

POLICY STATEMENT ON THE PROTECTION OF HUMAN RIGHTS

by the KRAIBURG Group

As of February 2024

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Preamble

As an internationally operating group of companies, we as the KRAIBURG Group are aware of our responsibility within global economic and retail chains. We can only achieve long-term business success if our business activities are in harmony with people, the environment and recognized regulations and laws.

Responsibilities

Responsibility for human rights (with a human rights officer) is an integral part of sustainability management at KRAIBURG Holding. Both the members of the management board of KRAIBURG Holding and the managing directors of the respective subsidiaries are responsible for implementing and complying with this Policy Statement on the Protection of Human Rights.

Statement on the protection of human rights and strengthening of environmental protection

We commit ourselves to protect human rights in harmony with internationally applicable standards and guidelines such as the UN Universal Declaration of Human Rights, the principles of the UN Sustainable Development Goals (SDGs), the UN Global Compact, the principles of the International Labor Organization (ILO) and the OECD Guidelines for Multinational Enterprises and to strengthen environmental protection by implementing relevant international management standards (ISO 9001, ISO 14001 and ISO 50001, if applicable).

In accordance with the Supply Chain Due Diligence Act for the prevention of human rights violations in supply chains (*Lieferkettensorgfaltspflichtengesetz* – LkSG), we constantly check our supply chains for potential risks for human rights and environmental protection violations. We use support from automated systems to do this.

We collaborate with our business partners and external experts to regularly check the impact of our activities on human rights and on environmental protection. Based on our own knowledge as well as on the above international standards and guidelines, we have derived a Code of Conduct and further guidelines. These form the mandatory framework for action for all employees and define specific measures and targets.

Our responsibility

In order to meet our responsibility for fair entrepreneurial action, we rely on a variety of possible measures such as training of employees, organization of training courses also for business partners or performance of audits and set requirements for business partners such

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as the minimum requirement to comply with applicable international and national laws as well as the standards of the International Labor Organization (ILO).

We expect all employees and business partners to comply with applicable laws and human rights conventions. Violations will not be tolerated and will be punished consistently. These can have legal consequences, including the termination of business relationships.

Our risk management system and the risk analysis associated with it helps us to identify negative developments at an early stage. In addition, internal processes used to reveal deficiencies and identify preventive and remedial measures are constantly being further developed.

The observance of human rights and the strengthening of environmental protection are important for our company. Implementing human rights due diligence and environmental protection in our own operational activities and in supply and value chains is an ongoing process.

We commit ourselves to regularly check our operational guidelines, measures and corporate strategies.

Waldkraiburg, February 2024

Management Board of KRAIBURG Holding SE & CO. KG

Dr. Adolf Zellner Martin Klinger