



Schindler

Human Rights Policy

1. Purpose and Objective

The Schindler Group (all companies directly or indirectly controlled by Schindler Holding AG jointly referred to as "Schindler" or "the Schindler Group") recognizes that business wherever it operates may potentially have an impact on human rights through its own operations or through business relationships along the value chain. Through this Human Rights Policy, Schindler aspires to lead by example in respecting and protecting human rights by adopting responsible business practices in line with internationally recognized human rights standards.

2. Based on Schindler Values and Schindler Code of Conduct

Schindler's commitment to respecting human rights is based on the Schindler values and the Schindler Code of Conduct as our overarching compliance document.

The Schindler values provide the cornerstones for Schindler's corporate culture. They unite the company across all regions by providing guidance for adopting a responsible approach for all our activities. In particular, our value "integrity and trust" contains an uncompromising commitment that all our employees, regardless of position, function or location, embrace the Schindler Code of Conduct.

The Schindler Code of Conduct requires Schindler employees to comply with all applicable laws and regulations, adhere to high ethical standards by respecting the rights and dignity of all persons with whom they are dealing and to actively help Schindler to achieve compliance with the Code of Conduct. As set out in the **Guidelines to the Schindler Code of Conduct**, this includes respecting human rights. Moreover, important aspects of our commitment to promoting rights of workers are set out in **Schindler's Inclusion & Diversity Commitment** and in our **Employee Safety and Health Policy**. With respect to its material suppliers, service providers such as subcontractors and distributors and other business partners including their affiliates, officers, directors, agents, employees, representatives, subcontractors, and consultants, Schindler's expectations regarding human rights due diligence are set out in the **Responsible Sourcing Policy**.

This Human Rights Policy provides a common framework and more details for Schindler's responsibility to respect human rights that is globally valid and underlies all business activities and relationships. As part of Schindler's comprehensive risk management processes, it sets out an effective and proactive framework for our risk management of human rights issues through a human rights due diligence ("HRDD") process.

The company's respect for human rights extends to all individuals along the value chain, including customers, suppliers, business partners and other parties directly linked to its operations, products and services.

3. International Reference Framework and salient human rights issues

Schindler is committed to high standards of business ethics and integrity including the support and respect of internationally recognized human rights and labor standards as outlined in international human rights frameworks listed in **Annex 1** which forms an integral part of this Human Rights Policy.

Schindler complies with the laws and regulations in the markets in which it operates. Where local laws are less stringent than Schindler's policies and internationally recognized human rights and labor standards, Schindler will seek to follow the higher standards where possible.

Schindler does not attribute more importance to one human right over another. For the practical implementation of its human rights commitment, Schindler prioritizes (in alphabetical order) the following issues, to the extent they may have adverse human rights impacts, that are most salient to the business according to their scale, scope and remediability:

- Child labor
- Corruption issues
- Employment practices (including fair remuneration)
- Forced labour (e.g., migrant workers)
- Freedom of association & collective bargaining
- Occupational Health & Safety (OHS)
- Product safety issues

These salient human right issues will be re-assessed annually via systematic human rights risk and impact assessments conducted in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGPs).

When prioritizing salient human rights issues, Schindler pays special attention to human rights impacts on people that may be at heightened risk of vulnerability or marginalization.

4. Schindler's HRDD Framework

Schindler is committed to aligning its HRDD framework with the UNGPs. Schindler conducts HRDD throughout the business to proactively and continuously take steps to identify, assess, cease, prevent or mitigate actual or potential human rights risks and impacts. It embeds responsible business conduct in business processes, tracks and communicates performance and allows access to grievance and remedy for people potentially affected (rightsholders) across the upstream and downstream value chain. This includes decisions about market entries, continuations, expansions and exits.

The HRDD framework follows these six steps as required by the OECD Guidelines for Multinational Enterprises on the basis of the UNGPs:

1. Policy Commitment
2. Identify and Assess Actual and Potential Impacts and Prioritize Human Rights Issues
3. Cease, Prevent or Mitigate Adverse Human Rights Impacts
4. Embed and Integrate Respect for Human Rights
5. Track and Communicate Performance
6. Access to Grievance and Remedy

The six steps are set out in more detail in **Annex 2** which forms an integral part of this Human Rights Policy.

5. Obligation to Implement

All Schindler Group companies are required to implement this Policy. This includes the obligation that Schindler communicates its expectation that all employees and managers, including part-time and temporary workers, respect human rights.

Schindler will equally communicate its expectation that all external partners directly linked to Schindler's operations, products and services throughout the upstream and downstream value chain, respect human rights.

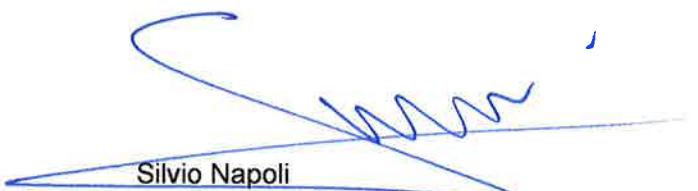
6. Validity

The Human Rights Policy comes into force on 14 December 2022 and remains valid until further notice. It will be reviewed periodically and updated as required to amend it to changed business processes, regulatory requirements as well as political and societal expectations.

7. Responsibility

All questions related to this Human Rights Policy may be addressed to human-rights@schindler.com.

Global Human Resources bears the responsibility for ensuring the implementation of this Human Rights Policy.



Silvio Napoli

Chairman of the Board of Directors and CEO, Schindler Group



Tobias B. Staehelin

Member of the Group Executive Committee responsible for Global Human Resources, Schindler Group

Appendices

Annex 1: International Reference Framework

- Universal Declaration of Human Rights (UDHR)
- International Covenant on Civil and Political Rights (ICCPR)
- International Covenant on Economic, Social and Cultural Rights (ICESCR)
- ILO Core Labour Conventions
- ILO-IOE Child Labour Guidance Tool for Business
- UNICEF's Children's Rights and Business Principles (CRBP)
- Ten Principles of the UN Global Compact (UNGC)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises and related implementation guidances
- Women's Empowerment Principles (WEP)

Annex 2: HRDD framework

1. Policy Commitment

Schindler's Human Rights Policy outlines Schindler's commitment to support and respect human rights and guides the implementation of the HRDD framework for the Schindler Group.

2. Identify and Assess Actual and Potential Impacts and Prioritize Human Rights Issues

In order to assess actual and potential human rights impacts, Schindler regularly conducts a systematic human rights risk assessment (HRRA) and identifies its salient human rights issues in line with the UNGPs. This also applies to decisions about market entries, continuations, expansions and exits (all including M&A). The following key elements are considered while assessing the severity and prioritizing the human rights issues:

- **Scope:** considering the company's own operation and the entire upstream and downstream value chain;
- **Risk to people:** Assessing the risks and impacts from the point of view of the potentially affected groups (rightsholders);
- **Human rights focus:** considering all internationally recognized human rights;
- **Sources of information:** using relevant internal and external sources and consulting human rights experts;
- **Prioritization:** identifying salient human rights issues considering the severity (scale, scope and possibility of timely remedial action) of an impact.

Schindler commits to conducting enhanced due diligence through human rights impact assessments (HRIA) in prioritized human rights risk areas. This includes the consultation of and meaningful engagement with potentially affected groups.

3. Cease, Prevent or Mitigate Adverse Human Rights Impacts

Based on the human rights risks and impacts identified and in a continued dialogue with internal and external stakeholders, Schindler defines and implements appropriate measures to cease, prevent or mitigate adverse human rights impacts across the value chain (see human rights implementation plan below 4. of this Annex 2). The company differentiates between impacts (i) which the company causes through its own operations, (ii) to which it contributes together with others or (iii) which it may be linked by its business relationships in order to maximize its leverage and identify the most impactful measures. Where Schindler's ability to influence human rights issues is limited, it strives to enhance leverage through collaboration with other actors.

While all identified risks and impacts are considered when implementing measures, Schindler concentrates its primary efforts on the most salient issues.

4. Embed and Integrate Respect for Human Rights

The human rights implementation plan outlining the key measures, targets, timelines and responsibilities is set up and monitored by Global Human Resources and presented to the Group Executive Committee annually.

The human rights implementation plan will be updated and revised when needed to address potential new human rights risks and to continuously improve Schindler's HRDD framework. To the extent possible, human rights-related prevention and mitigation measures are integrated into company operations, incentive schemes, training programs, policies, management systems and decision-making mechanisms.

5. Track and Communicate Performance

The measures outlined in the implementation plan are tracked based on appropriate qualitative and quantitative indicators and feedback from relevant internal and external stakeholders, which is used to inform and support continuous improvement and ensure the effectiveness of Schindler's HRDD framework. Where possible, the company strives to measure the impacts of its actions on the human rights of potentially affected people.

Schindler communicates the results, progress and further actions of the HRDD framework at least annually in its Sustainability Report as well as on its website to publicly account for how human rights issues are addressed by the company.

6. Access to Grievance and Remedy

Schindler attaches great importance to living a culture of integrity and shared responsibilities. Any one who has a legitimate concern can freely speak up, without fear of retaliation. Concerns can be placed directly with a team of Compliance Officers: every Schindler entity world-wide has at least one officer who supports the Schindler compliance program in all aspects. In addition, there is a compliance Speak Up Line which enables employees and other potentially affected external stakeholders around the world to report concerns related to potential violations of applicable laws, regulations and the Schindler Code of Conduct. This includes issues related to human rights, or any other issue which may be detrimental to Schindler and its employees and could cause personal grievance, financial loss or reputational damage. The Speak Up Line is operated by Case Managers who are the local Compliance Officers or Regional Compliance Officers and allows to raise concerns anonymously. The compliance Speak Up Line covers the main languages and is available to internal and external stakeholders. The Case Managers conduct a risk assessment (triage) and may forward reports to the appropriate person at Schindler for further investigation. Employees and other stakeholders can later ask for follow-up information:

<https://schindler.integrityline.com>.

When adverse human rights impacts are uncovered due to Schindler business activities or from linkages to its operations, the company is committed to taking timely and transparent action to remediate in a fair and equitable manner in line with the UNGPs. Where Schindler finds impacts directly linked to its business relationships, it will use its influence to encourage suppliers and business partners to respect human rights, whether through collaboration and support, corrective action plans or termination of the business relationship on a case-by-case basis.