



Reifenhäuser

The Extrusioneers

Declaration of principle on Compliance with human rights and environmental due diligence obligations

I. Our Commitment

Reifenhäuser is a family-owned company. Sustainable entrepreneurship and thinking for and about future generations require a shared fundamental understanding of socially responsible corporate governance in accordance with the following guidelines. We, the Reifenhäuser Group and all its employees, take responsibility within the scope of our respective possibilities and areas of action by considering the consequences of our business decisions and actions in legal, economic, technological, as well as social and ecological terms. In doing so, we contribute to the social and economic development of the countries and regions in which we operate. We act in compliance with the relevant legal regulations. We are guided by ethical values and principles, particularly integrity and righteousness, as well as respect for human dignity, as laid down in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the core labor standards of the International Labour Organization (ILO), and the United Nations Guiding Principles on Business and Human Rights. Our Code of Conduct establishes the fundamental principles of our actions, which we actively demand our employees worldwide to observe. The contents apply to all branches and business units of our company. We expect the same fundamental understanding from our business partners. This does not establish rights for third parties.

We recognize that our business activities and our global supply and value chains can potentially have adverse impacts on human rights. We are committed to respecting all internationally recognized human rights and focus our human rights due diligence processes particularly on the following human rights issues, which we have identified as essential for our company through a risk analysis. In these areas, we see the greatest risks of adverse impacts on people directly or indirectly associated with our business activities at our locations and in our global supply and value chains:

- Destruction of the natural basis of life through environmental pollution
- Prohibition of forced, slave, and child labor
- Disregard for freedom of assembly and association

- Discrimination in any form (e.g., based on gender, age, ethnic and social origin, nationality, religion or belief, physical or mental disability, sexual orientation or identity)
- Endangerment of health and safety at the workplace · Unlawful violation of land rights
- Prohibition of withholding a fair wage

II. Principles of Human Rights and Environmental

We align our business activities with the United Nations Guiding Principles on Business and Human Rights (UNGP) and commit to the following internationally recognized human and environmental standards:

- Principles of the United Nations Global Compact (UNGC)
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights
- International Bill of Human Rights
- International Covenant on Civil and Political Rights (ICCPR)
- International Covenant on Economic, Social and Cultural Rights (ICESCR)
- Core labor standards of the International Labour Organization (ILO) on labor and social standards
- Minamata Convention
- Basel Convention
- Stockholm Convention

III. Approach to Implementing Human Rights Due Diligence

For us, respecting human rights is a continuous process. The implementation of human rights due diligence, depending on changing conditions, the nature of our business activity, as well as the size and structure of our company, is constantly reviewed and continuously developed. Therefore, we have anchored human rights due diligence processes as integral

components in our organization and in our relationships with our business partners. The comprehensive commitments to respect human rights contained in our company's Compliance Policy or Code of Conduct include, among other things, the prohibition of negative operational impacts of business activities in accordance with § 2 Abs. Nr. 9 LkSG and the prohibition of depriving natural livelihoods in accordance with § 2 Abs. 2 Nr. 10 LkSG.

We respect and support the observance of internationally recognized human rights:

- We do not tolerate unacceptable treatment of people, such as physical and psychological hardship, sexual and personal harassment, or discrimination (ILO Convention 111).
- We do not tolerate child labor in accordance with ILO Conventions 138, 182.
- Forced labor, slave labor, or similar measures that deprive freedom are prohibited. According to ILO Conventions 29 and 105, all work must be voluntary, and there must be the possibility to terminate the employment relationship.
- In the sense of ILO Conventions 87 and 135, we respect the right of employees to freedom of association, freedom of assembly, and collective bargaining (ILO Convention 98), as far as this is legally permissible and possible in the respective country where we operate. If this is not permissible, we seek appropriate compromises for our employees.
- We promote equal opportunities and do not tolerate discrimination in accordance with ILO Convention 100. We treat all people equally, regardless of gender, age, skin color, ethnic origin, sexual identity and orientation, disability, religious affiliation, belief, or other personal characteristics.

IV. Environmental Protection

We act in accordance with applicable laws and are guided by international standards to minimize negative impacts on the environment and continuously improve our activities for

environmental and climate protection. We have taken appropriate environmental protection measures that adequately cover the following topics:

- Setting goals, defining and implementing measures, and continuously improving them;
- Environmental aspects such as reducing CO₂ emissions, increasing energy efficiency, avoiding fossil fuel-based energy sources, ensuring water quality and reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and its proper disposal, and responsibly handling hazardous substances for humans and the environment.
- To protect the environment, we comply with obligations from international environmental agreements such as the Minamata Convention regarding the use and treatment of mercury, the Stockholm Convention on persistent organic pollutants regarding the production, use, and treatment of certain chemicals and their waste, and the Basel Convention regarding the import and export of hazardous substances.

V. Codes of Conduct for Employees and Business Partners

We expect both our employees and our suppliers to adhere to the principles of our Code of Conduct or to apply equivalent codes of conduct. We also encourage them to enforce the contents of our Code of Conduct in their supply chains. We reserve the right to systematically and incidentally review the application of our Code of Conduct by our suppliers. This can be done, for example, in the form of questionnaires, assessments, or audits. If doubts about compliance with our Code of Conduct persist, we will ask the supplier to take appropriate countermeasures and report the incident to their responsible contact in our company. Furthermore, suppliers are obliged to report any violation of the principles of our Code of Conduct to their responsible contact in our company within two weeks of becoming aware of it. This also applies if suppliers become aware of a violation by one of their immediate suppliers, who is an indirect supplier for Reifenhäuser as part of a supply chain.

In the event of actual or threatened violations of the principles of our Code of Conduct, we support the supplier within our possibilities and the legal provisions in remedying or

preventing the grievances. If no improvement occurs or for other reasons no milder means are promising, we reserve the right to impose appropriate sanctions and measures. This can lead to the termination of business relationships as a last resort.

Our suppliers commit to indemnify Reifenhäuser against all civil claims and any fines in the event of their own violations of the obligations mentioned here.

VI. Risk Analysis and Risk Management

We consider it part of our duty of care to know the potentially and actually adverse human rights risks and impacts of our business activities on people along the entire value chain. Therefore, we identify and assess the relevant human rights issues and potentially affected parties of our business activities as well as our direct and indirect business relationships using an established management process. This includes analyzing both human rights risks and impacts from the use of our products and services.

For this purpose, we have systematically supplemented our company-wide risk and supplier management with human rights issues. In our management process, we also consider human rights criticism from third parties and reported incidents. The analysis of human rights risks and impacts is updated annually and on an ad hoc basis in the event of significant changes to the company's profile or business activities. We involve internal and external human rights expertise, business partners, and selected stakeholders, including representatives of actually or potentially affected groups.

The results of our analysis of human rights risks and impacts flow into our corporate decision-making processes regarding supplier selection, business partner management, product responsibility and development, as well as mergers and acquisitions. The risk analysis forms the basis for identifying appropriate measures. The management regularly discusses human rights conflicts of interest and relevant findings from our human rights due diligence processes. In addition, we use the results as a basis for creating and, where necessary, adapting internal regulations, processes, and training to meet the changing requirements of our due diligence processes

VII. Prevention and Remediation Measures

We make appropriate and reasonable efforts to continuously implement, document, and apply the principles and values described in our Code of Conduct. All employees are sensitized to the contents of the Code of Conduct and trained on relevant topics as needed. Violations of the Code of Conduct are not tolerated and can lead to employment-related consequences.

We communicate openly and in a dialogue-oriented manner about the requirements of our Code of Conduct and its implementation to employees, customers, suppliers, and other interested parties and stakeholders.

The risk-based control measures in purchasing with respect to our immediate suppliers include self-assessments of our immediate suppliers regarding their sustainability and, if necessary, external sustainability audits. If a risk is identified in the supply chain, we will promptly establish appropriate prevention measures with the suppliers and monitor their implementation. We ensure that the established measures are also implemented. Suppliers are monitored and evaluated according to the results of the risk analysis.

To fulfill our responsibility to respect human rights, we rely on the interplay of different measures. The goal is to protect the (potentially) affected individuals and prevent or at least minimize adverse human rights impacts on them. For this purpose, we have established standardized processes. We actively and systematically involve rights holders (such as employees of our own company and, if applicable, employees of suppliers or local communities) and human rights experts, regularly exchange information with other companies, including within the framework of industry initiatives, and cooperate with stakeholders to promote the realization of human rights. Concerns expressed by rights holders or their legitimate representatives, local stakeholders, experts, and civil society are taken into account. Outside our company, we contractually oblige at least all our direct business partners to comply with the applicable laws in the respective country, as well as the ILO core labor standards, to respect human rights, and to adequately address human rights-related risks with their own business partners.

We review at least annually and on an ad hoc basis how effective our measures are in preventing and mitigating adverse human rights impacts. We also check whether our requirements are being met. Within our company, we also conduct risk-based audits, investigate all indications of potential human rights violations, and review the effectiveness of training and further education measures. In our value chain, we assess the effectiveness of measures by observing the results of our continuous analysis of human rights risks and impacts. In addition, we conduct risk-based audits of our direct suppliers, such as document reviews, online assessments, and on-site inspections. Wherever possible and sensible, the potentially affected individuals and rights holders are involved.

VIII. Grievance Mechanisms

With our whistleblower system, we provide our employees and business partners, as well as all other individuals, access to a protected mechanism to confidentially report potential violations of the principles of our Code of Conduct. It is important to us that we act at Reifenhäuser in accordance with the legal framework and legal requirements. Our whistleblower system is an essential part of this.

IX. Responsibilities for Human Rights Due Diligence in Our Company

We have defined clear responsibilities for the fulfillment and compliance with our human rights due diligence obligations. Our management considers itself and, in particular, the compliance manager appointed from its ranks as directly responsible for respecting human rights in our business activities and in the upstream and downstream value chain. Regular and ad hoc internal reporting to this position on human rights-relevant results of our continuous risk analysis, indications from our grievance mechanisms, and information on the effectiveness of our remediation and prevention measures, as well as grievance procedures, ensures that informed decisions can always be made. The compliance officers are responsible for the operational implementation of our human rights due diligence processes for both our entire corporate group and each individual group company. Both the compliance

officers and the human rights officers in accordance with § 4 Abs. 3 LkSG report regularly and on an ad hoc basis to the management on compliance with human rights and environmental obligations, as well as other obligations under the LkSG and other laws.

X. Continuous Development

The aforementioned procedures for implementing human rights and environmental due diligence under the LkSG and other laws are regularly reviewed—at least once a year—and on an ad hoc basis. The risk analysis for the individual prohibitions of the LkSG also includes continuous monitoring of risk developments. Insights from handling indications from the grievance procedure are taken into account when reviewing the procedures.