



## POLICY STATEMENT

## ON HUMAN RIGHTS AND ENVIRONMENT

(EN)

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## 1. COMMITMENT TO THE PROTECTION OF HUMAN RIGHTS AND THE ENVIRONMENT

*Responsibility, appreciation and ethical principles are particularly important to us. Social commitment and consideration for our environment are just as important to us as the well-being of the individual and our society.*

*As a globally active family business, we are aware of our responsibility to respect human rights and protect the environment and the compliance with applicable laws and regulations is our minimum requirement. Our aim is also to strengthen human and environmental rights in our daily activities and to prevent their violation in advance as part of our business activities.*

*The policy statement applies to Glatt GmbH and its affiliated companies and describes our principles for respecting human rights and the environment. This includes in particular*

- *compliance with the prohibition of child labor, all forms of slavery and forced labor*
- *compliance with the applicable occupational health and safety regulations*
- *respect for freedom of association and the right to collective bargaining*
- *equal treatment of all employees*
- *the payment of appropriate wages*
- *compliance with the prohibition of causing harmful soil change, water pollution, air pollution, harmful noise emissions or excessive water consumption*
- *compliance with the prohibition of unlawful eviction*
- *compliance with the prohibition of hiring or using private and public security forces, insofar as this violates freedom of association, life and limb or the prohibition of torture and other inhumane treatment*

- *compliance with the ban on the manufacture of mercury-added products or the use of mercury and compounds in the production process, as well as the treatment of mercury waste (Minamata Convention of October 10, 2013)*
- *compliance with the ban on the production and use of chemicals in accordance with Article 3 (1) (a) and Annex A of the Stockholm Convention of May 23, 2001*
- *compliance with the ban on the non-environmentally sound handling, storage and disposal of waste, the export and import of hazardous waste in accordance with the Basel Convention of March 22, 1989*

*Our human rights and environmental strategy outlined below is anchored in all relevant business processes.*

## 2. IMPLEMENTATION OF HUMAN RIGHTS AND ENVIRONMENTAL DUE DILIGENCE OBLIGATIONS

### 2.1 *Risk management and risk analysis*

*We have implemented an effective risk management system for compliance with human rights and environmental due diligence obligations, which covers the entire process from risk identification, risk analysis and assessment through to the introduction of effective measures to minimize risks.*

*We carry out the aforementioned risk analyses in our own business area and in our supply chain in order to identify and prevent potential human rights and environmental risks at an early stage.*

*Regarding our own business units, a continuous evaluation is carried out in all areas in which there are risks of human rights and environmental violations. The risk analysis considers all relevant business processes at all Glatt Group locations.*

*The risk analysis along our supply chain is based on a classification of our direct suppliers according to risk classes. The risk assessment process takes into account what we consider to be relevant criteria such as country of origin, industry, product and product group and scope of business activity.*

*The risk analysis is reviewed and updated once a year and on an ad hoc basis.*

## **2.2 Preventive and corrective measures**

*To reduce human rights and environmental risks, we have implemented appropriate preventive measures in our own business units. The guidelines set out in this policy statement are anchored in all of our business processes and are regularly trained in the relevant business units.*

*If the risk analysis reveals an increased human rights or environmental risk, specific measures are introduced to reduce and prevent the potential risks.*

*As a preventative measure, we carry out an assessment of our direct suppliers with regard to human rights and environmental criteria when entering into new business relationships. In addition, we obtain written confirmation of compliance with our human rights and environmental expectations as set out in this policy statement. We support our suppliers in complying with human rights and environmental standards as part of the Glatt training concept.*

*Independently of this, we conduct ad hoc audits in our own business units and at direct suppliers and take corrective action if there is reasonable suspicion that violations of a human rights or environmental obligation are imminent or have already occurred, with the aim of preventing or ending them.*

*If there is a reasonable suspicion that violations of a human rights or environmental obligation are occurring at one of our indirect suppliers, we will immediately analyze and evaluate the resulting risks and initiate appropriate remedial and corrective measures.*

### 3. WHISTLEBLOWER SYSTEM

*We have implemented an appropriate and effective complaints and reporting system in the form of our "[whistleblower system](#)", which enables anyone inside and outside our company to report concerns and violations relating to human rights and environmental obligations in our own business units and in our supply chain.*

*All incoming reports are always processed under the aspect of confidentiality.*

### 4. EXPECTATIONS OF OUR EMPLOYEES AND BUSINESS PARTNERS

*We expect our employees and business partners to commit to respecting human rights and protecting the environment.*

*We also expect our business partners to pass on these expectations to their own suppliers, subcontractors and sub-suppliers in order to identify and avoid human rights and environmental risks along the entire supply chain at an early stage.*

### 5. RESPONSIBILITIES AND COMPANY-WIDE ANCHORING

*The management of Glatt GmbH is responsible for the implementation of and compliance with this policy statement for the protection of human rights and the environment.*

*The implementation of human rights and environmental due diligence obligations along the supply and value chains is ensured in particular by the purchasing department as part of the procurement management business processes.*

*The monitoring of risk management and the effectiveness of preventive measures is the responsibility of a specially established committee, which is represented by the relevant specialist departments. This committee reports regularly - at least once a year or as required - to the management on the results of the risk analysis and the preventive measures implemented.*



## 6. OUTLOOK AND REPORTING

*We are aware that the implementation of human rights and environmental due diligence obligations is a continuous process.*

*We therefore work to regularly review our structures and processes for potential improvements and adapt the implementation of our due diligence obligations and this policy statement on an annual basis.*

*We report on our approach to complying with our due diligence obligations annually - from the first quarter of 2025 - on our website.*

A handwritten signature in blue ink that reads 'Nowak'.

Jay Nowak

CEO