Policy statement LkSG of

Adler Pelzer Group



Policy statement LkSG

Our commitment to respect human rights and environment-related obligations.

At Adler Pelzer Group, we believe that human rights and environmental principles are a very important part of our daily operations. We are aware of our social responsibility and are committed to respect human rights and the environment throughout our company's supply chain.

Our approach to respect and uphold human rights is based on:

- · the UN Guiding Principles,
- the International Bill of Human Rights
- the International Labor Organization's Declaration on Fundamental Principles and Rights at Work
- the UN Guiding Principles on Business and Human Rights.

We are committed to prevent, and where possible eliminate and mitigate, negative impacts on human rights in our business activities worldwide.

In addition, we realize our responsibility to protect our planet. Therefore we are committed to minimize our company's impact on the environment.

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Adler Pelzer Group

Rights of all employees

We are committed to respect the human rights of Adler Pelzer Group employees. In particular, we strive to respect the following human rights, in accordance with our code of conduct:

- Health and Safety
- Trade Unions / Workers Representatives
- Respect for diversity, equality and integration
- Commitment to Responsible Labor Practices
- No discrimination and no harassment

Human rights in the supply chain

All suppliers of Adler Pelzer Group have to comply with and have to accept our Supplier Code of Conduct. These includes numerous commitments like :

- Fair employment conditions (wages, working hours, holidays),
- the right to freedom of assembly and association,
- · responsibility for health and safety standards,
- prohibition of discrimination,
- prohibition of forced and child labor,
- provision of anonymous complaint mechanisms.

The supplier shall respect all human rights, and where possible, eliminate and mitigate negative impacts on human rights throughout the supply chain.

Environmental protection:

In accordance with our Code of Conduct for Suppliers, the supplier is obliged to protect the environment. As a result our suppliers have to:

- comply with applicable laws and international standards related to the environment,
- minimize environmental pollution and continuously improve environmental protection,
- establish and implement an appropriate environmental management system.

We believe that environmental responsibility and compliance with environmental due diligence is an important part of a better future.

Risk management

We are using a risk-based due diligence approach to ensure that above mentioned requirements are met. Risk analysis is performed on an automated (Al-assisted) basis.

This includes periodic inspections at specified intervals in order to determine a supplier's risk profile. When the risk profile is alarming, preventive measures and/or remedial actions are taken.

These results play a key role in strategic purchasing decisions and will help to understand whether and to what extent there is a risk in our own business area or within supply chain.

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Whistleblowing / Grievance mechanism

All parties involved can inform us about risks or violations related to human rights or environmental protection through our Whistleblowing.

Complaints process remains confidential and can be also made anonymously. Stakeholders who have reported possible violations are protected from any disadvantages connected to the issues they have submitted.

Karsten Meise

Global Director

Sustainability, Quality, HSE & Systems

Alberto Buniato

CPO, CEO STS and President NAFTA

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