

## **Datwyler IT Infra Human Rights Policy**

## Table of contents

1. Purpose and Objective .....	3
2. Aligned with Datwyler Company Values and Code of Conduct .....	3
3. Reference Framework and Salient Human Rights Issues .....	4
4. Human Rights Due Diligence (HRDD) Framework .....	4
5. Scope of Application .....	5
6. Validity .....	5
7. Responsibility .....	5
Appendix A – International Reference Framework .....	7
Appendix B – HRDD Framework .....	8

## 1. Purpose and Objective

Datwyler IT Infra recognizes that business, wherever it operates, may potentially have an impact on human rights either through its own operations or via business relationships along the value chain. This Human Rights Policy formalizes and specifies the commitment of Datwyler IT Infra to support and respect human rights by adopting responsible business practices aligned with internationally recognized human rights standards.

## 2. Aligned with Datwyler Company Values and Code of Conduct

Datwyler IT Infra has an express commitment to respecting human rights reflected in its official company values and in its Code of Conduct, our overarching compliance document.

Datwyler company values are key to our success and act as strong roots in our growth strategy. Along with the Code of Conduct, these values shape the culture and leadership at each of Datwyler IT Infra locations around the world. In particular, our value “we respect others” contains an uncompromising commitment that all our employees, regardless of position, function or location, act with high integrity and embrace the Datwyler IT Infra Code of Conduct.

The Datwyler IT Infra Code of Conduct requires employees to comply with all applicable laws and regulations, adhere to high ethical standards, and actively help Datwyler IT Infra to achieve compliance with the Code of Conduct. In particular, it includes respecting the human rights, dignity, privacy and personal rights of every individual. This commitment is also expressed in other internal guidelines, processes and policies. By joining the UN Global Compact in 2013, Datwyler IT Infra has committed itself to the ten principles relating to human rights, labour standards, environmental protection and anti-corruption initiatives, having communicated on its progress ever since.

With respect to its material suppliers and other business partners, including their officers, directors, managers, employees, representatives and agents, Datwyler IT Infra’s expectations regarding human rights due diligence are set out in documents such as its Supplier Code of Conduct.

This Human Rights Policy provides a common framework and further detail for Datwyler IT Infra’s responsibility to respect human rights that is globally valid and underlies all business activities and relationships. As part of Datwyler IT Infra’s risk management processes, this policy sets out an effective and proactive framework for our risk management of human rights issues through a human rights due diligence (“HRDD”) process.

Datwyler IT Infra’s respect for human rights extends to all individuals along the value chain, including material customers, suppliers, business partners and other parties directly linked to its operations, products and services.

### 3. Reference Framework and Salient Human Rights Issues

Datwyler IT Infra is committed to high standards of business ethics and integrity, including the support and respect of internationally recognized human rights and labour standards as outlined in international human rights frameworks listed in Appendix A, which forms an integral part of this Human Rights Policy.

Datwyler IT Infra complies with the laws and regulations in the markets in which it operates. Where local laws are less stringent than Datwyler IT Infra's policies and internationally recognized human rights and labour standards listed in Appendix A, Datwyler IT Infra will seek to follow the higher standards where and when feasible.

Datwyler IT Infra does not attribute more importance to one human right over another. For the practical implementation of its human rights commitment, Datwyler IT Infra focuses on the following topics, to the extent they may have adverse human rights impacts, that are the most salient to our business according to their scale, scope and remediability:

- Child labour
- Consumer and product safety
- Corruption
- Environmental issues impacting human rights
- Forced labour
- Labour conditions
- Occupational health and safety

\* Topics in alphabetical order

These salient human rights issues will be periodically re-assessed via systematic human rights risk and impact assessments conducted in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

### 4. Human Rights Due Diligence (HRDD) Framework

Datwyler IT Infra is committed to aligning its HRDD framework with the UNGPs. Datwyler IT Infra conducts human rights due diligence throughout the business to proactively and continuously take steps to identify, assess, cease, prevent or mitigate actual or potential human rights risks and impacts. It embeds responsible business conduct in business processes, tracks and communicates performance and allows access to grievance and remedy for people potentially affected across the upstream and downstream value chain.

The HRDD framework follows the six steps required by the OECD Guidelines for Multinational Enterprises on the basis of the UNGPs. These six steps are set out in more detail in Appendix B, which forms and integral part of this Human Rights Policy.

## 5. Scope of Application

All Datwyler IT Infra entities are required to implement this Human Rights Policy. This includes the obligation that Datwyler IT Infra communicates its expectation that all employees and managers, including part-time and temporary workers, respect human rights. As such, each of Datwyler IT Infra subsidiaries' and departments' leadership must ensure that its employees are aware of this Policy, understand it and adhere to it, providing training as appropriate.

Datwyler IT Infra will also communicate its expectation that all external partners directly linked to Datwyler IT Infra's operations, products and services throughout the upstream and downstream value chain, respect human rights.

## 6. Validity

This Policy comes into force from 1 January 2024 onwards and remains valid until further notice. It will be reviewed periodically and updated as required to amend it to changed business processes, regulatory requirements as well as political and societal expectations.

## 7. Responsibility

All questions related to this Human Rights Policy may be addressed to [compliance@datwyler.com](mailto:compliance@datwyler.com).

The Corporate Leadership Team bears the responsibility for ensuring the implementation of this Human Rights Policy.

The Human Rights Policy has been approved by the Board of Directors on 26 February 2024 and is put into force on 1 March 2024.

Altdorf, 26 February 2024



Hanspeter Fässler  
Chairman of the Board of Directors



Adrian Bolliger  
CEO

## Appendix A – International Reference Framework

- Universal Declaration of Human Rights (UDHR)
- International Covenant on Economic Social and Cultural Rights (ICESCR)
- International Covenant on Civil and Political Rights (ICCPR)
- United Nations Guiding Principles on Business and Human Rights(UNGPs)
- ILO Core Labour Conventions
- ILO-IOE Child Labour Guidance Tool for Business
- Ten Principles of the UN Global Compact (UNGC)
- UNICEF's Children's Rights and Business Principles (CRBP)
- OECD Guidelines for Multinational Enterprises and related implementation guidance

## Appendix B – HRDD Framework

### 1. Policy commitment

The Human Rights Policy outlines Datwyler IT Infra's commitment to support and respect human rights and guides the implementation of the HRDD framework for the company.

### 2. Identify and assess actual and potential impacts and prioritize human rights issues

In order to assess actual and potential human rights impacts, Datwyler IT Infra periodically conducts a systematic human rights risk assessment (HRRRA) and identifies its salient human rights issues in line with the UNGPs. The following key elements are considered while assessing the severity and prioritizing the human rights issues:

- Scope: considering the company's own operations and the upstream and downstream value chain;
- Risk to people: assessing the risks and impacts from the point of view of the potentially affected groups;
- Human rights focus: considering all internationally recognized human rights;
- Sources of information: using relevant internal and external sources and consulting human rights experts;
- Prioritization: identifying salient human rights issues considering the severity (scale, scope and possibility of timely remedial action), and likelihood, of an impact

Datwyler IT Infra commits to conducting enhanced human rights due diligence through human rights impact assessments (HRIA) in prioritized human rights risk areas.

Even though Datwyler IT Infra does not attribute more importance to one human right over another, when it comes to children rights we commit to:

- Respect children's right to be free from child labour;
- Permit safe work for children above applicable minimum age, if such work exists;
- Seek to follow the higher standards, where and when feasible, whenever local laws are less stringent than Datwyler IT Infra's policies and internationally recognized human rights and labour standards (as listed in Appendix A).

### 3. Cease, prevent or mitigate adverse human rights impacts

Based on the human rights risks and impacts identified and in a continued dialogue with internal and external stakeholders, Datwyler IT Infra defines and implements appropriate measures to cease, prevent or mitigate adverse human rights impacts across the value chain (see human rights



implementation plan below 4. of this Appendix B). Datwyler IT Infra differentiates between impacts (i) which the company causes through its own operations, (ii) to which it contributes together with others or (iii) which to it may be linked by its business relationships, in order to maximize its leverage and identify the most impactful measures. Where Datwyler IT Infra's ability to influence human rights issues is limited, it seeks to enhance leverage through collaboration with other actors.

While all identified risks and impacts are considered when implementing measures, Datwyler IT Infra concentrates its primary efforts on the most salient issues.

#### **4. Embed and integrate respect for human rights**

The human rights implementation plan outlining the key measures, targets, timelines and responsibilities is set up and monitored by the Corporate Leadership Team. The human rights implementation plan will be updated and revised when needed to address potential new human rights risks and to continuously improve Datwyler IT Infra's HRDD framework. To the extent possible, human rights-related prevention and mitigation measures are progressively integrated into company processes.

#### **5. Track and communicate performance**

The measures outlined in the implementation plan are tracked based on appropriate qualitative and quantitative indicators and feedback from relevant internal and external stakeholders, which is used to inform and support continuous improvement and ensure the effectiveness of Datwyler IT Infra's HRDD framework. Where possible, the company strives to measure the impacts of its actions on the human rights of potentially affected people. Datwyler IT Infra communicates the results, progress and further actions of the HRDD framework at least annually in its Sustainability Report to publicly account for how human rights issues are addressed by the company.

#### **6. Access to grievance and remedy**

Datwyler IT Infra attaches great importance to living a culture of integrity and shared responsibilities. Anyone who has a legitimate concern can freely speak up, without fear of retaliation. Concerns can be placed directly, verbally or in writing, either with the direct manager, the VP Global Human Resources, the Managing Directors, the Compliance Officer (CFO). Additionally, there are both a Whistleblowing Policy and a Compliance and Whistleblowing Hotline, which enables employees and other potentially affected external stakeholders around the world to report concerns related to potential violations of applicable laws, regulations and Datwyler IT Infra's Code of Conduct. This includes issues related to human rights, or any other issue which may be detrimental to Datwyler IT Infra and its employees and could cause personal grievance, financial loss or reputational damage. The Compliance and Whistleblowing Hotline is operated by the Internal Audit Department of the Datwyler Group and allows to raise concerns anonymously, either in English or in local language, by email or by phone. The Compliance and Whistleblowing Hotline is available to internal and external stakeholders in the following contacts: [compliance@datwyler.com](mailto:compliance@datwyler.com) /+800 875 11 000.

When adverse human rights impacts are uncovered due to Datwyler IT Infra business activities or from linkages to its operations, the company is committed to taking timely and transparent action to remediate in a fair and equitable manner in line with the UNGPs. Where Datwyler IT Infra finds impacts directly linked to its business relationships, to the extent possible, it will use its influence to encourage suppliers and business partners to respect human rights, whether through collaboration and support, corrective action plans or termination of the business relationship on a case-by-case basis.