

Commitment to respect human rights

Policy Statement



Commitment to respect human rights

As part of the Haniel universe, CWS shares the idea that companies should always create economic value while strengthening social values. To do this, they must be aware of how their economic decisions affect the world and in which we live and the generations to come - in short, be “enkelfähig”.

Our image of a future worth living is based on sustainable value creation that is in harmony with environmental protection and serves the well-being of all. We want to live up to our social responsibility and strike a balance between tradition and innovation. Compliance with human rights and environmental due diligence obligations is an essential prerequisite for this sustainable value creation.

To this end, we are committed to respecting and complying with all internationally recognized freedoms and human rights, such as the

- Universal Declaration of Human Rights (UN, 1948)
- International Covenant on Civil and Political Rights (UN, 1966)
- International Covenant on Economic, Social and Cultural Rights (UN, 1966)
- ILO Declaration on Fundamental Principles and Rights at Work and its follow-up declaration (ILO Core Labor Standards, 1998)
- Convention on the Rights of the Child (UN Convention on the Rights of the Child, 1989)
- UN Global Compact (UN, 1999)

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We also support the content of the UN Guiding Principles on Business and Human Rights (UN, 2011), the OECD Guidelines for Multinational Enterprises (OECD, 2011), and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration, 2017).

CWS is engaged to preventing and minimizing risks of violations of human and environment rights within our supply chains and, in the event of a violation, to taking appropriate measures to remediate it.



CWSs principles for a future worth living



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We respect and comply with all applicable laws, regulations, our internal policies and guidelines.

We pay particular attention to respecting and complying with human and environmental rights, as reflected in our Principles for a Future Worth Living.

We ensure that we understand all relevant laws and regulations before we undertake any business activity, that we comply with their principles and that our actions do not inadvertently violate them. That's what our CWS Code of Ethics says.

It applies to all Group companies and employees.

We also expect all our business partners to adhere to these principles and to meet the requirements set out in our CWS Business Partner Code of Conduct.

CWSs principles for a future worth living

We create fair and safe workplaces where everyone can develop their potential. We do not tolerate discrimination based on gender, age, ethnic origin, nationality, social status, political opinion or sexual orientation. Harassment, retaliation, bullying or disrespect have no place in the CWS culture, where everyone's contribution counts.



Fair Employment Practices & Diversity

We respect the rights of our employees and the employees of our business partners in compliance with the following principles:

- Respect for human dignity
- Rejection of child labor
- Rejection of forced labor
- Decent treatment, anti-discrimination and diversity
- Ensuring safety and health in the workplace
- Right of association and collective bargaining
- Fair working conditions and remuneration
- Equal opportunities for professional development

CWSs principle for a future worth living

Responsibility to the environment and communities

Responsible treatment of the environment and natural resources is a matter of course for CWS. We use natural resources appropriately and sparingly to ensure that our activities have as little impact on the environment as possible. We promote environmental awareness among our employees and are committed to the dissemination and application of environmentally friendly technologies.

We fulfill our social responsibility by promoting and supporting the communities in which we operate in order to improve economic, environmental, social and cultural conditions and thus promote the respect for and protection of human rights. This includes in particular

- Protection of soil, water, air, biodiversity and cultural assets
- Reduction of environmental pollution and conservation of resources
- Safe handling of hazardous substances
- Responsible handling of wastewater and solid waste
- Prevention and emergency preparedness



Implementation of our due diligence obligations to respect human rights



Our Leadership Team is responsible for compliance with the human and environmental rights and due diligence obligations in their area of responsibility. Each leader is obliged to inform their employees about the contents of the CWS Code of Ethics and this policy statement and to advise and support them in applying the principles in their daily activities.

CWS and its portfolio companies are committed to further and continuously developing internal processes to identify human and environmental rights risks and properly address them by implementing mitigation measures whenever an issue is identified.

The identified risks and their impacts are assessed and prioritized on an ongoing basis. In the event of human or environment rights violations directly related to CWS's activities and business relationships, effective remedial measures will be taken in cooperation with the parties and authorities concerned.

At CWS the Group Compliance Officer holds the function of Human Rights Office and reports to the Leadership Team in a yearly basis and- in case of event – on an *ad hoc* basis.

Risk Management

At CWS, we are committed to upholding human and environmental rights throughout our supply chain. To ensure this, we conduct a comprehensive supplier risk assessment when onboarding new business partners and periodically review existing ones. The primary goal of this assessment is to identify and address any potential risks within our supply chain.

Our risk assessment considers various factors, including industry, location, and supplier relevance. As a first step, we utilize an IT tool that leverages publicly available sources to evaluate abstract risks in categories such as environment, labor and human rights, ethics, and sustainable procurement.

If significant risks are identified, we proceed with a concrete examination of the business partners, or our own operations classified as critical. This second step includes evaluating the potential damage and the likelihood of the risk occurring.

For our own business, any identified risk is promptly addressed and eliminated. For business partners, we verify whether the identified risk exists through a desk audit, including the request for documentation such as certificates and ISOs. If risks are confirmed, we collaborate with the business partner to minimize or eliminate them by creating a corrective action plan.

Should these measures fail to yield improvements, we escalate the issue to management, the Human rights officer, or the Supply Chain Steering Committee. As a last resort, we may terminate the business relationship.



Grievance Mechanism

As part of our complaints management, concerns and complaints about human rights or environmental risks and violations of human rights or environmental due diligence obligations can be reported through our web-based, multilingual electronic system.

The electronic system is accessible to both CWS employees and external parties. Reports can be made anonymously.

Concerns or complaints may relate to CWS, our suppliers or other business partners.

All reports will be carefully reviewed and handled by the CWS Compliance Team. CWS is committed to maintaining confidentiality and protecting those who raise concerns from retaliation.

CWS will not tolerate retaliation against anyone who comes forward to assist us in our efforts to address human rights and environmental violations.

For more information on the Grievance Mechanism, please refer to the Grievance Mechanism Rules of Procedure.



**Dear CWS Team,
dear Reader,**

This Human Rights Policy Statement is regularly revised and updated to adapt its contents to possible changes in business models or business areas.

It was approved by the Board of Directors of CWS in December 2024.

Board of Directors