

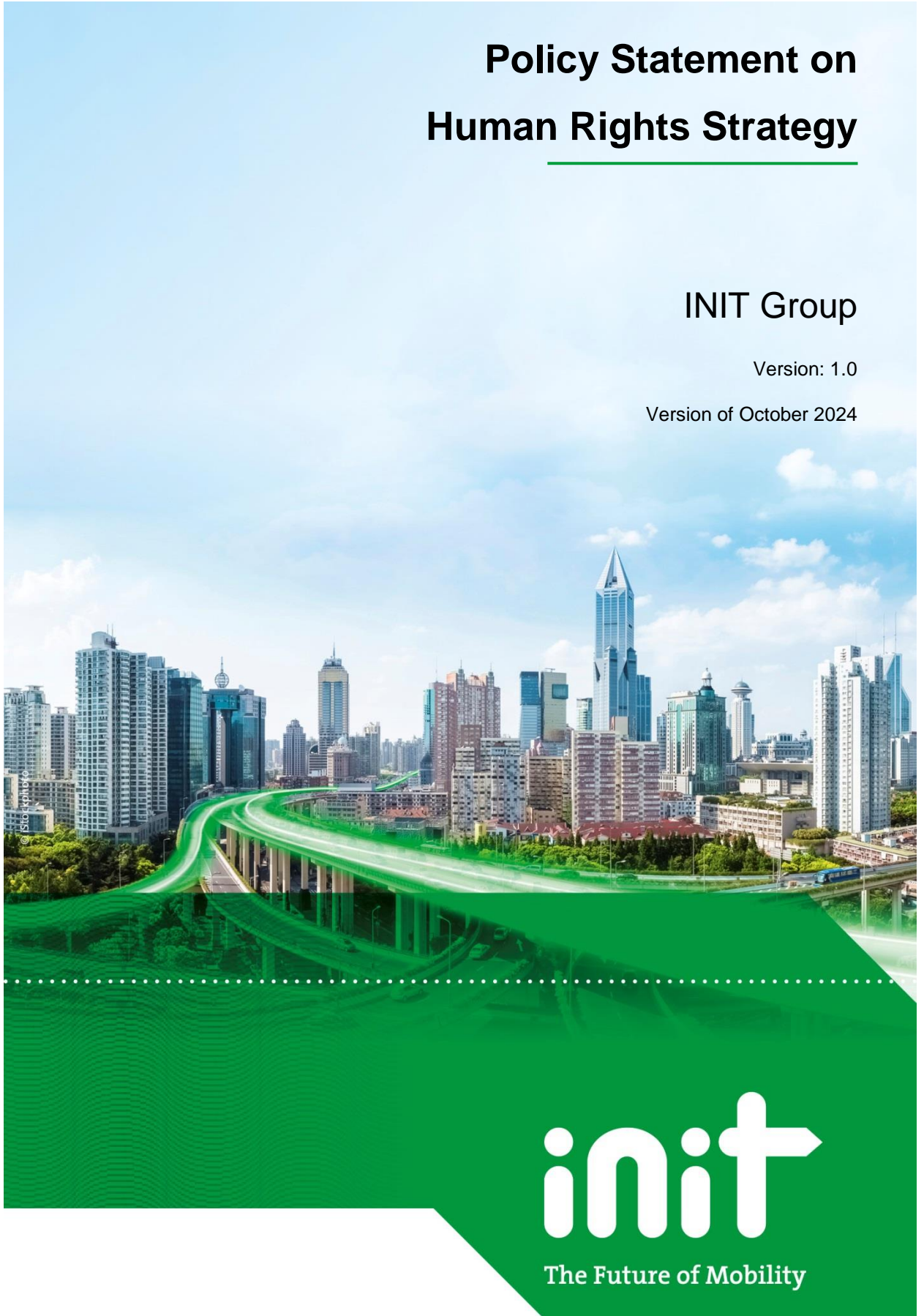
# Policy Statement on Human Rights Strategy

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INIT Group

Version: 1.0

Version of October 2024



**init**

The Future of Mobility

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## Review Period and Update

The Policy Statement on Human Rights Strategy, valid from 01.10.2024, is reviewed annually and updated as required and necessary.

The Policy Statement on Human Rights Strategy apply in accordance with the Board of Directors' resolution.

## Internal and External Communication

The Policy Statement on Human Rights Strategy will be communicated both internally and externally. It will be permanently available on the intranet and on the company website.



### Note

For reasons of better readability, the language forms male, female and diverse (m/f/d) are not used simultaneously. All references to persons apply equally to all genders.

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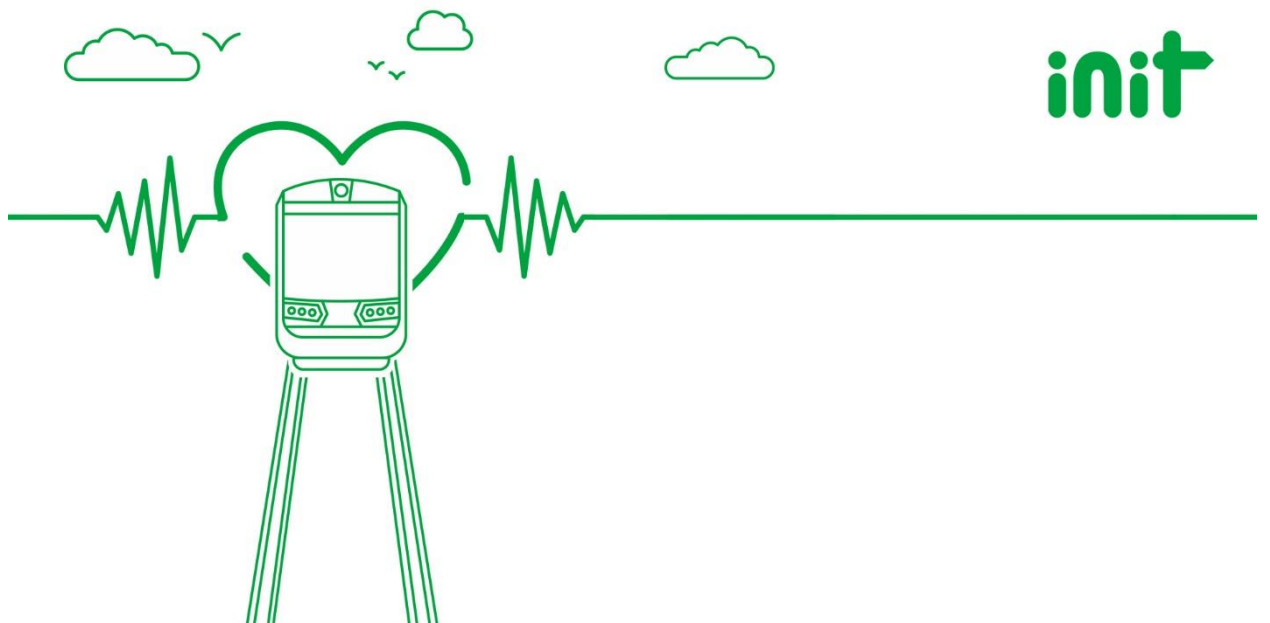
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## 1 Preamble

Since 1983, INIT has evolved from a university spin-off to the world market leader for integrated planning, scheduling, telematics and ticketing solutions in public transportation. Every day, INIT supports its customers in mastering the challenges and demands of public transport. INIT is more than just a company name - it is a mission statement: innovative IT applications for transport, traffic and control systems. The name stands for innovation, quality, and user-friendliness, with every individual playing a role in shaping our success. Only together can we succeed in providing the sophisticated solutions that inspire our customers.

INIT's entire business is based on the guiding principle of being the most innovative, reliable and sustainable provider. INIT is the only provider in the world to combine the entire operational spectrum in an integrated telematics system and an intermodal mobility platform.



## 2 Principles of Respect for Human Rights and Environmental Risks

For many years, INIT has recognized its responsibility to uphold human rights and protect the environment - principles that are reflected in our mission statement. In our Ethical Guidelines, we commit to respecting and promoting internationally recognized human rights while strongly condemning all forms of child and forced labor. The elements of our human rights strategy, outlined below, are embedded in our daily operations.

As a provider of IT solutions for public transport, we are committed not only to respecting human rights but also to ensuring fair working conditions, combating discrimination and protecting the environment. We expect all employees and managers to comply with applicable laws and regulations as well as internationally recognized standards for human and environmental rights.

Our Ethical Guidelines already define the expectations we have for our business partners and suppliers, which are also incorporated into our General Terms and Conditions of Purchase.

The German Supply Chain Due Diligence Act (LkSG) establishes the regulatory framework for companies to meet their human rights and environmental due diligence obligations. This declaration of principles was developed in accordance with Section 6 (2) LkSG. It is reviewed annually and on an ad hoc basis and updated as necessary.

### 3 Implementation of the Elements of the Human Rights Strategy

The implementation of this declaration of principles is an ongoing process that we regularly review.

Overall responsibility for respecting and upholding human rights and environmental obligations rests with the Managing Board of init SE. Monitoring and oversight of human rights-related activities are carried out in close coordination with the Compliance, Purchasing and Human Resources departments. This ensures that everyone involved is aware of their responsibility to respect human rights and integrate them into daily operations.

We particularly rely on the cooperation of our employees to report any grievances through the reporting line (see 3.4).

#### 3.1 Risk Analysis in Own Business Area and at Suppliers

INIT maintains a risk management system in accordance with Section 4 (1) LkSG to ensure compliance with due diligence obligations. This system covers risks within our own business operations as well as those in our supply chain. The compliance organization monitors the fulfillment of these obligations and oversees risk management.

As a global company, INIT procures goods and services from various regions and countries and exports products worldwide. As part of our duty of care, we strive to identify and assess both potential and actual human rights risks, as well as the impact of our business activities at our direct suppliers. To achieve this, we follow a structured process to evaluate relevant human rights issues and identify potentially affected parties within our own business and supply chain. Human rights risks and impacts are reviewed at least once a year and whenever significant changes occur in our company profile or business activities.

The foundation for defining appropriate measures is a thorough risk analysis, which identifies and prioritizes potential human rights and environmental risks at our global locations and suppliers. This analysis follows a standardized process:

- 1) We assess industry- and country-specific risks using various indices, such as the ILO Child and Forced Labour Index and the Modern Slavery Index.
- 2) Based on this analysis, suppliers are evaluated, prioritized, and subjected to further scrutiny.
- 3) Identified risks are reassessed based on their expected severity, likelihood of occurrence, and the reversibility of potential violations.
- 4) All identified risks are addressed through preventive measures or targeted action plans within our own business operations and across our supply chain.

### **3.2 Preventive Measures, Section 6 LkSG**

To minimize potential risks and damages, we develop and implement preventive measures as part of our compliance management system, procurement strategies, and purchasing practices. Additionally, a structured training program ensures that all employees are adequately informed and sensitized to fulfill their human rights due diligence obligations.

### **3.3 Remedial Measures, Section 7 LkSG**

If we become aware of an existing or imminent violation of human rights or environmental due diligence obligations within our own business operations or at direct or indirect suppliers, we will take appropriate remedial measures immediately.

### **3.4 Whistleblowing Procedure, Sections 8, 9 LkSG**

We ensure compliance with legal and internal company regulations in all our business relationships. Human rights or environmental violations can be reported through our whistleblower system, including anonymously. The system is accessible online at any time to all employees, business partners, and other stakeholders.

### **3.5 Effectiveness Monitoring**

We monitor the effectiveness of implemented preventive and remedial measures, as well as the whistleblower system, through risk-based control measures.

## 4 Expectations for Employees and Suppliers

We expect our employees to uphold human rights due diligence obligations and comply with legal requirements and internal guidelines throughout the entire value chain.

For our suppliers, these expectations are outlined in our General Terms and Conditions of Purchase, making them an integral part of contractual agreements.

Additionally, we expect our business partners and indirect suppliers to recognize the "United Nations Universal Declaration of Human Rights", the principles of the UN Global Compact, and the core labor standards of the International Labour Organization (ILO). Compliance with country-specific laws applicable at each location is generally required.





## 5 Documentation

In accordance with Section 3 (1) No. 9 LkSG, the fulfillment of due diligence obligations is documented and stored for seven years in compliance with statutory requirements. The report is prepared no later than four months after the end of the financial year and is made publicly available free of charge on the init SE website for seven years.

All identified human rights and environmental risks or violations are recorded in the report while maintaining business confidentiality. If a violation is identified, we explain - pursuant to the provisions of the LkSG - the measures taken to fulfill our due diligence obligations, how the impacts were assessed, and what conclusions have been drawn for future actions.