

# **Declaration of Principles concerning Respect for Human Rights**

We, the Westfleisch Group, are aware of our responsibility towards people, animals and the environment. Westfleisch recognises that its business activities and global supply and value chains can potentially cause adverse human rights impacts. We commit to respecting all internationally recognised human rights and focus on human rights due diligence processes.

In this policy statement, we present our human rights compliance strategy to strengthen the assurance of human rights and environmental obligations in the company and upstream supply chain and to prevent violations.

#### **International Standards and Guidelines**

With regard to corporate responsibility for society and the environment, the following standards and guidelines are decisive for our actions and cooperation with our suppliers and business partners:

- the Supply Chain Sourcing Obligations Act
- the principles of the UN Global Compact
- the Universal Declaration of Human Rights
- the conventions and recommendations of the International Labour Organisation (ILO) on labour and social standards
- the UN Guiding Principles on Business and Human Rights
- the Sustainable Development Goals of the United Nations
- OECD Guidelines for Multinational Enterprises
- the European Convention for the Protection of Human Rights and Fundamental Freedoms

## Guiding principles and guidelines for employees as well as suppliers and business partners

In order to live up to our commitment to uphold human rights and environmental standards, Westfleisch supplements recognised standards with guidelines and directives that provide a binding framework for our employees as well as our suppliers and business partners. These include, in particular:

- the corporate group's mission statement "Quality Partnership Westfleisch" as a binding guideline for all employees and managers, in which economic, ecological and social aspects are reconciled as best as possible.
- the Code of Conduct, which is binding for all employees and regulates how employees interact with one another.
- the "Code of Conduct for Suppliers and Business Partners", which sets out the principles and requirements regarding compliance with human rights and environmental standards in the supply chains.
- the guideline "Management for Safety and Health", in which the company commits itself to structuring the organisation in such a way that the health and safety of the employees is not impaired.
- the "Energy and Environment" guideline, which commits the company to sustainable management and environmental protection.



## Risk Management for Compliance with Due Diligence Requirements

We assess entrepreneurial risks with our established risk management system. This also includes human and environmental risks in our own business operations and in upstream supply chains. The risk management system analyses and evaluates risks and implements measures for risk identification, risk minimisation and risk prevention.

## **Risk Analysis**

Within the framework of risk management, relevant risks are identified, then evaluated according to their probability of occurrence and significance and assigned to individual areas and persons responsible.

Based on the risk analysis, we have determined that our priority is to intensify our efforts to improve occupational safety and equal conditions in the company. The area of occupational health and safety will be optimised.

#### **Prevention and Mitigation Measures**

In the risk management system, suitable and appropriate preventive measures have been implemented for in-house processes and for the supply chains in order to avoid human rights-related and environmental risks in advance. On this basis, management processes are aligned accordingly to raise awareness among employees, business partners and suppliers.

In the event of possible violations of human rights or environment-related obligations, appropriate and adequate remedial measures are taken to minimise or eliminate the extent of the violation.

## **Our Expectations**

We expect that our measures can avert or further reduce human rights and environmental risks. We expect of our employees, suppliers and business partners that applicable laws, conventions and binding guidelines and directives are observed and complied with. We will not tolerate any breaches of obligations and will sanction them appropriately. Violations by suppliers can also lead to the termination of a business relationship as a last resort if actions are contrary to relevant provisions or if the supplier or business partner is not prepared to take the necessary measures to comply with the defined or related obligations.

## **Whistleblower System and Complaints Procedure**

Westfleisch provides various reporting channels for complaints and information on human rights violations. These channels are open to anyone, regardless of the existence or nature of the contractual or business relationship with Westfleisch. A report can be sent to the company at any time at <a href="mailto:compliance@westfleisch.de">compliance@westfleisch.de</a> or to the external ombudsman of the Westfleisch Group: Dr Carsten Thiel von Herff, <a href="mailto:ombudsmann@thielvonherff.de">ombudsmann@thielvonherff.de</a>. As a lawyer, Dr Carsten Thiel von Herff is subject to the statutory duty of confidentiality and may not disclose any information to third parties without consent. Messages are treated confidentially and appropriately.

## Structure and responsibilities

The Management Board of Westfleisch SCE mbH is responsible for reviewing compliance with an implementation of our human rights due diligence obligations.



## **Continuous Further Development**

We see the implementation of human rights due diligence as a continuous development process. The effectiveness of the measures taken is analysed annually and as needed in order to take current changes into account. We also report annually on our policy, progress and commitments to human rights in our Sustainability Report.

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