

# Declaration of Principles on Human Rights

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# 1 Foreword

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For more than 130 years, Dräger has stood for 'Technology for Life'. Protecting, supporting and saving lives - that is our daily motivation. In a world that is constantly changing and facing a variety of challenges, we are also committed to actively contribute to ensuring that the rights and dignity of every individual are respected and protected. As a company, we are therefore fully and wholeheartedly committed to upholding human rights.

We expect our employees and business partners to respect the people and laws in all countries in which we operate and to extend this responsibility to their business partners. But that's not all: we are also committed to the responsible use of resources - from development and production through to the delivery to our customers.

This declaration of principles is an expression of our determination to constantly evolve. It provides insights into how we integrate these expectations into our business processes and diligently monitor their implementation. We present this as both guidance and motivation, encouraging you to join us in this collective effort.

Acknowledging that, despite our best efforts, mistakes may occur, we ask you, the reader, to support us: Don't look away! Let us know where there is room for improvement. Together, by embracing responsibility, we can become even better!



Stefan Dräger

## 2 Introduction

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At Dräger, we have always seen sustainability as a basic condition for economic success. We attach great importance to respecting human rights and, in particular to creating good working conditions. We expect both our own company and our business partners to comply with all applicable laws and regulations.

We define the binding framework for the implementation of this expectation in our Principles of Business and Conduct and in the Code of Conduct for Business Partners. These documents are guided by the United Nations' Universal Declaration of Human Rights, the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and its Follow-up, and the Organization for Economic Cooperation and Development's (OECD) Guidelines for Multinational Enterprises.

We are issuing this policy statement on respecting human rights not only as part of the German Supply Chain Due Diligence Act (LkSG), but also to make our expectations clear to everyone associated with Dräger. We expect each and every individual to support us in our efforts to live up to our social responsibility as a company.

# 3 Our Risk Management System

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We have implemented a human rights-related risk management system to identify and prevent the negative effects of our business activities. This system monitors compliance with human rights and environmental standards in our own operations and at our suppliers. At its core is the annual risk analysis, which we use to review and further develop the effectiveness of our various preventive and remedial measures.

We also assess potential human rights risks in our own operations and at our suppliers on an ad hoc basis. Our risk management system is completed by a freely accessible complaints mechanism. In order to effectively develop the various existing instruments for implementing our human rights strategy, we have appointed a human rights officer to monitor the risk management system. She provides regular and ad hoc information to the Management Board and coordinates the documentation and reporting on human rights issues.

In the following, we describe individual components of the risk management system in order to make our expectations transparent to all stakeholders. We pay particular attention to the methodology and results of the risk analysis, the preventive and remedial measures and the complaints management system. Where possible and appropriate, we have adopted a comparable approach for our own operations and for our suppliers. Where this was not reasonable or appropriate, the approach is described separately.

## 3.1 Processes and Methods of our Risk Analysis

We have set up a two-stage analysis process for our comprehensive risk assessment. In the first step, we identify potential human rights and environmental risks in our own business area and at our suppliers. We use the external provider Ecovadis for this purpose. Potential risks are classified as "high", "medium" and "low" on the basis of country and industry indices.

In the second step, we examine in detail the extent to which measures and information are available that break down the probability of occurrence of these potential risks to such an extent that we can make an assessment of the actual risks.

### **The following potential risks were identified at a global level:**

- the violation of occupational health and safety,
- inadequate working conditions at production sites and in the supply chain: forced labor, child labor, slavery,
- general environmental risks,
- unequal treatment/discrimination,
- inadequate remuneration and
- the prevention of freedom of association.

In the second stage of the analysis process, the potential risks are examined in detail.

## 3.2 Specific Risk Assessment in our Own Operations

The evaluation of actual risks in our own business area is based primarily on the high standards and instruments implemented in the global organization in the areas of Human Resources and Environmental, Health & Safety. These instruments are regularly reviewed, e.g. in internal audits and through external ISO certifications. In many cases, they go far beyond local regulatory requirements and serve to apply our principles globally.

As Dräger, we also use the Ecovadis platform to have our efforts for sustainable management assessed externally.

### 3.3 Specific Risk Assessment for Suppliers

The evaluation of the actual risks at our direct suppliers is carried out in the respective purchasing departments. All strategically important suppliers are subjected to a detailed review by Ecovadis. To this end, we invite these suppliers to prepare a comprehensive rating to prove that there are no specific risks in the areas of the environment, human rights, ethics and sustainable procurement.

In selected cases, we also use other risk-based assessment tools such as audits.

If we also become aware of human rights risks or violations, e.g. through ad hoc reviews or complaints, we will initiate appropriate measures and adapt our risk management system accordingly.

We review indirect suppliers on an ad hoc basis and following substantiated knowledge. This review is not part of the annual risk analysis.

### 3.4 Result of the Risk Analysis

We carried out a risk analysis in 2023 in accordance with the methodology described. No specific risks were identified in our own operations.

A specific suspected case in the area of occupational safety was identified at one of our direct suppliers. Risk-minimizing measures were therefore immediately introduced and documented.

Our risk analysis did not identify any other specific human rights or environmental risks.

### 3.5 Prioritization

Based on the abstract risks identified, our experience in dealing with suppliers and our value system, we will continue to prioritize the following in our human rights risk management system in the future

- the prevention of slavery and all forms of forced and child labor,
- compliance with occupational health and safety regulations,
- compliance with environmental standards and
- the prevention of discrimination of all kinds.

### 3.6 Preventive Measures

Irrespective of the fact that we have not identified any specific open risks in our assessment, we continue to see abstract, country-specific risks. We have therefore implemented various preventive measures both in our own business area and for our suppliers in order to prevent human rights violations.

The topic of occupational health and safety is particularly important to us. Supported by our business model, we see this as the greatest leverage for exerting a positive influence on the specific living conditions of people who work together with Dräger.

#### 3.61 Dräger Own Operations

Dräger has been setting strict rules for its own business conduct for 25 years with its [Principles of Business and Conduct](#). The Principles of Business and Conduct formulate our standards for all employees of the company. All employees are trained on them.

In addition to the Principles of Business and Conduct, there are other guidelines and documents on which our employees are trained, including on the topics of occupational safety, health protection, compliance, quality, and discrimination.

We report on this in detail in our [Sustainability Report](#). The aim is to make all employees aware of the importance of corporate social responsibility.

We monitor implementation through internal audits and external certification of our sites for occupational health and safety and compliance with environmental standards (ISO 45001, ISO 14001).

We are certified by Ecovadis for environmental protection, human rights, ethics, and sustainable procurement.

In addition, we offer low-threshold services to advise employees on issues such as discrimination and, if necessary, take remedial action.

### 3.62 Direct Suppliers

For the most part, Dräger maintains long-standing relationships with strategically important suppliers. This leads to a trusting relationship and a good knowledge of local conditions in our purchasing departments.

We have long set high standards for our procurement processes. For example, we have developed and implemented a [Code of Conduct for Business Partners](#), in which we set out our expectations of our suppliers with regard to human rights and sustainable corporate governance. We strive to ensure that all major suppliers explicitly commit to our Code of Conduct. Coverage of the Code of Conduct for Business Partners in the area of production materials has been well over 80% of the purchasing volume for several years.

Furthermore, new suppliers complete extensive self-disclosures and can find out about our requirements for successful collaboration in our [Supply Chain Handbook for Suppliers](#).

New suppliers are also subjected to a pre-check. We also carry out this pre-check with the help of Ecovadis in order to set comparable standards for us and our suppliers. In future, we also want to select our suppliers according to sustainability criteria.

In supplier audits, we check selected aspects of the supplier's quality, including compliance with the Code of Conduct for Business Partners. Remedial measures are agreed and followed up for any risks identified.

## 4 Complaints Procedure

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Dräger provides a web-based complaints channel, the Dräger Integrity Channel, regardless of whether the company itself is directly affected. This channel can be used to report human rights or environmental risks that might otherwise remain undetected. This also allows remedial action to be taken quickly if a report turns out to be a specific risk.

Reports can be made in such a way that dialog is also possible with anonymous whistleblowers and reporters.

The Dräger Integrity Channel is linked in various places and in numerous languages on our websites. The [rules of procedure for human rights complaints](#) are also published on our website. The Dräger Integrity Channel is not only available to Dräger employees, but also to our business partners and any other person around the clock and from any location.

[https://www.draeger.com/en\\_uk/About-Draeger/Sustainability#report-complaints](https://www.draeger.com/en_uk/About-Draeger/Sustainability#report-complaints)

Complaints can also be sent directly to the Human Rights Officer at [humanrights@draeger.com](mailto:humanrights@draeger.com).

## 5 Documentation and Reports

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For Drägerwerk AG & Co. KGaA, the Human Rights Officer is responsible for monitoring the implementation and effectiveness of the human rights risk management system. She is part of the Global Sustainability Office and thus integrated into Dräger's sustainability strategy.

Based on careful documentation, Drägerwerk AG & Co. KGaA prepares the annual report on compliance with the due diligence obligations under the LkSG for the Federal Office of Economics and Export Control (Bafa). This report is published on our website.

## 6 Conclusion

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This declaration of principles is regularly reviewed in accordance with the LkSG risk analysis as well as in the event of risks arising and adapted as necessary.

In addition to other measures, it serves to formulate our requirements and expectations regarding compliance with human rights and to make them available to our employees and business partners worldwide.

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**Corporate Headquarters**

Drägerwerk AG & Co. KGaA  
Moislinger Allee 53-55  
23558 Lübeck, Germany

[www.draeger.com](http://www.draeger.com)

**Region Europe**

Drägerwerk AG & Co. KGaA  
Moislinger Allee 53-55  
23558 Lübeck, Germany

☎ +49 451 882 0  
✉ +49 451 882 2080  
✉ [info@draeger.com](mailto:info@draeger.com)

**Region Asia Pacific**

Draeger Singapore Pte. Ltd.  
61 Science Park Road  
The Galen #04-01  
Singapore 117525

☎ +65 6872 9288  
✉ +65 6259 0398

**Manufacturer**

Drägerwerk AG & Co. KGaA  
Moislinger Allee 53-55  
23558 Lübeck, Germany

**Region Middle East, Africa**

Drägerwerk AG & Co. KGaA  
Branch Office  
P.O. Box 505108  
Dubai, United Arab Emirates

☎ +971 4 4294 600  
☎ +971 4 4294 699  
✉ [contactuae@draeger.com](mailto:contactuae@draeger.com)

**Region Central and South America**

Dräger Indústria e Comércio Ltda.  
Al. Pucurui - 51 - Tamboré  
06460-100 - Barueri - São Paulo

☎ +55 (11) 4689-4900  
✉ [relacionamento@draeger.com](mailto:relacionamento@draeger.com)



Locate your Regional Sales  
Representative at:  
[www.draeger.com/contact](http://www.draeger.com/contact)