

Declaration of Principles on Respect for Human Rights

1. OTTOBOCK'S COMMITMENT TO PROTECTING HUMAN RIGHTS

In our company, responsible governance and economic success have gone hand in hand for more than 100 years. We have always put people first.

As an internationally active company, we are aware of our responsibility as part of the global flow of goods. We are therefore committed to respecting human rights and taking responsibility for the company's supply chain. We implement applicable law, respect internationally recognised human rights and commit ourselves to preventing human rights violations in the course of our business activities. This commitment applies both to our own business activities and to our global supply and value chains.

2. STANDARDS & DIRECTIVES

In line with the United Nations Guiding Principles on Business and Human Rights, we are committed to the principles of internationally recognised human rights frameworks, including:

- Fundamental Human Rights Standards
 - Universal Declaration of Human Rights (UN, 1948)
 - UN Convention on the Rights of the Child (1989)
 - UN Convention on the Elimination of All Forms of Discrimination Against Women (1979)
- Business and Human Rights
 - UN Guiding Principles on Business and Human Rights (UNGPs, 2011)
 - OECD Guidelines for Multinational Enterprises
- Labor and Social Standards
 - Conventions and Recommendations of the International Labour Organization (ILO)
- Environmental Agreements
 - Minamata Convention on Mercury (2013)
 - Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (1989)
 - Stockholm Convention on Persistent Organic Pollutants (2001)

In compliance with these and other international standards on human rights, labor norms, environmental protection, and anti-corruption, Ottobock aligns its Code of Conduct with the universally recognized principles of the United Nations Global Compact (www.unglobalcompact.org). We have been a member of the UN Global Compact since 2015.

The eleven behavioral principles of the Ottobock Code of Conduct serve as a binding framework for the actions of our employees. All Ottobock employees take responsibility for their own actions and behavior. Through training sessions, Ottobock supports its employees in identifying the need for action regarding the Code of Conduct and implementing appropriate measures.

The “Explanatory declaration on the sustainability goals in the Code of Conduct“ further fleshes out the binding goals in the Code of Conduct, based on the 10 principles in the UN Global Compact – also and especially with regard to respect for human rights:

1. We support and respect the protection of internationally proclaimed human rights.
2. We make sure we are not complicit in human rights abuses.
3. We uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. We uphold the elimination of all forms of forced and compulsory labour.
5. We uphold the effective abolition of child labour.
6. We uphold the elimination of discrimination in respect of employment and occupation.

As a signatory of the UN Global Compact, Ottobock is also committed to the 17 Sustainable Development Goals (SDGs) of the United Nations. Based on a comprehensive analysis, we have identified the SDGs most relevant for Ottobock and integrated them into our sustainability strategy, including “Decent Work and Economic Growth (SDG8)“ and “Reduced Inequalities (SDG10)”. We want to make our contribution to attaining these goals through our business activities.

With its over 100-year tradition, Ottobock is deeply aware of its special responsibility to respect human rights. We therefore expect all employees, as well as our suppliers and business partners, to comply with applicable laws and regulations, adhere to internationally recognized human rights and environmental standards, act responsibly, and follow the fundamental principles outlined in the Ottobock Supplier Code of Ethics.

3. OUR APPROACH TO IMPLEMENTING HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE OBLIGATIONS

Worldwide, more than 9,000 people across diverse cultural contexts are committed to Ottobock. Both they and employees throughout our supply chains are potentially exposed to various human rights and environmental risks. A comprehensive and consistent management of these risks helps to prevent or minimize potential violations of human rights and environmental rights of those affected.

We view the management of human rights and environmental risks as a continuous process firmly integrated into our operational procedures. At Ottobock, a multi-step process has been implemented to address risks within the supply chain and our own business operations. The goal is to take preventive and remedial actions wherever we have identified significant risks or incidents have occurred. We align our management processes accordingly and raise awareness among our employees, business partners, and suppliers about these issues.

Risk Analysis:

1. Through comprehensive analyses of abstract and specific risks, we identify potential negative impacts (risks) on human rights and environmental concerns, as well as the potentially affected areas within our own business operations and supply chains.
2. Based on the insights gained, we derive concrete prioritized risks if necessary and set corresponding goals to prevent and minimize these risks.

Preventive and Remedial Measures:

3. Based on the risk assessment and prioritization, we implement preventive measures in our own business operations and supply chains. Whenever possible, we involve relevant stakeholders and utilize information from the grievance mechanism.

Effectiveness Monitoring:

4. The measures taken are reviewed for their effectiveness and continuously improved. The processes and results are documented, retained, and incorporated into the annual reporting in accordance with Section 10 (2) of the German Supply Chain Due Diligence Act (LkSG) based on their materiality.

Through appropriate guidelines, internal awareness-raising via employee training, the ongoing review of goals and measures for their suitability, and the regular evaluation of our procurement and purchasing strategies, we embed human rights and environmental issues within our workforce.

Our systematic supply chain management is characterized by close collaboration with suppliers. Human rights and environmental risks are already considered during the supplier selection process.

Sustainability in the supply chain can only be achieved in the long term through cooperation with all relevant stakeholders. We maintain continuous dialogue with a wide range of actors. Key elements of this include participation in external events, partnerships, and monitoring political and regulatory developments.

4. RISK MANAGEMENT & RESPONSIBILITIES

The Executive Board of Ottobock SE & Co. KGaA is responsible for reviewing compliance with and implementation of our human rights due diligence obligations.

The Human Rights Officer oversees the fulfillment of these due diligence obligations across all relevant business processes on behalf of the management and reports regularly, as well as on an ad hoc basis if necessary, to the executive leadership.

To design appropriate preventive and remedial measures, cross-functional teams comprising human rights, sustainability, and compliance experts work closely with the operational procurement teams and, as needed, other specialized departments. The relevant departments are then responsible for implementing and tracking these measures.

This ensures that every area of our company is aware of its responsibility to respect human rights.

This fundamental declaration applies to all companies within Ottobock SE & Co. KGaA. The scope of corporate due diligence extends across our own operations, employees, and business partners throughout our entire supply chain.

5. GRIEVANCE MECAHNISMS & HANDLING VIOLATIONS

Ottobock provides all internal and external stakeholders with online reporting channels for complaints and reports of human rights violations:

- The [Whistleblowing Unit](#) is open to all employees, customers and business partners, regardless of the existence or nature of the contractual or business relationship with Ottobock or its affiliated companies.
- Ottobock has also established an [external ombudsman's office](#). It reviews the facts, investigates as comprehensively as possible and reports to the Compliance department of Ottobock SE & Co. KGaA while maintaining anonymity.

If we determine that our business actions contribute to potential or actual human rights violations or are indirectly related to them, we will seek appropriate remedy through the responsible parties.

- In the case of a justified suspicion or concrete indication of possible human rights violations within our own operations, we will immediately take measures to end the violation or mitigate the risk.
- If a supplier has violated a human rights or environmental legal position, we will contact the supplier to jointly define corrective actions. These may range from addressing the behavior causing the violation by the supplier, implementing preventive measures through training and audits, encouraging appropriate remedy, to terminating the supplier relationship.

6. COMMUNICATION

Respect for human rights is an important contribution to achieving the United Nations Sustainable Development Goals (SDGs).

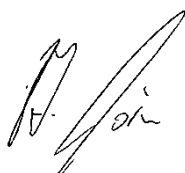
We view the focus on human rights and the implementation of due diligence in our own business activities as well as in our supply chains as a sustainable and continuous process. We regularly review our strategic approaches and measures.

This fundamental declaration is made accessible to all internal and external stakeholders in an appropriate form and will be published, among other places, on our intranet and corporate website.

We report regularly and transparently on our progress and developments as part of our publicly accessible sustainability reporting..



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ABOUT THIS DECLARATION

This declaration was created in dialogue with the relevant departments of Ottobock. The approval of this declaration is carried out by the Managing Directors.

We review this principal declaration annually, as well as on an ad hoc basis (for example, before changes in business activities), and will update it should we identify changed or expanded risks.

No rights can be derived from this principal declaration for individuals or third parties. This principal declaration has no retroactive effect and came into force for the first time on October 24, 2022.

Version 2.0 of this declaration will be valid from December 1, 2024.

	Date:	Author:	Revision details
1.0	October 24, 2022	Christin Franzel, Head of Global Sustainability & Human Rights Officer	
2.0.	December 1, 2024	Christin Franzel, Head of Global Sustainability & Human Rights Officer	Linguistic adjustments Content additions Updates based on the results of the 2023 risk analysis