



Statement of principles

pursuant to § 6 (2) Supply Chain Due Diligence Act (LkSG)

Introduction

As a company operating worldwide, we are aware of our social responsibility. We are committed to upholding and respecting human and environmental rights along our entire supply chain. This is one of the cornerstones of responsible corporate governance.

The consideration does not only take place along our supply chain, but also relates to all our business activities, subsidiaries and value chains. Only with this holistic approach is it possible to identify, prevent and address risk responsibly.

This Statement of Principles does not refer to both the masculine and feminine forms of personal names. The masculine form is considered to be male, female and miscellaneous in all cases where this is not explicitly excluded.

This policy statement applies to Windmüller & Hölscher SE & Co. KG and all its affiliated companies and subsidiaries.

Executive board of the Windmüller & Hölscher SE & Co. KG

Lengerich, 21.02.25



1 Collaboration with our partners

In order to the requirements of W&H standards, processes and guidelines have been implemented company-wide that clarify our attitude and commitment to our business partners and suppliers. For W&H ensuring that human rights and environmental standards are respected and promoted as a top priority and is anchored as a central element of corporate responsibility.

2 Our guidelines for protecting human rights and environmental standards

We are aware of our corporate responsibility to protect human rights. Therefore, we are committed to respecting human rights in our own business activities as well as in our global supply and value chains and to providing access to redress for those affected by human rights violations. We align our entrepreneurial behavior with the internationally recognized United Nations Guiding Principles for Business and Human Rights and implement the requirements of the National Action Plan for Business and Human Rights.

In addition, our understanding and human rights due diligence processes are based on the following international human rights reference instruments to which we are committed:

- The OECD guideline
- Guiding principles of the United Nations
- The International Charter of Human Rights, i.e. the Universal Declaration of Human Rights of the United Nations as well as the Civil Covenant and the Social Covenant
- The core working standards of the International Labour Organization (ILO)

This includes in particular:

- Prohibition of forced and child labour and all forms of slavery
- Compliance with occupational safety and health and prevention of health hazards
- Enhancing employees' freedom of coalition
- Compliance with fair working conditions and appropriate remuneration
- Prohibition of environmental contaminations (e.g. water, soil or air)
- Recognition of land rights
- Prohibition of corruption
- Strengthening mutual appreciation
- Prohibition under the Minamata Convention (mercury)
- Prohibition of the production or use of substances after POP (Harmful chemical)
- Prohibition of the import and export of hazardous waste
- Violation of the unlawful bearing of and disposal of waste

In our efforts to uphold human rights and environmental standards, we focus on the following groups of people as stakeholders, as their human rights are considered to be deserving of protection through business activities along our global supply and value chains:

- own employees at national and international locations including trainees and temporary employees
- employees of business partners and joint venture partners
- groups of people in our downstream value chain: employees of customers, end customers, people in the environment of the products and services

In order to live up to this claim, we also expect our suppliers and subcontractors to commit to upholding human rights and environmental standards. They undertake to do this within the framework of our "Supplier Code of Conduct".



3 Our approach to due diligence

For us, respect for human rights and compliance with environmental standards is a continuous process that needs to be further developed on a regular intervals. To ensure respect for human rights and environmental standards, we have anchored the due diligence processes as an integral part of corporate management at the top management level and implemented cross-departmental processes and structures for implementation. In addition to analyzing human rights and environmental risks and deriving preventative and remedial measures, we also focus on regularly reviewing the effectiveness of these processes.

3.1 Risk analysis

As a component of our due diligence duty, we consider it important to be aware of potential and actual adverse human rights risks, as well as violations of the applicable environmental standards and the impact of our business activities along the entire value chain. In addition, this occurs when substantiated knowledge of specific risks or injuries at indirect suppliers is obtained.

The results of the risk and impact analysis are incorporated into our business decision-making processes with regard to supplier selection, business partner management, product responsibility and development. The risk analysis forms the basis for deriving appropriate measures. The applicable internal guidelines and due diligence processes are continually developed based on these results. We also carry out risk-based audits on our direct suppliers as required, e.g. in the form of document checks, online assessments and on-site checks

3.2 Prevention measures

In order to fulfill our responsibility for respecting human rights, we rely on the interaction of various measures. The aim is to protect the (potentially) affected people in advance and to prevent or at least minimize adverse environmental effects on them.

Our preventive measures include::

- outside of our company, we commit at least all of our direct business partners to comply with the laws applicable in the respective country as well as the core labor standards of the ILO, to respect human rights and to address human rights-related risks to their own business partners in an appropriate manner. This is ensured in our Supplier Code of Conduct
- training for employees of our company and suppliers
- controls or audits as well as suggestions for improvement, if necessary

In addition, individual case-related measures can be defined that result from a concrete risk situation. The type and extent of the agreed measures, especially towards suppliers, depend on the severity of the identified risk, our ability to influence and our contribution to the cause

3.3 Remedy measures

If we have a reasonable suspicion or a concrete information about possible human rights violations or violations of environmental standards in our company or along our upstream and downstream value chain, we will carefully and consistently follow up. We oblige our business partners to assist us in clarifying the facts.

In the event of serious injuries, if suitable remedial measures have not been implemented after an agreed implementation period has not occurred or if no other less severe measures apply, we reserve the right to take legal action, temporarily suspend the business relationship or end it as a last resort.



3.4 Effectiveness control

We check the effectiveness of our measures at least annually as well as on occasion. If necessary, we will make improvements. In addition, we will check whether our specifications are being adhered to. We also carry out event-related risk-based audits within our company, take note of potential human rights violations and check the effectiveness of training measures and their awareness. In our value chain, we check the effectiveness of measures by evaluating the result of our risk analysis and implementing preventive and remedial measures based on it.

4 Complaint procedure

We reject all forms of human rights violations and violations of applicable environmental standards. We have set up an in-house complaint management system that is accessible inside and outside the company. We have set up a company complaint management system that is accessible inside and outside the company.

We operate an electronic whistleblower system that provides internal and external interest groups as well as all potentially affected parties worldwide with a confidential communication channel to report possible violations.

Access to the whistleblower system is offered in several languages. Reports can also be made anonymously. This can be done via our home page as well as via the following link: <https://whgroup.vispato.com/>.

For more information on the whistleblower system please refer to the W&H website and the rules of procedure for the complaint procedure published there.

5 Reporting and continuous improvement

Our commitment to respecting human rights and environmental standards as well as the implementation of the guiding principles are monitored by the managing directors of the companies, the board of directors and the human rights officer in accordance with Section 4 (3) LkSG. Findings and progress as well as challenges are discussed and improvement measures are derived. In particular, the findings from the effectiveness check are processed for this purpose.

The Human Rights Officer reports both at regular intervals and on occasion to the executive board on compliance with due diligence obligations and identified approaches to improvement. In addition, W&H informs the public about our defined environmental standards, self-commitments and due diligence processes in an annual sustainability report.