



**Policy Statement: Corporate Human Rights
Strategy for
FES Frankfurter Entsorgungs- und Service GmbH**

Table of contents

I.	Preamble	3
II.	Requirements and expectations upheld by us and our business partners.	
	4	
III.	Identification and assessment of risks.	4
IV.	Outlook.	5

1. Preamble

The FES Group can look back on a far-reaching tradition. We have been acting responsibly and efficiently in line with our values for over 25 years. And we strive to (and will) continue doing so. This statement hereby expresses the values that guide us in everyday work. Within the Group, we are committed to our values and embrace them fully not only internally, but also externally. The FES Group is part of Frankfurt's multicultural and colourful society. In a city that has welcomed people from roughly 170 nations and 160 communities of all world religions, we see diversity as a source of enrichment. The employees in our Group of companies are of different origins and nationalities. They are also of different faiths and maintain different world views. They are of different genders, and they have different sexual identities. They span a broad width of ages, and some may have an impairment. They are all FES, and they all have a right to respectful interaction with one another.

The FES Group is both social and diverse; humanity and fairness are central to our actions, and are practised every day by employees from over 50 nations. The FES Group is, therefore, committed to strengthening human rights, and preventing any instance of their violation. This applies both to our own business areas and to (direct) suppliers. Our corporate culture is characterised by a spirit of partnership and forms the basis for the long-term success of our Group of companies. Our consistent focus is on people and the inclusion of their skills and talents in the company's activities.

Our values are also reflected in our mission statement. We ensure cleanliness, secure raw materials and protect the environment. This all takes place in a spirit of co-operation rooted in trust and competence. At the FES Group, we stand together for a future worth living. We always keep people, the environment and resources at the forefront of our mind in our day-to-day business.

The FES Group bases its business activities on the following internationally recognised standards and guidelines:

- The Universal Declaration of Human Rights of the United Nations (UN)
- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The conventions and recommendations of the International Labour Organization (ILO) on labour and social standards
- The principles of the United Nations Global Compact (UNGC)
- The UN Conventions on the Rights of the Child & Women
- The Diversity Charter

In addition, we comply with local laws wherever we operate. The FES Group (and the following affiliated companies) are committed to respecting human rights through this Policy Statement: Corporate Human Rights Strategy –

- FES Frankfurter Entsorgungs- und Service GmbH (FES)
- FFR GmbH
- FES Abfallmanagement- und Service GmbH
- RMB Rhein-Main Biokompost GmbH
- FES Wohnen und Leben GmbH
- RMS Rhein-Main Solarpark GmbH
- MHW Müllheizkraftwerk Frankfurt am Main GmbH

II. Requirements and expectations upheld by us and our business partners

With the aim of recognising (and respecting) human rights and protecting the environment within the FES Group, we have implemented guidelines that define what is expected of us, our employees, our business partners, customers and suppliers.

In order to ensure maximum compliance, the following guidelines – developed and implemented by the FES Group – should be emphasised:

Guideline – Compliance Code of Conduct

The guideline “Compliance Code of Conduct” sets out a binding framework of behaviour for the everyday orientation of all employees of the FES Group. The principles of behaviour describe the company’s shared values, and aids us in assessing everyday situations and actions in the respective area of activity as right or wrong. This is intended to prevent employees of the FES Group from violating relevant legal regulations – particularly those of a criminal nature. This guideline addresses specific topics such as human rights and environmental issues, as well as data protection, dealing with customers and other related topics.

Code of Conduct for business partners

The aim of the FES Group is to realise defined values and principles together with our business partners. Subsequently, we require them to act in accordance with our principles and values, and thus support us in achieving this goal. The legal framework is defined by our “Code of Conduct for Business Partners”, which sets out the applicable principles, values and legal requirements. All relevant business partners must ensure compliance with the Code of Conduct, in order to ensure that any and all forms of co-operation are successful.

III. Identification and assessment of risks

At least once a year, we assess potential risks with regard to human rights and environmental impact – both within our own business areas and with our direct suppliers. Risks can be prioritised and dealt with on the basis of these risk analyses. With this in mind, we conduct targeted expert interviews and perform a structured evaluation of our suppliers’ regions of origin and product groups, by way of example. The prioritised risks based on these analyses comprise the following points that could potentially be relevant throughout our value chain:

- Working condition risks
- Environmental risks
- Discrimination risks
- Health & safety risks

Wherever risks are ascertained – be they in our own business area or at direct suppliers – these are addressed, minimised and eliminated by means of appropriate measures.

In order to avoid (and prevent) risks in our own business area, appropriate guidelines have been implemented that include both preventive and remedial measures – such as the development and implementation of appropriate purchasing strategies and practices, or the implementation of control measures. Compliance with the guidelines is monitored at regular intervals and reviewed by the respective departments.

Depending on the severity of a given risk, information is initially obtained from our direct suppliers in the form of defined measures – such as by querying risk strategies or performing human rights audits, in order to analyse the risks more closely. Together with the suppliers, we define how those risks identified are to be addressed as part of a remedial concept and within a specific schedule. However, the FES Group reserves the right to take further measures. Furthermore, we have enshrined human rights and environmental due diligence obligations in our “Code of Conduct for Business Partners”, which serves as a guide.

We are aware that human rights violations can occur despite our careful conduct. For this reason, we have established a complaints procedure and a whistleblowing system through which those affected (or other whistleblowers) can report grievances at any time. This complaints procedure is not limited to our own business areas, but also includes both suppliers and sub-suppliers.

As a group of companies, we advocate the enforcement of ethical and moral principles, and call for the reporting of irregularities. Whistleblowers render an important contribution to upholding social values and the rule of law, and thus contribute to the company's success.

IV. Outlook

We constantly document and report on our progress

We regularly review and evaluate the efficacy of our established measures and our risk management system. This also includes consistently scrutinising existing processes and delivering continuous improvements in line with this Policy Statement.

We report annually (and with maximum transparency) on the identified risks and the measures derived therefrom via various media – such as in the annual report in accordance with the Supply Chain Duty of Care Act (Lieferkettensorgfaltspflichtengesetz) – as part of the FES Group's sustainability reporting or in the annual report of FES GmbH. We also evaluate the efficacy of our measures at this point, and derive conclusions for future activities.

The executive management body of FES GmbH is responsible for the implementation of (and compliance with) this Policy Statement on respect for human rights. It monitors the operational implementation of those stated corporate values. Executive management is supported in this by the role of the Human Rights Officer, who informs executive management at regular stages about risks and measures taken.

For the FES Group, continuous respect for human rights is an important contribution to achieving the United Nations' Sustainable Development Goals.

We are acutely aware that the implementation of human rights due diligence efforts in our own business activities, as well as in supply chains and disposal channels, represents an ongoing process.

Transparency is a central requirement of our actions. As the world and our market environment are constantly changing and we aim to maintain this degree of transparency in the long term, we constantly review our risk assessment, measures and processes with the aim of ensuring continuous improvement. We also regularly review this Policy Statement and our communication, and adapt it to changing circumstances if necessary.



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