

## Declaration of Principles on Respecting Human Rights

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SURTECO is committed to respecting human rights and protecting environmental interests. We are therefore committed to observing internationally recognised human rights, complying with applicable laws and preventing human rights violations. We work towards compliance with these rights not only in our own business area, but also in our upstream and downstream supply chains. We expect our partners to also demand compliance with nationally applicable laws and international principles for the protection of human rights and the environment from their suppliers. This policy statement applies to all companies in the SURTECO Group.

### Standards and guidelines

We are committed to adhering to the standards enshrined in the following internationally recognised human rights and environmental reference instruments, in accordance with the United Nations Guiding Principles on Business and Human Rights:

- United Nations Universal Declaration of Human Rights
- United Nations International Covenant on Civil and Political Rights
- United Nations International Covenant on Economic, Social and Cultural Rights
- Principles of the United Nations Global Compact
- Charter of Fundamental Rights of the European Union
- Conventions and recommendations of International Labour Organisations for labour and social standards
- Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- Eight ILO core conventions on forced labour, child labour, discrimination, freedom of association and the right to collective bargaining

Furthermore, we support the United Nations Sustainable Development Goals (SDGs) and would like to contribute to the achievement of the Sustainable Development Goals through our actions.

In addition to the framework regulations mentioned above, our Code of Conduct, our Corporate Policy and our Supplier Code of Conduct provide a binding framework for our employees, business partners and suppliers.

With these guidelines, we commit all employees worldwide to appropriate and lawful conduct towards colleagues, business partners and suppliers. We also encourage our business partners and suppliers to commit to respecting human rights, to fulfil their due diligence obligations and to transfer our expectations to their own suppliers, and we support them in doing so.

### Relevant human rights issues

We condemn any form of disregard for internationally recognised human rights and working conditions. SURTECO refers in particular to the following human and environmental rights:

- Prohibition of discrimination; right to equal opportunities and equal treatment,
- Prohibition of slavery and forced labour,
- Prohibition of child labour; protection of minors,
- Right to freedom of association and assembly,
- Right to safe working conditions and social security,
- Right to appropriate remuneration for work performance,
- Lawful use of private and public security forces,
- Safeguarding of land rights,
- Protection of environmental rights.

## **Risk analysis**

As part of the analysis of human rights and environmental risk issues, we identify relevant risks and devise measures to avert them, align our internal processes appropriately and raise awareness among our employees, suppliers and partners accordingly.

The risk analysis is subject to regular reviews by management and comprehensively assessed.

To uphold human rights and environmental protection, we offer close cooperation to all suppliers in the supply chain. In addition, we engage in initiatives to share experiences and underline our commitment.

## **Prevention and remedial measures**

Before entering into new business relationships, we conduct careful audits of our suppliers. In the event that a human rights or environmental violation is identified, we promptly take appropriate remedial action which, depending on the severity of the violation, may include termination of business relationships.

## **Complaints mechanism**

We reject any form of violation of human and environmental rights and provide adequate and effective grievance management. Those affected have the possibility of anonymously submitting all kinds of information and complaints about the conduct of SURTECO or direct or indirect suppliers via the appropriate communication channels. Our Compliance Department handles notifications and complaints impartially and with a duty of confidentiality. Our management is informed about incoming complaints.

## **Reporting and further development**

We see the examination of human rights issues and the performance of risk analyses as an ongoing process that requires continual further development. Reporting on our progress towards respecting human rights and fair labour conditions is carried out in accordance with applicable legal requirements.

## **Final provision**

This Declaration of Principles shall enter into force from the date of its signature. The Board of Management of SURTECO GROUP SE bears explicit responsibility for the implementation of this policy statement within the Group.



Wolfgang Moyses  
Chairman Management Board



Andreas Pötz  
Management Board