



Respect for human rights

Policy Statement on Respect for
Human Rights and the Fulfilment of
Human Rights Due Diligence Obligations
by Wüstenrot & Württembergische
AG, Wüstenrot Bausparkasse AG and
Württembergische Versicherung AG
pursuant to Section 6 LkSG (Supply Chain Act)



Wüstenrot & Württembergische AG is a listed company based in Kornwestheim. It sees itself as a strategic management holding company for controlling the interests of all companies of the W&W Group. The Executive Board of Wüstenrot & Württembergische AG acts through the Management Board of the W&W Group in close coordination with the two divisions of Housing and Insurance.

In the Housing division, the focus is on the home loan and savings business and construction financing through Wüstenrot Bausparkasse AG. In the Insurance division, the W&W Group offers its customers a broad range of personal and property/casualty insurance products. Württembergische Versicherung AG is one of the main companies in this business segment.

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Chapter 1:

Our commitment to respecting human rights and environmental due diligence in accordance with Section 6 para. 2 LkSG (Supply Chain Act)



By adopting this Policy Statement on Respect for Human Rights and the Fulfilment of Human Rights Due Diligence Obligations by Wüstenrot & Württembergische AG, Wüstenrot Bausparkasse AG and Württembergische Versicherung AG, the respective Executive Board acknowledges the corporate responsibility to respect

general, internationally recognised human rights. The goal is to follow the associated human rights and environmental due diligence obligations in an appropriate manner and to prevent human rights and environmental risks, minimise them or cease the violation of human rights-related or environmental obligations (Section 3 para. 1 LkSG (Supply Chain Act)). This Policy Statement implements the requirements of Art. 6(2) LkSG (Supply Chain Act).

For us, respect for human rights and environmental due diligence is a cornerstone of responsible corporate governance. This Policy Statement applies to Wüstenrot & Württembergische AG, Wüstenrot Bausparkasse AG and Württembergische Versicherung AG and supplements the [Code of Conduct of the W&W Group](#). We strive to ensure that human rights are respected in all Group companies and by our business partners, suppliers and service providers, and that violations are punished accordingly. We implement applicable law, respect internationally recognised human rights and, in the course of our business activities, ensure that we fully comply with the associated human rights and environmental due diligence obligations. We expect our employees, commercial representatives of the tied agents of the W&W Group, business partners, suppliers and service providers to familiarise themselves with this Policy Statement and to act accordingly, in particular to fulfil their due diligence obligations in an appropriate manner (cf. Section 3(2) LkSG (Supply Chain Act)) and to prevent any negative impact.

Chapter 2:

Reference frameworks (standards and guidelines)



In addition to complying with all legal requirements for the respect of human rights and environmental due diligence, we are expressly committed to the principles of the internationally recognised frameworks and standards listed in the Annex.

On the basis of the mentioned frameworks/standards, the following standards may potentially be relevant along our value chain:

Human rights risks

- Prohibition of child labour – Section 2(2) Nos. 1 and 2
- Prohibition of all forms of forced labour or practices similar to slavery – Section 2(2) Nos. 3 and 4
- Disregard of occupational health and safety and work-related health hazards – Section 2(2) No. 5
- Failure to respect freedom of coalition – freedom of association and right to collective bargaining – Section 2 (2) No. 6

- Prohibition of unequal treatment in employment – Section 2(2) No. 7
- Prohibition of withholding an adequate wage – Section 2(2) No. 8
- Destruction of the natural basis of life through environmental pollution – Section 2(2) No. 9
- Unlawful violation of land rights – Section 2(2) No. 10
- Prohibition of the hiring or use of private/public security forces, which, due to a lack of instruction or control, may lead to impairments – Section 2(2) No. 11
- The prohibition of an [...] act or omission in breach of duty which is directly capable of impairing a protected legal position in a particularly serious manner (stemming from the human rights conventions within the meaning of section 2(1)) and the unlawfulness of which is obvious upon reasonable assessment of all the circumstances in question – Section 2(2) No. 12

Environmental risks

- Prohibited production, use and/or disposal of mercury (Minamata Convention) – Section 2(3) Nos. 1 to 3
- Prohibited production and/or use of chemicals within the scope of the Stockholm Convention (POPs) and the handling of waste containing POPs (Persistent Organic Pollutants) in a manner that is not non-environmentally sound – Section 2(3) Nos. 4 and 5
- Prohibited import/export of hazardous waste within the meaning of the Basel Convention – Section 2(3) Nos. 6 to 8

Chapter 3:

Scope and application according to Section 6(2) No. 3 LkSG (Supply Chain Act)



On the basis of the frameworks and standards mentioned in the Annex, the following stakeholders may potentially be relevant along our value chain:

3.1 Employees and commercial representatives of the tied agents

3.2 Business partners, suppliers, service providers

The standards and value orientations laid down in the above-mentioned regulations on the prohibition of discrimination, as well as forced and child labour, on the observance of social and employee concerns, as well as on information and consultation processes, are incorporated into guidelines and rules (e.g. Code of Conduct) that the W&W Group has established for its business activities.

The Policy Statement is anchored in the procedures and business practices of the W&W Group and focuses on the following areas of action: respect for the human rights of employees under human rights legislation and the prevention of human rights violations by business partners, suppliers and service providers of the W&W Group.

3.1 Employees and commercial representatives of the tied agents

The [Code of Conduct of the W&W Group](#) defines the minimum standard that governs the dealings of all employees and sales representatives of the tied agents with each other and with customers, competitors, business partners, authorities and our shareholders. The Code of Conduct of the W&W Group is supplemented by sales-specific regulations. This concerns the practical implementation of applicable laws and internal company guidelines on the one hand and ethically impeccable conduct in daily work on the other. These basic values, which are rudimentary for the W&W Group, are described in the Code of Conduct. It constitutes a binding standard of conduct for all the above-mentioned groups of people, regardless of their individual position and capacity.

The Code of Conduct also sets out key guidelines on how to integrate and implement human rights due diligence in working practice. The following are essential standards of conduct with regard to respecting human and labour rights.



Corporate values

Working together constructively on a level playing field and empowering our employees to take on decision-making authority is anchored in W&W's understanding of leadership. Safeguarding employee rights and promoting diversity form an important basis for the human resources work of the W&W Group. We maintain trusting and constructive working relationships with the various employee representative bodies and adhere to the agreements reached together with them. Moreover, the safety and health of our employees, the work-life balance and the further development of professional and personal skills are also key goals of our human resources work.

We treat each other with honesty, openness and transparency. On the basis of this foundation of trust, we foster a spirit of cooperation and teamwork. Innovative thinking and the opinions of our employees are important to us: we want to learn from experience and become better in the future.

Diversity and equal opportunities

As part of our business strategy, diversity and inclusion form the basis of a conscious approach to diversity and individuality. Our attitude towards one other is based on partnership and characterised by mutual respect, tolerance and fairness. Equal opportunities for all is our goal. We want to establish a workplace that is devoid of prejudice, characterised by openness and integration, and in which people with a wide range of individual abilities enjoy working together. This enables us to achieve the highest levels of productivity, competitiveness, innovation, creativity and efficiency.

We underscore our dedication to diversity as a signatory to the Diversity Charter, a project to advance and strengthen diversity in the workplace.

We therefore do not discriminate against anyone – not even if artificial intelligence applications are used – on the basis of age, disability, ethnic or national origin, social origin, skin colour, gender, political stance or trade union activity, race, religion or sexual identity, ideology or any other characteristic protected by law. We do not tolerate any discrimination or harassment in the workplace

Our employees are recruited and promoted on the basis of their qualifications and skills, and assessed according to their performance and potential.

Sustainability

Taking responsibility vis-a-vis society and the environment is an integral part of the corporate understanding and sustainability philosophy of the W&W Group. Hence we want to conduct our business in an environmentally compatible, socially responsible and economically successful manner – entirely in the interests of current and future generations. This creates an obligation for all employees to conduct themselves in accordance with this orientation towards preserving values and thus to contribute to the well-being of the company as well as to the common good.

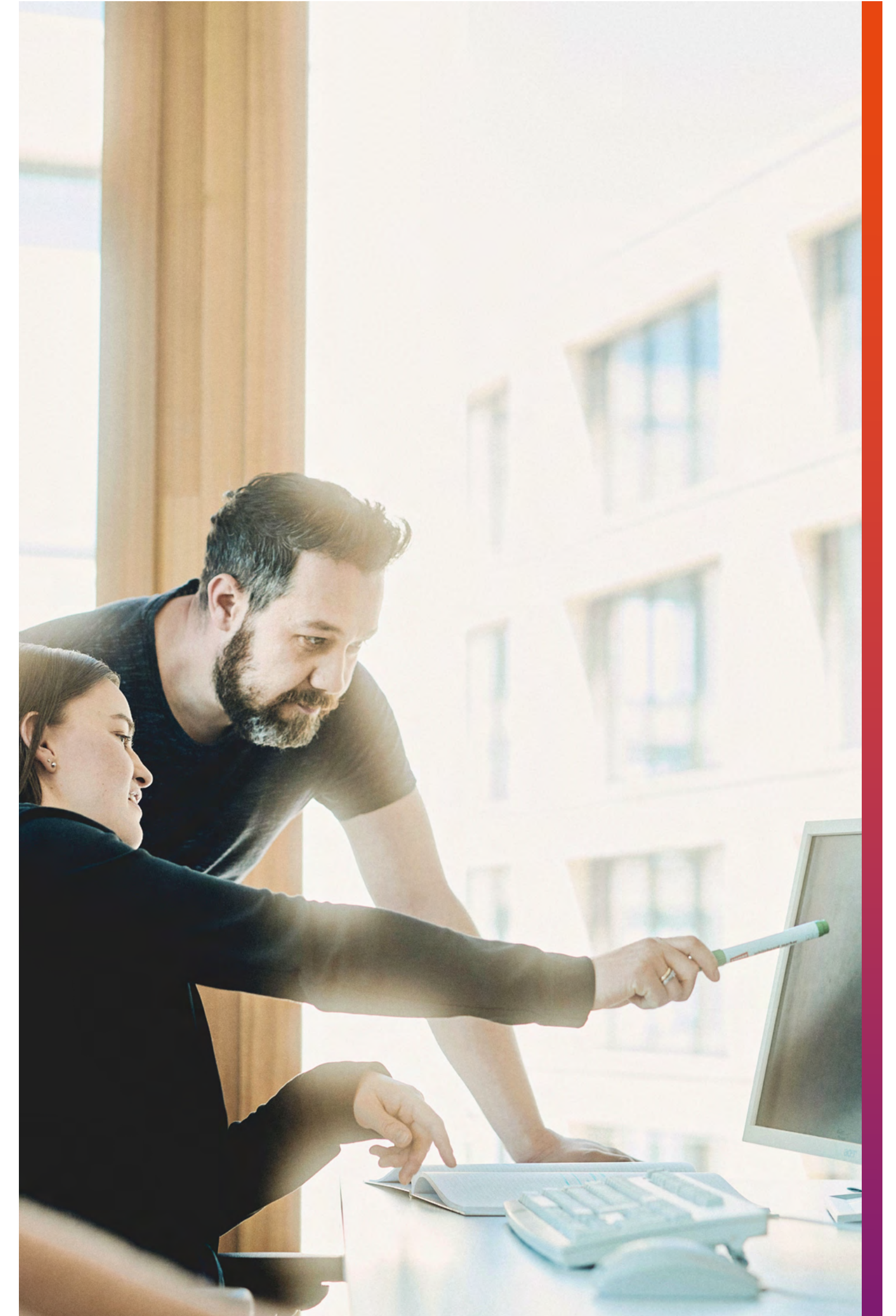
3.2 Business partners, suppliers, service providers

The observance of human rights and environmental due diligence is integrated into the supplier management and tendering procedures of the companies of the W&W Group via contractual obligations.

In a [Code of Conduct on Sustainability](#) for Business Partners, Suppliers and Service Providers, the W&W Group has set out, among other things, its expectations for how a business relationship should comply with human rights and respects environmental due diligence. This is based on the applicable legal regulations in accordance with the W&W Code of Conduct.

Via contractual agreements, the substantive requirements of the [Code of Conduct on Sustainability](#) for Business Partners, Suppliers and Service Providers form part of every new master agreement drawn up by companies of the W&W Group.

All existing business relationships are being successively adjusted in line with the obligation to comply with human rights and environmental due diligence requirements in the supply chain as part of a risk-based approach. The companies of the W&W Group reserve the right to check compliance with the agreements made by their suppliers, service providers and business partners by means of spot checks or in cases of justified suspicion. If suppliers or service providers violate reached agreements or legal regulations, the companies of the W&W Group grant them the opportunity to remedy the flaws, for example via jointly prepared action plans (Section 6 and Section 7 LkSG (Supply Chain Act)). In the event of a permanent or serious breach of the agreements made or legal regulations, the companies of the W&W Group reserve the right to terminate the business relationship on extraordinary grounds.



Chapter 4:

Risk management, risk analysis and risk assessment Section 4(1) and Section 5(1) LkSG (Supply Chain Act)



We have implemented a risk-based approach to avoid risks from environmental and human rights violations. The risk analysis aims to gain knowledge about the human rights and environmental risks in the company's own business area and in the supply chains. The specific risk situation of Wüstenrot

& Württembergische AG, Wüstenrot Bausparkasse AG and Württembergische Versicherung AG including the respective subsidiaries (Section 2 (6) sentence 3 LkSG (Supply Chain Act)) is addressed. The process is based on an abstract risk analysis, in which industry- and country-specific supplier risks, other classification criteria and validated supplier self-assessments are analysed. Conspicuous suppliers or business units then undergo a concrete risk analysis and receive a risk score. The risk assessment is based on severity and probability of occurrence. When assessing the severity, the extent, scope and irreversibility are taken into account. Based on the specific, annual or event-related risk analysis, appropriate preventive measures or remedial measures are derived immediately if necessary in order to reduce significant risks and align our management processes with the findings (Section 6 (1) LkSG (Supply Chain Act)). We are

aware that we may only have limited influence along complex value chains. In any case, our aim is to continuously increase transparency in our supply chains.

The responsibility for identifying and assessing risks in connection with environmental and human rights violations, ensuring compliance with the agreements and taking measures lies with parts of the company responsible for the business relationships. The Human Rights Officer is responsible for monitoring risk management (Section 4(3) LkSG (Supply Chain Act)). The information provided as part of the supplier self-disclosure must be validated by the responsible departments. External databases such as ISS DataDesk may be used for risk identification, risk assessment and plausibility checks.

The direct suppliers/contractual partners of the W&W Group operate predominantly in the Federal Republic of Germany. In addition, we expect our suppliers to comply with our Code of Conduct for Business Partners, Suppliers and Service Providers with defined principles for the protection of human rights and environmental concerns. This contributes significantly to minimizing potential human rights and environmental risks in the W&W Group. Nevertheless, we are aware of potential risks.

As part of our current risk analysis, no violations or material risks in accordance with the principle of appropriateness were identified either in our own business area or at our suppliers. Marginally identified risks to which we are exposed due to our supplier relationships relate to human rights risks (primarily, for example, potential risks from non-compliance with applicable national occupational health and safety standards and potential risks from non-compliance with freedom of association).

We carry out individual case reviews at the suppliers concerned, from which we derive and implement remedial measures where necessary.

In the event of a significantly changed or extended risk situation, we react accordingly.

Chapter 5:

Complaint mechanism and handling of violations according to Section 7 and Section 8 LkSG (Supply Chain Act)



Our stakeholders and third parties can report potential violations of human rights and environmental due diligence obligations pursuant to the LkSG (Supply Chain Act) via a [central web form](https://www.ww-ag.com/en/about-us/Sustainability) at <https://www.ww-ag.com/en/about-us/Sustainability>.

This channel is open to everyone, regardless of whether a contractual or business relationship exists. All tip-offs are processed confidentially and discreetly in our complaints management system. To this end, a separate category for human rights violations and environmental risks was introduced in order to process and clarify indications, suspected cases or complaints regarding human rights violations in accordance with our complaints management.

If potential or actual human rights violations or infringements of environmental standards are identified in relation to the business activities or relationships of the W&W Group, we take appropriate measures in accordance with Section 7(2-4) LkSG (Supply Chain Act) to mitigate or, if possible, completely eliminate them within the scope of our possibilities.

Furthermore, civil and criminal law consequences will be assessed. These depend on how and under what circumstances a person or company has breached this Policy Statement. If a violation of legal provisions is proven, appropriate measures will be taken.

Chapter 6:

Reporting and continuous development according to Section 10 LkSG (Supply Chain Act)



The overall responsibility for the implementation and further development of the principles of respect for human rights and the fulfilment of human rights and environmental due diligence obligations is borne by the Executive Board of Wüstenrot & Württembergische AG, Wüstenrot Bausparkasse AG, Württembergische Versicherung Ag or by each Executive Board member for their individual remit. The Policy Statement is regularly reviewed and adapted to reflect current changes and processes.

Wüstenrot & Württembergische AG



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Jens Wieland

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We report regularly – usually annually – on the risk situation and measures to respect and protect human rights based on legal requirements.

Wüstenrot Bausparkasse AG



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Beschwerdemanagement



Jürgen Wörner
Firmenkunden-Abteilungen
Gesamtschaden

Annexes

Internationally recognised frameworks and standards according to Section 2(1) and Section 7(3) sentence 2 LkSG (Supply Chain Act)

1. International Labour Organisation Convention No. 29 of 28 June 1930 concerning Forced or Compulsory Labour (BGBl. (Federal Law Gazette) 1956 II pp. 640, 641) (ILO Convention No. 29)
2. Protocol of 11 June 2014 to the International Labour Organisation Convention No. 29 of 28 June 1930 concerning Forced or Compulsory Labour (BGBl. (Federal Law Gazette) 2019 II pp. 4 37, 438)
3. International Labour Organisation Convention No. 87 of 9 July 1948 concerning Freedom of Association and Protection of the Right to Organise (BGBl. (Federal Law Gazette) 1956 II pp. 2072, 2071), as amended by the Convention of 26 June 1961 (BGBl. (Federal Law Gazette) 1963 II pp. 1135, 1136) (ILO Convention No. 87).
4. International Labour Organisation Convention No. 98 of 1 July 1949 concerning the Application of the Principles of the Right to Organise and to Bargain Collectively (BGBl. (Federal Law Gazette) 1955 II pp. 1122, 1123), as amended by the Convention of 26 June 1961 (BGBl. (Federal Law Gazette) 1963 II pp. 1135, 1136) (ILO Convention No. 98).
5. International Labour Organisation Convention No. 100 of 29 June 1951 concerning Equal Remuneration for Men and Women Workers for Work of Equal Value (BGBl. (Federal Law Gazette) 1956 II pp. 23, 24) (ILO Convention No. 100)
6. Convention No. 105 of the International Labour Organisation of 25 June 1957 concerning the Abolition of Forced Labour (BGBl. (Federal Law Gazette) 1959 II pp. 441, 442) (ILO Convention No. 105)
7. International Labour Organisation Convention No. 111 of 25 June 1958 concerning Discrimination in Respect of Employment and Occupation (BGBl. (Federal Law Gazette) 1961 II pp. 97, 98) (ILO Convention No. 111)
8. International Labour Organisation Convention No. 138 of 26 June 1973 concerning the Minimum Age for Admission to Employment (BGBl. (Federal Law Gazette) 1976 II pp. 201, 202) (ILO Convention No. 138)
9. International Labour Organisation Convention No. 182 of 17 June 1999 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (BGBl. (Federal Law Gazette) 2001 II pp. 1290, 1291) (ILO Convention No. 182)
10. International Covenant of 19 December 1966 on Civil and Political Rights (BGBl. (Federal Law Gazette) 1973 II pp. 1533, 1534)
11. International Covenant of 19 December 1966 on Economic, Social and Cultural Rights (BGBl. (Federal Law Gazette) 1973 II p. 1569, 1570)
12. Minamata Convention on Mercury of 10 October 2013 (BGBl. (Federal Law Gazette) 2017 II p. 610, 611) (Minamata Convention)
13. Stockholm Convention of 23 May 2001 on Persistent Organic Pollutants (BGBl. (Federal Law Gazette) 2002 II p. 803, 804) (POPs Convention), last amended by the decision of 6 May 2005 (BGBl. (Federal Law Gazette) 2009 II p. 1060, 1061)
14. Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (BGBl. (Federal Law Gazette) 1994 II pp. 2703, 2704) (Basel Convention), as last amended by the Third Ordinance amending Annexes to the Basel Convention of 22 March 1989 of 6 May 2014 (BGBl. (Federal Law Gazette) II p. 306/307).