

Basic Declaration on Respect for Human Rights

COMMITMENT TO PROTECTING HUMAN RIGHTS

The Uhlmann Group is committed to respecting and protecting human rights and to the responsibility for its value chain. We implement, respect, demand and promote internationally recognized standards for observing human rights and ensure that human rights violations are prevented as part of our business activities. This declaration of principle applies bindingly to all companies affiliated with Uhlmann Group Holding GmbH & Co. KG. It is regularly reviewed and constantly developed in compliance with relevant changes.

STANDARDS AND GUIDELINES

In accordance with the guiding principles for economics and human rights of the United Nations, we commit to the principles of the following internationally recognized human frameworks and standards:

- The General Declaration of Human Rights of the United Nations (UN)
- The Conventions of International Labor Organizations (ILO)
- The guidelines for multinational companies of the Organization for Economic Cooperation and Development (OECD)
- The Ten Principles of the United Nations Global Compact (UNGC)
- Charter of the Fundamental Rights of the European Union (EU)

In addition, we support the agenda 2030 for sustainable development of the United Nations and want to contribute to the achievement of Sustainable Development Goals (SDGs) through our actions.

The standards and values anchored in the aforementioned frameworks form the binding framework of action for all employees and business partners and are also reflected in the following guidelines in particular:

- Code of Conduct for Employees and Business Partners of the Uhlmann Group
- Human Rights Policy: Our commitment to respect and promote human rights in our businesses and chains of supply.

The Uhlmann Group Code of Conduct is the central and binding guideline for all Uhlmann employees and managers worldwide and is based on our core values: strong, open, reliable. The Code of Conduct obliges all employees to always observe and implement our defined values in their daily actions, both in dealing with each other and with business partners. We expect our employees worldwide to always adhere to the contents of the Code of Conduct as part of their work for the Uhlmann Group.

We encourage and support both our employees and our business partners in their day-to-day business in complying with their due diligence obligations and avoiding negative effects due to misconduct. We ask our suppliers to pass on our human rights requirements to their subcontractors.

RISK ANALYSIS AND IMPLEMENTATION

In the area of our corporate activity, human rights risks mainly exist in the upstream value chains. We have therefore developed our own code of conduct for our business partners, which specifies binding criteria for responsible action according to legal and ethical standards. We last updated this Code of Conduct for Business Partners in 2022. Furthermore, this Code of Conduct is reviewed annually. Thus, our business partners and their sub-suppliers have a secure framework for fulfilling the same requirements that are also binding for us. The code of conduct includes critical areas of influence such as corporate integrity, human rights and work standards, health and safety at the workplace, and environmental protection. The written declaration of compliance with the Code of Conduct is mandatory for all suppliers and service providers. We expect all business partners to observe the contents of this Code of Conduct throughout their business relationships with the Uhlmann Group at all times. We always include its actual implementation in the selection and regular review of our suppliers.

Uhlmann Group Holding
GmbH & Co. KG

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To review the impact of our actions on human and environmental risks, we carry out a risk analysis of our business partners specifically related to human rights and ecologically relevant aspects annually as well as on an ad hoc basis in the event of significant changes or expansions of the risk situation in the supply chain, for example, when we introduce new products and projects or enter a new business field.

The goal of this risk analysis was to comprehensively and structurally identify potential human rights-related risk topics and to prioritize where we have identified special risks.

Based on the specifications and risk assessments applicable to us, we have identified the following risk and action areas related to human rights as a result of our risk analysis, which may potentially be of relevance along our value chain:

1. Prohibition of child labor
2. Prohibition of forced labor and all forms of slavery
3. Disregard of occupational safety and occupational health risks
4. Disregard of freedom of coalition, freedom of association and right to collective bargaining
5. Prohibition of unequal treatment in employment
6. Prohibition of withholding an appropriate wage
7. Destruction of the natural basis for life by environmental pollution
8. Unlawful infringement of land rights

Based on the results of this risk analysis, we derive specific measures to reduce and avert the identified potential risks, orient our considerations and management processes accordingly to the inclusion of these risks and sensitize both our employees and our suppliers to these risks and the associated defense measures.

Specific measures included sending questionnaires to suppliers, which resulted from the risk analysis with an increased risk and the review of suppliers in the form of concrete sustainability audits. In addition, we ensure that new suppliers confirm the Code of Conduct for Business Partners in a structural and documented manner. Further specific measures are defined in a step-by-step model, whereby the lowest level of measures includes the conduct of discussions about measures to be implemented and the highest level of measures includes the termination of the cooperation with suppliers.

PREVENTION MEASURES

If we determine that the violation of a duty of human rights or environment in our own business area or with one of our direct suppliers has occurred or is imminent, we will immediately take measures to end, prevent and minimize the extent of the violation.

CORRECTIVE MEASURES

In the event that we have actual indications that make a violation of a duty under human rights or environmental law at indirect suppliers seem possible, we shall immediately take appropriate corrective measures to prevent such violations and to minimize the extent of the violation based on the possibilities available to us legally and actually. With regard to our business partners, we reserve the right to respond appropriately up to the end of the business relationship, depending on how severe the violation is.

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COMPLAINT MECHANISM AND SENSITIZATION

The Uhlmann Group provides its employees and its business partners worldwide with a whistleblower system, which is also to be used for complaints and information on human rights and environmental violations. This channel is open to every person, regardless of the existence or type of contractual or business relationship with the Uhlmann Group or its affiliated companies.

Incoming messages and information may be communicated to internally responsible compliance positions as well as to a company-independent trusted person who is obligated to professional secrecy and are always subject to confidential and, if desired, anonymous treatment. In addition, all employees worldwide have the option of contacting the compliance positions responsible in every company belonging to the Uhlmann Group directly and directly with questions and instructions.

Comprehensive training on the code of conduct of the Uhlmann Group, on proper conduct in the workplace, on ethical decision-making and compliance with laws and regulations is held for all employees both at the beginning of their work at Uhlmann and at regular intervals. The employees of the purchasing departments are also regularly trained specifically on the Code of Conduct for Business Partners. Our Group-wide Compliance Management System regularly checks compliance with the Code of Conduct, which we last updated in 2022 and which is reviewed annually.

STRUCTURE AND RESPONSIBILITIES

The management of Uhlmann Group Holding GmbH & Co. KG is responsible for the compliance and implementation of our due diligence obligations with respect to aspects related to human rights. The review is carried out by appropriate specialist positions; in particular the Corporate Procurement Department regulates implementation of the initial human rights-related risk analysis. Based on the results of the risk analysis, we are currently defining specific measures and internal responsibilities for their implementation.

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REPORTING AND CONTINUOUS FURTHER DEVELOPMENT

We understand dealing with human rights and carrying out a corresponding risk analysis as a continuous process that we always adapt and develop to take into account current changes in our behavior and our processes. We report our progress on the status of implementation and further development in our annual sustainability report and in our sustainability area on our website.

Furthermore, our annual human rights report to the Federal Office of Economics and Export Control (BAFA) informs the public about our human rights and environmental due diligence processes and their effectiveness.

Laupheim, June 30, 2024

Uhlmann Group Holding GmbH & Co. KG

Prof. Dr. Ing. Matthias Niemeyer
Managing Director (CEO)

On behalf of Heiko Wendel
Chief Compliance Officer
Attorney at Law (In-house Attorney)

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