

## Declaration of Principles on Respect for Human Rights (pursuant to § 6 LkSG)

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### Our Commitment to Respect for Human Rights

We, the management of the WITTE Group, acknowledge our corporate responsibility to respect human rights. Therefore, we commit to upholding human rights in our own business operations as well as throughout our global supply and value chains. We also strive to ensure that those affected by human rights violations have access to remedies.

Our business practices align with the internationally recognized United Nations Guiding Principles on Business and Human Rights, thereby implementing the requirements of the National Action Plan for Business and Human Rights.

Furthermore, our understanding and human rights due diligence processes are based on the following international human rights frameworks, which we endorse:

- The International Bill of Human Rights
- The Core Labor Standards of the International Labour Organization (ILO)

We expect our customers, suppliers, and other business partners to also commit to respecting human rights, establishing appropriate due diligence processes, and passing on this expectation to their own suppliers.

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### Relevant Human Rights Issues and Potentially Affected Groups

We recognize that our business activities and global supply and value chains can potentially have adverse impacts on human rights.

Our human rights due diligence processes focus on the key issues identified through risk analysis as significant for the WITTE Group. These include:

- Forced and child labor
- Restrictions on freedom of association and assembly
- Discrimination in any form
- Risks to health and safety in the workplace
- Precarious employment and working conditions
- Corruption and bribery
- Consumer protection risks and lack of product responsibility
- Violations of the rights of local communities and indigenous peoples
- Environmental harm, such as water, soil, or air pollution, and deforestation
- Restrictions on land rights
- Limited access to education

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### Key Focus Groups

In our efforts to respect human rights, we prioritize the following groups:

- Employees of all WITTE Group companies
- Workers of business partners, direct or indirect suppliers, service providers, and customers
- Residents near company locations
- Public sector employees interacting with our operations

Among these groups, we recognize individuals at higher risk of adverse human rights impacts. These include:

- Women
- Children
- Elderly, poor, or ill individuals
- People with disabilities
- Ethnic or religious minorities
- LGBTQ+ individuals
- Whistleblowers
- Representatives of specific interest groups, including human rights defenders and labor representatives

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## Our Approach to Implementing Human Rights Due Diligence

### **Human Rights as a Continuous Process**

Respecting human rights is an ongoing process for us. The implementation of human rights due diligence is continuously reviewed and developed based on changing contextual conditions, business activities, and the size and structure of the company.

To respect human rights, we have integrated due diligence processes into our organization and relationships with business partners. Additionally, we have appointed a Human Rights Officer to oversee these efforts.

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## Risk Analysis

As part of our due diligence obligations, we assess potential and actual adverse human rights risks throughout the value chain. We identify and evaluate relevant human rights issues and potentially affected groups connected to our business activities and partnerships.

Our company-wide risk and supplier management system includes human rights issues and considers third-party feedback and reported incidents.

Risk analysis is conducted annually and when significant changes occur in the company profile or business activities.

Results from these analyses influence decisions on supplier selection, partner management, product responsibility, and mergers or acquisitions. They also form the basis for identifying appropriate measures. Our management regularly discusses human rights challenges and insights from due diligence processes. The findings are used to create and update internal regulations, processes, and training to adapt to evolving requirements.

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## Measures

### **Actions to Prevent and Mitigate Risks**

To fulfill our responsibility to respect human rights, we employ various measures, including:

- Effectiveness controls
- A complaint mechanism
- Remedial actions

These measures aim to protect (potentially) affected individuals and prevent or minimize adverse human rights impacts.

### **Expectations for Business Partners**

We require all direct business partners to comply with applicable laws and ILO core labor standards, respect human rights, and address human rights risks with their own business partners.

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### Effectiveness Controls

We review the effectiveness of our measures at least annually and as needed to ensure they prevent and mitigate adverse human rights impacts. This includes:

- Risk-based audits within our company
- Investigations into reported potential human rights violations
- Continuous monitoring of human rights risks and impacts in our value chain

Additionally, we conduct risk-based audits of our direct suppliers, such as on-site inspections, to assess the effectiveness of implemented measures.

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### Complaint Mechanism

An effective complaint management system is a critical component of our due diligence processes to prevent and address potential adverse human rights impacts.

We have established a whistleblower system that provides a confidential communication channel for internal and external stakeholders and potentially affected individuals to report possible violations of human rights and international agreements. Anonymous reporting is also possible.

All reports and substantiated suspicions are processed transparently and predictably. We ensure the confidentiality and anonymity of whistleblowers and strive to protect them from disadvantages and retaliation. Insights gained from complaints help us continuously improve our human rights due diligence processes.

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### Remedial Actions

If the company directly causes human rights violations, we act quickly to stop the activities or make them compliant with human rights standards. Employee behavior incompatible with human rights results in appropriate sanctions.

In cases where our business activities contribute to potential or actual human rights violations, we work toward appropriate remediation and timely redress by responsible parties.

We investigate substantiated reports of possible human rights violations within the company or value chain thoroughly and decisively. Business partners are expected to cooperate fully and promptly in such investigations. Depending on the severity of violations, we may take measures ranging from immediate corrective actions to legal steps or termination of business relationships.

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## Reporting

Our sustainability and progress reports provide transparency about our human rights commitments, due diligence processes, and their effectiveness.

We report on identified human rights risks and impacts from business activities across our global supply and value chains. These reports include details about implemented preventive and remedial measures.

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## Responsibilities

We have defined clear responsibilities to ensure adherence to our human rights due diligence obligations.

At the highest management level, the executive board is responsible for respecting human rights in our business activities and throughout the upstream and downstream value chains. Regular and situational internal reporting to the executive board includes:

- Results from ongoing risk analysis regarding human rights
- Insights from the complaint mechanisms
- Effectiveness of preventive and remedial measures

This ensures informed decision-making at all times.

Operational implementation of human rights due diligence processes is the responsibility of the appointed Human Rights Officer.

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## Training

We view training as a vital part of our human rights due diligence obligations. Employees are sensitized to respect human rights and equipped with the necessary expertise to implement effective due diligence processes.

We are committed to conducting regular training sessions to achieve this goal.

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## Commitment to Continuous Improvement of Human Rights Due Diligence

Respecting human rights and implementing due diligence processes within our operational practices are vital contributions to improving human rights conditions throughout global supply and value chains.

We embrace this challenge and are committed to continuously enhancing our human rights due diligence processes.

Effective due diligence processes are of great importance to us. We are committed to engaging in dialogue with individuals potentially affected by adverse human rights impacts arising from our business activities and along the value chain.

These dialogues aim to:

- Identify human rights risks

- Evaluate the effectiveness of measures to prevent, mitigate, and remedy adverse impacts

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## Declaration of Commitment

The WITTE Group acknowledges its corporate responsibility to respect human rights and commits to maintaining and improving processes to address human rights risks.

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**Signed,**  
Rainer Götz  
CEO

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