

Human Rights Policy

VERSION 1, VALID AS OF 2023-09-01, APPROVED BY MANAGEMENT BOARD

1 Respecting Human Rights

We acknowledge the responsibility our business enterprise to respect human rights, referring to internationally recognized human rights as those expressed in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and the main instruments through which it has been codified) and the principles concerning fundamental rights set out in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work. Respect for human rights is a fundamental value of our company and we therefore strive to respect and promote the human rights in our relationships with our employees and third parties.

2 Our Practices

We have identified the following most relevant, urgent, and probable human rights impacts for our business and the businesses we invest in, operating in the financial sector. Where we identify adverse human rights impacts resulting from or caused by our business activities, we are committed to provide for or cooperate in their fair and equitable remediation. However, situations may change, so all human rights should be the subject of periodic review. We ask all our business partners, which includes the businesses we invest in, to adopt similar policies in their own companies and review their principles on a regular basis.

2.1 Due Diligence

In practice, some human rights may be at greater risk than others in particular industries or contexts, and therefore will be the focus of heightened attention. The DEWB's business model focuses on investments in asset management and related businesses which contribute to the digitalization of this economic sector. While there may be the impression that financial institutions in general cannot cause or contribute to human rights beyond employment practices, there may well be situations where actions of business partners can impact human rights. To avoid investments in enterprises whose activities adversely affect human rights, we perform an adequate due diligence before taking any investment decisions in order to avoid or mitigate the risk to indirectly harm human rights. We consider operation-specific impacts as well as the geographic context in which the investment will take place.

UDHR Articles 4,5

2.2 Bribery and Corruption

Corruption is pervasive in large-scale projects that seek outside funding, especially those taking place in autocratic countries, carried out by state-owned enterprises, or overseen by politically connected individuals. Corruption and bribery profoundly affect vulnerable communities—either by misdirecting funds that could be spent on healthcare, education, or other public goods, or by preventing participation in the democratic process. We ensure that any engagement in high-corruption contexts proceed according to international norms of transparency and accountability.

UDHR Articles 8, 17, 25, 26

2.3 Customer and Employee Privacy

Data breaches and misuse of customer or employee information may result in human rights violations, particularly if sensitive financial information is disclosed. We ensure that all collected data is protected through regular security upgrades and adequate employee training. Arbitrary interference with privacy is considered a human rights violation, and we acknowledge that the proper collection and handling of such data is firmly within our direct responsibility.

UDHR Article 12

2.4 Discrimination in Investment Practices

Investment practices contain human rights risks regardless of their size or scale. Investment or lending institutions may deny customers and partners access to finance based on race, religion, or gender. We have a zero-tolerance approach to discrimination of any kind and apply it to our investment decisions.

UDHR Articles 2, 7

2.5 Equal Opportunity and Equal Pay

We ensure that our employees receive equal pay for equal work and remediate if inequalities are found.

The financial sector has historically been a male-dominated industry. Beyond the gender wage gap, financial institutions have also discriminated against other minority groups in hiring, promotion, and workplace cultural practices and in order to avoid this risk at our own form we have a zero tolerance approach to discrimination and adopted an Equal Opportunity Police that guides our employment practices.

UDHR Article 2 23

2.6 Health and Development at Work

The safety and health of our employees is of paramount importance. We have a Health and Safety Policy in place to provide a safe and healthy workplace and comply with applicable safety and health laws and regulations, as well as internal requirements. Also, we believe that continuous personal and professional development of our employees is not only beneficial for the company but also their right and we support this through our Training Policy.

UDHR Article 25 26

3 Whistleblowing

We strive to create a workplace in which open and honest communications among all employees are valued and respected and we make sure that employees are aware of the Human Rights Policy and other related Policies through adequate communication measures.

Any employee or business partner who believes a conflict arises between the language of the policy and the law or who has questions about this policy or would like to confidentially report a potential violation of this policy, should get in touch with Marco Scheidler (ms@dewb.de; Tel: 03641 3100032).

4 Public Reporting

We report to the public on our human rights-related commitments, efforts and statements, consistent with this Policy, through annual publication on our corporate website.
