



Policy Statement of Social Responsibility and Human Rights

1. OUR OBLIGATION TO RESPECT HUMAN RIGHTS AND THE ENVIRONMENT

Who are we?

The Huelsenberg Group operates internationally as a family-owned enterprise organised into four subgroups. Activities of the Huelsenberg Group cover the business sectors of agribusiness, biotechnology, renewable energies as well as industrial combustion technology, emission control, and emission data management. Furthermore, research and development activities are pursued.

What are our values?

We are committed to living the traditional values of a family business and combining them with the requirements of our globally active group of companies, allowing us to continue standing out in the competitive market thanks to our high quality, continuous innovations and sustainable growth. From the outset, the Huelsenberg Group has been committed to upholding human rights and environmental protection standards in all its business activities, as well as to ecological and economic sustainability. Our fundamental understanding includes the sustainable use of natural resources as well as the dignified and careful treatment of people.

To which values are we committed?

Being an internationally operating group of companies, social responsibility is a key factor in our business activities. We are committed to respecting human rights, protecting the environment and taking responsibility for our supply and value chain in accordance with legal requirements. Therefore, it is our aim to protect human rights and the environment within our own business activities and in our global supply chains, to prevent human rights and environmental violations, and to enable access to remedy for those who may be affected. We endeavor to continuously improve our contribution to corporate social responsibility together with our employees, business partners, suppliers, and customers.

To which international standards are we committed, and which guidelines did we impose on ourselves?

International standards and guidelines

- *Universal Declaration of Human Rights*
- *International Covenant on Civil and Political Rights*
- *International Covenant on Economic, Social and Cultural Rights*
- *International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work*
- *UN Guiding Principles on Business and Human Rights*
- *UN Global Compact Principles*
- *OECD Guidelines for Multinational Enterprises on Responsible Business Conduct*

- **Our guidelines for employees, suppliers and business partners**

- *The Codes of Conduct of the companies of the Huelsenberg Group*
- *Policies for Suppliers*
- *Guidelines for Occupational Safety*
- *Guidelines for Environmental Management*
- *Guidelines for Energy Policy*

Being a values-oriented group of companies, we ensure that our employees, sales partners, contractors and suppliers operate within a mandatory scope of action based on the principles and standards of the aforementioned guidelines.

2. Our responsibility within the supply chain

Human rights are an integral part of our group's corporate values. We strive to ensure appropriate working conditions in our own group companies, as well as those of our suppliers and business partners. We treat our employees, customers and business partners with equal dignity and respect. We act in accordance with human rights, the aforementioned recognised international labor and social standards as well as our own policies.

We distance ourselves from any disregard of internationally acknowledged human rights and unworthy working conditions.

We especially acknowledge the following human rights and environmental laws:

- **The prohibition of child labor, slavery and forced labor**

We do not tolerate child labor, criminal or forced labor, human trafficking, slavery, and any other forms of exploitation and discrimination.

- **Freedom of association, right to collective bargaining and right to strike**

We uphold the rights of our employees to form employee representations, their right to collective bargaining regarding the working conditions, and their right to go on strike within the legal framework.

The cooperative collaboration with the employee representatives is an important part of our actions. We guarantee that the founding, the joining or the membership/non-affiliation in a juridically acknowledged trade union does not entail disadvantages or reprisals of any sort.

- **Occupational Health and Safety**

We as Huelsenberg Group ensure the compliance with the regulations of occupational health and safety, to support and uphold the health of our employees, and to prevent work accidents and occupational diseases. We pursue a policy of prevention to avoid occupational accidents and illnesses. We believe that a healthy working environment and fair working conditions can prevent or considerably reduce physical and mental health concerns.

We place high value on compliance with occupational health and safety regulations. Wearing personal protective equipment (PPE), risk averse behavior as well as reporting safety risks by our employees is self-evident to us.

The health of our employees is important to us. We help keeping our staff healthy by offering a range of sports courses and subsidising health-promoting measures, as well as providing wholesome meals in our canteens.

▪ **Fair working conditions and protection against discrimination**

As a corporate group, we are committed to providing fair working conditions, equal opportunities and protection against discrimination of any kind. We ensure the compliance with national and international laws and regulations as well as customary standards in all aspects regarding working hours, break times and holidays, equal pay, minimum wage, and social benefits. We encourage social security and respect the freedom of speech within our area of responsibility.

Fairness is key principle for us in the way we treat our employees. We do not accept any form of discrimination or unequal treatment that violates German or local laws.

▪ **Social responsibility**

We take our social responsibility seriously. In particular, the Huelsenberg Group makes a significant contribution through the H. Wilhelm Schaumann Foundation. The foundation's purpose is the sponsoring of research and development projects and education of scientists, predominantly specialising in animal and agribusiness sciences, giving awards to students for special research project achievements, and funding and organising an interdisciplinary scientists conference.

▪ **Conscious use of resources and environmental protection**

A sustainable dealing with nature and natural resources is fundamental for us and is constantly evaluated and optimised. Our constant efforts are aimed at minimising any adverse effects of our activities on the environment or climate, and making a qualitative contribution to environmental protection and sustainability through our products. Ensuring that raw materials are responsibly sourced is also part of this. In order to constantly minimise negative environmental impacts associated with our business activities, we use the necessary resources as efficiently as possible and work towards the development and dissemination of environmentally friendly technologies as well as the professional disposal of waste as a valuable resource. Moreover, we expect all employees and business partners to comply with the legal and other regulations as well as substance prohibitions.

▪ **Supply chain responsibility**

To run our various business activities, materials, raw materials and products are required from suppliers with reliable and honest integrity. We maintain a fair and cooperative interaction with our customers, business partners and suppliers. Minimum standards will be documented and included in upcoming supplier codes of conduct. We refuse to cooperate with suppliers who do not meet our ethical, social and ecological standards.



This declaration simultaneously represents a Policy Statement in compliance with the Supply Chain Due Diligence Act (in German **LkSG**) and is intended in particular to give employees and suppliers an idea of how we fulfill our obligations with regard to human rights and environmental issues as well as our expectations towards our employees, suppliers and other business partners. Should any of our group companies not be directly subject to the LkSG, this declaration of principles shall nonetheless apply equally to all group companies. We expect our suppliers to confirm their compliance with the LkSG. The suppliers are obligated to immediately inform us, if this confirmation cannot be made.

3. Implementation of this Policy Statement

▪ **Commitment and responsibility**

This Policy Statement is binding for all executive corporate bodies of the Huelsenberg Group's companies as well as the management and the employees worldwide. It names contact persons to whom business partners, customers and employees can turn to in individual cases.

The members of executive corporate bodies of the Huelsenberg Group implement this Policy Statement. The implementation of this Policy Statement is the responsibility of the the managers of each group company and each site.

Our Quality Management departments of the agribusiness and industrial areas as well as the Group Internal Audit department include the risks regarding human rights and the environment in their audit scope, evaluate each risk in the processes and initiate preventative measures.

We will provide access to this Policy Statement to our employees and the employee representations in an appropriate form.

▪ **Our risk management**

To ensure security within the supply chain, it is essential to identify risks, assess their possible impacts and develop effective measures. For us, the fulfillment of our responsibilities within the supply chain means a process of constant change and improvement.

Due to the continuous enhancement of our risk management system, we analyse and evaluate business risks which may arise from our business operations. This includes risks for humans and the environment in our businesses and the upstream supply chains. As part of risk management, relevant risks will be identified, evaluated in terms of significance and probability of occurrence, and assigned to individual areas and persons in charge. Furthermore, measures for risk identification, risk minimisation and risk prevention will be implemented.

In this respect, the Huelsenberg Group is also using the services of IntegrityNext, a cloud-based platform for supply chain monitoring.

- **Preventive and remedial measures**

As part of our risk management system, appropriate and suitable preventive measures are in place for internal processes and supply chains in order to identify and avoid human rights and environmental risks in advance. On this basis, we will continuously develop management processes with the aim of raising awareness among employees, business partners and suppliers. In case of breaches of human rights or environmental obligations, we will take appropriate remedial measures to eliminate or minimise the extent of infringement and to prevent its recurrence.

- **Dealing with non-compliance in respect of this Policy Statement**

Any evidence of a breach of human rights or environmental obligations within the Huelsenberg Group by our employees, distribution partners, contractors or suppliers will be investigated immediately and appropriate remedial measures will be taken.

Various channels have been set up to enable employees and external parties to report human rights abuses and seek remedy. These channels especially include:

- Human Rights Officer (menschenrechte@huelsenbergholding.de)
- Whistleblower System:
Anonymous indications of risks or violation of the Policy Statement can be sent to the digital whistleblower system of the Huelsenberg Group (<https://report.hintcatcher.com/ltoWP1cG5CbXFU1lymc5/>) at any time.

The confidentiality and the protection of whistleblowers are our primary concern. To the extent feasible and in our sphere of influence, we ensure that whistleblowers receive protection from retaliation and punishment in connection with the reports and complaints they submit. Failure to comply with this ban will be treated as a compliance offence and may trigger contractual or labor law consequences.

4. Continuous development

The implementation of the due diligence obligations arising from the Supply Chain Due Diligence Act (German LkSG) are understood as a continuous development process. The efficiency of the measures taken will be evaluated annually and situation-related in order to recognise the need for action and for improvement. The results will be published in a report in accordance with section 10 (2) of the LkSG. As of 2025, we will annually report on our approach, our progress and our obligations regarding the significant risks in relation to human rights and the environment in the sustainability report, which has to be published as part of the Huelsenberg Group's annual management report.

5. Contact, questions and further information

In case of questions and comments regarding our Policy Statement or any other human rights related topic, please contact us at menschenrechte@huelsenbergholding.de or reach out directly to our Group Human Rights Officer.



6. Final terms

No rights of individuals or third parties may be derived from this Policy Statement nor may it have any retrospective effect.