

Thinkproject Group Human Rights Policy

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1 PURPOSE AND MISSION STATEMENT

At Thinkproject Group, we strive to achieve positive environmental, social and economic impact with our products and to be a role model in our own operations. Sustainability is deeply embedded in our company's corporate DNA, and we have set the mission of becoming a recognized sustainability leader in the Architecture, Engineering, Construction and Operations (AECO) sector. This means that Thinkproject Group expands in a way that it strives to create long-term value for external stakeholders, but also to its own internal resources, as employees are its most important asset.

2 DEFINITIONS AND ABBREVIATIONS

Abbreviation	Description
AECO	Architecture, Engineering, Construction and Operations
UN	United Nations
UNGC	United Nations Global Compact
OECD	Organization for Economic Cooperation and Development
WHO	World Health Organisation
Human Rights	Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination. ¹

3 COMMITMENT

It is Thinkproject Group's commitment as a responsible company to uphold the highest human rights standards across its entire organization, operations, activities and its broader value chain. This Human Rights Policy complements the company's Code of Conduct and outlines its approach to human rights and its expectations on stakeholders to promote and implement these rights, contributing to creating positive impact. Thinkproject Group wants to ensure that all employees working for or on behalf of the company understand and comply with this policy.

Thinkproject Group has implemented a range of programs and policies. Thinkproject Group is committed to ensuring that human rights are respected across its operations and supply chain and to this end, the company is particularly committed to:

- Embedding sustainability as an integral part of its corporate strategy
- Complying with all applicable laws and regulations
- Signing and following all ten principles of the UNGC
- Providing a working environment characterized by diversity, equal opportunity, respect and wellbeing
- Measuring and monitoring sustainability performance and progress against environmental, social and governance related objectives and targets

Besides basing itself on the UNGC's ten principles, this Policy also follows the International Bill of Rights, which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights. Finally, it additionally takes into account the International Labor

¹ As defined by the United Nations (UN).

Organization's Declaration on the Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises and the Diversity Charter, to help us implement our commitment.

4 AREA OF APPLICABILITY

This policy applies to Thinkproject Group and its subsidiaries. All employees working for or on behalf of Thinkproject Group have a responsibility to adhere to this policy, and the company reiterates its expectations of stakeholders to promote and implement these rights as well, contributing to creating positive impact.

5 RESPONSIBILITIES & GOVERNANCE

The Thinkproject Group's CEO is responsible for compliance with human rights within the organisation. The development, regular review of this policy and education of all relevant stakeholders about its contents is assigned to the company's sustainability department. The Sustainability Director reports to the CMO, within the CXO team, of Thinkproject Group and provides ongoing updates and recommendations with respect to Thinkproject Group's Human Rights Policy. In addition, the Sustainability Director regularly consults with the other members of the Thinkproject Group Executive Board on specific human rights topics when and as required.

The CEO has ultimate decision-making authority and oversight over human rights at Thinkproject Group. When critical, the CEO will escalate risks, issues and topics that need to be discussed in the broader Senior Management Team or Board for feedback and guidance.

6 STATEMENT

Thinkproject Group focuses its efforts on the human rights described below, which have the greatest relevance to its business model as well as the greatest risk potential for the organization. Five issues were identified: Diversity and Inclusion, Harassment and Discrimination, Forced Labor, Mental Health and Fair Wages. These are translated into policy requirements laid out below, or in the respective individual policies available on Thinkproject's Website or on demand from the company's Sustainability department.

We invite our stakeholders to consider the list of focus areas below as they identify the human rights that are most at risk in their own daily operations – the list could vary depending on their activities, assessments and industry focus. We finally invite our stakeholders to contact us to partner with them on this journey, always keeping in mind the creation of shared value and positive impact.

6.1 Diversity and Inclusion

All people, regardless of their gender, age, race, ethnicity, religion, marital status, sexual orientation, gender identity, experience, socio-economic status, abilities, must be given fair and equal opportunities when it comes to recruitment, compensation and career development. They must be valued, accepted and treated equally in the organization, regardless of any differences.

Thinkproject Group firmly believes that diversity is key to promote and develop a rich work environment, where all employees feel they belong: strengthening the company's position as a diverse and inclusive company aligns with its beliefs and values and contributes to long-term business success, fosters innovation and supports employee engagement and productivity. Additionally, diversity enables Thinkproject Group to better understand and respond to its changing customer based around the world and embrace cultural and societal change.

This identified human right is consistent with the principles set out in the company's Code of Conduct, Non-Discrimination and Anti-Harassment Policy and Diversity and Inclusion Report. Please review these specific documents that outlines in detail Thinkproject Group's commitments, ambitions and approach to contributing to diversity and inclusion.

6.2 Harassment and Discrimination

Discrimination is the unfair treatment of a person in comparison with another, based on ethnicity, gender, skin color, religion, political opinion, disability, family status, sexual orientation, race, age, nationality, marital status, social background and physical, mental and sensitive medical conditions. Harassment can take many forms, including activity that is retaliatory or intimidating or hostile conduct such as offensive language or inappropriate jokes. It also includes moral and sexual harassment, sexist conduct and bullying.

Any form of bullying and harassment is prohibited at Thinkproject Group. This includes any inappropriate conduct or comment by a person towards another person that the person knew or reasonably ought to have known would cause that employee to be humiliated or intimidated. Thinkproject Group firmly believes that harassment and discrimination are destructive to the team environment company culture that is aimed foster and can result in loss of motivation, reduced productivity and lack of trust in colleagues and management at work. Any employee has the right to freely form or join a labour union to voice their grievances through collective bargaining agreements.

This identified human right is consistent with the principles set out in the company's Code of Conduct, Non-Discrimination and Anti-Harassment Policy and Diversity and Inclusion Report. Please review these specific documents that outlines in detail Thinkproject Group's commitments, ambitions and approach to repudiate harassment and discrimination.

6.3 Forced Labour

Forced labor is often referred to as modern slavery or human trafficking and refers to work or service that is forced on a person under threat of a penalty and which the person has not offered him/herself voluntarily. Instances of modern slavery in companies' supply chains and operations are seemingly on the rise in different industries, including the construction industry, which Thinkproject Group is aware of. The company strictly prohibits any form of forced labor.

Thinkproject Group attaches great importance to pay attention to stakeholders that might be at risk to carry out such practices, and to therefore map out and identify associated risks to seek out remedies in the event where forced labor could be employed.

This identified human right is consistent with the principles set out in the company's Code of Conduct. Please review this specific document that outlines in detail Thinkproject Group's commitments, ambitions and approach to ban forced labor.

6.4 Mental Health

Mental health is a state of wellbeing in which an individual realizes his or her own abilities, can work productively, can cope with the normal stresses of life and is able to make a contribution to his or her community². Mental health has long been stigmatized in organizations, and not been taken as seriously as physical health has – but things are now evolving, and Thinkproject Group has been active in building awareness on mental health by enhancing coping capacity, resilience and providing access to specific services to help with this issue.

Thinkproject Groups believes that a healthy work environment where every single employee can feel positive, confident and be themselves, is a priority. A good mental health fosters innovation, creativity, motivation and can help increase productivity. This is why the company has dedicated measures in place to promote the health & wellbeing of its employees and provide continuous support to employees and all managers. Additionally, Thinkproject Group assesses risks and monitors progress on company commitments and the effectiveness of initiatives, done both with internal resources from the People & Culture department and with external support, through an annual employee survey conducted with the independent service provider "Great Place to Work" to gain insights into how employees perceive their working environment and mental health.

This identified human right is consistent with the principles set out in the company's Code of Conduct. Please review these specific documents that outlines in detail Thinkproject Group's commitments, ambitions and approach to contributing to employee mental health.

² As defined by the World Health Organization (WHO).

6.5 Fair Wages

Fair wages refer to remuneration that is set at least at a level that is livable and reflects market-based practices providing adequate reward and recognition of an employee’s work. Fair wage contributes to decent work, decent standards of living, and competitive salaries reflecting market practices to attract and retain the best talent.

Thinkproject Group guarantees a living wage – defined in line with best practices – for all employees, which covers their fundamental needs. Furthermore, the company’s People and Culture department has developed an internal Talent Acquisition Strategy that accentuates and puts in place precise action plans to keep attracting talents and paying them fairly. This strategy is continuously evolving.

This identified human right is consistent with the principles set out in the company’s Code of Conduct, internal Equal Pay Analysis and internal Talent Acquisition Strategy. Please review the Code of Conduct specifically that outlines Thinkproject Group’s commitments, ambitions and approach to attribute employees’ fair wages.

7 GRIEVANCE MECHANISM

Every internal or external stakeholder of Thinkproject Groupe is expected to report any violation of the standards set out in the Human Rights Policy. Anyone has the option to submit an anonymous report through Thinkproject Group’s whistleblower system at <https://thinkproject.integrityline.com/>

Details of the reporting procedures and processes can be found in the relevant Whistleblowing Policy, which can be accessed via the same link. All reports, including references to the whistleblower, will be processed confidentially and in accordance with applicable laws.

8 REFERENCE DOCUMENTS

- Diversity and Inclusion Report
- Freedom of Association Policy
- Non-Discrimination and Anti-Harassment Policy
- Whistleblowing-Policy

9 DOCUMENT CONTROL

Version	Date	Author	Approved by	Details of changes made
1.0	29.07.2022	Marc Kiesser	Anne-Aurélie Duval Patrik Heider	First version
1.1	03.01.2023	Marc Kiesser	Anne-Aurélie Duval Renzo Taal	Change in approval responsibility
1.2	22.11.2023	Andrea Collado Betrán	Renzo Taal	Change of governance structure within the sustainability team