



## PRINCIPLES OF HUMAN RIGHTS AND SOCIAL RESPONSIBILITY



**BELFOR** 

RESPECT | COMMITMENT | INTEGRITY

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### Document Note:

The statements contained in Chapters 2 and 3 of this document are identical to those in the BELFOR Handbook "Corporate Social Responsibility," which has been binding for employees of all (international) subsidiaries of BELFOR Europe GmbH since its publication on 21 December 2016.

## 1. TOP MESSAGE from Elvir Kolak, CEO BELFOR Europe

### #we are **BELFOR**



Our global CEO, Sheldon Yellen, says: **"We do the right thing even when no one is watching."**

For many years, we have adhered to an internal code of conduct defined in the BELFOR Corporate Social Responsibility Handbook, in which we set high standards for human rights compliance and environmental protection - considering the risks specific to our industry. With this statement of principles, we aim to make excerpts from our manual available to the public, especially to our business partners - our customers, insurance companies, claims adjusters, surveyors, brokers, and other stakeholders - and reaffirm our commitment to protecting human dignity and the environment.

Our actions are guided by internationally recognised human rights standards, particularly the International Bill of Human Rights and the fundamental labour standards of the International Labour Organization (ILO). We align our actions with the UN Guiding Principles on Business and Human Rights and with key recommendations from international frameworks such as the OECD Guidelines for Multinational Enterprises, and we continuously work to further improve our implementation of these standards.

#we are BELFOR – this is more than just a slogan. For us, it is a clear statement from a strong, values-oriented community. At BELFOR, we are there when competent help is needed after damage has occurred. We are proud to help bring our customers back into their business or homes after a loss.

Our corporate values are **RESPECT, COMMITMENT** and **INTEGRITY**. These clearly defined principles form the foundation of our responsibility as a company.

We comply with all applicable laws and regulations and provide training to our employees.





We are committed to complying with relevant European and national legal requirements related to human rights and corporate due diligence. For our German companies, this includes in particular the requirements of the German Supply Chain Due Diligence Act (LkSG). We also ensure that our subsidiaries in the countries in which they operate comply with all local laws concerning human rights and responsible corporate governance.

We are aware that the construction industry, with which our business is partly connected, is considered a high-risk sector in terms of labour law and minimum wages. We will continue to

review and adapt our approach to human rights and environmental protection to adequately respond to changes and new requirements.

We firmly believe that sustainable success is only possible if we fully meet our responsibility to protect human rights and the environment — both locally and globally.

This statement is another significant milestone on this path.

Elvir Kolak  
CEO BELFOR Europe

## 2. STATEMENT ON HUMAN RIGHTS

Human rights are about treating all individuals with respect, regardless of their personal characteristics. At BELFOR, special value is placed on human rights and good working conditions — both within our subsidiaries and among our direct and indirect suppliers and business partners.

BELFOR avoids and does not tolerate any direct or indirect discrimination based on colour, religion, gender, age, ethnic or national origin, disability, marital status or sexual orientation, in any of its activities and actions. These activities include, in particular, hiring and terminating employees, selecting suppliers, and providing services. Our goal is to create a welcoming and pleasant environment for all employees, customers, subcontractors, and suppliers.

Migrants, foreign workers and their families are often particularly affected due to their origin. BELFOR respects their rights and contributes to an environment that values the human rights of migrants, migrant workers, and their families.

BELFOR strives to respect and integrate people with disabilities. However, due to the nature of our work, the possibilities for integration in day-to-day operations are limited.

BELFOR is committed - according to the Code of Conduct for BELFOR Suppliers & Business Partners - to consistently ensuring compliance with human rights due diligence obligations. This means that only subcontractors and

other business partners who respect human rights and fully meet the standards defined in the aforementioned Code of Conduct may be engaged. This requirement applies equally in countries where BELFOR does not have its own branch.

### 2.1 Prohibition of Forced Labour and Slavery

BELFOR strictly rejects all forms of forced labour, compulsory labour, modern slavery and human trafficking. Employment relationships are based solely on voluntariness and can be terminated with appropriate notice periods. Unlawful practices such as coercion, threats, debt bondage, exploitation or withholding personal documents are strictly prohibited. All employment and labour practices adhere at minimum to the ILO core labour standards. BELFOR expects all employees, business partners and suppliers to fully comply with these principles and conducts appropriate audits for this purpose.

If indications or confirmed violations arise, suitable measures are taken immediately.

### 2.2 Prohibition of Child Labour

BELFOR strictly rejects all forms of child labour. Relevant - though not limited to - are the applicable conventions of the International Labour Organization, particularly ILO Conventions No. 138 (Minimum Age) and No. 182 (Worst Forms of Child Labour), as well as applicable national laws.

Children must not be impaired in their physical, mental or social development; their dignity, safety and health must be respected and protected at all times.

BELFOR expects all business partners and suppliers to neither permit nor tolerate child labour and to take suitable measures to effectively prevent its occurrence within their own supply and value chains. BELFOR reviews compliance with these principles as part of risk analyses and supplier assessments.

Employees, suppliers and other stakeholders are explicitly encouraged to report possible violations confidentially and without disadvantage through BELFOR's whistleblowing systems. In suspected cases, BELFOR immediately takes appropriate action.

### 2.3 Remuneration and Performance

BELFOR adheres to internationally recognised principles of labour law, including equal pay for comparable work regardless of gender and the right to fair and safe working conditions.

BELFOR ensures that remuneration meets at least the statutory minimum wage of the respective place of assignment or employment. When determining compensation, local legal requirements, general living costs and social security systems of the respective country are taken into account.

### 2.4 Prohibition of Discrimination

Disparaging, unprofessional behaviour or harassment based on colour, religion, gender, age, ethnic or national origin, disability, marital status or sexual orientation violates BELFOR's Anti-Discrimination Policy.

All supervisors and managers are responsible for ensuring a workplace free from any form of harassment. No supervisor or manager may explicitly or implicitly threaten that an employee's refusal or acceptance of sexual advances will affect their working conditions.

BELFOR employees must require all persons working on behalf of BELFOR - such as subcontractors, consultants, agents and representatives - to comply with this Principles of Human Rights and Social Responsibility. Furthermore, BELFOR expects all stakeholders to act responsibly and comply with the principles outlined above. This includes environmental protection, the safeguarding of social standards including occupational safety, health and fair working conditions, as well as transparent and ethical corporate governance.

BELFOR promotes an environment in which integrity, sustainability and respect for all people and the environment are lived values.

### 3. STATEMENT ON ENVIRONMENT AND SUSTAINABILITY

BELFOR recognizes its responsibility for protecting the environment and is aware of the possible impacts of its products, production processes and work processes on people and the environment. Therefore, BELFOR takes both human rights and environmental due diligence obligations into account within its subsidiaries as well as when selecting and working with suppliers and business partners.

By definition, BELFOR's services are environmentally friendly and aim to save resources rather than waste them. Sustainability is a decisive criterion for both strategic decisions and daily operational measures.

BELFOR assumes responsibility for environmental damage caused by its business activities, services, products or processes. BELFOR's development of its own restoration chemicals aims to reduce environmental risks associated with activities, services and products.

Furthermore, systematic employee training in the proper application of these methods contributes to environmentally responsible service delivery.

### 4. COMPLAINTS PROCEDURE

BELFOR Europe GmbH operates a reporting office and reporting channels for whistleblowers. Through these channels, violations of the aforementioned legal and ethical principles or the BELFOR Code of Conduct can be reported confidentially.

An online reporting form is available at the following link:

<https://www.belfor.com/de/compliance-und-meldung-gem-hinschg>.

Alternatively, complaints can also be sent by email to [csr.complaints@belfor.com](mailto:csr.complaints@belfor.com) or by phone to **+49 203 756 409 35**.

All reported incidents and suspicions are appropriately investigated, documented and followed up.

No BELFOR employee who uses this reporting system must face negative consequences, even if this results in loss of business, or because they report violations.

The person responsible for monitoring and investigating matters related to due diligence obligations at BELFOR is the Human Rights Officer.

### 5. HUMAN RIGHTS OFFICER

Where required by national law — such as the German Supply Chain Due Diligence Act (LkSG) — BELFOR has appointed a member of the management team as Human Rights Officer. This person is responsible for conducting the required risk analyses and implementing

and monitoring preventive and corrective measures.

Requests to the Human Rights Officer may be sent by email to [csr@belfor.com](mailto:csr@belfor.com).

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