

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 global value chains. We are therefore committed to respecting human rights and taking responsibility for our supply chains. We comply with applicable law, respect internationally recognized human rights, and are committed 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 (UNGP, 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 details the binding goals set out in the Code of Conduct, based on the ten principles of 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 to Ottobock and integrated them into our sustainability strategy, including “Decent Work and Economic Growth” (SDG 8) and “Reduced Inequalities” (SDG 10). We aim to contribute to achieving these goals through our business activities.

With its more than 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 set out in the Ottobock Supplier Code of Ethics.

We expect all employees, business partners, and suppliers in particular to comply with the following human rights and environmental requirements:

- the prohibition of child labour, forced labour, and modern slavery
- compliance with adequate working conditions, particularly with regard to working hours, remuneration, and occupational health and safety
- respect for freedom of association and the right to collective bargaining
- the prohibition of discrimination and the promotion of equal opportunities
- the protection of employees' health and safety in the workplace
- compliance with environmental due diligence obligations, particularly with regard to the handling of hazardous substances and compliance with international environmental conventions, such as the Minamata, Stockholm, and Basel Conventions

We also expect our business partners to appropriately address these requirements along their own supply chains and to take corresponding measures to minimize risks.

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

Worldwide, more than 10,000 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 that is firmly integrated into our operational procedures. At Ottobock, a multi-step process has been implemented to address risks in the supply chain and in our own business operations. The aim is to take preventive and remedial action wherever we have identified significant risks or where incidents have occurred. We align our management processes accordingly and raise awareness of these issues among our employees, business partners, and suppliers.

We have established a risk-based and continuous process for implementing our human rights and environmental due diligence obligations, covering all steps from risk identification and prioritization through to the implementation and review of measures.

This process ensures that we systematically implement our statutory due diligence obligations under the German Supply Chain Due Diligence Act.

Risk Analysis - Prioritized Human Rights and Environmental Risks

- Based on our regular risk analyses, we identify and prioritize the human rights and environmental risks relevant to our company in our own business operations and along our supply chains.
- The currently prioritized risks include in particular:
 - forced labour and modern slavery
 - child labour
 - discrimination and unequal treatment
 - restriction of freedom of association and the right to collective bargaining
 - inadequate occupational health and safety conditions
 - environmental risks, particularly in connection with the handling of hazardous substances, waste management, and potential violations of the relevant international conventions
- Prioritization is carried out on a risk-based basis, taking into account the likelihood of occurrence and the severity of potential negative impacts on potentially affected persons, as well as country- and sector-specific risk factors.
- The identified risks are reviewed regularly and adjusted where necessary, particularly in the event of changes in business activities, the supply chain structure, or the regulatory environment.
- Based on the results of our regular risk analyses, we derive targeted preventive and remedial measures and transparently present the material risks and corresponding measures, particularly as part of our sustainability reporting.

Preventive and Remedial Measures:

- 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.
- If we determine that our business activities contribute to, or are linked to, potential or actual human rights or environmental violations, we will immediately take appropriate measures to end or minimize them, or to prevent their recurrence.

Effectiveness Monitoring:

- 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 and employee training, ongoing reviews of the suitability of objectives and measures, and regular evaluation of our procurement and purchasing strategies, we embed human rights and environmental considerations within our organization.

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 fulfilment of these due diligence obligations across all relevant business processes on behalf of the management and reports regularly, and on an ad hoc basis where necessary, to the Executive Board.

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

5. GRIEVANCE MECHANISMS & HANDLING VIOLATIONS

Ottobock provides all internal and external stakeholders with online reporting channels for complaints and reports concerning human rights and environmental risks or violations:

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

The reporting systems are confidential, protect reporting persons from disadvantages, and are also available to external potentially affected persons.

If we determine that our business activities contribute to, or are linked to, potential or actual human rights or environmental violations, we will immediately take appropriate measures to end or minimize them, or to prevent their recurrence.

- 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 obligation, we will contact the supplier to jointly define corrective actions. These may range from addressing the conduct causing the violation and implementing preventive measures through training and audits, to encouraging appropriate remediation or 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 Declaration of Principles is made accessible to all internal and external stakeholders in an appropriate form and is published, among other places, on our intranet and corporate website.

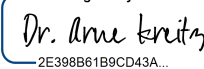
We report regularly and transparently on our progress and developments as part of our publicly accessible sustainability reporting.

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ABOUT THIS DECLARATION

This declaration was prepared in dialogue with the relevant departments of Ottobock. The declaration is approved by the Executive Board.

We review this Declaration of Principles annually, as well as on an ad hoc basis, for example before changes in business activities, and update it if we identify changed or expanded risks.

No rights can be derived from this Declaration of Principles for individuals or third parties. This Declaration of Principles has no retroactive effect and first entered into force on October 24, 2022.

Version 3.0 of this declaration will be valid from July 1, 2026.

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
3.0 July 1, 2026	Christin Franzel, Vice President Global Sustainability & Human Rights Officer	Content additions Updates based on the results of the 2025 risk analysis