

# Policy Statement of the AUMA Group

## 1. Preface

AUMA Riester GmbH & Co. KG as well as its affiliated companies (hereinafter referred to as "AUMA") have gained a high reputation in a variety of fields of business due to their innovative power, customer orientation and reliability while taking on their corporate social responsibility during the last decades.

As a global corporation, AUMA has to cope with diverse requirements and challenges. AUMA's corporate actions are always guided by the principles of ethics, integrity and compliance with the law.

Considering the Supply Chain Due Diligence Act (German: Lieferkettensorgfaltspflichtengesetz - LkSG) which became effective in Germany on 1 January 2023, AUMA has developed this Policy Statement with which AUMA expressly declares its commitment to complying with human rights and environmental due diligence obligations, preventing and minimising risks to human rights and the environment and ending any violations of human rights or environmental obligations.

## 2. Responsibility to respect human rights across the global supply chains

We are aware of our corporate responsibility to respect the human rights. Therefore, we are committed to respect human rights in our own business activities as well as in our global supply chains and to provide access to remedy for persons affected by the violation of human rights.

For this, we align our corporate activities according with the internationally recognised United Nations Guiding Principles on Business and Human Rights and thus implement the requirements of the National Action Plan for Business and Human Rights. In addition, our understanding and our human rights due diligence processes are based in particular on the following international human rights reference tools, to which we are committed:

- The **International Bill of Human Rights**, this means the United Nations Universal Declaration of Human Rights as well as the International Covenant on Civil and Political Rights and on Economic, Social and Cultural Rights, which define the civil, political and social rights to which all human beings are entitled for the sake of their dignity.
- The **Core Labour Standards of the International Labour Organization (ILO)** with their four basic principles on freedom of association and the right to collective negotiations, the elimination of forced and child labour and the prohibition of discrimination in employment and occupation.

We consider regular instructions of employees in terms of human rights and working conditions as a matter of course. AUMA expects its business partners to also comply with the aforementioned principles and to pass on these obligations within the complete supply chain.

## Relevant human rights issues and potentially affected groups of persons

We recognise that our business activities and our global supply chains have the potential to cause adverse impacts on human rights.

Through a risk analysis, we have identified the areas where we see the greatest risks of adverse impacts on people in direct or indirect connection with our business activities at our locations and in our global supply chains. In a first step, we therefore focus our human rights due diligence processes in particular on these identified human rights issues, which are listed below:

- Threats to data protection and privacy
- Risks to health and safety in the workplace
- Precarious employment and working conditions (e.g. in the case of unregulated temporary labour or the abuse of short-term contracts)
- Corruption and bribery
- Damage to health, the shelter or the economic assets needed for subsistence, for example through water, soil or air pollution or deforestation

In addition, the following human rights issues are of course always in our focus in the second step:

- Forced and child labour
- Restrictions on the freedom of assembly and association (this also includes the systematic combating, suppression and sabotage of employee representatives)
- Discrimination in any form (e.g. based on gender, age, ethnic and social origin, nationality, religion or ideology, physical or mental disability, sexual orientation)

In our efforts to respect human rights, we focus on the following groups of people, as their human rights are potentially jeopardised by business activities along our global supply chains:

- Our own employees at national and international locations, including trainees and apprentices
- Groups of people in our direct and indirect supply chain: Employees in the production and processing of raw materials as well as the production of intermediate products, employees of service providers and direct suppliers

## 3. Approach to implement due diligence obligations for human rights

For us, the respect of human rights is a multi-level and continual process. The implementation of human rights due diligence obligations depending on the changing contextual conditions, type of business activity and size and structure of the company is constantly reviewed and continuously developed.

We have therefore established human rights due diligence processes as an integral part of our organisation and in our relationships with our business partners to ensure the respect of human rights.

We have implemented guidelines that integrate this commitment into our daily actions, such as our internal code of conduct for employees and the external Compliance Declaration for our suppliers and service providers.

### 3.1 Risk analysis

We consider it part of our duty of due diligence to recognise potential and actual adverse human rights risks and the impact of our business activities on people along the entire supply chain. For this purpose, we have systematically added the human rights issues to our corporate risk and supplier management.

The analysis of human rights risks and impacts is updated annually and on special occasions when there are significant changes to the company's profile or business activities. For this, we include internal and external expert knowledge.

The annual risk analysis is based on the assessment of the direct suppliers in particular in terms of country of origin and the material group of the supplied products. The results thus obtained are checked for plausibility. Furthermore, random checks on the assessment are additionally made in individual cases. If the risk analysis reveals an increased human rights or environmental risk, affected suppliers are subjected to an in-depth review and, if necessary, appropriate remedial and preventive measures are taken.

The results of the analysis of human rights risks and impacts are incorporated into our corporate decision-making processes with regard to supplier selection and supplier management. We also use the results as a basis for creating and, where necessary, adapting internal regulations, processes and training in order to take the changing requirements of our due diligence processes into account.

### 3.2 Preventive and corrective action

In order to fulfil our responsibility to respect human rights, we rely on a combination of different measures. It is our objective to protect (potentially) affected persons and to prevent or at least minimise adverse human rights impacts for the affected persons. For this, we have established standardised processes.

Outside of our company, we contractually oblige at least all our direct suppliers and service providers to respect human rights, in particular to comply with the International Bill of Human Rights by the United Nations and the Core Labour Standards of the ILO as well as the legislation applicable in the respective country and to address human rights-related risks appropriately vis-à-vis their own business partners.

Should we as a company have directly caused a violation of human rights, we work quickly to prevent the business activities that caused the violation or to organise them in a way that complies with human rights and work towards restitution. Respective sanctions will be introduced should the behaviour of our employees not be compatible the human rights obligations.

In the event that we contribute to potential or actual human rights violations through our business activities or are indirectly associated with them, we endeavour to contribute to appropriate remedy and prompt restitution by the responsible parties. If we have a well-founded suspicion or specific indication of possible human rights violations in our company or along our supply chain, we will investigate this carefully and consistently. We oblige our direct suppliers and service providers to support us in clarifying the facts of the case and to cooperate fully within a reasonable frame of time. Depending on the severity of the violation, we reserve the right to take appropriate action towards our direct suppliers and service providers, ranging from requesting the immediate rectification of the violation to taking legal action and terminating the business relationship.

### 3.3 Control of effectiveness

We check at least once a year and on special occasions how effective our measures are in preventing and mitigating adverse human rights impacts. Furthermore, we check if our specifications are met. Within our company, we also carry out risk-based audits, investigate all information on potential human rights violations, conduct employee surveys and review the

effectiveness of training and development measures. In our supply chain, we check the effectiveness of the measures by monitoring the results of our continuous analysis of risks and impacts of human rights. Wherever possible, the involvement of potentially affected parties or at least their representatives and, with regard to the aforementioned audits, the consultation of right holders is ensured.

### 3.4 Grievance procedure

We decline any type of violation of the human rights. Appropriate and effective grievance management is therefore an important part of our due diligence processes in order to effectively prevent and remedy any potential adverse human rights impacts caused by our company and our business activities. We have established a company grievance management system which is accessible from inside and outside our company.

Our grievance management system can be found at [lksg-beschwerden-auma.whistleapp.eu](https://lksg-beschwerden-auma.whistleapp.eu), resp. +49 7542 949 21 70. It is accessible to all internal and external groups of interest as well as to all potentially affected persons worldwide, offering a protected communication channel to notify on potential violations against human rights and international conventions. The access options to the grievance system are actively communicated and in appropriate language to these target groups. Notification can also be made anonymously. We actively inform the target groups to be reached about the available grievance mechanisms using measures that are adapted to the target group and the local context and actively involve them in the design of the mechanisms.

All reported information and substantiated suspicions of possible human rights violations are processed as part of a transparent, balanced and predictable process for all parties involved. The secrecy and anonymity of complaints are maintained. As far as possible and within our sphere of influence, we ensure that whistleblowers are protected from discrimination and punishment in connection with the complaints they submit. Our systematic processing of complaints and the gained knowledge thereof allows us to continuously improve our due diligence processes in favour of human rights. We also review the effectiveness of the existing grievance mechanisms in accordance with the effectiveness criteria of the United Nations Guiding Principles on Business and Human Rights once a year and on special occasions in the event of significant changes in the risk situation or specific indications of restrictions in grievance management.

### 3.5 Reporting

Documentation and reporting is made according to the legal prescriptions.

## 4. Responsibilities

We have defined clear responsibility for implementing and respecting our due diligence obligations of human rights. On the top level, our company management is responsible for the respect of human rights within our business activities and our supply chain. Regular and ad hoc internal reporting to this division on the results of our continuous risk analysis relevant to human rights, information from our grievance mechanisms and information on the effectiveness of our preventive and corrective actions and grievance procedure ensures that informed decisions can always be made. For the operative implementation of our due diligence obligation processes for human rights, the responsible persons are the Human Rights Representative, the Head of Purchasing with regard to direct suppliers and service providers as well as the Head of Human Resources with regard to the members of staff.

## 5. Training

We consider it an important part of our due diligence obligations to create awareness among our employees for respecting human rights and to impart the necessary expertise for the effective implementation of human rights due diligence processes. Therefore, we commit to carry out regular training sessions for this purpose in the future.

## 6. Conclusion

For us, respecting human rights and implementing human rights due diligence obligations in our operational processes is an important contribution to improving the human rights situation along global supply chains. We accept this challenge and are committed to continually improving our human rights due diligence processes.

Effective due diligence processes are of crucial importance to us.

We are therefore committed to engaging in dialogue with people who are potentially affected by adverse human rights impacts of our business activities and along our supply chain. The dialogue formats have the objective to identify risks to human rights as well as to assess the efficiency of our measures in terms of prevention, minimisation and remedy of adverse impacts on human rights.

Muellheim, 27<sup>th</sup> May 2025

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Place, date

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