



Zeppelin GmbH

**DECLARATION OF PRINCIPLES ON RESPECT FOR
HUMAN AND ENVIRONMENTAL RIGHTS**

1. Responsibility

The Zeppelin Group¹ is a globally operating company with a strong foundation of values. As a foundation-based company, ecologically and socially responsible corporate governance is a prerequisite for Zeppelin. The foundation of our values is the integrity and excellence of our employees. Appreciation, mutual respect, and fairness characterize our daily interactions and are an integral part of our corporate's values.

Respect for human rights, environmental rights, and responsible treatment of our environment is a fundamental element of our corporate governance. We aim to ensure that these rights are observed in all our Group companies and also by our partners and suppliers.

This policy statement on respect for human and environmental rights expresses our responsibility within our value and supply chain. We implement applicable laws and regulations, respect internationally recognized standards, and ensure that human rights and environmental risks and violations are prevented and addressed in our business activities, as well as providing those affected with access to remedies and complaint channels. These guiding principles of our business are substantiated in our internal codes of conduct (including [the Code of Conduct for Business Ethics and Compliance](#)). The requirements we place on our business partners in the supply chain are formulated in the [Code of Conduct for partners and suppliers](#).

Zeppelin (hereinafter also "we") will only be successful in the long term if we are equally committed to respecting human and environmental rights locally and globally. This Group-wide declaration of principles and the measures defined therein are a further important step in this direction and ensure that respect for human rights and the environment is implemented in every part of our Group. We encourage our employees to implement risk management, conduct regular risk analyses, and implement appropriate preventive and remedial measures along their supply chains. All Zeppelin employees are obliged to apply the contents of this declaration of principles in their daily practice. Thank you in advance for your support.

This declaration of principles is adopted by the management of Zeppelin GmbH, as the parent company with decisive influence within the meaning of the German Supply Chain Due Diligence Act (LkSG), for all Group companies.

2. Understanding

Responsible, sustainable, and legal management is one of our core values and is firmly anchored in our corporate strategy. Zeppelin (hereinafter also "we") respects the dignity and rights of both individuals and societies. We respect the sovereignty of states and their role in enacting laws. It is the duty of states to protect human rights, and as a company, it is a matter of course for us to follow laws and respect human rights. We therefore expressly commit to respecting human rights in our own business activities and promoting them along our value chain in cooperation with our suppliers.

On this base, we are committed to the following international standards:

- UN Charter of Human Rights (International Bill of Human Rights);

¹In this context, "Zeppelin" refers to Zeppelin GmbH and all companies in which Zeppelin GmbH directly or indirectly holds a majority stake.

- Ten principles of the UN Global Compact;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- ILO core labor standards (conventions No. 29, 87, 98, 100, 105, 111, 138, 182, based on the principles of freedom of association and the right to collective bargaining, elimination of forced labor, abolition, child labor and prohibition of discrimination in employment and occupation) including protocol to convention No. 29 concerning Forced or compulsory labour)
- UN Guiding Principles on Business and Human Rights

3. Scope

This statement of principles applies to our employees in all areas of the company worldwide. With these standards, we underscore our understanding and expectation of our employees worldwide to behave respectfully, appropriately, and lawfully toward colleagues and suppliers. Since we rely on our direct suppliers in our business activities, and they, in turn, build trusting relationships with other suppliers along the value chain, we also expect our direct suppliers to adhere to these standards and, in turn, to pass on our commitment to respecting human rights to their suppliers.

4. Identified risks

Prioritization in our own business area

Based on our risk analysis in our own business area, which we conducted at the level of the Group, we have identified country-specific risks as our primary human rights-related risks in line with our global activities and verified their plausibility in a specific risk analysis and the following areas were given priority: right to health and safety at work.

Prioritization in our supply chains

We recognize that, due to our business activities, human rights risks in the countries and industries of our direct suppliers are generally unlikely, but cannot be completely ruled out. Accordingly, we have identified a certain number of suppliers located in countries with a generally higher risk, as well as suppliers operating in industries that potentially pose an increased risk. We have verified these suppliers' plausibility through a specific risk analysis. The following areas were prioritized: occupational health and safety, and fair remuneration. These suppliers were reviewed according to our established processes and, where necessary, further qualified.

5. Implementation

5.1 Risk analysis

To review the impact of our actions on human rights, we conduct a risk analysis annually and as needed, particularly when launching new products, projects, or new business areas, both at the holding company and its subsidiaries. We conduct this risk analysis with the support of the ESG risk management software Integrity-Next to ensure a comprehensive and in-depth analysis.

As part of this analysis, one or more of the following measures are taken, for example, as needed: commissioning external screening services, reviewing contracts, conducting supplier surveys using questionnaires, media research, internal and/or external on-site audits, and discussions with (potentially affected) stakeholders such as employees, works councils, or

residents. The human rights risks identified are assessed and prioritized. We communicate the results of our risk analysis to the relevant decision-makers and appropriately consider them.

We apply a risk-based, two-step approach that combines an abstract risk analysis with a subsequent detailed risk analysis:

Abstract risk analysis

The so-called "Abstract risk analysis" initially assesses potential human rights and environmental risks within the company's own business area and those of its direct suppliers. This analysis is based on a systematic recording of country and industry risks in various thematic areas. Recognized quantitative indicators from international institutions such as the World Bank and the United Nations are used to assess country risk. This is complemented by an analysis of industry-specific risks based on qualitative sources, including the CSR Risk Check and studies from the Business & Human Rights Helpdesk. The industry risk analysis differentiates between 88 industries according to NACE codes. The results of the country and industry risk analyses are combined to produce a differentiated risk assessment for each thematic area and for each direct supplier or business area. Risks are classified into the categories "low risk," "medium risk," and "high risk" and form the basis for the further risk analysis.

Specific risk analysis

The second step involves an in-depth analysis of the previously identified potential risks within the company's own business area and those of its immediate suppliers. A risk-based approach is used to prioritize relevant business relationships that pose an increased risk of human rights or environmental impacts. Structured survey tools based on internationally recognized standards are used for the assessment. These serve to determine the extent to which identified risks have been recognized and addressed through appropriate measures. The feedback is incorporated into a qualitative assessment of the company's ability to effectively implement human rights and environmental due diligence obligations. The results of this analysis are combined with the findings from the abstract risk analysis to provide a well-founded assessment of the actual risk. Classification is based on defined risk categories and forms an essential basis for deriving further measures. In addition, continuous monitoring is used, drawing on external information sources to identify relevant developments at an early stage and respond appropriately.

5.2 Risks "own business operation"

After completing the specific risk analysis, the identified risks are prioritized based on two key criteria: probability of occurrence and severity. The probability of occurrence results from the combination of the abstract and specific risk analysis and is assessed for both our own business units and our direct suppliers.

The severity of a risk is assessed as part of an internal evaluation process. Various departments, such as CSR, Purchasing, and the Works Council, are involved. Together, the potential impacts are systematically weighed across different risk dimensions.

When prioritizing significant risk areas, it is crucial to consider both the probability of occurrence and the severity. In addition, two other factors are considered in the assessment: the causal contribution, and particularly our company's influence. The latter is determined based on the

ratio of our purchasing volume to the respective supplier's sales. To determine these key metrics, we use data from Duns & Bradstreet. The results of the risk analyses are presented in the appendix.

5.3 Preventive measures

To avoid or mitigate identified human rights risks, we have implemented various preventive measures, whose effectiveness we continuously monitor and adapt as needed. These preventive measures include, among other things, our own regulations that provide a binding framework for our employees and suppliers:

- [Code of Conduct for Business Ethics and Compliance](#)
 The Code of Conduct for Business Ethics and Compliance sets out the ethical and legal framework within which we operate. It defines the fundamental principles for our behavior within Zeppelin and in our relationships with our partners and the public. It sets out the principles of our entrepreneurial activities and is an expression of our corporate values.
- [Code of Conduct for partners and suppliers](#)
 Our Code of Conduct for partners, suppliers, and service providers is part of our standard procurement contracts and general purchasing conditions. This is intended to oblige our direct suppliers to respect human rights. Our standard procurement contracts also provide for the possibility of internal on-site inspections and external audits to regularly monitor compliance with the standards set out in this policy statement. Furthermore, we oblige our direct suppliers to also demand human rights compliance from their respective suppliers. We actively promote compliance with and implementation of these standards throughout the value chain. The commitment of our direct suppliers to comply with these standards is important to us.

Respect for human rights is an important evaluation criterion when selecting our direct suppliers. We also offer training courses for our direct suppliers, raising participants' awareness of human rights and labor standards and informing them of our requirements. We also strive to ensure compliance with these standards with regard to indirect suppliers. If we gain substantiated knowledge of a (potential) violation by an indirect supplier, we conduct a risk analysis and implement appropriate preventive and remedial measures. With regard to the prioritized risks, all active suppliers of the German Group companies were sent our Code of Conduct for Partners, Suppliers, and Service Providers. They were also informed of the opportunity to report violations of defined standards through our complaints procedure, and actively requested information about violations. Likewise, certain suppliers from potentially high-risk industries were sent a letter that further addressed the identified risks in detail. In addition, framework agreements have been concluded with certain suppliers, which stipulate the control options described above on an individual basis and include a commitment to adhere to certain defined criteria. In our own business area, we also provide ongoing training for our employees. We also regularly review compliance with the standards set out in the regulations and this policy statement and consider them as part of preventive due diligence for planned investments in locations.

5.4 Deviation measures

If we identify imminent or already occurring violations in our own business area, we will prevent or stop them. The same applies – where possible – to violations at one of our suppliers. If a

violation at one of our suppliers is of such a nature that we cannot prevent it or stop it in the foreseeable future, we will immediately implement a mitigation plan based on our procedural instructions for prevention and remedial measures.

6. Responsibilities

Responsibility for respecting human and environmental rights lies with the Group's management, which commissioned the central CSR function to monitor compliance in May 2025 (Ms Ramona Kail, Head of CSR). Regular meetings are held to discuss the impacts of our business activities on human rights and possible preventive and remedial measures, and, where necessary, human rights-related activities and policies are adopted. The relevant departments, particularly our legal, quality management, and purchasing departments, are closely involved in this process.

7. Complaints procedure

In our [online whistleblower system](#) stakeholders can report complaints and reports of human rights violations. This system is accessible to everyone, regardless of the existence or nature of their contractual or business relationship with us. Critical questions, concerns, and complaints are always heard there, and all concerns are investigated.

Our online whistleblower system functions like an electronic mailbox where reports can be submitted 24/7. The most important difference from other contact options is that the whistleblower can be assured of anonymity. The electronic platform is hosted on an external server, meaning that submitted reports cannot be traced. We expressly encourage our employees, in particular, to report suspected violations of this policy statement there. Additionally you can contact Ms Ramona Kail, Head of CSR (lksg@zeppelin.com) for any hints. All questions and comments will be treated confidentially.

8. Documentation and reporting

We publish current information annually in our sustainability report. These reports are available at www.zeppelin.com. We review these procedures and this policy statement regularly, at least annually, and as needed. They are continuously updated, taking into account the findings from the processing of information received through the complaints process. This declaration is communicated to employees, the works council and externally to our direct suppliers and is publicly accessible on our website as well as on the websites of Zeppelin Rental GmbH and Zeppelin Baumaschinen GmbH.

Garching near Munich, September 09th 2025



Matthias Benz
Chairman of the
management board/CEO



Marc de Groen
Managing director/
COO



Christian Dummmler
Managing director/
CFO



Alexandra Mebus
Managing director/
CHRO

Attachment I: Results risk analysis

As a result of the risk analysis, we identified the following human rights and environmental risks in our own business area:

- Disregard for occupational safety and health hazards (Section 2 (2) No. 5 LkSG)
- Destruction of the natural basis of life through environmental pollution (Section 2 (2) No. 9 LkSG)
- Disregard for freedom of association - freedom of association and the right to collective bargaining (Section 2 (2) No. 6 LkSG) • Unlawful violation of land rights (Section 2 (2) No. 4 LkSG)
- Prohibition of forced labor and all forms of slavery (Section 2 (2) No. 3 LkSG)
- Prohibition of unequal treatment in employment (Section 2 (2) Nos. 7 and 12 LkSG)
- Prohibition of withholding a fair wage (Section 2 (2) No. 8 LkSG)
- Prohibited production, use, and/or Mercury Disposal (Minamata Convention)

In the areas of "occupational safety," "environmental pollution," "freedom of association," "violation of land rights," "forced labor," and "unequal treatment," a medium relevant country risk was identified for Germany, the main area of our activities. Despite the preventive measures already in place, such as our Code of Conduct for Business Ethics and Compliance, Code of Conduct for Partners, Suppliers, and Service Providers, promotion of women in leadership positions, conducting training in relevant business areas, and developing case studies where the LkSG protection areas apply, we will therefore continue to place a special focus on these topics. Our risk analysis has shown that the risks of adverse impacts on people and/or the environment are overall higher in our foreign subsidiaries than in our own domestic business areas. This is primarily since higher abstract risks exist for these subsidiaries at the country-specific level.

We have identified the following risk areas for our own business areas in Germany and abroad:

- Disregard for occupational safety and health hazards (Section 2 (2) No. 5 LkSG)
- Destruction of the natural basis of life through environmental pollution (Section 2 (2) No. 9 LkSG) • Disregard for freedom of association - freedom of association and the right to collective bargaining (Section 2 (2) No. 6 LkSG) • Unlawful violation of land rights (Section 2 (2) No. 4 LkSG)
- Prohibition of forced labor and all forms of slavery (Section 2 (2) No. 3 LkSG)
- Prohibition of unequal treatment in employment (Section 2 (2) Nos. 7 and 12 LkSG)
- Prohibition of withholding a fair wage (Section 2 (2) No. 8 LkSG)
- Prohibited production, use, and/or disposal of mercury (Minamata Convention)

While medium and occasionally high risks were identified in environmental law areas within our own business area abroad, medium risks were predominantly recorded in our own business area at home. Despite our existing ISO 14001-compliant environmental management system, which coordinates and specifies the implementation of European and German legal requirements in the environmental sector (e.g., through regulations and work aids), we feel compelled to pay increased attention to these issues. Based on our occupational safety assessment and to specifically identify potential risks, we sent corresponding risk questionnaires to all foreign companies within our own business area as part of our risk analysis. We were able to determine that established and effective preventive measures exist in these areas (e.g., a wide range of occupational safety management measures, an internal code of conduct, and guarantees of payment of the local minimum wage).

Attachment II: Scope

This Group-wide declaration of principles and the measures defined therein represent another important step in this direction and ensure that respect for human rights and the environment is implemented in every part of our Group. Zeppelin Rental GmbH and Zeppelin Baumaschinen GmbH, in their capacity as independently obligated companies pursuant to Section 1 of the Supply Chain Due Diligence Act (LkSG), are committed to fulfilling their human rights and environmental due diligence obligations and are committed to establishing and implementing appropriate risk management, conducting regular risk analyses, and implementing appropriate preventive and remedial measures along their supply chains.

All Zeppelin employees are required to apply the contents of this declaration of principles in their daily practice.