

JUWI Corporate Group

Human Rights Policy

Policy

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- **Unconditional commitment to human and personal rights**

We are aware that, on account of its business activities, JUWI may directly or indirectly touch on matters relating to human rights issues and may be able to influence these. Human rights apply to JUWI without restriction and comprehensively, even if they are not explicitly anchored in national legal systems. When defining human rights in terms of content, JUWI refers to the internationally recognized human rights standards, conventions, principles and guidelines, including the International Bill of Human Rights of the United Nations (UN), OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights and the core labor standards of the International Labour Organization (ILO). In line with the UN Global Compact, we feel obliged to do so,

- to respect and uphold human rights,
- to promote compliance with them within their own sphere of influence and to ensure that human rights violations are not caused, supported or tolerated by their own business activities,
- advocate the abolition of all forms of forced labor and child labor,
- to uphold freedom of association and the effective recognition of the right to collective bargaining, and to ensure compliance with internationally recognized standards of occupational safety at our company and, if possible, at our suppliers, and
- to work for the elimination of all forms of discrimination in employment and occupation,
- to ensure the health and safety of employees and stakeholders,
- to respect other human and personal rights related issues such as, for example, land distribution and use, the right to water, property rights and the right to education, data protection and privacy.

- **Our management approach**

We work continuously to identify the impact of our business activities on human and personal rights more systematically and to continuously reduce the probability of possible human rights violations. To this end, we maintain an open dialogue with our stakeholders in order to know and take into account their legitimate expectations.

At group level, human and personal rights are the subject of regular assessments (due diligence) as part of our sustainability and risk management, as well as the compliance management system. If necessary, action points and measures are initiated. In addition, existing processes for compliance with human and personal rights and for identifying potential risks are regularly reviewed and further developed as necessary. Direct responsibility lies with the management of our companies and sites. Individual companies can develop specific local approaches to enable and promote continuous improvement.

Our business activities are mainly concentrated in the EU or in OECD countries or OECD cooperation partner countries where human and personal rights are anchored in national legal systems and supplemented by fundamental rights, therefore, going well beyond the minimum standards of the UN and ILO. The commitment to human and personal rights is so deeply rooted at JUWI that we provide explicit training on this topic for all employees and consider it important.

Acquisitions of companies or company shares are subject to a careful due diligence process, which also includes compliance with human and personal rights.

- **Suppliers**

We also require business partners to respect and observe human and personal rights: At JUWI, suppliers must meet high minimum requirements in the area of sustainability. Their selection is based on the standards of various conventions of UN, ILO, OECD and the UN Global Compact on basic human and personal rights, the fight against child labor, freedom of association, working conditions, equal pay, health, safety and business ethics.

In addition, we have set ourselves the goal of raising supplier awareness for social and labor law issues. Compliance with social standards is also the subject of supplier assessments and contract award discussions.

- **Corruption**

JUWI is aware that corruption is a major obstacle to economic and social development around the world — and that corruption has a significant negative impact on progress in general and on local communities.

Identifying and preventing potential acts of corruption is an absolute priority in order to protect the

integrity and reputation of our company. JUWI shows zero tolerance for acts of corruption.

JUWI has implemented effective mechanisms to monitor the effectiveness of the group's anti-corruption and anti-bribery measures: With our compliance management system, we have committed ourselves to actively fighting all forms of corruption. A compliance manual gives our employees clear guidance.

Increasing the awareness of our employees on the topic of corruption is also a regular component of ongoing compliance training.