



A large teal graphic element on the left side of the page, consisting of a solid teal top section, a middle section with diagonal hatching, and a solid teal bottom section.

DECLARATION OF FUNDAMENTAL RIGHTS ON THE HUMAN RIGHTS STRATEGY¹

Two parallel teal lines, one light and one dark, slanted upwards from left to right.

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¹ Since this declaration is subject to German law, this translation is for your convenience only. In the event of any inconsistencies, the German version shall prevail.

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1. Introduction

INFORM Institut fuer Operations Research und Management GmbH (hereinafter referred to as „INFORM“) is committed to respecting human rights and protecting the environment. It is the declared aim of the company management to respect, protect and promote human rights and the environment along the entire value chain. Violations of internationally enshrined human rights and national and international environmental protection regulations will not be tolerated.

The following international regulations, to which INFORM is committed, form the basis of the human rights and environmental due diligence obligations:

- International Bill of Human Rights
- UN Guiding Principles on Business and Human Rights
- UN Global Compact
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- ILO Core Labour Standard
- UN Convention on the Rights of the Child

INFORM and all companies in the Group comply with the laws applicable to them in Germany and abroad. Where national law does not comply with international human rights standards, we always act in accordance with the higher standard.

The principles of human rights and environmental strategy set out in this declaration apply throughout INFORM's business operations, including its subsidiaries in Germany and abroad, and must be observed by management and employees in the performance of their duties. INFORM expects all business partners to comply with human rights and environmental obligations. Respect for and observance of human rights and environmental obligations is the basic prerequisite for cooperation with INFORM.

2. INFORM

INFORM develops software to optimize business processes using artificial intelligence and advanced mathematics of operations research. Founded in 1969, the company promotes sustainable value creation in various industries through optimized decision-making. The software solutions are tailored to industry-specific requirements and help companies worldwide to operate more resiliently and sustainably.

3. Respect for Human Rights and the Environment throughout the Supply Chain

INFORM takes appropriate and effective measures to identify and verify human rights and environmental risks in its own business area and in the entire supply chain and to prevent the realization of risks. If it is determined that a violation of a human rights or environmental

obligation has occurred or is imminent, a targeted remediation process takes effect, as part of which individual measures are taken to end a violation and minimize its consequences.

All measures taken as part of our human rights and environmental responsibility follow the principle of “*empowerment before retreat*”: We are committed to supporting our business partners in preventing and ending violations of human rights or environmental regulations before we abandon business relationships or switch to alternative sources of supply.

3.1 Human Rights and Environmental Expectations

INFORM expects its employees and suppliers to comply with the following protected human rights related legal positions:

- Right to life and health
- Prohibition of slavery and dept bondage
- Prohibition of child labor
- Prohibition of torture
- Right to an adequate wage
- Right to breaks and reasonable limitation of working hours
- Right to form trade unions
- Right to strike, freedom of association
- Prohibition of discrimination based on gender, age, origin, health status, political/religious beliefs or sexual orientation
- Prohibition of wage discrimination
- Prohibition of causing soil, water and air pollution that endangers the supply of food and drinking water or impedes access to sanitary facilities

In addition, INFORM expects compliance with the following environmental legal positions:

- Prohibition of the manufacture of products containing mercury, the use of mercury and mercury compounds, and the treatment of mercury waste
- Prohibition of the production and use of persistent organic pollutants and the non-environmentally sound handling, collection, storage and disposal of persistent organic pollutants
- Prohibition of import and export of hazardous waste
- Compliance with all due diligence obligations in relation to conflict minerals

The Dodd-Frank Act and the EU Conflict Minerals Regulation aim to prevent the financing of armed groups, the promotion of forced labor and other human rights violations as well as corruption and money laundering through the trade in gold, tin, tantalum and tungsten (“3TG”) in politically unstable areas.

INFORM has no direct obligations arising from these regulations. Nevertheless, compliance with the regulations is a contribution to INFORM's corporate responsibility. Our goal is to ensure a global supply chain that is free of conflict minerals. If INFORM discovers that a supplier or product contains conflict minerals, INFORM will take appropriate measures and document them to rectify the situation.

INFORM expects its suppliers to initiate and document appropriate steps if they discover conflict minerals in their products or purchase them from their suppliers.

In addition, suppliers and other third parties can submit complaints about our handling of conflict minerals via our whistleblower system.

3.2 Measures of Effective Risk Management

To protect the aforementioned legal positions in the supply chain, INFORM implements a series of due diligence obligations in its own business area, with direct suppliers and, in the event of substantiated knowledge of possible violations of legal rights, also with indirect suppliers. We encourage our suppliers to also implement the due diligence obligations and to pass on the obligation to implement human rights and environmental due diligence obligations in the supply chain.

The due diligence obligations are implemented for the company's own business area and the entire supply chain as part of a risk management system. Through the horizontal and vertical integration of due diligence obligations into all relevant business processes, INFORM ensures that risks are identified, and preventive and remedial measures are implemented in a targeted manner.

(a) Effective Risk Management and Effectiveness Reviews

The company's own risk management system defines processes for implementing due diligence obligations as well as areas of responsibility, competencies and reporting lines.

The due diligence obligations are anchored horizontally within INFORM. All relevant departments - Operations, Purchasing, Sustainability, Compliance and the Human Rights Officer - are involved in the implementation steps. The implementation of the due diligence obligations is managed operationally by our Compliance Department and the Human Rights Officer. They coordinate the due diligence obligations, set priorities and lead INFORM's efforts to protect human rights and environmental obligations.

The due diligence obligations are anchored vertically by defining supervisory and coordination responsibilities at management level. Overall responsibility for the implementation of human rights and environmental due diligence obligations lies with INFORM's management.

INFORM has appointed a Human Rights Officer who monitors risk management for its own business area and the entire supply chain and carries out regular effectiveness reviews. The Human Rights Officer reports directly to the Management Board.

(b) Identifying, Weighting and Prioritizing Risks

INFORM carries out comprehensive risk analyses regarding compliance with human rights and environmental obligations within its own business area and at its direct suppliers. In doing so, we draw on both internal and external expertise. The complexity and scope of our international supply chain requires the use of technical solutions such as Ecovadis and CSR Risk Check, which support us in identifying, verifying, weighting and prioritizing risks.

Our risk analysis system enables us to determine the individual risks of each business partner. Based on the general supplier information - in particular country of origin and industry - an abstract risk analysis is carried out based on many indices specified by the Federal Office of Economics and Export Control and studies by external experts. We then check business partners for specific human rights or environmental risks on the basis of supplier self-assessments, an AI-driven media analysis tool, verified certifications, our own findings from inspections or business processes and findings from our complaints procedure. This not only considers the business partner's country of origin and sector. We also analyze product risks, trade level risks, the complexity of upstream supply chains and a wide range of other data to narrow down, localize and identify risks at an early stage.

We weight and prioritize risks by comparing the typically expected severity of a possible legal violation and its irreversibility with the probability of occurrence. We also consider our own possible contributions to causation and the degree of our influence to prioritize risks and take targeted action where there is a threat of risks materializing. We use a risk matrix to identify our need for action and initiate preventive and remedial measures where they are necessary.

(c) Take Preventive Action

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

An internal Code of Conduct applies in our own business area, which clearly and comprehensibly summarizes the expectations and rights of employees. Our declaration of principles is publicly available on our website and is communicated to suppliers when entering or renewing a business relationship and on a risk-based basis.

INFORM offers trainings and educational opportunities that employees can take advantage of. The employees entrusted with the implementation of human rights and environmental due diligence obligations regularly take part in further training measures to be able to implement the international requirements for human rights and environmental protection throughout the entire supply chain. We offer our suppliers training and further education opportunities so that they too are empowered to help enforce human rights and environmental protection in their business areas.

We carry out regular and ad hoc checks in our own business area to identify and minimize risks at an early stage. We monitor suppliers on a risk-based basis within the scope of legal and contractual possibilities and requirements.

We encourage our suppliers to pass on our human rights and environmental expectations in the supply chain and to monitor their compliance on an ongoing basis. To this end, our Code of Conduct for Suppliers forms the basis for entering a new business relationship.

(d) Remedy

Effective remedial action is taken when a violation of a human rights or environmental obligation occurs or is imminent.

INFORM initiates remedial measures immediately after identifying a corresponding violation. We develop customized remedial measures for each situation and each direct or indirect supplier to put a targeted end to violations. At the same time, we have developed a series of framework measures that can be activated immediately as a modular system and filled with specific content in response to breaches.

For each corrective action, we define a process, success targets and clear internal company responsibilities. Each corrective action contains a concrete timetable and can be provided with interim targets. The system-supported action processes link all relevant stakeholders.

(e) Follow up on Leads

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

Our web-based whistleblowing system is multilingual and considers the complexity of our supply chain. Any access threshold is set low to make whistleblowing as easy as possible.

Complaints are handled confidentially and swiftly. The employees involved in processing complaints are not subject to any instructions within the framework of complaints management; their neutrality is guaranteed. Every complaint triggers an assessment and action process, which ends with the cessation of the reported violation or the minimization of an identified risk. Each complaint is examined upon receipt and forwarded to a responsible officer. Once the facts of the case have been clarified, a targeted solution is developed, if necessary, in consultation with the whistleblower. Once remedial measures have been implemented, the success of the measure is reviewed. The entire system is subject to regular effectiveness checks, during which we identify potential for improvement based on effectiveness indicators. As part of the effectiveness review, we also benefit from the experience of other economic operators who implement their complaints procedure based on the same system in the supply chain.

Information and complaints submitted are considered as part of the risk analysis.

(f) Responsibility throughout the Supply Chain

INFORM 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, as required by law. For the event-driven inclusion of indirect suppliers, we rely on close cooperation with our direct business partners to increase transparency in the supply chain in a cooperative manner 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 centralized risk management system to network all the information available to us on identified risks and the preventive and corrective measures taken.

We are also committed to transparent communication on the human rights and environmental challenges faced by INFORM. Through our public reporting, we communicate recognized risks, measures taken, and progress made at least once a year.

3.3 In Focus: Human Rights and the Environment

One particular challenge facing INFORM is the service industry. The human rights-related risks identified in this sector - in particular exceeding working hours and health hazards - are addressed through appropriate and effective measures. We set specific targets that must be met in a measurable way within a certain timeframe. Measures to minimize risks include, for example, supplier inspections and the development of our own standards as well as the search for alternative sources of supply.

4. Outlook

INFORM is committed to continuously reviewing, developing and improving its own measures. The effectiveness and efficiency of all human rights and environmental due diligence obligations must be always guaranteed.

Effectiveness reviews are carried out on an ad hoc basis and at least once a year.

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