

## **OHB SE**

### **Policy Statement on the Human Rights Strategy**

**December 2023**

#### **I. Introduction**

OHB SE, including its subsidiaries in Germany and abroad, hereinafter referred to as the OHB Group, is committed to respecting human rights and protecting the environment. It is the declared aim of the company's management to respect, protect and promote human rights and the environment along the entire supply chain. Violations of internationally defined human rights and national and international environmental regulations will not be tolerated.

Human rights and environmental due diligence obligations are based on the following international regulations, to which the OHB Group is committed:

- International Charter of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- International Labour Organization Core Labour Standards
- United Nations Convention on the Rights of the Child

The principles of human rights and environmental strategy set out in this declaration apply throughout the business unit and must be adhered to by the Management Board and employees in the performance of the tasks assigned to them. The OHB Group expects all business partners to comply with human rights and environmental obligations. Respect for and observance human rights and environmental obligations is a basic requirement for cooperation with the OHB Group.

#### **II. Respect for human rights and the environment throughout the supply chain**

The OHB Group takes appropriate and effective measures to identify and verify human rights and environmental risks in its own business area and throughout the supply chain and to prevent the realisation of risks. If it is determined that a violation of a human rights or environmental obligation has occurred or is imminent, a targeted remedial process takes effect, in

which individual measures are taken to end a violation and minimize its consequences.

The Group has defined clear responsibilities for compliance. The Management Board ensures that human rights and environmental obligations are respected in all business activities. Human rights and environmental due diligence is monitored by a committee consisting of employees of OHB SE and OHB System AG, which is made up of cross-departmental responsibilities. The committee is convened regularly and on an ad hoc basis.

The committee reports to the Management Board and Supervisory on a regular basis (at least once a year) and on an ad hoc basis. Key contents of the reporting include human rights and environmental findings from the continuous risk analysis, findings from the examination of complaints received and information on the effectiveness of prevention and remedial measures.

For this reason, OHB has formulated the following policy statement to ensure that the requirements of the German Act on Corporate Due Diligence in Supply Chains ('LkSG') are complied with in the OHB Group's companies without exception:

## **1. Measures for effective risk management**

The due diligence obligations are implemented for the company's own business unit and the entire supply chain as part of a risk management system. The OHB Group ensures that risks are identified and preventive and remedial measures are implemented in a targeted manner by integrating due diligence requirements horizontally and vertically in all relevant business processes.

The risk management system is implemented on a Group-wide basis and centrally managed and monitored by the Committee.

### **a) Effective risk management**

The risk management system establishes processes for the implementation of due diligence obligations and defines responsibility areas, responsibilities and reporting lines.

The due diligence obligations are anchored horizontally within the OHB Group. All relevant departments - Sustainability, Legal and Compliance, Quality Management, Risk Management, Purchasing and Procurement – are involved in the implementation steps. The implementation of the due diligence obligations is operationally controlled and vertically anchored by the committee. The responsibilities and implementation processes can be viewed in a central process description.

**b) Identify, weight, and prioritize risks**

The OHB Group conducts comprehensive risk analyses with regard to compliance with human rights and environmental obligations within its own business unit and with its direct suppliers. In doing so, we draw on both internal and external expertise. The complexity and scale of our international supply chain requires the use of technical solutions that help us identify, verify, weight, and prioritize risks.

Our risk analysis system enables us to determine the individual risks of each business partner. On the basis of general supplier information – in particular country of origin and industry – an abstract risk analysis is carried out based on a large number of recognised indices and studies by external experts. Based on supplier self-assessments, an AI-driven media analysis tool, proven certifications, and our own findings from controls or business transactions, we then screen business partners for specific human rights or environmental risks. Not only the country of origin and the industry of the business partner are taken into account. We also analyze product risks, trade level risks, the complexity of upstream supply chains, and a variety of other data to isolate, localize, and identify risks at an early stage.

We weight and prioritize risks by setting the typically expected severity of a possible legal violation and its irreversibility with the probability of occurrence. We also take into account our own possible contributions to causation and the degree of our influence in order to prioritize risks and take appropriate action in those areas where risks are expected to occur. We use a risk matrix to identify our need for action and initiate preventive and remedial measures where they are necessary.

**c) Taking preventive measures**

The comprehensive risk analysis is supplemented by appropriate and effective preventive measures.

An internal *Code of Conduct* applies in our own business unit, which clearly and comprehensibly summarizes the expectations and rights of employees. The OHB Group offers a wide range of training and education opportunities that employees can take advantage of.

We carry out regular and ad-hoc audits in our own business area in order to identify and minimise risks at an early stage. We control our business partners within the scope of the legal possibilities and requirements. We require business partners to communicate our human rights and environmental expectations in the supply chain and to monitor their compliance on an ongoing basis. For this purpose, our *Supplier Code of Conduct* forms the basis for a new business relationship.

**d) Taking remedial measures**

Effective remedial measures must be taken when a breach of a human rights or environmental obligation occurs or is imminent.

The OHB Group will take remedial measures immediately after identification of a corresponding violation. In doing so, we develop customized remedial measures for each situation and each direct or indirect supplier in order to put an end to violations in a targeted manner. At the same time, we have developed a number of framework measures.

For each remedial action, we define a course of action, success goals and a clear internal company responsibility. Each remedial measure includes a specific timeline and can be provided with intermediate targets. If measures are necessary, they are implemented in the committee and, depending on the severity, reported directly or regularly to the Management Board.

**e) Following up on Indications**

An important role in identifying risks and breaches in the supply chain is played by a functioning complaints procedure that is accessible to all stakeholders in the supply chain, from employees to suppliers to third parties who are affected by our activities or those of our suppliers. It is important that information can be submitted anonymously and confidentially.

Our web-based whistleblowing system is multilingual and takes into account the complexity of our supply chain. Any access threshold is set low to make it as easy as possible to submit reports.

The handling of reports is confidential and expeditious. The employees involved in the processing of reports are not subject to any instructions in the context of complaint management; their neutrality is maintained. Each complaint triggers an assessment and action process, culminating in the termination of the reported breach or the minimization of a recognized risk.

**f) Responsibility throughout the supply chain**

The OHB Group takes its responsibility for the entire supply chain very seriously. Accordingly, we also extend our risk analysis to suppliers who do not have a direct business relationship with us but are part of our supply chain.

The long-term goal is to create complete transparency in the supply chain. Despite the understandable conflicting interests of some business partners, we make every effort to identify indirect suppliers and include them in the risk analysis. To this end, we rely on close cooperation with our direct business partners in order to increase transparency in the supply chain cooperatively and for the benefit of all.

**g) Documentation and Reporting**

The implementation of all due diligence obligations is documented on an ongoing basis. We use a central risk management system to network all information available to us about identified risks and preventive and remedial measures taken.

We are also committed to transparent communication on the human rights and environmental challenges facing the OH B Group. Through our public reporting, we communicate at least annually identified risks, actions taken and progress made.

**2. In Focus: Human Rights and Environmental Risks**

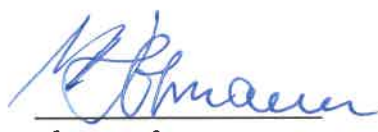

The prioritization of human rights and environmental risks takes place after the risk analysis has been completed.

**III. View**

The OH B Group is committed to continuously reviewing, developing and improving its own measures. The effectiveness and effectiveness of all human rights and environmental due diligence obligations must always be ensured. Effectiveness reviews are carried out on an ad hoc basis and at least annually.

Bremen, January 01, 2024

The Management Board

  
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Marco Fuchs  
Chairman of the Board  
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Kurt Melching  
Member of the Board  
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Klaus Hofmann  
Member of the Board  
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Daniela Schmidt  
Member of the Board  
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Markus Moeller  
Member of the Board