

## **Policy statement on observance of human rights**

### **COMMITMENT TO PROTECTING HUMAN RIGHTS**

The Uhlmann Group is committed to observing and protecting human rights and to its responsibility for its value chain. We implement applicable law, respect, demand and promote internationally recognized standards on the observance of human rights, and take care to prevent human rights violations in our business activities.

This policy statement is binding for all companies affiliated with Uhlmann Group Holding GmbH & Co. KG. It is reviewed on a regular basis and continuously developed in line with relevant changes.

### **STANDARDS AND GUIDELINES**

In accordance with the United Nations Guiding Principles on Business and Human Rights, we are committed to adhering to the principles of the following internationally recognized human rights frameworks and standards:

- The Universal Declaration of Human Rights of the United Nations (UN)
- The Conventions of the International Labour Organization (ILO)
- The Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD)
- The Ten Principles of the United Nations Global Compact (UNGC)
- The Charter of Fundamental Rights of the European Union

We also support the United Nations 2030 Agenda for Sustainable Development and aim to play a part in achieving the Sustainable Development Goals (SDGs) through our actions.

The standards and values established in the aforementioned frameworks form a binding framework for action for all employees and business partners and are reflected, in particular, in the following guidelines:

- Code of Conduct for Uhlmann Group Employees and Business Partners
- Human Rights Policy: Our commitment to respecting and promoting human rights in our enterprises and supply chains.

The Code of Conduct is the central and binding guideline for all of Uhlmann's employees and managers worldwide and is based on our core values: Strong, transparent, reliable. The CoC obliges all employees to adhere to our defined values at all times in their daily actions and in their

interactions with one another and with business partners. We expect our employees worldwide to observe the content of the CoC at all times when working for the Uhlmann Group.

We empower and support our employees as well as our business partners in their daily business to fulfill their due diligence and prevent any misconduct from having a negative impact. We ask our suppliers to pass our human rights requirements on to their subcontractors.

## RISK ANALYSIS AND IMPLEMENTATION

In our business activities, human rights risks mainly exist in upstream value chains. For this reason, we have developed a dedicated Code of Conduct for Business Partners, which defines binding criteria for acting responsibly in accordance with legal and ethical standards. We last updated this Code for Business Partners in 2022. This provides our business partners and their upstream suppliers with a reliable framework for fulfilling the same standards that are also binding for us. The Code of Conduct for Business Partners includes critical spheres of influence, such as corporate integrity, human rights and working standards, health and safety at work and environmental protection. The written declaration on compliance with the Code of Conduct for Business Partners is mandatory for all suppliers and service providers. We expect all business partners to adhere to the content of this Code of Conduct at all times for the duration of their business relationships with the Uhlmann Group. When selecting and regularly reviewing our suppliers, we always consider how they implement this Code of Conduct in practice.

To examine the impact that our actions have on human rights, in 2021 for the first time, we carried out a risk analysis of our business partners specifically related to human rights and environmentally relevant aspects. The aim of this risk analysis was to record potential risk areas relating to human rights in a comprehensive and structured manner and to define an order of priority in areas where we identified particular risks.

Based on the standards and risk assessments which apply to us, as a result of our risk analysis we identified the following nine risk and action areas. These are related to human rights and may be relevant along our value chain:

1. Prohibition of discrimination, right to equal opportunities and equal treatment
2. Right to work, fair remuneration, safe working conditions and social security
3. Right to health, welfare and occupational safety
4. Freedom of assembly and association
5. Right to education, further education and training
6. Freedom of thought, opinion and religion
7. Right to privacy and self-determination
8. Prohibition of child labor, protection of minors
9. Prohibition of slavery and forced labor

Based on the results of this risk analysis, we derive specific measures to reduce and prevent the potential risks identified, align our perspectives and management processes so that they take due consideration of these risks, and specifically raise awareness of these risks and the associated preventive measures among our employees and suppliers.

Specific measures included sending questionnaires to suppliers which were assigned an increased risk based on the risk analysis and reviewing suppliers using specific sustainability audits. We also ensure that new suppliers provide structured and documented confirmation of the Code of Conduct for Business Partners. Additional specific measures are defined in a tier model – in the lowest tier of measures, discussions are held about measures to be implemented and in the highest tier of measures, the supplier relationship is terminated.

## COMPLAINT MECHANISM AND AWARENESS-RAISING

The Uhlmann Group provides a whistleblower system to its employees and business partners worldwide, which can also be used for complaints and reports of human rights violations. This channel is open to anyone, regardless of whether or not they have a contractual or business relationship with the Uhlmann Group or its affiliated companies and irrespective of the form such a relationship takes.

Incoming messages and reports can be shared with internal Compliance Officers as well as an independent trusted person who has a duty of confidentiality. This information is always kept confidential and, on request, anonymous. In addition to this, all employees worldwide are able to contact the Compliance Officers in each company within the Uhlmann Group at any time if they would like to ask any questions or provide any information.

All employees receive comprehensive training on the CoC, on correct conduct at the workplace, on ethical decision-making and on compliance with legislation and standards both when they start working at Uhlmann and then at regular intervals. Employees in the Purchasing departments also receive specific training about the Code of Conduct for Business Partners on a regular basis. Our Group-wide Compliance Management department regularly checks that the CoC, which we last updated in 2022, is being adhered to.

## STRUCTURE AND RESPONSIBILITIES

The Executive Board of Uhlmann Group Holding GmbH & Co. KG is responsible for checking compliance with and implementation of our human rights due diligence. The relevant specialists perform this check; the Corporate Procurement department in particular was in charge of performing the first human rights risk analysis. Based on the results of the risk analysis, we are currently in the process of defining specific measures and internal responsibilities for implementing them.

Uhlmann Group Holding  
GmbH & Co. KG

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## REPORTING AND CONTINUOUS DEVELOPMENT

We see our approach to human rights and the performance of a corresponding risk analysis as a continuous process that we are constantly adapting and further developing in line with the latest changes in our conduct and our processes. We report on the progress being made with implementation and further development in our annual Sustainability Report and in the sustainability section on our website.

Laupheim, June 30, 2022

**Uhlmann Group Holding GmbH & Co. KG**

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