



## **Policy statement by the Management Board on environmental laws and human rights**

### **Who we are and what we do**

WITRON is a German corporate group headquartered in Parkstein (Bavaria / Upper Palatinate) which is active in the field of planning, realizing, and operating logistics systems and material flow systems worldwide, particularly in the food retail sector.

Logistics systems realized by WITRON are therefore in many cases a core element for supplying consumers with convenience goods via stores or online trade.

Our customers are therefore partly systemically relevant, as they ensure the supply of the population in the respective areas and regions with their distribution centers. In order to account for this, WITRON provides sustainable support on site for its customers' distribution centers by means of customized service and operator concepts.

In doing so, our business activity influences people's lives inside and outside WITRON as well as beyond the entire supply chain on a daily basis.

### **Our commitment to human rights and the environment**

At WITRON, we grasp the mantle. The Management Board and all executives and employees are beholden to this principle and live by it during their daily work. Responsible action refers to our products and our business relations to customers, service providers, suppliers, and other. In our actions, we always keep an eye on what consequences our business activity may have. We highly value people and the environment. Therefore, we continuously check our business processes for risks to the environment and human rights, and prematurely take preventive measures regarding identified risks. In the event of a possible violation of the environmental law or human rights, we will analyze and check them accordingly. If such a violation is determined, we immediately take the corresponding measures to prevent, improve, or stop it, or to minimize its extent.



The following principles shall explain our commitment to the environmental laws and human rights:

**WITRON sets the highest standards for human rights at work**

Protecting employees during their work and preventing accidents makes a central part of our commitment. Observing labor rights is a fundamental element of our human rights strategy. This is why we set high standards.

**Rejection of forced labor as well as child labor**

We reject any form of forced labor or bonded labor as well as modern slavery and human trafficking. We do not tolerate any form of child labor including any exploitation of children and juveniles. This includes, for example, works carried out involuntarily by people due to intimidation, punishment, violence by security personnel, or imminent disadvantage.

**Equal treatment**

We reject any form of discrimination, harassment, and unjustified disadvantage. Discrimination due to ethnic or social backgrounds, skin color, gender and gender identity, nationality, language, religion, ideology, physical or mental impairment, sexual orientation, health, age, marital status, pregnancy/parenthood, union membership, or political conviction (as far as this conviction corresponds to democratic principles) is not tolerated. Equal treatment in the remuneration of workers, whether male, female, or non-binary, is a matter of course for us. Equal opportunities and respectful treatment of one another are essential cornerstones of our corporate culture.

**Freedom of association**

We respect the right of all employees to found and join appropriate workers' representations. We reject any form of discrimination based on corresponding activities. We are convinced that cooperation based on trust with our employee representatives makes a significant contribution to the company's success.

**Health and safety at work**

We are committed to our responsibility for the health and safety of our employees and to the continuous improvement of the working environment. This is why we provide numerous preventive measures of health care and health promotion for our employees. The aim of these measures is to increase the job and performance satisfaction of our employees through appropriate development measures. The protection of our employees as well as a safe and healthy work environment for everyone is our utmost priority.

**Environmental risks**

We are aware of the fact that climate change and other events can have a noticeable influence on the environment. Therefore, we strive to continuously improve our environmental performance and to mitigate or avoid those risks that could have an adverse impact on the environment.



### *Environmental laws and human rights in our supply chain*

In our commitment to people and the environment, we do not limit ourselves to WITRON alone, but work closely with our customers, suppliers, service providers, and business partners along the supply chain to ensure that environmental laws and human rights are also adequately taken into account by them.

In concrete terms, this means that a detailed risk analysis is carried out to identify the areas that have a corresponding risk potential. In a second step, prioritization takes place. Subsequently, structural and case-related solutions are developed and implemented for the issues in question.

We have a high vertical range of manufacture and work closely with assembly and installation companies worldwide. Accordingly, the manufacturing and installation processes are subjected to a quantitative and qualitative risk analysis on a regular basis and as required. The departments of Purchasing, Health & Safety, and Quality Management responsible for this work closely with the specialist departments, suppliers, service providers, and other business partners to eliminate or minimize any risks that have arisen and to ensure ongoing optimization.

However, violations can never be completely prevented. Therefore, reacting and responding appropriately to potential violations is an essential part of our risk management. When we are informed of cases of suspected misconduct, we promptly investigate them and find solutions on how to end actual violations and limit and mitigate the adverse effects. In the event of substantiated knowledge of a violation in our supply chain, we seek dialog with our supplier, service provider, or business partner and attempt to find a joint solution that ensures future compliance with environmental laws and human rights. If necessary, we use contractually agreed audit rights to obtain further information on potential violations and risks and to identify and implement remedial measures. In the event that the suppliers, service providers, or business partners do not take sufficient measures for preventing or terminating violations of the environmental laws and human rights or minimizing their consequences, as the last option, termination of our cooperation with the supplier, service provider, or business partner may be the result.



### Responsibility for environmental laws and human rights

The Management Board is responsible for complying with and implementing the environmental laws and human rights. Specific implementation takes place by the specialist departments, the Purchasing departments, the departments of Health & Safety and Quality Management.

Due to the high importance of environmental laws and human rights, and in awareness of the fact that the actual and legal requirements can change in this respect at short notice, the position of Human Rights Officer was created at WITRON. The Human Rights Officer is available to employees and external parties as a contact person for risks and violations of environmental laws and human rights, both at our company and at our suppliers, service providers, and business partners. He/She advises the departments involved and monitors the associated risk management. The Human Rights Officer is independent in their activity and directly reports to the Management Board.

Compliance with and optimization of the high standards we live by in the field of environmental laws and human rights can only be achieved through continuous and consistent further development and review of the risk management. We are fully aware of the responsibility for this and act accordingly.

Parkstein, December 22, 2023

#### **WITRON Service GmbH & Co. KG**

Christian Dietl

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at the same time acting on behalf of all companies that it currently controls and will control in the future in accordance with § 15 et seqq. AktG by analogy