

Declaration of principles in accordance with the German Supply Chain Due Diligence Act

Schaltbau Holding AG and its subsidiaries (hereinafter referred to as the "Schaltbau Group") are a leading international technology supplier specialising in safety and availability for rail and DC power applications. The Schaltbau Group operates in 14 countries with 30 sales offices and manufacturing sites and has a global network of external sales partners. The Schaltbau Group employs some 2,700 people who generate revenue of approximately EUR 500 million per annum.

The Schaltbau Group is divided into three core brands:

Schaltbau GmbH

A leading international supplier of safety-related electromechanical components such as contactors, connectors and switching systems, specialising in direct current (DC) technology for the railway industry and the new energy / new industry and e-mobility markets.

Bode – Die Tür GmbH

A globally leading supplier of door and boarding systems. This core brand offers a broad portfolio of innovative, intelligently integrated complete systems for buses, trains and commercial and electric vehicles as well as interior fittings for road vehicles and rolling stock.

PINTSCH GmbH

A specialised provider of customised system solutions, safety components and services for rail infrastructure. Its wide range of products includes level crossing systems, signalling and safety equipment, interlocking and shunting technology, axle counting systems, point machines and point heating systems.

The Schaltbau Group is aware that the implementation of human rights and environmental due diligence obligations under the German Supply Chain Due Diligence Act in its own business activities as well as in its supply and value chains is an ongoing process. We accept this challenge and regularly review the strategic approaches and measures taken in the course of our business activities with the aim of continuously improving them.

With respect to human rights and environmental issues, we endeavour to comply with the 17 Sustainable Development Goals (SDGs) of the United Nations Global Compact.

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I. Responsibility

The Executive Board of Schaltbau Holding AG is responsible for implementing and complying with this declaration of principles regarding respect for human rights and the associated environmental issues. The Human Rights Officer of the Schaltbau Group is responsible for reviewing the effectiveness of the human rights strategy set out below.

II. The human rights strategy of the Schaltbau Group

We are aware of our corporate responsibility to respect human rights and uphold environmental standards. For this reason, the Schaltbau Group has established a human rights strategy, both within its own sphere of business and with its direct suppliers. We expect both our employees and our suppliers to avoid committing human rights and environmental violations and, if they occur, to ensure that they are promptly rectified.

We do not tolerate either forced labour or child labour. The Schaltbau Group's subsidiaries and their suppliers are required to minimise any risks associated with hazardous processes or machinery in order to prevent accidents. Employees must be guaranteed appropriate payment, at least equal to the statutory minimum wage in the respective country. If there are no statutory minimum wage regulations in a particular country, employees must be paid at least enough to ensure their livelihood and an appropriate standard of living, taking local standards into account. All employees should be treated equally, regardless of their national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief. This expectation is set out in the Schaltbau Group's Code of Conduct for Business Partners as well as in its general Code of Conduct, which also applies to our employees.

III. Risk analysis

We attach particular importance to identifying human rights and environmental risks, both in our own business operations and at our direct suppliers, and to implementing appropriate measures to mitigate these risks. For this reason, we have conducted a risk analysis both within our own sphere of business and at our direct suppliers, involving relevant functions such as compliance, risk management and sustainability as well as representatives of the three core brands. Any risks identified are analysed in terms of their severity and probability of occurrence. Our own contribution to causing the risk and our ability to influence that risk are also taken into account. These risk analyses are performed both annually and on an ad-hoc basis in the event of significant changes to, or a deterioration of, the risk situation within the supply chain. When the risk analysis is repeated at regular intervals, the risks identified in the previous year in particular are reviewed for their relevance and accuracy.

When conducting a risk analysis of our direct suppliers, an abstract risk assessment is initially carried out in relation to country- and sector-specific risks. Various human rights and environmental indices are applied in the course of this analysis, such as the Children's Rights in the Workplace Index, the Political Freedom Index and the Environmental Performance Index.

Overall, the human rights risk to which the Schaltbau Group is exposed is considered moderate due to the preventive measures in place.

The effectiveness of the risk management system is reviewed annually and on an ad-hoc basis by the Schaltbau Group's Human Rights Officer, who reports directly to the Executive Board of Schaltbau Holding AG at least once a year.

IV. Complaints procedure

We strictly reject any form of violation of human rights and/or environmental standards. We are convinced that an effective complaints management system plays an essential role in identifying and avoiding human rights and environmental risks and violations.

With this point in mind, we have introduced a suitable complaints procedure that records any supply chain-related reports from suppliers and any other persons who may be affected by the supply chain. The complaints channel is accessible for internal, external, public and anonymous reports [here](#). The channel is available for communication via the Schaltbau Holding AG website. Our effective complaints management system ensures that any report of possible human rights violations or breaches of environmental obligations is dealt with via a standardised procedure. The rules of procedure for this complaints system are also available [here](#) on the Schaltbau Holding AG website. Within this procedure, the confidentiality or anonymity of the whistle-blower is especially protected.

The effectiveness of the Schaltbau Group's complaints management system is reviewed annually and also on an ad-hoc basis, particularly if a change or an escalation of the risk situation indicates that the complaints procedure may be less effective. Moreover, reports are included in the risk assessment if they are relevant to the respective sphere of business.

V. Preventive measures to implement the human rights strategy

The human rights strategy developed by us, which serves to avoid any violations of our human rights and environmental obligations, includes specific preventive measures that are geared to our risk situation. These measures are illustrated below, both for our own sphere of business and for our direct suppliers.

Preventive measures at direct suppliers

The human rights strategy is consolidated right across the supply chain, primarily through the procurement and purchasing practices we have developed and implemented. In 2024, work began on implementing various preventive measures, which are outlined below.

In particular, any of our existing suppliers who have been identified as high-risk suppliers or from which we source products that contain minerals subject to the EU Conflict Minerals Regulation (EU 2017/821) are required to accept our Code of Conduct for Business Partners.

Moreover, any new suppliers based in a high-risk country, assigned to a high-risk industry or involved in the extraction of minerals subject to the EU Conflict Minerals Regulation (EU 2017/821) are required to sign the Schaltbau Group's Code of Conduct for Business Partners. Any new suppliers who exceed a defined value threshold in terms of annual purchasing volume, regardless of their risk category, are also required to sign the Schaltbau Group's Code of Conduct for Business Partners.

The acknowledgement of the Schaltbau Group's specific expectations with regard to human rights and environmental issues is supplemented by further specified processes with regard to purchasing. For example, suppliers who fall under the EU Conflict Minerals Regulation (EU 2017/821) are required to provide appropriate proofs of origin for the minerals used. Furthermore, we require practically all of our suppliers to provide a risk-based supplier self-disclosure, which includes information on human rights and environmental risks as well as existing management processes relating to human rights and environmental due diligence. The effectiveness of the established measures is reviewed through regular and ad-hoc risk-related audits.

Preventive measures within our own sphere of business

The human rights strategy is implemented within our own sphere of business in particular by providing the appropriate information and training documentation if necessary. We also focus on a systematic exchange of experiences with the human rights officers of the respective core brands of the Schaltbau Group, including in the areas of training, awareness raising and due diligence. In 2024, for example, all those responsible for supervising (student) interns were provided with guidelines to ensure human rights due diligence (including company obligations regarding working hours, remuneration, holidays and the handling of hazardous substances as well as machinery). Moreover, in 2025 our Code of Conduct was supplemented to define the expectations of the Executive Board of Schaltbau Holding AG, particularly in an international context, with regard to freedom of assembly and employee rights (including freedom of association, joining trade unions, establishing works councils) as well as remuneration (including no withholding of wages as a disciplinary measure) and maximum working hours (including at least one day off per calendar week).

VI. Regular review of preventive measures

We regularly review the effectiveness of the preventive measures implemented as part of our risk management system by the mutual monitoring of various hierarchical levels, including the Human Rights Officer. The effectiveness of the existing measures is continuously monitored with the help of various indicators, such as by linking the risk management system with the risk analysis in accordance with the German Supply Chain Due Diligence Act and the inclusion of related topics in standard audits. These continuous audits can be additionally supplemented to include ad-hoc audits if our risk situation changes, both within our own sphere of business and at our direct suppliers.

During our reviews, we take into account findings from the complaints system, which enables employees and/or third parties to report potential violations or risks either openly or anonymously.

VII. Corrective measures

If human rights or environmental obligations are violated, we rigorously initiate the appropriate corrective measures without delay. In doing so, we ensure that any corrective measures taken within our own domestic sphere of business lead to a cessation of the violation and in our foreign business operations generally bring about the cessation of the violation. Should we find ourselves in a situation in which we are unable to effectively put an end to violations of human rights or environmental obligations committed by one of our direct suppliers in the foreseeable future, we then draw up a plan designed to either minimise the extent of or put an end to the violations. If we receive substantiated evidence of violations at indirect suppliers, we also conduct a risk analysis and draw up a plan to either minimise or put an end to the violations. The plan is supplemented by a specific timetable. In order to minimise the risk, we will consider suspending the business relationship, at least temporarily, in such cases. In the event of serious violations of human rights or environmental obligations, if the implementation of the measures defined in the plan fails to rectify the situation after the specified period has expired, if we have no more moderate means at our disposal or are unlikely to be able to exert greater influence, the respective Schaltbau Group subsidiary is entitled to terminate the business relationship completely, in consultation with the Executive Board of Schaltbau Holding AG if necessary.

To determine the effectiveness of the corrective measures taken, the Human Rights Officer conducts an audit once a year and on an ad-hoc basis as required. The findings from the complaints procedure are then duly taken into account.

VIII. Indirect suppliers

If there is substantiated evidence of violations at indirect suppliers, we will respond without delay and conduct a risk analysis, establish preventive measures, draw up a plan to prevent, terminate or minimise violations and then implement it. Information relating to human rights and/or environmental risks and violations at an indirect supplier can be reported at any time via the Schaltbau Group's complaints system and included in the process described under "Complaints procedure".

IX. Documentation and reporting obligations

We document the fulfilment of our due diligence obligations in-house and on an ongoing basis.

Further information on human rights and environmental issues is available [here](#) in Schaltbau Holding AG's Sustainability Report.