

Human Rights Declaration of RKW Group

on the implementation of due diligence according to § 6.2 of the German Supply Chain Act

1. Preamble

Commitment to respect human rights

As an internationally operating company, RKW Group (RKW) is aware of its responsibility to respect human rights. We are therefore committed to respecting human rights within our own business activities and to working towards preventing risks and ending violations in our global supply and value chain.

In doing so, we align our corporate actions with the internationally recognized Guiding Principles on Business and Human Rights of the United Nations. We have implemented the requirements of the National Action Plan for Business and Human Rights applicable in Germany as well as the Supply Chain Act.

2. International human rights references

Our understanding of principles is based on the following international human rights reference instruments:

- United Nations Universal Declaration of Human Rights AEMR | A/RES/217, UN Doc. 217/A(III) (e.g., recognition of the inherent dignity and of the like, inalienable rights of all members of the community of man for freedom, justice and peace),
- Principles of the UN Global Compact (including protection of international human rights, prevention of human rights violations, precautionary principle for environmental problems),
- OECD Guidelines for Multinational Enterprises (including recommendations for responsible business conduct in a global context),
- Core Labour Standards of the International Labour Organization (ILO) with their four basic principles (freedom of association and right to collective bargaining, abolition of forced labour, elimination of child labour, no discrimination in respect of employment and occupation),
- European Convention for the Protection of Human Rights and Fundamental Freedoms (including the Universal Declaration on Human Rights).

3. Measures for the implementation of human rights due diligence obligations

We fulfill our human rights and environmental obligations under this declaration of principles through a variety of measures. The aim of these measures is to improve the international human rights situation through responsible and sustainable management of our own business activities and our supply chains.

3.1 Risk management for compliance with the due diligence obligations of the German Supply Chain Act

Risk management within the framework of the German Supply Chain Act at RKW is integrated into all relevant business processes and is based on the nine due diligence obligations of the German Supply Chain Act.

By appointing a Human Rights Officer, RKW has bundled responsibility for monitoring risk management in a central role. The Human Rights Officer works together with a multifunctional team of employees from various departments.

3.2 Risk analysis and preventive measures

In order to obtain an initial overview of possible risks for human rights violations, RKW has used an abstract risk analysis to obtain an overview of the risk situation both for its own business area and for its direct suppliers. Both RKW's own production sites and all of RKW's direct suppliers were divided into three risk categories (low, medium, high). The most important criteria in the risk analysis are the country in which the company's own production site or direct supplier is located and the sector in which the company or direct supplier operates.

Initial prevention measures were implemented and prioritized on the basis of this analysis. These include

- Conducting training for employees in the purchasing department to raise awareness of human rights issues along the supply chain and to ensure compliance with the new processes for supplier onboarding and awarding contracts in accordance with the German Supply Chain Act
- Implementation of employee training on the RKW Code of Conduct
- Requesting existing and new suppliers to agree to the RKW Supplier Code of Conduct

We review the risk analysis and all preventive measures at least once a year and on an ad hoc basis to ensure that they are up to date and effective.

3.3 Remedy

We encourage all stakeholders to raise their concerns regarding activities and suspected violations of the rules mentioned under point 2, including this statement. If there is a reasonable suspicion or concrete indication of possible human rights violations within RKW or along our upstream value chain, this will be carefully and consistently investigated, addressed, responded to and corrective action taken by RKW. We ask our suppliers to contribute to the clarification of the facts and to cooperate fully within a reasonable timeframe. Depending on the severity of the violation, we reserve the right to take appropriate action in connection with our suppliers – from requesting that the violation be remedied immediately to taking legal action and terminating the business relationship.

3.4 Complaints mechanism

We reject all forms of human rights violations. For us, appropriate and effective grievance management is an important part of our due diligence processes. We have expanded the existing company grievance management system to include the due diligence obligations from the German Supply Chain Act. This system is designed to enable anyone, including employees and third parties, to raise concerns about unethical or illegal activities that they observe in our company or in relation to our company. All concerns raised through the portal will be thoroughly investigated and appropriate action will be taken to resolve any issues identified.

Your report can be made confidentially or anonymously. We will also take steps to ensure that those who use the system are not subject to any adverse treatment.

4. Obligations of our employees

RKW adheres strictly to ethical standards of conduct and complies with all applicable national and international laws. These include, for example, working conditions, antitrust law and fair competition, prevention of bribery and corruption, protection and recognition of company assets, copyright and other forms of intellectual property. Against this background, RKW has joined the GKV Code of Conduct as the industry code of the plastics processing industry with the corresponding certification. The GKV Code of

Conduct also forms the basis for the RKW Code of Conduct. The RKW Code of Conduct ("the Code") is intended to make the principles and ethical values of the company as well as legal requirements and ethical standards unambiguously clear to all employees at all RKW locations. In addition, it defines our expectations of third parties who do business with us and our employees – regardless of location, business activity or person.

All RKW employees are obliged to adhere to the Code and are trained accordingly.

5. Commitments of our suppliers

We expect our business partners in our supply chain to commit to respecting human rights, to establishing and adhering to appropriate due diligence processes and to passing these expectations on to their own suppliers. We have formulated these expectations in our RKW Supplier Code of Conduct.

We endeavor to oblige all suppliers to sign this Supplier Code of Conduct, both for existing suppliers and for future, new partners.

Among our existing suppliers, we prioritize those for which an increased risk was identified in the abstract risk analysis and those for which we have an increased ability to influence. To ensure that new suppliers also commit to respecting human rights in accordance with our RKW Supplier Code of Conduct, we have updated our process for new suppliers and made approval of our RKW Supplier Code of Conduct a mandatory part of the process. Any deviation requires separate approval from the purchasing management. We also carry out the abstract risk analysis for all new suppliers directly when they are created.

6. Relevant human rights issues and potentially affected groups of people

In order to reduce potential risks of human rights violations in our own business area and along our supply chains, we have taken appropriate measures and established preventive processes (see above). Nevertheless, it cannot be ruled out that there are residual risks and that we could potentially cause adverse effects on human rights in global supply and value chains.

We are committed to respecting all internationally recognized human rights and focus on human rights due diligence processes.

As RKW, we see the greatest risks of negative impacts on people that may be directly or indirectly related to our business activities and global supply and value chains in the following areas:

- Health hazards due to environmental pollution
- Health and safety hazards in the workplace
- Restriction of freedom of assembly and association
- Discrimination in any form (e.g., based on gender, age, ethnic and social origin, nationality, religion or ideology, physical or mental disability, sexual orientation)
- Forced and child labor

We check regularly and on an ad hoc basis whether there are groups of people who are at particularly high risk of being affected by human rights violations. In such a case, we would take appropriate targeted preventive measures or shift the focus of our risk management.

7. Continuous development of our human rights due diligence processes

Respect for human rights and the implementation of human rights due diligence in operational processes is an important contribution to improving the human rights situation for us. We accept this challenge and are committed to the continuous development of our human rights due diligence processes.

Mannheim, December 21, 2023

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