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## Human Rights Policy

Date of revision: 03/2023

Distributed to all employees of DO & CO

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DO & CO, a family-run first-generation business, incorporates its beliefs and core values into all business activities by adopting a quality-driven, people-led approach around three core principles **responsibility, gratitude, and equality**.

**Responsibility** encourages us to do business sustainably to ensure our future generations will have access to the same resources. We see an opportunity to positively influence our surroundings and handle resources more efficiently through responsible business practices and compliance with applicable laws.

**Gratitude** helps us to develop our principle of responsibility coherently. DO & CO asks that all its employees consider the wider impact of their actions, whether it is their impact on people or the environment, in an appreciative manner which minimizes wastefulness. This thoughtful approach is applied throughout all aspects of our value chain to maximize the positive impact we exhibit on our surroundings.

**Diversity, Inclusion and Equity** drive our culture of innovation and passion, where we celebrate and include all our people. DO & CO embraces, respects, and strives to maintain and augment the diversity of its workforce as one of the aspects that contributes to a positive and engaging working environment.

These principles are not only a guideline for our desired way of conduct, but they have truly become the ethos of the company. We thoroughly share the belief, that our ethical outlook is at the foundation of our accomplishments and helps our stakeholders reach their fullest potential.

DO & CO bases its principles of human rights on its belief that good corporate citizenship is essential to our long-term business success and must not only be reflected in our relationships and actions in the marketplace but also across the workplace, with the respect to the environment and the communities in which we operate. The following guidelines should serve as an indicator of how DO & CO operates. We want workers to know what we expect of suppliers and their facilities on topics like wages and hours, safety, fair treatment and forced or child labour – as well as how to report issues of concern.





At DO & CO, we support fair employment practices consistent with our commitment to human rights in our workplace. We seek to:

**1. Establish a strong and direct relationship with our employees through open and honest communications.**

To ensure that any employee can engage in open and honest conversation we installed an internal platform that enables all employees to anonymously discuss worries and bring forth any cases of misconduct., This way we can take swift and effective action in the form of mitigative and disciplinary measures, as per DO & CO's Diversity, Inclusion and Equity policy.

**2. Treat our employees with fairness, dignity, and respect.**

As also referenced above, we commit to sustainably offering safe and agile work environments free of any discrimination and harassment. We firmly support the notion that the best way to motivate our employees to develop and grow within the international organization of DO & CO is to offer them the opportunity to be agile and give them ample room to develop their personal and professional skills as part of a work environment that is based on a fair assessment, equal opportunity and healthy competition, as per Article 23 of the UN *Universal Declaration of Human Rights*.

**3. Abide by applicable local labour laws, including those that address working hours, compensation, discrimination, and third-party representation.**

Wages and salaries comply with national legal requirements and are independent of race, sex, skin colour, origin, religion, or sexual orientation. On a broader spectrum and in accordance with Articles 23 and 24 of the UN *Universal Declaration of Human Rights*, DO & CO regards as imperative the right of all employees to equal pay for equal work, their right to a sufficient remuneration package that meets or exceed the minimum wage levels, which ensures and safeguards a dignified and sufficient level of life for all employees and their families. On the same level, DO & CO respects and upholds the right of its employees to rest, recuperate, recover, as well as engage in leisure activities, by setting a reasonable limitation of working hours and allowing periodic holiday periods based on local labour laws. As a final remark, based on Articles 20 and 23 of the *UN's Universal Declaration of Human Rights*, all employees reserve the right to assembly and association, as well as, if they chose to, to form and participate in a trade union. In the case they find themselves in a workplace situation where they consider any of the above to be violated, they reserve the right to be represented by a third representation party, such as a trade union.

**4. Zero tolerance for issues surrounding modern slavery and child labour.**

DO & CO is unequivocally opposed to and condemns modern slavery and commits to under no circumstance use forced labour, in the forms of trafficked labour, indentured labour, bonded labour, or in any other form, including mental and physical coercion. In addition, it is strictly prohibited for individuals under the age of 15 to be employed or under the given local legal minimum age of work or mandatory schooling whichever is higher. The above clauses were developed based on the company's ethical stance on modern-day slavery and child exploitation, respecting and upholding Article 4 of the UN's *Universal Declaration of Human Rights* strictly prohibiting human exploitation through slavery, and the *UN's Convention on the Rights of the Child* condemning and seeking to abolish child mistreatment and exploitation. Should any cases that exhibit characteristics of the aforementioned issues come to the attention of management or a member of staff, mitigative, counter and if needed, disciplinary measures





will be immediately put into effect.

It should also be noted that all employees are free to terminate their employment after a pre-defined notice period agreed upon and explicitly mentioned in the working terms and conditions of their employment.

We take thorough and preemptive measures to assure that no children under the age of 15 participate in our operations.

#### **5. Value diversity.**

At DO & CO we believe that diversity is a crucial pillar of our company's successful development and growth over the years. We ensure that all our employees are treated fairly as part of the DO & CO workforce and given equal opportunities to develop and pursue their career aspirations, personal and professional skills, and goals, without having to overcome unwarranted hurdles, based on discriminatory and biased behaviours. Regardless, of race and religious background, gender, sexual orientation, disability, beliefs, parental status or age, all employees are treated with respect and fairness.

In DO & CO it is of utmost importance to maintain, support, and augment diversification through an egalitarian and fair recruiting, training, and promotion process, based on our updated *Diversity, Inclusion and Equity Policy*.

#### **6. Hold each other accountable for performance at the highest levels.**

The unit heads carry the responsibility to ensure that their co-workers are treated according to this policy and must react to any mismatches.

#### **7. Reward our employees commensurate with performance.**

All employees will have an annual review of their work performance with their superior to discuss potential improvements, during which the superior might suggest potential responsibility increases where applicable.

#### **8. Provide opportunities for employees to develop personally and professionally.**

In continuation to the diversity, inclusion and equity statement made in § 4, it is crucial to reference again the company's dedication to assisting its employees in developing both on a personal and professional level. Apart from working closely and being mentored by senior members of management during office hours, as well as presented with internal relocation opportunities, contributing to their career advancement and agility, employees will find proposed online resources for personal development on the intranet to access during their leisure time. Furthermore, all employees have the opportunity to and are encouraged to independently research appropriate development programs and to propose their participation to their superiors.

#### **9. Ensure, with our employees, the safety of the workplace.**

Local department or site managers pay particular attention to their employees regarding their well-being to ensure that they do not suffer any health consequences due to shift and night work, injuries caused by



non-compliance with safety regulations as well as exhaustion caused by employees being overburdened with work. This is documented by a periodic report offering a status update to the HR team.

#### **10. Suppliers' conduct and compliance.**

Companies need to ensure that their suppliers are adhering to their purchasing conditions, as well as any relevant laws and ethical principles in the countries where they operate. This helps to ensure that the company's operations are conducted responsibly and legally. Adhering to this notion, we expect our suppliers to fully comply with our purchasing conditions outlined in our *Supplier Code of Conduct*, as well as applicable laws and principles in the countries in which they operate. In addition, we expect our suppliers to fully conform, comply and provide tangible proof of their alignment with DO & CO's *Human Rights Policy*.

#### **11. Implementation:**

- We will communicate this policy throughout its workforce to ensure that all employees are aware of our commitment to human rights.
- Employees will be appropriately trained to identify and, where possible, remedy human rights infringements.
- We will establish appropriate audit and due diligence processes throughout our organization to ensure that no human rights infringements take place, and where such cases could not be avoided, take appropriate corrective action.

#### **12. Responsibilities:**

**The Board:** The Management Board Members Attila Dogudan, Attila Mark Dogudan and Gottfried Neumeister hold managerial responsibility for overseeing and operationalising the Human Rights Policy throughout DO & CO global operations.

**Sustainability team:** the Sustainability team ensures that the policy is always up to date and reflects on stakeholder inquiries regarding external communications. The policy is therefore reviewed on an annual basis and cross-checked with the other responsibility holders to inform them of any changes that might have occurred.

**Legal department:** In case of substantial legislative changes that would require the adaptation of the policy, the legal team will inform the Sustainability team of the necessary amendments and work collaboratively to implement them.

**HR team:** The HR team ensures that staff is appropriately trained to respect all matters relating to human rights and how to identify possible divergences.

#### **13. Management responsibility statement**

DO & CO's Management Board, hereby states that it holds itself accountable for the application, operationalization, upholding and general oversight of the above-outlined Human Rights Policy. The above statement entails that management is responsible for monitoring, steps taken by the responsible departments and teams to maintain the adequacy of the policy and update, when necessary, the





relevant procedures. The Members of the Management Board also commit to monitoring the efforts of the Legal and HR Departments to communicate and implement comprehensively the content of the given policy and its relevant procedures to the staff.

**MANAGEMENT NAME:** Attila Dogudan

**SIGNATURE** \_\_\_\_\_

**MANAGEMENT NAME:** Gottfried Neumeister

**SIGNATURE** \_\_\_\_\_

**MANAGEMENT NAME:** Attila Mark Dogudan

**SIGNATURE** \_\_\_\_\_

A draft of the policy was reviewed and approved by the Management Board on 20/03/2023.

The Company was guided by international GRI, ILO, EU, UN and WHO standards during the preparation and presentation of this policy.