Declaration of principles on respect for human rights



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1. Our commitment and 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 obligations. We are therefore committed to respecting human rights in our own business activities and in our supply and value chains, to providing access to remedy for those affected by human rights violations and to preventing and minimizing environmental risks.

In particular, Hellmann implements the requirements of the German Act on Corporate Due Diligence in Supply Chains ("Lieferkettensorgfaltspflichtengesetz"). Our understanding and corporate actions with regard to human rights and environmental risks are based, among other things, on the following international human rights reference instruments to which we are committed:

- United Nations Universal Declaration of Human Rights,
- OECD Guidelines for Multinational Enterprises,
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work and related conventions, and
- UN Guiding Principles on Business and Human Rights.

The focus here is on preventing human rights violations and combating the negative effects of environmental damage. Hellmann sees the adoption of due diligence obligations in the supply chain as a process that is continuously adapted to current circumstances. As part of this process, a risk analysis is carried out at least once a year to determine the current situation. In addition, Hellmann expects its business partners to also commit to respecting human rights and environmental protection, to commit to establishing appropriate due diligence processes and to pass on these expectations to their own suppliers.

The Hellmann Group Management Board is responsible for adopting and implementing this policy statement. It also applies to the International Executive Board, all managers and all employees. This broad scope of application is intended to ensure that all areas of the company are aware of their responsibility.

2. Procedures and responsibilities

Respect for human rights and environmental obligations is a top priority for us. We have therefore anchored appropriate due diligence processes as an integral part of our organization and in our relationships with our business partners.

The respective management is responsible for compliance with and implementation of this declaration of principles. The Management Board has also appointed a Human Rights Officer for this purpose, who implements and manages the relevant processes. We see our task as an ongoing process that we constantly review and develop further depending on changing contextual conditions and the nature of our business activities.

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



2.1. Risk analysis

In order to ensure compliance with international human rights standards and fulfillment of the Supply Chain Due Diligence Act, Hellmann conducts an analysis at least once a year and on an ad hoc basis to identify potential human rights and environmental risks as well as actual violations ("risk analysis"). It serves to identify, prevent and minimize human rights and environmental risks both in our own business area and at our business partners. Among other things, we review the effectiveness of measures by monitoring the results of our continuous analysis of human rights and environmental risks and impacts.

The risk analysis is carried out by the Human Rights Officer. For this purpose, the Human Rights Officer may request support in particular from the Purchasing Department, Products, Human Resources Department, Compliance and, if necessary, other departments. The risk analysis is documented in a reportable form.

2.2. Complaints procedure

Effective grievance management is an important part of our due diligence processes in order to effectively prevent potential adverse human rights impacts from our business activities and, if necessary, to provide effective remedies.

¹For this purpose, we have set up a complaints procedure that enables individuals to report human rights and environmental risks and violations of human rights or environmental obligations that have arisen as a result of our business activities or those of our business partners (HWL Whistleblower Hotline <u>Compliance@Hellmann I</u> <u>Hellmann Worldwide Logistics</u>). If there is a suspicion of a violation of human rights or environmental obligations based on a report, Hellmann will investigate and, if necessary, take appropriate remedial action. All reports will be treated confidentially and discreetly.

All employees and external parties involved in our supply chain are expressly encouraged to use the complaints procedure to report potential violations.

2.3. Remedial measures

If we determine that a violation of a human rights-related or environmental obligation 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 a reasonable suspicion or concrete indication of a violation of human rights or environmental obligations in our company or along our supply chain, we investigate this carefully and consistently. Depending on the severity of the violation, we reserve the right to take appropriate action in relation to our business partners, from requesting the immediate rectification of the violation to taking legal action and even terminating the business relationship.

Behavior by our employees that is incompatible with human rights or environmental obligations will not be tolerated and will be sanctioned accordingly.



¹ Alternatively, you can contact us via email: human.rights@hellmann.com

2.4. Preventive measures

Hellmann implements appropriate prevention measures both in its own business area and in relation to business partners. These include the following measures in particular:

- In order to sensitize our employees to respect human rights and environmental obligations and to impart the necessary expertise for the effective implementation of human rights due diligence processes in the relevant business areas, we carry out regular, mandatory training and further education measures within our company in the form of training courses, among other things. The training courses take place at regular intervals and, if necessary, on an ad hoc basis in accordance with professional requirements.
- In addition, we carry out regular and risk-based monitoring measures to check compliance with our human rights strategy in our own business area.
- We also investigate all reports of potential human rights violations, conduct employee surveys and review the effectiveness of training and development measures.
- Finally, we also expect our business partners to comply with our business principles and oblige them to comply with human rights and environmental obligations.

Our efforts to respect human rights are also reflected in the guidelines of Hellmann Worldwide Logistics SE & Co KG. They are listed in the Code of Conduct and the Code of Conduct for Suppliers. They are therefore an integral part of our governance structure.

3. Our main topics

We are committed to respecting all internationally recognized human rights and focus our human rights and environmental due diligence processes in particular on the key topics listed below. We have identified these as material for our company as part of a risk analysis using a desk research analysis and an internal survey. We see these topics as potentially posing the greatest risks of adverse effects on people that are directly or indirectly related to our business activities at our locations and in our supply chains:

3.1. Occupational health & safety

Our philosophy is that every employee works at least to the legally prescribed occupational safety standards of the respective country in which the employee works. Additional information on occupational safety and global standards can be found in our globally applicable QHSE & Sustainability Policy .

3.2. 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 both to our employees and to the employees of business partners who are involved in our supply chain.



3.3. Working conditions (contracts, working hours)

We are aware of our social responsibility towards 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 hand, we strive to offer all employees in our supply chain an enriching and fair workplace through effective measures.

3.4. Forced labor, human trafficking & child labor

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

3.5. Discrimination

We consider the diversity and differences of our workforce and the workforce of our business partners to be one of our greatest strengths, which deserves the respect of all. We are also 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, ancestry, citizenship, disability, sexual orientation, social origin, religion, belief, political opinion or other characteristics that are considered "prohibited factors" because they violate human rights.

3.6. Remuneration & compensation

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

3.7. Climate, energy & air pollution

We continuously strive to reduce the potential negative environmental impact of our activities. One example of this is the continuous reduction of energy consumption (especially from fossil fuels) and CO2 emissions. This applies in particular where the effects of consumption and pollution have a negative impact on people.

4. Expectations of our business partners

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

This includes, in particular, respecting 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 successful and sustainable cooperation. This must be reviewed on a regular basis and appropriate action taken in the event of violations. Violations can also result in legal action and potentially lead to the termination of the business relationship.

Before concluding contracts with new business partners, we therefore carry out a transparent and risk-oriented integrity check to the extent permitted by law. Compliance with legal requirements on the part of our partners is also mandatory after the conclusion of the contract.

5. Our internal and external communication

Respect for human rights and the environment is part of the Group-wide Code of Conduct, the Supplier Code of Conduct and the QHSE & Sustainability Policy (available at: <u>Downloads | Hellmann Worldwide Logistics</u>). These documents also apply to our employees and our business partners.

An external report is also published annually, which reports on the results of the risk analysis and any incidents. This will be published for the first time in April 2024.

