

As a service provider in the field of international cooperation for sustainable development and international education work, GIZ is dedicated to shaping a future worth living around the world. Against this background, the company makes every effort to ensure that it adopts responsible business practices, especially in relation to the environment and human rights. GIZ is committed to upholding the Universal Declaration of Human Rights, the core UN human rights instruments, the ILO Core <u>Labour Standards</u> and the <u>European Convention</u> on Human Rights. It also recognises its own corporate responsibility to respect human rights. As a company, we are committed to the 10 Principles of the UN Global Compact and observe the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. When delivering its services, GIZ aligns with the requirements of the Human Rights Strategy for German Development Policy. To monitor the company's risk management system, and perform other tasks, we created the position of GIZ's human rights officer. Their responsibilities include ensuring external reporting on our human rights and environmental due diligence obligations, and making sure our management of these obligations is continuously reviewed and adjusted.

I. Goal-setting and addressees

This policy statement formulates GIZ's stance on human rights and constitutes a binding document for the organisation. It applies to all organisational units equally and informs GIZ's actions, both within the company and outside it. It is integral to GIZ's understanding of sustainable development and serves as the yardstick for interpreting and

refining existing rules. Further information on human rights at GIZ can be found in our <u>Code of Ethics</u> and in our own Processes and Rules (P+R). At the same time, this Policy Statement underscores GIZ's understanding of how its stance on human rights relates to its commissioning parties, clients and the general public. It formulates GIZ's expectation that our business partners, partner institutions and suppliers will comply with human rights requirements.

II. Human rights in our service delivery

Through its working practices, GIZ develops the capacity of governmental and civil society organisations and the private sector to respect, protect and guarantee human rights within the international frame of reference. GIZ assists state partner institutions in meeting their human rights obligations as duty bearers. We empower target groups to assert and realise their rights more effectively as rights holders. We also support companies with meeting their corporate responsibility to respect human rights (human rights-based approach).

On behalf of the German Government and other commissioning parties and clients, GIZ implements projects to directly improve the human rights situation in our partner countries (specific human rights projects).

At the same time, through our advisory and training measures we make a significant contribution to realising human rights in all sectors of international cooperation (mainstreaming the human rights-based approach as a cross-cutting issue).

III. Risk management – The key steps

GIZ takes its human rights due diligence obligations very seriously and has, among other things, set up a risk management process. GIZ's risk management system is based on a standardised process that involves systematically addressing risks at project level. We use a conventional approach to risk management that consists of the following steps.

- 1. Identify and describe risks
- 2. Assess and analyse risks
- 3. Develop appropriate risk control measures
- 4. Monitor the effectiveness of measures to control existing risks, and report on risks to the next higher management level

To read more about GIZ's risk management process, click here: Risk Policy.

IV. Risk management – Implementation

GIZ's risk management practices comply with the statutory requirements that apply to it as a GmbH in Germany (including Section 91 (2) of the German Joint Stock Corporation Act [Aktiengesetz – AktG], and IDW Auditing Standard 980), and pursuant to the German Act on Corporate Due Diligence Obligations

(*Lieferkettensorgfaltspflichtengesetz* – LkSG) as defined in Section 2 (6) LkSG.

It covers all the company's actions to achieve its corporate objective, also in the business area of its suppliers, and comprises several elements.

Six-monthly company-wide risk recording and control cycle

GIZ has developed a risk management system that sets out the principles, processes and roles involved in dealing pro-actively with potential risks, and complies with the statutory requirements. All such risks are reported in a six-monthly cycle and brought to the attention of the Management Board and Supervisory Board.

All GIZ managers have an obligation to identify, assess and manage risks in their area

of responsibility. Risks that need to be managed at corporate level are reported by the directors general or directors of units to the responsible team in the Governance, Risk, Compliance (GRC) Unit. At corporate level, risks and control measures potentially affecting the entire company are discussed by the relevant bodies.

The mandatory risk dialogue between management levels as part of the six-monthly risk recording process ensures that decisions on specific risk situations are taken systematically.

2. Annual risk analysis pursuant to the LkSG GIZ conducts annual and ad hoc risk analyses in its own business area (Section 5 LkSG). This process involves GIZ identifying and assessing the relevant human rights and environmental risks. If risks are identified, they are incorporated into the standard six-monthly risk recording process, and preventive measures are taken.

and structural compliance risks For certain subject areas where responsibility does not lie with a given specialist unit on the basis of its specific role, GIZ has defined and assigned clear and binding compliance

3. Defined responsibilities for identifying material

responsibilities. The responsible officers report annually on the material and structural risks that make up the risk situation in their designated compliance area. The next step is to develop (or request the development of) any actions that may be required.

4. Safeguards+Gender Management System
GIZ's Safeguards+Gender management
system is designed to ensure that all projects
are compatible with environmental and social
criteria. This means adopting a precautionary
approach to planning all our projects above a
defined threshold, regardless of the
commissioning party or client. We apply this
approach at an early stage in the preparatory
phase by checking for any unintended adverse
impacts, including those affecting human

rights. Unintended adverse impacts are undesirable impacts triggered, amplified and/or consolidated by the project that directly, indirectly and/or cumulatively affect people and other protected resources in the project and/or stakeholder environment. If required, we then define and integrate appropriate measures that can mitigate or prevent the adverse impacts.

Compliance management in GIZ's field structure

GIZ has a risk-based compliance management system. Those countries where GIZ operates that have a high or very high level of risk are therefore required to implement a more extensive compliance process than countries with a low or medium risk. In all countries, country-specific risks are identified and assessed on a structured basis. Where appropriate, specific activities are planned to manage these risks. The results of this recording and planning process are then reported to the company-wide risk recording system, where they are then monitored.

6. Risk analysis in the supply chain

Risk analyses of direct suppliers and service providers are coordinated centrally. Based on the results of analyses of specific groups of products and services and of particular risk exposures in partner countries, we can then assign an appropriate priority level to each risk. Any sustainability risks that are identified across our supply chains are followed up by conducting specific analyses to ensure that we can detect any risks among our indirect suppliers at an early stage. Preventive measures are taken in response to any identified risks.

V. Identified risks

Most of GIZ's workforce are employed in partner countries. Here, GIZ has a special responsibility to ensure basic human rights for its staff worldwide, either by adopting the relevant approaches to safety and security, or by complying with international

labour and social standards. GIZ recognises that its business activities (especially in fragile contexts) and its global supply and value chains may cause adverse impacts on human rights. GIZ spends around 50 per cent of its business volume on the procurement of materials and equipment, services, financing arrangements and construction activities. Consequently, GIZ has great potential for making its supply chains sustainable through its procurement activities and for promoting respect for human rights.

As part of its endeavours to demonstrate respect for human rights, GIZ will also focus on the following areas that have been identified as particularly significant for the company: protection of vulnerable groups; fair working conditions; occupational safety; freedom from discrimination; no economic or social exploitation of children; prevention of forced or compulsory labour; and protection against sexual assault at the workplace.

VI. Preventive measures

To prevent identified risks from occurring and to protect identified risk groups, GIZ has already taken a range of preventive measures. The main ones are described below.

1. Human rights in HR work

GIZ works continuously to ensure a high level of protection for national staff. The National Staff Policy therefore includes human rights-related standards which can thus be communicated on the staff's behalf. Human rights issues have been made an integral part of onboarding for all staff members, who have to repeat the subject matter on a regular basis.

2. <u>Unintended adverse human rights impacts in</u> the supply chain

GIZ has a adopted a <u>Sustainable Procurement</u> <u>Policy</u> that is designed to reduce risks in its supply chains. It has also integrated human rights aspects into its Code of Conduct for Contractors, which is a binding component of the General Terms and Conditions of Contract and Purchase (<u>AVB/AEB</u>) and the terms and conditions of all special agreements. When

classifying the risks associated with purchases of materials/equipment, services and construction work, we identified products and services with a particular risk or sustainability potential. We continuously produce new guidance documents (including possible sustainability criteria) covering these products and services. The specific guidance is shared across the company and made available, for example, to all units involved in procurement. In addition, regular training is provided for staff in different positions to help them define risk-minimising criteria and apply the guidelines at an early stage during the procurement process. GIZ also arranges regular sustainability dialogues with selected direct suppliers in order to strengthen their own systems.

VII. Detection measures

GIZ has created an extensive whistleblower system for reporting violations of rights or rules. Various channels have been set up, and these can be used anonymously if required. The received tip-offs will be processed by the Governance, Risk, Compliance (GRC) Unit in the strictest confidence and in accordance with the basic principle of protecting whistleblowers. To ensure that the system is easily accessible for potential whistleblowers, the GIZ has set itself minimum standards for creating lowthreshold access. GIZ follows up all reported violations of rights or rules and all human rightsrelated complaints. It also ensures that matters reported in this way are clarified and resolved thoroughly and fairly. We have developed a standardised and transparent procedure for this.

VIII. Remedial measures

The following procedure for developing and implementing remedial measures is initiated whenever we become aware of impending or existing human rights or environmental violations. The first step in our own business area is to draw up a plan to prevent/end the violation and a plan

of corrective measures with a specific time frame. This is done together with the unit concerned. If we become aware of an impending or actual violation in our supply chain, the above plans are drawn up together with the direct supplier in question. It may be necessary to suspend our business relationship temporarily or to limit our supplies/orders until corrective action is taken. We will only break off a business relationship completely in the case of a very serious violation where there are no other measures for corrective action. We will also draw up a plan to prevent, end or minimise the risk or violation if we have substantiated knowledge of human rights or environmental violations by indirect suppliers. In such cases, we will endeavour to make direct contact with the indirect supplier in question in order to perform or arrange for appropriate checks as required, to strengthen the indirect supplier's own systems, raise awareness and consequently, as far as possible, prevent further violations.

IX. Responsibilities and reporting

Responsibility for producing reports lies with the Corporate Development Unit. The Corporate Development Unit reviews this policy at regular intervals and on an ad hoc basis to identify any modifications that may be required. It also coordinates any work needed to revise the policy. Ultimate overall responsibility lies with the Management Board. GIZ is aware that implementing its human rights and environmental due diligence obligations in its own business activities and in supply chains is an ongoing process. It therefore regularly reviews its strategic approaches and measures in order to continuously improve them. GIZ provides transparent information on implementation and developments as part of its annual sustainability reporting and in its LkSG report to Germany's Federal Office for Economic Affairs and Export Control (BAFA).

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