

# German Supply Chain Act Policy Statement

# **Human Rights Policies and Governance**

Baker Hughes operates and is managed as an integrated group with overarching policies, systems and processes that are designed to be applied and implemented consistently across business segments and geographic regions. Examples of relevant global Baker Hughes policies that govern the protection of human rights and the environment in all jurisdictions, including Germany, are:

Code of Conduct
Human Rights Policy
Supplier Integrity Guide
Fair Employment Practices Policy & Trafficking Addendum
HSE Policy Statement & implementing policies
Digital Trust Compliance Policy
Data Privacy Policy
Record and Information Management Policy
Know Your Customer Due Diligence Policy
Climate Change Policy
Carbon Offset Policy

The Baker Hughes Code of Conduct reaffirms Baker Hughes' commitment to promote human rights within the supply chain and to report concerns regarding suspected human rights violations. The Baker Hughes Human Rights Policy recognizes the protection of human rights as a universal obligation which all Baker Hughes employees, business partners, vendors, suppliers and contractors are expected to uphold. Both of these documents set forth Baker Hughes' expectation of its employees to seek out and take action against incidents of human rights infringement.

The Baker Hughes Supplier Integrity Guide governs all aspects of Baker Hughes' relationships with suppliers. Baker Hughes requires that suppliers adhere to the standards of conduct set out in the Supplier Integrity Guide and all applicable laws and regulations, including labor laws. The Supplier Integrity Guide places a clear obligation on suppliers not to (i) use forced, prison, or indentured labor, (ii) use workers subject to any form of physical, sexual or psychological compulsion, exploitation, or coercion, or to engage in or abet trafficking in persons; and (iii) employ workers younger than sixteen (16) years of age or below the applicable minimum age, whichever is higher. The Supplier Integrity Guide also specifically prohibits activities associated with human trafficking, such as withholding passports, charging recruitment fees, and misleading recruitment. The guide imposes certain affirmative obligations on suppliers, such as a requirement to reimburse workers for transportation costs and to provide workers with written contracts in a language they understand. Further, the guide encourages suppliers, and in some cases imposes an affirmative duty, to raise concerns about any actual or potential compliance violation and identifies the mechanisms to do so.

Baker Hughes also complies with the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018, as evidenced by its Modern Slavery Statement.



### **Risk Analysis**

Baker Hughes' German entities collaborate with global Baker Hughes functions that support local German entities to identify, assess and mitigate human rights and environmental risks in their operations and supply chains. Such functions include Sourcing Compliance, Legal Sustainability, Legal Operations, Compliance, Labor & Employment, Security, Commercial Risk, and Diversity Equity & Inclusion. These functions also assist the German entities to implement remedial actions when necessary.

In accordance with the United Nations Guiding Principles and the OECD Guidelines for Multinational Enterprises, Baker Hughes conducted an enterprise level risk analysis to identify the human rights and environment related risks in its own operations and in its direct supply chain. Baker Hughes then weighted and prioritized the identified risks for mitigation.

Similarly, the German entities listed below conducted a risk assessment of potential human rights and environment related issues throughout their value chains including their own operations, suppliers and customers, and identified the following risks as high priority, against which suppliers are regularly reviewed: 1) modern slavery; 2) right to fair pay and safe working conditions; 3) freedom from discrimination; 4) freedom of expression and religion; 5) right to health and safety at work; 6) freedom of assembly and association; 7) data protection and privacy; and 8) access to education; 9) elimination of hazardous materials; 10) waste management; 11) minimization of environmental impact

## **Supply Chain Diligence**

The Baker Hughes Supplier Social Responsibility Program ("SSRP") sets high standards of HSE performance, ethics, compliance, and respect for human rights and the environment, and to monitor suppliers' compliance with those standards. In alignment with the OECD Guidelines for Multinational Enterprises, Baker Hughes employs a risk-based approach to diligence of its direct material suppliers through the supplier onboarding process. These suppliers complete a questionnaire and are then scored against metrics such as country risks, the supplier's past performance, supplier's activity risk, human trafficking risks, environmental risks and other factors. A supplier that scores above a certain number is identified as high-risk and automatically placed into the SSRP.

Suppliers placed into the SSRP or, where Baker Hughes otherwise becomes aware of a given supplier posing a potential risk, are subject to on-site audits by trained auditors using a global questionnaire and risk-weighting metrics. On-site audit assessment findings are recorded and monitored until all noted findings have been corrected. Baker Hughes works with its suppliers to remediate any actual identified human rights and/or environmental impacts within a specified timeframe. If a supplier does not engage with Baker Hughes in that remediation process or cannot appropriately remediate the impact within the specified timeframe, Baker Hughes will suspend or terminate the business relationship.

Sourcing personnel, including the audit teams, receive "Eyes Always Open" training to be alert to potential violations and concerns during any supplier visit. Baker Hughes also makes human rights training available to direct suppliers.

The Supplier Integrity Guide, the SSRP and related diligence and audit procedures all apply to the suppliers that provide goods and services to Baker Hughes entities in Germany.

#### **Complaint Mechanism**

Baker Hughes employs several complaint mechanisms to identify human rights and environmental impacts of its operations and supply chain. All employees, suppliers and stakeholders are encouraged to speak up, without



retribution, about any concerns regarding human rights or the environment in our operations or supply chain. As detailed in the Baker Hughes Human Rights Policy Statement, the Baker Hughes Supplier Integrity Guide and on the Baker Hughes website, anyone can submit a report through:

- the hotline at reportconcerns.bakerhughes.com; OR
- by emailing <u>bakerhughes.Ombuds@bakerhughes.com</u>; OR
- by calling 1.800.288.8475 (toll-free) or outside the U.S. +1.713.626.0521.

Baker Hughes can track human rights and/or environmental grievances raised through the various reporting channels. Trends of reporting can be identified and shared with relevant business functions to implement mitigating solutions, while every report is treated confidentially and discreetly and investigated in an appropriate manner.

## Reporting

We report annually and transparently on our human due diligence obligations. This report is publicly available on our website.

#### **Outlook**

The world is constantly changing, and we are changing with it. We act in the knowledge that respect for human rights and the implementation of corporate due diligence to comply with these in our own business activities and in the value chain is an ongoing process. We therefore continuously review our risk assessment and measures in order to adapt them where necessary. We see this as an important contribution to improving the human rights situation and are happy to take on this challenge.



# **Approval**

This statement was approved by the management of the Baker Hughes companies in Germany (Baker Hughes (Deutschland) Holdings GmbH, Baker Hughes (Deutschland) GmbH, Baker Hughes INTEQ GmbH, Baker Hughes Chemicals GmbH, Baker Hughes International Beteiligungs GmbH, Baker Hughes International GmbH & Co. KG, Baker Hughes Kopp GmbH, Baker Hughes Digital Solutions GmbH).

Overall responsibility for reviewing compliance with and implementation of our human rights due diligence lies with the aforementioned management team.

Prof. Dr.-Ing. Sven Krüger

Arnold Bock

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