



Delivery Hero

Human Rights Policy

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1. Introduction

This policy sets out the commitment and responsibilities of Delivery Hero SE and all its direct or indirect subsidiaries and affiliated companies (together, "Delivery Hero", "DH", "Company", or "we"), in relation to human rights, and specifically those affecting its business activity and the operations carried out by DH's employees and management bodies.

Delivery Hero promotes respect for human rights internally (as set forth in this policy, sections **3**, **4**, and **5**) and externally. Externally, the Company promotes and encourages human rights to be respected by its third parties, adhering to the core values defined in our Code of Conduct.

Delivery Hero summarizes that human rights are basic rights and freedoms for everyone based on dignity, fairness, equality, and respect.

2. Scope

This policy applies to all companies of Delivery Hero, including subsidiaries and affiliates over which Delivery Hero has effective control or holds positions in the management bodies.

Local laws and regulations applicable to each of Delivery Hero SE and all its subsidiaries need to be considered. Any conflict that may arise between this policy and the specific regulations shall be communicated to the Central Compliance Team compliance@deliveryhero.com. The most restrictive regulation will prevail.

3. Delivery Hero Commitment

3.1. Human Rights Commitment

Delivery Hero embraces international human rights principles aimed at promoting and protecting human rights, such as the United Nations Guiding Principles on Business and Human Rights (UNGPs).

We also draw on guidance from the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, and the German Supply Chain Act (Lieferketten Sorgfaltspflichtgesetz "LkSG").

As an example of our commitment, in 2022, Delivery Hero joined the United Nations Global Compact initiative ("UNGC").

Delivery Hero commitment embraces all internationally recognized human rights, including but not limited to those contained in;

- the International Bill of Human Rights consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights as well as the International Covenant on Economic, Social and Cultural Rights; and
- the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work including freedom of association and the right to collective bargaining,

the rights not to be subject to forced labor, child labor, or discrimination in respect of employment and occupation.

Where there is potential for adverse impacts on vulnerable people or groups, we will also consider other international standards and principles that elaborate on the rights of such individuals or groups, including indigenous peoples, women, national, ethnic, religious, and linguistic minorities, children, disabled people, migrant workers and their families, and human rights defenders. This includes, for example, the Convention on the Elimination of All Forms of Discrimination Against Women and the Convention on the Rights of the Child.

3.2. Supply Chain

In particular, Delivery Hero being a group headquartered in Germany, is obliged to comply with the obligations laid out in the German Supply Chain Act.

According to the act, a human rights risk is a condition in which, based on factual circumstances, there is a reasonable likelihood of sufficient probability a violation of one of the following prohibitions is imminent:

- Child labor (<15 years old),
- Worst forms of child labor (slavery, mandatory military recruitment, prostitution, drugs, security or health endanger)
- Forced labor,
- Slavery,
- Employee safety,

- Disregard for freedom of association (no unions, no strikes),
- Unequal treatment
- Not taking into account the minimum wage
- Access to basic food/drinking water
- Eviction
- Violation of a protected legal position

The Company has established an approach (described in section 5) to ensure compliance with the present act. The approach includes an ongoing monitoring of the measures in place to ensure that process and procedures are reviewed on a regular basis and the Company is consistently compliant with the law over time.

4. Principles

We aim at setting the working conditions of our employees in compliance with internationally recognized labor standards, such as the ILO's core labor standards and the laws of the countries in which Delivery Hero operates. This includes the following principles:

- **Rejection of Forced Labor and Human Trafficking;** Delivery Hero shall ensure that no forced, bonded or involuntary labor, in any form, including slave labor and any form of human trafficking, is used in its business. No employee may be compelled to work through force intimidation of any form, such as physical punishment, threats of violence, sexual, psychological or verbal abuse. Delivery Hero will not

tolerate any of these methods of discipline or control.

- **Rejection of Harassment and Discrimination;** Delivery Hero prohibits any type of discrimination or harassment based on age, ethnicity, sex, skin color, nationality of origin, language, social status, religion, gender identity, disability, sexual orientation, pregnancy status, or any other situation protected by applicable law. Furthermore, the basis of recruitment, hiring, placement, training, compensation and advancement at Delivery Hero is always objective and based on, by way of example but not limited to, qualifications, skills, experience, and performance. Delivery Hero values the diversity and unique contributions of our employees and has a long-standing commitment to equal opportunities and does not tolerate any form of discrimination and/or harassment.
- **Rejection of Child Labour;** Delivery Hero prohibits the hiring of underaged individuals or under the local legal minimum working age. Younger workers may be employed through Delivery Hero approved short term internships, apprenticeships or work experience programs, but they shall never be permitted to do work that may threaten their health and safety, nor hinder their education or vocational orientation and training, and always in accordance with applicable legislation.
- **Health and Safety;** Delivery Hero provides and maintains a safe and healthy workplace environment and

complies with the applicable safety and health laws, regulations and internal requirements. Delivery Hero is committed to ensuring a safe workplace by minimizing the risk of accidents, injury and exposure to health risks. Delivery Hero is committed to engaging with employees to continually improve health and safety measures in workplaces, including the identification of hazards and remediation of health and safety issues.

- **Workplace Security;** Delivery Hero provides and maintains a workplace that is free from violence, harassment, intimidation, and other unsafe or disruptive conditions due to internal and external threats.
- **Freedom of Association and Collective Bargaining;** Delivery Hero respects our employees' right to join or form a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, Delivery Hero is committed to establishing a constructive dialogue with their freely chosen representatives. Delivery Hero is committed to bargaining in good faith with such representatives.
- **Working Hours, Wages, and Benefits;** Delivery Hero compensates employees competitively relative to the industry in line with all applicable local laws governing the payment of wages and benefits to employees. If the compensation paid does not meet the workers' basic needs and provide some discretionary income, our business partners are required to take

appropriate actions that seek to progressively realize a level of compensation that does. We do not condone holding workers' passports to keep them from leaving, charging any type of fee or deposit for employment, or any other unfair practice. Working hours must comply with national laws and benchmark industry standards.

- **Right to strike;** All employees have the right to strike without consequences such as the termination of their contract. Therefore, Delivery Hero policies reflect our commitment to respect the protection of the internationally recognized human rights.
- **Environment;** Delivery Hero is cognizant of today's global environmental challenges and their impacts on people and communities. Sustainability is an integral component of our company strategy, and we apply measures in our own operations, and through our business partners, to address these issues, including those around climate change, water, the use of hazardous chemicals, and waste.
- **Privacy;** Delivery Hero is committed to comply with all relevant privacy laws and regulations. Our Global Data Protection Policies define the framework to meet this commitment.

5. Our Human Rights Approach

5.1. Approach towards third parties

We seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products, or services by our business relationships, even if Delivery Hero has not contributed to those impacts directly. We seek to exercise our leverage, and exert such leverage where necessary, to address adverse human rights impacts arising out of our business relationships.

We strive for compliance with human rights by means of contractual clauses, training, policies, specialized teams and procedures, amongst other measures. In the event of disrespect to human rights by any of our third parties (including but not limited to suppliers, partners, riders) or any kind of third party relationship, we will notify them so that they shall adopt corrective measures and in cases in which said measures are not taken, we take further measures such as rescinding the respective business relationship.

5.2. Employee duties

Everyone in the Delivery Hero group has the duty to ensure the following:

- Avoid any act considered violation of human rights;
- Protect human rights;
- Support communication, dissemination, creation of understanding and provide any support to any investor in the business value chain, including couriers, suppliers, partners and consumers with ethics respecting human rights and treating everyone

according to the human rights principles of this policy;

- Monitor and provide support to protect human rights.

In addition, Delivery Hero undertakes to fairly treat and protect any whistleblowers from human rights violations by applying protection measures for whistleblowers or persons providing cooperation.

Delivery Hero is committed to developing a corporate culture aiming at respecting human rights.

Any person who violates human rights will be subjected to disciplinary actions in accordance with employment law that may lead to termination of employment relationship.

5.3. Delivery Hero Policies

The following [internal policies](#) and procedures complement and are linked to the principles set forth in this policy:

- Global Code of Conduct
- Supplier Code of Conduct
- Business Ethics Policies
- Whistleblower FAQ
- Anti-Harassment & Anti-Bullying Guideline
- Internal Investigations Policy

Accordingly, employees, suppliers, partners, customers and riders are expected to comply with this policy and the remaining applicable Delivery Hero policies. Failure to comply with this policy or the refusal to cooperate in the process of investigating cases of possible violations, may result in disciplinary actions for employees or termination of the business

relationship with third parties. Referral to the appropriate authorities may be considered too, if applicable.

6. Reporting Channels

All DH employees are required to report any situations of risk that may arise inside or outside the company and that may cause harm or damage to any natural or legal person. In particular, they must report situations of breaches of the Human Rights Policy, DH's Code of Conduct or other related regulations.

For this purpose, Delivery Hero has made available to all employees and third parties a Whistleblower channel through which they can send any communications (also anonymously) reporting the existence of a breach or situation of risk, as well as any queries regarding Compliance topics:

www.bkms-system.net/deliveryhero

OR (non anonymously)

compliance@deliveryhero.com

Delivery Hero guarantees that all communications received through the Whistleblower channel will be treated as confidential and that there will be no retaliation of any kind against persons making disclosures in good faith.

For more information on the management of Delivery Hero's Whistleblower channel and on the investigations that may be carried out as a result of the communications received, please refer to the [Compliance Portal](#).

7. Monitoring and Improvement

Delivery Hero is committed to carrying out a constant verification of the application of this policy and will propose the appropriate modifications in the following circumstances:

- When legal changes or changes in the guidelines and criteria of the control authorities occur.
- When relevant changes occur in Delivery Hero or in its activities.

Hence, this policy will be periodically reviewed and updated in order to reflect any changes or improvements in the Compliance System.

Approval and Revision Information

	Contact Details	Signature
Prepared by Policy Owner	Marc Salvador Manager, Compliance	
Reviewed by	Patrick Wiemer Manager, Risk Assurance	
	Sachka Stefanova-Behlert Director, Employment Law	
	Jeffrey Oatham Senior Director, CSR & Sustainability	
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Approved by	Andreas Krause General Counsel	
Approved by the Executive Board	Emmanuel Thomassin CFO	
	Pieter-Jan Vandepitte COO	
	Niklas Östberg CEO	

Policy Governance Framework	
Type	L1_P
Revision Period	2 years
Related Documents	<ul style="list-style-type: none"> ● Global Code of Conduct ● Third Party Code of Conduct ● Business Ethics Policies ● Whistleblower FAQ ● Anti-Harassment & Anti-Bullying Guideline ● Internal Investigations Policy
Confidentiality	External

Revision Log		
Version	Date of Release	Description of Changes
01	2023-04-01	First Release



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