



Human and Labor Rights Policy

May 2023

Introduction and purpose

At SimCorp, we recognize every human being as free and equal in dignity and rights at work, and we are committed to respecting human and labor rights both in our own operations and in our relations with external partners.

We wish to promote a working environment that is characterized by respect and fairness, equality, non-discrimination and non-harassment and respect for labor. We do not accept any form of forced labor, nor child labor. All our employees are expected to consider how their decisions may adversely impact human and labor rights, and to report any breaches of our standards to management, People and Culture, or through our Whistleblower system.

The Human Rights and Labor Policy is developed in accordance with the principles of the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and applicable national and international labor laws, including the conventions of the International Labor Organization ('Human Rights and Labor standards').

Scope

The SimCorp Human and Labor Rights Policy applies globally to all managers and employees, both full and part time of all entities. The Policy applies to all markets and functional units globally.

We contractually commit our suppliers to adhere to Human and Labor Rights principles, hereunder that suppliers are responsible for setting the same or comparable standards for their subcontractors. Expectations towards our suppliers are specifically addressed in our Code of Conduct for Suppliers.

1 Guiding principles

1.1 Non-discrimination

We ensure that all our colleagues have the same opportunities for employment and promotion based on their ability, qualifications, and suitability for the work. We are open-minded and listen when given constructive feedback regarding others' perception of our conduct. We foster teamwork and encourage representation of different employee perspectives, and all our employees are expected to support and contribute to an inclusive workplace.

We treat our colleagues equally, with dignity and respect regardless of race, color, religion, political conviction, gender, age, national origin, sexual orientation, marital status or disability, or any other characteristic protected by national or local laws.

1.2 No harassment and violence

We are committed to treating every employee with dignity and respect. We do not tolerate bullying or harassment from anyone whether towards employees, job applicants or business partners, be it direct or indirect, physical, or psychological, verbal or non-verbal.

1.3 No child labor

We do not tolerate child labor and follow local laws when it comes to the minimum age for workers. We are committed to preventing child labor and adhere to the principles of the Convention on the Rights of the Child of the United Nations and the relevant principles under the International Labor Organization (ILO). The minimum age of full-time employment must be 15 years, or the legal minimum

age for employment under applicable law, whichever is higher. Exceptions can occur in certain developing countries where a minimum age of 14 years applies. These countries of exception are specified by the ILO.

We do not tolerate forced labor or any other forms of compulsory work or service including indentured labor, bonded labor and slave labor, or human trafficking. Employees shall enjoy freedom of movement during their employment and be permitted to terminate employment after reasonable notice. We will not retain original identification documents, deposits or financial guarantees or withhold wages outside of a legal contractual agreement or applicable law.

1.4 Fair wages, income, working hours and benefits

We are committed to ensuring full compliance with applicable human rights and labor laws, regulations and relevant collective agreements concerning working hours, overtime, sick leave, parental leave, and minimum rest periods.

All employees have the right to fair compensation. The wage of a full-time employee must provide for the satisfaction of the needs of the employee in the light of national economic and social conditions.

We recognize the right to rest and leisure and comply with local laws, regulations, and customs when it comes to working hours and overtime.

Employees must not be asked to regularly work more than stipulated in their contract or similar employment documents and have the right to a satisfactory state of equilibrium between an individual's work and private life.

1.5 Freedom of association and the right to collective bargaining

We respect the right to freely associate, form or join organizations and to bargain collectively in accordance with recognized international standards, local laws, and regulations. We also recognize the right of our employees to refrain from joining such organizations.

1.6 Health and Safety

We are committed to ensuring a safe and secure working environment that supports the health and wellbeing of employees. All employees are expected to observe and promote a safe working environment and to report any breaches of our standards.

2 Grievance mechanisms

SimCorp is committed to acting responsibly in fulfilling its role in society. We have processes and procedures in place to ensure that human rights risks are identified, assessed, and mitigated.

We have People and Culture management procedures in all the countries where we operate to ensure that all employees are recruited lawfully and in compliance with local labor law. When legally acceptable, we require candidates to present a clean criminal record. Further, we require that all employees have valid residence and work permits to ensure that they are living and working legally in the country in question. Finally, depending on location there may be a number of additional checks, e.g. global education, global sanctions and enforcement check, global ID checks (see our Background Check Policy for more details). SimCorp offers mandatory training programs to ensure that employees adhere to our policies and procedures.

All employees can consult possible wrongdoings or concerns with their manager or the People and Culture management who will treat any concerns confidentially and can advise on further actions.

If neither of these options are possible or the employee does not feel comfortable taking any of the above actions, SimCorp encourages the use of the Whistleblower hotline to file a strictly confidential report if the matter is covered by the Whistleblower Policy. SimCorp has a non-retaliation policy as part of our Whistleblower Policy enabling stakeholders, including temporary, permanent and contract employees, suppliers, and business partners to report any illegal or unethical misconduct of serious or sensitive concern, including human rights violations.

3 Accountability and governance

The Human and Labor Rights Policy is subject to regular revision by People & Culture to ensure its continued adequacy and relevance. Amendments and updates can be made at any time with the approval of the SimCorp Board of Directors and the Executive Committee who is responsible for approving the policy. This Policy should be read together with SimCorp's associated policies stated below.

Overview of Roles and Responsibilities

Roles	Responsibilities
Board of Directors	Responsible for policy approval.
Executive Committee	Responsible for policy approval.
Chief People & Culture Officer	Owns, endorses and ensures the implementation of the policy.
People & Culture	Drives the implementation of the policy, provides specific advice on human rights issues, and ensures that human and labor rights are identified and addressed. Audits, reviews, measures and reports on human rights performance.

Associated policies

- Anti-Harassment and Anti-Bullying Policy
- Health & Safety Policy
- Diversity, Equity and Inclusion Policy
- Global Background Check Policy