

# Human Rights Compliance

## UK Modern Slavery Act Statement (Financial Year 2022)

### Preamble

The Section 54 of the United Kingdom Modern Slavery Act 2015 (“**UK Modern Slavery Act**”) requires certain globally operating corporations to disclose their efforts to address Modern Slavery and Human Trafficking in their supply chains. This statement intends to provide transparency for stakeholders regarding Nemetschek Group’s value chain and respective business partners.

This statement is made in respect of the supply chains of **Allplan GmbH**, **Bluebeam Inc.**, **Graphisoft SE**, **Maxon Computer GmbH** and **Vectorworks Inc.** The statement sets out the steps taken during 2022 to prevent Modern Slavery and Human Trafficking in the business and supply chains.

### Our Organization

The Nemetschek Group is organized as a strategic holding company (Nemetschek SE) with operating subsidiaries. The Nemetschek Group is a leading global software provider for the AEC/O (Architecture, Engineering, Construction and Operation) and media industry and employs today more than 3,000 experts. The company develops software solutions that enable a sustainable and efficient process for complex building and infrastructure projects. Founded in 1963 by Prof. Georg Nemetschek, the portfolio covers both products for the entire workflow in the buildings & infrastructure market and products for the media & entertainment market.

With its innovative solutions, the Nemetschek Group is the only company in the world that maps the entire workflow in the lifecycle of a building or infrastructure project – from the architect’s first sketches to construction to managing and operating the building. Nemetschek software is guiding architects, engineers of all stripes, building contractors, developers, general administrators, and building managers into the future of digitalization.

The Nemetschek Group is driving the digitalization of the building industry. With our software, architects, engineers, construction companies, and facility managers can plan ahead, seamlessly share information and work together more closely. Building and infrastructure projects can thus be conducted more efficiently and sustainably.

The Nemetschek Group is represented at 81 locations worldwide. With millions of users in hundreds of countries, we are one of the world's most successful software vendors for the AEC/O industry (Architecture, Engineering, Construction and Operation).

Managing our company well and taking responsibility for employees, society and the environment is of great importance to us. With our solutions, which improve resource efficiency in the construction industry and enable the most careful use of resources, we make an important contribution to climate and environmental protection.

We pursue a preventative compliance approach and have a corporate culture in which all employees are made aware of the issue and receive appropriate training.

To learn more about the Nemetschek Group visit our website:  
***[www.nemetschek.com](http://www.nemetschek.com)***

## Code of Conduct (CoC) – Basis of our Business

Nemetschek Group's business activities are based on the legal framework and ethical standards of the different countries in which it operates.

Compliance, fair business practices and the prevention of discrimination are of utmost relevance for us. Actual or suspected violations of applicable laws, internal regulations or ethical standards could have negative financial consequences. They could also have a negative impact on the reputation of the Nemetschek Group.

In order to promote trusting and long-term business relationships, the Nemetschek Group focuses on the transparent and lawful processing of all transactions. In addition, employees are expected to treat each other and third parties fairly and respectfully.

To this end, we have summarized the most important principles and regulations in our group-wide Code of Conduct (CoC) and made it available on our Nemetschek Group's website in German and English.

The CoC is the key document addressing individual responsibility within the Nemetschek Group. It is binding for all employees – regardless of their position – and this has been announced throughout the company in order to reach clear guidance and more sustainable transparency

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Visit our website to learn more about our CoC:  
***[www.nemetschek.com/en/responsibility](http://www.nemetschek.com/en/responsibility)***

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## **Our actions to prevent Modern Slavery & Human Trafficking**

One of our foremost objectives is ensuring that critical compliance incidents do not happen in the first place.

To implement our Corporate Social Responsibility (CSR) activities, we have installed CSR experts in our holding company who, together with a cross departmental CSR core team, identifies relevant topics and coordinates the implementation of appropriate measures.

Since the Nemetschek Group includes 13 largely independent brands, non-financial issues are managed separately within the brands. Since 2017, a number of basic and group-wide standards relating to key non-financial issues have been introduced as part of CSR activities. These are aimed at making sustainability an integral part of all business practices of the Nemetschek Group.

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Visit our website to learn more about our CSR program:  
[\*\*www.nemetschek.com/en/responsibility\*\*](http://www.nemetschek.com/en/responsibility)

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The Nemetschek Group recognizes that Modern Slavery & Human Trafficking is still a global problem in our society. Our aim must therefore be to address this problem in a transparent manner and to recognize our responsibility by making all our employees and suppliers aware of the problem and the risks and by working together to find a sustainable solution.

The Nemetschek Group is strongly committed to ensuring that our operations and supply chains are free of Modern Slavery & Human Trafficking and acknowledges its responsibility to the Modern Slavery Act 2015 and will ensure transparency within the company and with suppliers of goods and services to the company.

We at the Nemetschek Group have already been able to implement some measures on the topic of Modern Slavery & Supply Chain. However, the entire complex of topics is to be successively expanded over the next few years on a risk-based basis. For this reason, we have or would like to take the following measures starting next year.

The Nemetschek Group have achieved or will achieve these aims by our initiative to identify and mitigate risks in the following ways (but not limited to):

- a) By having finalized our group-wide Compliance Risk Analysis in 2022, also with regard to Human Rights aspects and Supply Chain Management processes
- b) By having implemented and communicated our group-wide digital whistleblowing system and by constantly encouraging the reporting of any concerns and by protecting whistleblowers
- c) By developing our group-wide Compliance Management System (CMS) also with a noticeable focus to Human Rights and Sustainability aspects
- d) By integrating our group-wide Supplier Code of Conduct (SCoC) in important supplier contracts on a risk-based basis
- e) By implementing a risk-based Business Partner Due Diligence Process (Integrity Checks) also with regard to Human Rights aspects by including and considering the Global Slavery Index in the selection of business partners
- f) By expanding the field of Contract Compliance and using risk-based Compliance & Human Rights clauses in supplier contracts
- g) By conducting group-wide awareness measures such as clear and sustainable communication
- h) By integrating and providing customized trainings for all employees
- i) By constantly reviewing our supply chain processes, contracts and contractors
- j) By constantly reviewing and assessing our internal practices – checking all employees are paid at least the minimum wage and have the right to work
- k) By having Zero Tolerance to Modern Slavery & Human Trafficking

We encourage our employees to report behavior that may violate our Code of Conduct. To do so, they can contact their superiors, the HR manager responsible or the Corporate Legal & Compliance Department directly in either German or English. In addition, violations may be anonymously reported by using our group-wide digital whistleblowing system.

No significant compliance violations regarding Modern Slavery & Human Trafficking were identified during the reporting period. There were thus no cases of legal action.

The Nemetschek Group will ensure a high level of understanding of the risks of Modern Slavery & Human Trafficking with its own business and its supply chains by providing training to the relevant members of staff as well as briefing all Directors on the subject.

In order to live up to our holistic responsibility, we have created a Nemetschek Group's Supplier Code of Conduct (SCoC) and made it available on the company website in German and English. We include this document as an integral risk-based part of any important supplier contract. Furthermore, we expect our suppliers and business partners to accept and live our values in daily business.

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Visit our website to learn more about our SCoC:  
***[www.nemetschek.com/en/responsibility](http://www.nemetschek.com/en/responsibility)***

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The Nemetschek Group will not knowingly support and/or do business with any suppliers who are involved in Modern Slavery and/or Human Trafficking. In case of any Non-Compliance the Nemetschek Group reserves the right to take appropriate measures, including the termination of business relationships.

## Approval of the Statement

The UK Modern Slavery Act Statement will be reviewed on a yearly basis by the Corporate Legal & Compliance Department. This statement has been examined and approved by Nemetschek Group's Executive Board on December 16, 2022.



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Chief Executive Officer (CEO)  
Nemetschek SE




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