

ANTI-DISCRIMINATION POLICY

Effective Date: 15.01.2026

Responsible: Management of MOprojects & Schwanekamp Interior

Applies to: MOprojects, Schwanekamp Interior, all employees, suppliers, and partners

1. Principle & Objective

MOprojects & Schwanekamp Interior are committed to providing a respectful, inclusive, and discrimination-free working and business environment.

Discrimination, harassment, or unfair treatment of any kind will not be tolerated. The objective of this policy is to ensure **equal opportunities**, promote diversity, and create a workplace in which all individuals are treated fairly and with respect, regardless of personal characteristics.

2. Scope

This policy applies to:

- all employees and managers
- trainees, apprentices, and interns
- applicants
- external partners, suppliers, and service providers

and covers all business activities, including recruitment, hiring, training, promotion, remuneration, professional development, and termination of employment.

3. Forms of Discrimination

Discrimination refers to any unjustified disadvantage or unequal treatment based on personal characteristics, including but not limited to:

- gender, gender identity, or sexual orientation
- nationality, ethnic origin, race, or skin color
- religion or belief
- age
- disability or health condition
- marital status or family responsibilities

Direct and indirect discrimination, harassment, bullying, sexual harassment, intimidation, or any form of degrading treatment are strictly prohibited.

4. Legal & International Framework

This Anti-Discrimination Policy is based on:

- the **German General Equal Treatment Act (AGG)**
- the **ILO Core Labour Standards**
- the **UN Guiding Principles on Business and Human Rights**
- the **UN Global Compact**

These standards also define our expectations for suppliers and business partners.

5. Prevention & Implementation

To prevent discrimination and ensure fair treatment, we implement the following measures:

- Equal treatment in all employment-related decisions
- Objective, qualification-based recruitment and promotion processes
- Awareness of equal opportunity and respectful conduct among managers
- Clear integration of these principles into employment contracts and internal policies
- Zero-tolerance approach towards discriminatory behavior

6. Complaint & Whistleblowing Mechanism

Every individual has the right to report discrimination or harassment **without fear of retaliation**.

- Reports can be submitted internally, confidentially, and anonymously if desired
- Complaints are reviewed by the Management Board
- All reports are handled objectively, confidentially, and in a timely manner

Any form of retaliation against whistleblowers is strictly prohibited.

7. Measures in Case of Violations

Confirmed violations of this policy may result in disciplinary action, depending on the severity and circumstances, including:

- Clarification meetings
- Formal warnings
- Disciplinary or labor-law measures up to and including termination
- Termination of business relationships with external partners

8. Review & Continuous Improvement

- This policy is reviewed **at least annually**
- Findings from complaints, audits, or employee feedback are incorporated into continuous improvement
- Implementation is monitored as part of our CSR and compliance controlling processes

9. Final Statement

Diversity, respect, and equal treatment are integral parts of our corporate culture. We firmly believe that a discrimination-free environment is essential for sustainable success, innovation, and long-term cooperation.

Vreden-Lünten, 15.01.2026

Signed on behalf of the Executive Management:

Delia Bensing



Stefan Deelmann

