

Policy Statement on the Respect for Human Rights



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Content

1. Our Commitment and the Scope of Application	3
2. Procedures and Responsibilities	3
2.1. Risk Analysis	4
2.2. Complaints Procedure	4
2.3. Remedial Action	4
2.4. Preventive Measures	5
3. Our Main Focus	5
3.1. Freedom of Association & Assembly	5
3.2. Working Conditions (Contracts, Working Hours)	5
3.3. Forced Labor, Human Trafficking & Child Labor	6
3.4. Discrimination	6
3.5. Remuneration & Compensation	6
3.6. Occupational Health & Safety	6
3.7. Climate, Energy & Air Pollution	6
4. What we Expect from our Business Partners	6
5. Our Internal and External Communication	7

1. Our Commitment and the Scope of Application

Hellmann Worldwide Logistics SE & Co. KG and its subsidiaries (hereinafter referred to as “Hellmann” or “Hellmann Group”) are committed to their corporate responsibility to respect human rights and environmental law obligations. Therefore, we undertake to respect human rights in our own business activities as well as in our supply and value chains, to provide access to remedy for those affected by human rights violations, and to prevent or minimize environmental risks.

To this end, Hellmann implements in particular the requirements of the Supply Chain Due Diligence Act [*Lieferkettensorgfaltspflichtengesetz*]. Our understanding and our corporate actions with regard to human rights and environmental risks are based, among other things, on the following international human rights reference tools to which we are committed:

- United Nations Universal Declaration of Human Rights,
- OECD Guidelines for Multinational Enterprises,
- ILO Declaration on Fundamental Principles and Rights at Work and its Conventions,
- UN Guiding Principles on Business and Human Rights.

Our focus lies on preventing human rights violations and counteracting the negative impacts of environmental damage. Hellmann deems the adoption of due diligence in the supply chain as a process that will be continuously adapted to current circumstances. As part of this process, Hellmann carries out a risk analysis at least once a year to determine the status quo. Furthermore, Hellmann expects its business partners to also commit to respect for human rights and environmental protection, to establish appropriate due diligence processes, and to communicate this expectation to their own suppliers.

The Management Board of the Hellmann Group is responsible for adopting and implementing this Policy Statement. In addition, it applies to the International Executive Board, all managers as well as all employees. By applying this wide scope, Hellmann intends to ensure that all departments of the Group are aware of their responsibilities.

2. Procedures and Responsibilities

The respect for human rights and environmental law obligations is our top priority. Therefore, we have anchored appropriate due diligence processes as integral components in our organization and in our relationships with our business partners.

The respective management is responsible for the compliance with and implementation of this Policy Statement. To this end, the Management Board has also appointed a Human Rights Officer who implements and manages the relevant processes. We see our task as a continuous process. We constantly review and develop it, taking into account the development of the social context and the nature of our business.

In particular the following measures are of central importance for the compliance with our human rights and environmental due diligence obligations:

2.1. Risk Analysis

In order to ensure our compliance with international human rights standards and the fulfillment of the Supply Chain Due Diligence Act, Hellmann conducts an analysis to identify potential human rights and environmental risks as well as violations that have actually occurred (“Risk Analysis”) at least on an annual or an ad hoc basis. Our Risk Analysis serves to identify, prevent and minimize human rights and environmental risks both in our own business operations and those of our business partners. In this context, we review the effectiveness of measures, inter alia by monitoring the results of our continuous analysis of human rights and environmental risks and impacts.

The Human Rights Officer carries out the Risk Analysis. To this end, the Human Rights Officer may request support in particular from the departments Purchase, Products, Human Resources, Compliance, and others, if necessary. The risk analysis is documented in a report.

2.2. Complaints Procedure

Effective complaints management is an important component of our due diligence processes in order to effectively prevent any potential adverse human rights impacts caused by our business activities and, if necessary, to take effective remedial action.

Therefore, we have set up a complaints procedure that enables individuals to point out human rights and environmental law risks as well as violations of human rights or environmental law obligations that have occurred as a result of our economic activities or those of our business partners (HWL Whistleblower Hotline [Compliance at Hellmann | Hellmann Worldwide Logistics](#)¹). If, based on information provided, Hellmann suspects a violation of human rights or environmental law obligations, we will investigate this and, if necessary, take appropriate remedial action. Any and all information will be handled with privacy and confidentiality.

All employees as well as external parties involved in our supply chain are strongly encouraged to use the legal complaints procedure to report potential violations.

2.3. Remedial Action

If we determine that a violation of human rights or environmental law obligations has already occurred or is imminent, we will immediately take appropriate remedial action to prevent, stop or minimize the extent of the violation.

If we have reasonable suspicion or concrete evidence of a violation of human rights or environmental law obligations in our company or along our supply chain, we will investigate this with utmost care and consistency. Depending on the severity of the violation, we reserve the right to take appropriate action with regard to our business partners, ranging from a request to remedy the violation immediately to legal action and termination of the business relationship.

¹ As an alternative, we can be contacted via email: human.rights@hellmann.com

Behavior of our employees which is incompatible with human rights law obligations and/or environmental law obligations will not be tolerated and will be sanctioned accordingly.

2.4. Preventive Measures

Hellmann anchors appropriate preventive measures both in its own business operations and within the scope of the cooperation with its business partners. These include, in particular, the following measures:

- In order to sensitize our employees to respect human rights and environmental law obligations and to provide them with the necessary expertise in the relevant business areas for the effective implementation of human rights due diligence processes, we conduct mandatory trainings and continuing education programs within our company on a regular basis. Depending on the professional requirements, the training courses are held at regular intervals and, if necessary, on an ad hoc basis.
- In addition, we carry out regular and risk-based monitoring measures to examine the compliance with our human rights strategy in our own business area.
- We follow up on all indications of potential human rights violations, conduct employee surveys, and review the effectiveness of trainings and education programs.
- Finally, we also expect our business partners to adhere to our business principles and oblige them to comply with human rights and environmental law obligations.

The guidelines of Hellmann Worldwide Logistics SE & Co. KG also reflect our efforts to respect human rights. To this end, they are included in the Code of Conduct and the Code of Conduct for Suppliers. Therefore, they are an essential part of our governance structure.

3. Our Main Focus

We are committed to respecting any and all internationally recognized human rights and focus our human rights and environmental due diligence processes in particular on the priority issues listed below. We have identified these as essential for our company as part of a risk analysis using a desk research analysis and an internal survey. We think that these topics have the potential to pose the greatest risks of adverse impacts on people directly or indirectly related to our business activities, both at our sites and in our supply chains:

3.1. Freedom of Association & Assembly

As part of our commitment to respecting human rights, we respect and promote the right to freedom of association and assembly in accordance with all national and international laws and regulations. This applies to both our employees and the employees of business partners involved in our supply chain.

3.2. Working Conditions (Contracts, Working Hours)

We are aware of our social responsibility to both our own employees and the employees of our business partners. On the one hand, this commitment is reflected in our efforts to improve the standard of living of all employees

through education, understanding, and respect. On the other, we strive to provide an enriching and fair workplace for all employees within our supply chain through effective measures.

3.3. Forced Labor, Human Trafficking & Child Labor

We do not accept any form of forced labor, human trafficking and child labor. We will identify any possible violations and consistently punish violators. This applies not only to our own facilities, but also to all service providers involved in our entire supply chain. We are committed to employing only persons who have reached a minimum age of sixteen (16) years. This principle applies notwithstanding the International Labor Organization (ILO) minimum age of fourteen (14) years.

3.4. Discrimination

We consider the diversity and differences of our workforce and of our business partners' workforce to be one of our greatest strengths which deserves the respect of all. Furthermore, we are committed to ensuring and promoting equal opportunities for all employees. We prohibit any discrimination or other form of unequal treatment in employment opportunities or practices based on gender, race, descendance, citizenship, disability, sexual orientation, social origin, religion, belief, political opinion or any other characteristic that is considered a "prohibited factor" since it violates human rights.

3.5. Remuneration & Compensation

We ensure that the salary and social benefits always meet the minimum legal standard of the country in which the employee works for Hellmann. Overtime must be compensated at least in accordance with the requirements of the applicable laws and regulations. Our employees are entitled to receive a comprehensible and verifiable payslip proving the payment of the agreed wage/salary. Contingent workforce may only be hired in accordance with the applicable laws and regulations.

3.6. Occupational Health & Safety

Our philosophy is that every employee works at least in accordance with the occupational health and safety standards required by the applicable local law where the employee works. Additional clarifications on the subject of occupational safety and global standards are set forth in our globally applicable QHSE & Sustainability Policy.

3.7. Climate, Energy & Air Pollution

We continuously strive to reduce any potential negative environmental impacts resulting from our operations. One example of this is our continuous reduction of energy consumption (especially from fossil fuels) and CO2 emissions. Our particular focus lies on the areas where the effects of consumption and pollution have negative impacts on people.

4. What we Expect from our Business Partners

In order to live up to our responsibility in connection with human rights and environmental law, we also expect our business partners to comply with the business principles outlined above.

This includes in particular the compliance with our Supplier Code of Conduct in which we define our requirements for compliance with human rights, environmental protection, business ethics, and working conditions. For us, compliance with these standards is a prerequisite for a successful and sustainable cooperation. Such compliance must be reviewed on a regular basis and appropriate action must be taken in the event of non-compliance. Violations may also result in legal action and might lead to the termination of our business relationship.

Therefore, before concluding contracts with new business partners, we conduct a transparent and risk-oriented integrity check to the extent permitted by law. Compliance of our partners with legal requirements is mandatory, also after conclusion of the contract.

5. Our Internal and External Communication

Respect for human rights and the environment is an integral part of the Group-wide Code of Conduct, the Supplier Code of Conduct and the QHSE & Sustainability Policy (available at: [Downloads | Hellmann Worldwide Logistics](#)). Our employees and our business partners are also bound by these Codes and Policies.

Furthermore, we publish an external report on an annual basis which reports on the results of the risk analysis and any incidents. This will be published for the first time in April 2024.