGPR) UN doc A/HRC/17/31.

Relevant human rights issues and potentially affected groups

We recognise that our business activities and our global supply and value chains may have an adverse impact on human rights.

We are committed to respecting all internationally acknowledged human rights and we focus our human rights due diligence processes on the following human rights issues in particular. We have identified these issues as being fundamental through risk analyses among our suppliers and in our own area of business. We recognise the potential risk of negative impacts on people that are directly or indirectly related to our business activities at our office locations and in our global supply and value chains in these areas:

- Forced labour, child labour and slavery
- Disregard for the freedom to unionise, freedom of association and the right to collective bargaining
- Unequal treatment in employment and discrimination in any form (e.g. based on gender, age, ethnic or social origin, nationality, religion or belief, physical or mental disability, or sexual orientation)
- Threats to data protection and privacy
- Disregard for occupational safety and work-related health risks
- Insecure employment and working conditions
- Corruption and bribery
- Restriction of access to education

With regard to the legal positions and environmental obligations set out in the LkSG, our analyses have shown that there are currently no potential risks arising as a result of our business activities as an auditing and consulting firm.

Our commitment to respecting human rights focuses particularly on the following groups of people, as their human rights may be put at risk by business activities in our global supply and value chains:

- PwC Germany's own employees at our national and international office locations, including trainees, temporary workers, interns and working students
- Employees of business partners and joint venture partners
- Groups of people in our direct supply chain: employees of service providers and direct suppliers
- Groups of people in our downstream value chain: employees of clients, people in the neighbourhood of our products and services
- The following groups of people regardless of their location in the value chain: employees with contracts to produce works (Werkverträge, as under Section 631 et seq. of the German Civil Code [Bürgerliches Gesetzbuch, or BGB]); trade unionists at suppliers, service providers or business partners; joint venture employees
- Groups of people with an indirect connection to the value chain – e.g. members of local communities, residents near office locations, family members, employees of public authorities

Within these groups of people, we have identified individuals whose human rights are more at risk than other people's. These potentially affected parties occupy a distinct position within our due diligence processes. They are groups of people who have special needs, are socially excluded or who find it difficult to make their concerns heard. We recognise the following as groups of people at particular risk:

- Women
- Older people
- Sick people and people with disabilities
- Groups in weakly regulated/unregulated environments
- Ethnic/religious minorities
- Lesbian, gay, bisexual, transgender, intersex, queer and non-binary people
- Insecure or informal workers
- People with a lower level of education or limited access to education





Our approach and measures for implementing human rights due diligence

For us, respect for human rights is a continuous process, and the implementation of human rights due diligence is subject to constant review and ongoing development based on the changing context and our business activities:

- To ensure respect for human rights, we have made human rights due diligence processes an integral part of our organisation and of our relationships with direct suppliers.
- Using an established process, we identify and evaluate relevant human rights issues and the people potentially affected by our business activities and direct business relationships. To this end, we have added human rights issues to our firmwide risk and supplier management systems. We also take human rights criticism from third parties and reported incidents into account in our management process.
- Our analysis of human rights risks and impacts is updated annually, and at other times as necessary when significant changes are made to our corporate profile or business activities.
- The results of our analysis of human rights risks and impacts are factored into our business decision-making processes regarding supplier selection. The risk analysis forms the basis for identifying appropriate preventive and remedial measures.

- The Human Rights Officer reports to the Board at least once a year, or at other times as necessary, on the risk analysis and on conflicts of objectives concerning human rights in connection with our business activities. The Board takes any necessary measures based on these reports.
- We also use the results to create and, where necessary, adapt internal rules, processes and training to take into account the changing requirements for our due diligence processes and obligations.

In order to live up to our responsibility to respect human rights, we rely on the interaction of various measures that aim to improve the situation of (potentially) affected persons. We actively involve our employees – for example, through our Global People Survey. We communicate regularly with our suppliers through various means, not only on matters relating to human rights due diligence, but also on sustainability issues. We also regularly exchange ideas with other companies – for example, within Econsense’s “Business and Human Rights” and “Sustainability in the Supply Chain” project groups – as well as in our network of Human Rights Officers.

Outside our firm, we contractually require all our suppliers to comply with the applicable national and international laws on human rights and the ILO’s core labour standards. We also require them to respect human rights themselves and to appropriately address human rights-related risks with their own business partners.

In addition to the above, PwC works to uphold human rights in business and society by offering auditing and consulting services regarding the implementation of human rights due diligence obligations and around reporting on the fulfilment of human rights due diligence obligations.

Reviewing effectiveness

We review how effective our measures are for preventing and mitigating adverse impacts on human rights at least annually, and at other times as necessary. We also check whether our standards are being met. Within our firm, we investigate all reports of potential human rights violations and conduct employee surveys. We also check the effectiveness of training and development courses by asking questions during the learning process to check employees’ understanding or by conducting final tests.

In our value chain, we check the effectiveness of measures by observing the results of our continuous risk analysis regarding human rights risks and impacts. We also reserve the right to carry out on-site inspections of our direct suppliers.

Complaints mechanism

We stand against all forms of human rights violations. For us, appropriate and effective complaint management is an important part of our due diligence processes. We have therefore set up a complaint management system that is accessible inside and outside our firm.

As a leading auditing and consulting firm, PwC upholds the highest standards of quality and seriousness in business dealings. This is why compliance with legal and professional requirements, as well as internal rules and standards, is essential. The PwC Code of Conduct is our commitment to ethical behaviour towards (potential) business partners and employees. It summarises our shared values and forms the basis for our daily work. An Ethics Officer, who is responsible for implementing the Code of Conduct, is appointed at the highest level of the hierarchy in each PwC member country.

Within PwC Germany, the internal, independent Ethics Office is responsible for the complaints procedure required by the LkSG. The Ethics Office is responsible for processing complaints and investigating reported risks and violations. The established complaints procedure also covers monitoring, managing and reporting on the information received.

Suspected violations of the German Whistleblower Protection Act (Hinweisgeberschutzgesetz, or HinSchG) and LkSG can be reported:

- a) online or by telephone via the Ethics Helpline, anonymously if desired, or
- b) in a personal meeting with Ethics Office employees.

This process can be accessed by our own employees, employees of suppliers, external stakeholders such as NGOs or trade unions, and residents near our office locations.

Complaints are processed immediately: matters raised are investigated neutrally, without the identity of the persons concerned or their hierarchical position in the firm being revealed. We listen to those involved and

find a solution. Further information can be found in our rules of procedure. These are publicly accessible via our external website (www.pwc.de/de/ueber-uns/ethik-und-compliance.html), as well as internally on our intranet. The rules of procedure describe in detail how to make a tip-off and how the complaints process works.

Remedial actions

We encourage all stakeholders to raise any concerns about our activities or suspected violations of our policies, including this statement. If our business activities are suspected of causing or contributing to human rights violations, we will investigate, address and respond to the concerns raised and take appropriate corrective action.

Where we have concerns that our work is directly related to human rights violations committed by a client, we will discuss our concerns with the relevant parties and attempt to mitigate the impact.

If we have a justified suspicion or a specific report of possible human rights violations in our firm or our upstream value chain, we will investigate it carefully and conscientiously. We undertake to support our suppliers in clarifying the matter and to cooperate fully within a reasonable time frame. Depending on the seriousness of the violation, we reserve the right to respond appropriately to our suppliers, from requesting immediate remediation of the violation or taking legal action to terminating business relations.

Reporting

PwC discloses information related to human rights due diligence:

- as part of an annual transparency report in accordance with Article 13 of Regulation (EU) 537/2014,
- in an annual voluntary sustainability report,
- in our report to the Federal Office for Economic Affairs and Export Control (BAFA) in accordance with the LkSG,
- in a progress report on the implementation of the principles of the UN Global Compact (Communication on Progress),
- on the PwC intranet, and
- on the PwC website.

Responsibilities for human rights due diligence in our firm

We have defined clear responsibilities for fulfilling and complying with our human rights due diligence obligations.

The Human Rights Officer (HRO) is selected and their appointment is confirmed by the Board. The HRO's rights, duties and tasks are documented in their job description.

In addition to the prevention of child labour and forced labour, the LkSG addresses issues such as occupational health and safety, freedom to unionise, freedom of association, upholding and respecting human rights in the supply chain and the ban on unequal treatment in employment. The relevant specialist departments such as People, OGC/Risk Management and Procurement, as well as the Works Council, if necessary, must therefore be involved. They are responsible for taking the necessary steps within their areas of responsibility. An LkSG representative has been appointed for Procurement, who is in regular contact with the HRO.

The Board obtains information regularly (at least once a year) about the work of the person or persons responsible.

The HRO must be regularly informed about the level of implementation, any necessary adjustments and any weak points or challenges in each area.

Training

We consider it an important part of our due diligence obligations to sensitise our employees to the issue of respecting human rights and to provide them with the necessary specialist knowledge to effectively implement human rights due diligence processes. For this reason, human rights due diligence is part of our annual compliance training, which is mandatory for all employees. We also conduct specific training sessions for our employees in internal units that are involved with implementing the LkSG.

Commitment to continuous development of our human rights due diligence processes

For us, respecting human rights and implementing human rights due diligence obligations in our operational processes plays an important role in improving the current state of human rights. We accept this challenge and are committed to continuous development of our human rights due diligence processes.

6.10.2023



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