

Human Rights Policy

Of the Witzenmann Group to respect and promote human rights.
(pursuant to Section 3 of the Act on Corporate Due Diligence Obligations
in Supply Chains of July 16, 2021)



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A. Introduction

The commitment to sustainable and ethically correct conduct is central to our company. For us, sustainability means creating lasting value for our customers, employees, business partners, and society. With our human rights strategy, we have firmly integrated this goal into our core business and are actively committed to acting responsibly and with a future-oriented approach.

A crucial part of this responsibility is the respect for human rights. Our claim is clear: we want only products and services that are created under fair and ethical conditions. With this policy statement on human rights and social responsibility, we reaffirm our commitment to complying with international human rights standards, fundamental labour rights principles, and the United Nations guidelines.

This statement concretizes our existing policies and will become the central document for our commitments in the area of human and labour rights. The foundation is our clear stance on respecting human rights, but the key is implementation in practice. For this, we have developed a process that helps us, through a risk-based approach, to identify risks early and avoid or minimize negative impacts. This approach is applied in all our business activities and with our business partners.

The development of this statement and the resulting opportunities and challenges have been, are, and will remain an ongoing process of interdisciplinary collaboration. In the future, we will continuously review how we can contribute to the protection of human rights within our scope of action.

We are convinced that the long-term success of our company can only be ensured if we fulfill our responsibility regarding human rights.

Thank you for your support!

B. Our Commitment to Respecting Human Rights and Environmental Obligations

For the Witzenmann Group (Witzenmann GmbH and all subsidiaries of the Witzenmann Group), respect for people and the environment is a fundamental principle of our business policy. Therefore, we explicitly commit to our corporate responsibility to respect both human rights and environmental protection in our own business activities as well as in our global supply chains, to identify and mitigate human rights and environmental risks.

Accordingly, we align our business actions with the following internationally recognized standards:

- Universal Declaration of Human Rights of the United Nations
- United Nations Guiding Principles on Business and Human Rights
- UN Global Compact and its Ten Principles
- OECD Guidelines for Multinational Enterprises
- Core Labour Standards of the International Labour Organization (ILO) with their labour standards for multinational enterprises, particularly in the area of personnel and social policy
- International Covenant on Civil and Political Rights of the UN
- International Covenant on Economic, Social and Cultural Rights of the UN

We view the global respect for these regulations to protect human rights as the foundation of our strategy to uphold human and labour rights within the Witzenmann Group.

C. Responsible Supply Chains

Human and labour rights are of central importance for an internationally operating company like Witzenmann, as they do not only ensure moral and legal responsibility towards employees but also influence global reputation and long-term business success. Companies that respect and promote these rights build trust with their employees and stakeholders, minimize legal risks, and strengthen their position in international markets. Furthermore, they contribute to sustainable and ethically responsible business practices, which are increasingly expected in a globalized world.

Prohibition of Child Labour

Child labour is prohibited. The minimum age for employment and all work practices comply with ILO standards and the regulations prohibiting the worst forms of child labour.¹

Prohibition of Forced Labour and Rejection of all Forms of Modern Slavery

We strongly condemn forced labour and all forms of modern slavery, including human trafficking. This includes work performed under threat of punishment or disadvantage (e.g., involuntary prison labour).² Employment relationships are always based on voluntariness and can be terminated by employees at their own discretion, subject to reasonable notice periods.

Right to Safety and Health at Work

The protection of safety and health at work is a central issue for Witzenmann as an employer. In accordance with applicable legal requirements, we create a safe and health-promoting work environment that is continuously developed. Our top priority in occupational safety is to prevent workplace accidents, identify and minimize accident risks, and thus ensure the best possible safety at work. Equally important is the active promotion of our employees' health through our corporate health management. To achieve these goals and external effectiveness, we have achieved a group-wide ISO-45001 certification coverage of 66%.

Our group-wide guidelines and principles on occupational health and safety provide a clear framework that regulates the establishment, operation, and continuous optimization of our safety management. Company representatives, employees, safety and health experts, and employee representatives work closely and constructively together at all locations to promote a culture of prevention. We are convinced that many workplace accidents and occupational diseases are preventable and therefore rely on high technical standards and strict operational safety precautions.

Through targeted preventive measures and the consistent implementation of our protection concepts, we create a work environment that protects the well-being of our employees. These safety requirements apply equally to permanent employees and external workers, such as temporary employees.

Freedom of Association, Right to Strike and Collective Bargaining

Witzenmann recognizes the right of employees to form and join trade unions and to engage in collective bargaining.³ Neutrality is maintained, and discrimination based on union activities is excluded.⁴ The right to strike and freedom of association are respected. In countries with legal restrictions, dialogue with employees is promoted.

The formation and membership in trade unions do not lead to any disadvantages. During organizational campaigns, both management and trade unions remain neutral to allow employees a

¹ ILO-Convention No. 138 and No. 182.

² ILO-Convention No. 29 and No. 105, Protocol of 2014 to the Forced Labour Convention.

³ ILO-Convention No. 87 and 98.

⁴ ILO-Convention No. 135.

free choice. Regular exchanges between employee representatives and management are actively supported to ensure fair working conditions.

The goal is constructive cooperation that balances the economic interests of the company with the needs of the employees. Interactions are characterized by respect and fairness, even in conflicts, to ensure long-term and trustworthy collaboration.

Diversity and Equal Opportunities / Protection Against Discrimination and Unequal Treatment

As a globally operating company, Witzenmann is committed to openness and fairness and particularly promotes diversity and equal opportunities. For us, diversity means recognizing, including, and also integrating different ways of thinking, attitudes, experiences, backgrounds, skills, and life plans - across all hierarchy levels, areas, and locations. We are convinced that diversity makes us successful. With appropriate measures - such as our membership in the "Diversity Charter" - we promote a working environment and a culture of collaboration based on mutual understanding and appreciation, respecting individual needs.

Our strategic action areas include the promotion of women, internationality, and equal opportunities. Diversity and equal opportunities are integral parts of our corporate mission statement. Our self-concept is: fair, appreciative, and respectful treatment of everyone - regardless of skin colour, age, gender, sexual identity and orientation, disability, ethnic or social origin, religion, or belief. We reject any form of discrimination.

We are committed to the fair treatment of all employees and tolerate no discrimination or unjustified unequal treatment.⁵ We also strictly reject any form of violence and harassment in the entire work environment.⁶

Fair Compensation

Witzenmann is committed to the international principle of equal pay for work of equal value, regardless of gender.⁷

We also commit to providing fair compensation that is at least in line with the legally prescribed and guaranteed minimum according to the applicable national laws. In the absence of legal or collective bargaining provisions, compensation and benefits are based on industry and regional standards. These should ensure a reasonable income for employees and their families, taking into account the cost of living and social security benefits in the respective country.

Reasonable Working Hours

Witzenmann ensures that working hours comply with the applicable national laws and industry standards. We ensure that working hours are humane and health-promoting, that safe working conditions are guaranteed, and that international standards, such as the ILO-Conventions, are adhered to. Regular breaks, a limitation of working hours, and paid vacation leave are also guaranteed.

Use of Security Forces

When we employ our own security forces to protect our sites, they are required to uphold human rights and our Codes of Conduct. When we engage private security services, we ensure through clear guidelines and measures that they also respect and adhere to internationally recognized human rights.

⁵ ILO-Convention No. 111.

⁶ ILO-Convention No. 190.

⁷ ILO-Convention No. 100.

Protection of Local Communities and Indigenous People

Witzenmann respects and upholds the rights of local communities and indigenous people who may be affected by our business activities at our international locations.⁸ We also consider the local impacts of our activities.

Sustainability and Environmental Management

Witzenmann is aware of the importance of environmentally and socially responsible and sustainable practices. For this reason, we have been publishing an annual report on these topics since 2010. Detailed information can be found in our [sustainability report](#).

Handling of Hazardous Substances and Compliance with Relevant Legal Regulations

The Witzenmann Group complies with all relevant regulations, standards, and laws in the areas of environment, hazardous substances, and sustainability. These include, among others, the requirements of the REACH Regulation, the RoHS Directive (Restriction of Hazardous Substances), the Chemicals Act, the RISL (Railway Industry Substance List), the Basel Convention, the Stockholm and Minamata Conventions, as well as other relevant environmental laws such as the Circular Economy Act (KrWG), the Water Resources Act (WHG), the Federal Immission Control Act (BImSchG), and the Environmental Impact Assessment Act (UVPG).

Witzenmann has implemented internal processes to ensure that all requirements of these laws are met with the utmost care and diligence. These include the control and minimization of hazardous substances in products and processes, as well as the responsible use of natural resources. Environmentally conscious operations, which also focus on protecting the health and safety of our employees and the public, are also a central aspect of our business activities.

D. Process Description

Our strategy on human rights and environmental aspects aims to prevent or minimize these described risks to human rights and environmental impacts, as well as to prevent, end, or reduce the extent of human rights violations. To achieve this goal, we have implemented appropriate measures both in our own business operations and in our procurement processes. Our own employees and the employees of our suppliers are at the center of every measure. Witzenmann places particular importance on considering and safeguarding the interests of potentially affected individuals in all areas.

1. Risk Management

Witzenmann has established a comprehensive risk management system regarding human rights in its own business operations and supply chain. Efficient risk management process structures ensure the success of our measures and a continuous improvement process. We regularly and ad-hoc monitor the effectiveness of all risk management measures and make adjustments as necessary. The management is informed about the risk management at least once a year. The risk management is divided into the subprocesses of risk analysis, preventive measures, grievance procedures, remedial actions, effectiveness review, as well as documentation and reporting.

2. Responsibilities

Witzenmann ensures compliance with the human rights strategy internally through clear structures and responsibilities. The company management is responsible for compliance with the human rights strategy at a strategic level.

⁸ ILO-Convention No. 169.

A so-called human rights committee has taken on the role of the human rights officer. This committee consists of the heads of the legal, purchasing, and sustainability departments. Quarterly, it reports to the responsible management within the framework of a steering committee.

An extended committee, which meets once a month, takes care of the implementation of the human rights strategy in all relevant business processes and the improvement of internal processes. The interdisciplinary composition of employees from the sustainability, legal, and purchasing departments, with additional interfaces to the HR, quality management, and marketing departments, as well as the works council, ensures internal collaboration and the versatile development of the topic in internal processes.

3. Risk Analysis

We understand due diligence in the area of human rights as an ongoing process with constantly changing conditions. We conduct annual and ad-hoc analyses to identify potential and actual negative impacts on human rights and the environment in our own business operations and with our direct suppliers.

For a comprehensive and in-depth analysis, we work with the company IntegrityNext. The platform enables a holistic assessment of our own business operations and our suppliers regarding ESG topics based on country and industry risks (abstract), critical news monitoring and an evaluation of our suppliers' sustainability performance based on questionnaires (concrete). This way, IntegrityNext supports Witzenmann in identifying, assessing, and, if necessary, prioritizing human rights and environmental risks in the supply chain.

The following groups are the focus of our human rights strategy and are thus central to conducting a risk analysis:

- Our own employees at national and international locations
- Employees of business partners
- Groups at direct and indirect suppliers, such as employees
- Groups with indirect connections, such as local communities and residents

Furthermore, Witzenmann is committed to incorporating the perspectives and interests of potentially affected individuals into our analysis.

In the event of changes or restructuring of our business activities or substantiated knowledge of indirect suppliers, we also conduct ad-hoc risk analyses.

4. Results of the Initial Risk Analysis

Based on the initial risk analysis conducted for the fiscal year 2024 (from the first applicability of the LkSG to Witzenmann), no human rights or environmental risks or violations were identified in our own business operations that were so severe that additional measures beyond the existing ones were necessary, considering the already established regulations and procedures. Therefore, no prioritization was made.

The results of the risk analysis with our suppliers focus particularly on the human rights and environmental aspects described above, which we have identified as potentially particularly high-risk.

Identified risks are subjected to an appropriateness review, and our investigative efforts are increased as needed. Due to the assessment framework of the appropriateness criteria, prioritization was not carried out, as no critical risk was identified based on the expected severity, probability of occurrence, and the nature and scope of our business activities.

Nevertheless, all identified risks are addressed through appropriate preventive measures.

Since the risk analysis is conducted annually and reported in detail to BAFA in a dedicated report, we refer to this report at this point. The report will be publicly available on our website by the specified deadline.⁹

5. Preventive Measures

In collaboration with the managing directors of Witzemann's legal entities, the LkSG committee immediately develops, implements, and monitors appropriate preventive measures when risks are identified. These measures aim to prevent or minimize human rights and environmental risks within our own business operations. We ensure that these measures are adhered to and implemented.

For risks concerning direct suppliers, appropriate preventive measures are promptly taken through the cooperation of the purchasing department and the LkSG committee, and their implementation is monitored. If there are indications of potential violations by indirect suppliers, we also take appropriate measures to ensure compliance with human rights and environmental obligations.

The following preventive measures are to be named within our own business operations as well as with direct (and possibly indirect) suppliers:

- **Mandatory Compliance with Guidelines and Codes of Conduct:** The goal is to ensure compliance with all legal requirements applicable to the Witzemann Group worldwide, internal company guidelines, as well as fundamental ethical principles and international standards. Additionally, our expectations are clearly formulated in internal and external codes of conduct to make the behavioral requirements of the Witzemann Group clear to both our employees and our suppliers. Our suppliers are expected to address our human rights and environmental expectations throughout their supply chain.
- **Training and Competence Building:** A crucial factor here is the targeted and continuous development of competencies. In addition to training programs for suppliers, we rely on advanced training for employees and specific capacity-building measures for our global and regional locations. In particular, departments such as compliance, purchasing, and sustainability are focused on. Where necessary, existing training is supplemented with relevant content from the Supply Chain Due Diligence Act (LkSG) to ensure that employees are comprehensively trained in current preventive measures.
- **Initiatives and Associations:** Regular exchange with stakeholders, other companies, as well as associations and initiatives is of great importance to us. Over ten years ago, we signed the UN Global Compact, whose principles are reflected in our corporate mission statement. In 2022, we also committed to the Diversity Charter and the WIN Charter of the State of Baden-Württemberg by signing them. We are members of numerous other initiatives and associations and will continue to expand our network towards human rights in the future.
- **Purchasing Practices:** We apply strict criteria when selecting a direct supplier, taking into account specific environmental and human rights risks. We ensure compliance with human rights and environmental standards as long as the business relationship lasts. Our purchasing practices are continuously developed.
- **Improvement of Supplier Communication:** We firmly believe that a positive and human rights-promoting influence as a company can only be achieved through interactive and dialogue-oriented exchange on a personal level. Therefore, we maintain personal exchanges with our suppliers at trade fairs and during regular visits. Furthermore, the questionnaires filled out by our suppliers are continuously improved, expanded, and adapted to the respective risk situation of the supplier. Our goal is to further intensify the exchange with our suppliers to gain a deeper understanding of their

⁹ 31.12.2025; BAFA - Berichtspflicht (last viewed: 26.10.2024)

individual situation and to specifically examine how we, as Witzenmann, can provide support in the context of the LkSG.

If we have concrete indications that a violation is possible with an indirect supplier, we immediately involve the responsible party in our risk management and risk analysis and develop appropriate preventive and remedial measures.

6. Complaint Procedure

We are aware that despite the diligence we have established in the area of human rights, violations can still occur. We provide affected individuals in our own operations, at our suppliers, and throughout our entire supply chain, as well as affected third parties, with confidential access to an appropriate grievance procedure to report violations. We communicate our grievance procedure internally and publicly on our website and handle all reported concerns confidentially.

A reporting channel has already been established, which is publicly accessible throughout the [Witzenmann Complaints Office](#). An appointed law firm receives, reviews, and processes the submitted reports. This is done impartially, characterized by independence and freedom from instructions. The law firm is also bound to confidentiality.

The procedure is available in 12 languages and can be accessed equally via the homepage of all locations. An annual effectiveness review of this grievance procedure is also conducted. The first effectiveness review will take place in 2025.

7. Remedial Actions

If a violation occurs within our own business operations domestically, we ensure the termination of the violation. In our own business operations abroad, we will take measures that generally lead to the end of the violation.

If the violation occurs with one of our direct suppliers or an actor in our supply chain, we expect and demand that our suppliers immediately cease actual human rights violations. We develop a plan to end the violation with specified deadlines and responsibilities together with the responsible actor. If necessary, we support our business partners in implementing the required measures. We reserve the right to pause or terminate the business relationship if the violation is not resolved.

8. Review of Effectiveness

Witzenmann ensures its diligence regarding human rights through the measures described. However, global circumstances and our business environment are constantly changing. Therefore, we review the effectiveness of all described measures annually and on an ad-hoc basis, making adjustments as necessary. This includes employee surveys, comprehension checks after training sessions, and, if necessary, audits within our own business operations. In our supply chain, we will verify the effectiveness of measures through continuous analyses and dialogues with our suppliers, as well as on-site visits if necessary. During on-site visits, we place particular emphasis on incorporating the perspectives of potentially affected individuals. We view the respect for human rights as an ongoing process in which we continuously strive for improvements.

9. Documentation & Reporting

We document all activities related to human rights due diligence in our own business operations and in the supply chain, and report annually in our LkSG report to BAFA on the current human rights due diligence processes. Our first report will be publicly accessible free of charge after the deadline set by the legislator.

This policy statement is also communicated internally and externally and is publicly accessible on our website.

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