

# Declaration of principle

## on respect for human rights and the environment

As a global company, the BWF Group is committed to internationally recognized human rights standards and pursues a clear human rights strategy.

A central aspect of our strategy is to achieve economic success with the greatest possible respect for our fellow human beings, and the environment through fair, legally compliant business practices.

In 2024, we published our Code of Conduct on sustainable procurement for internal and external stakeholders.

### 1. COMMITMENT AT THE HIGHEST CORPORATE LEVEL

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Respect for human rights is of central importance to the BWF Group. In this declaration of principles, we set out our Group-wide strategy with regard to human rights. The declaration of principles is issued by the two managing partners Dr. Philipp von Waldenfels and Maximilian Offermann. In this way, we ensure that respect for human rights and the environment is implemented in every part of our company.

### 2. REFERENCE TO INTERNATIONAL STANDARDS

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The BWF Group is guided by international standards and frameworks. Our strategy in the area of human rights is therefore based on the following guidelines.

Supply Chain Due Diligence Act:

- The United Nations International Covenant on Political and Civil Rights
- The United Nations International Covenant on Economic, Social and Cultural Rights
- The Declaration on Fundamental Principles and Rights at Work of the International Labor Organization (ILO)

### 3. PROCESS DESCRIPTION

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The BWF Group's human rights strategy aims to prevent or minimize risks to human rights and to prevent, end or minimize the extent of human rights violations. To achieve this goal, we have implemented appropriate measures in our own business areas and in our procurement processes. Our own employees and the employees of our suppliers are at the center of every measure. However, it is always a particular concern of the BWF Group to include and consider the interests of those potentially affected in all areas.

#### 3.1 RISK MANAGEMENT

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The BWF Group has established comprehensive human rights risk management in its own business areas and in the supply chain. Responsibility for the day-to-day management and monitoring of human rights risk management lies with an internally appointed employee. Efficient risk management process structures ensure the success of our measures and a continuous improvement process. We monitor the effectiveness of all risk management measures regularly on an ad hoc basis and adjust where necessary. The Management is informed about risk management at least once a year. Risk management is divided into the sub-processes of risk analysis, preventive measures, complaints procedures, remedial measures, effectiveness testing, documentation and reporting.

#### 3.2 RISK ANALYSIS

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The BWF Group sees due diligence in the area of human rights as an ongoing process with constantly changing framework conditions. We conduct annual analyses to identify potential and actual negative impacts on human rights and the environment in our business areas and at our direct suppliers. We work together with the company IntegrityNext to carry out a comprehensive and in-depth analysis. The platform enables a holistic assessment of our business areas and our direct suppliers with regard to ESG issues based on country and industry risks, critical news monitoring and an evaluation of our suppliers' sustainability performance based on questionnaires. IntegrityNext also helps us to identify potential industry-specific human rights and environmental risks in our deeper supply chain.

The BWF Group is also committed to incorporating the perspectives and interests of those potentially affected into our analyses. We pay particular attention to potentially more vulnerable groups, such as indigenous peoples, minorities, people with disabilities, employees of external companies and expectant parents. In addition, we include past complaints in our risk analyses in order to assess the actual risk in our own business areas and at suppliers.

In the event of changes or restructuring of our business activities, we also carry out ad hoc risk analyses.

As a result of the risk analysis, we have identified and prioritized the following potential human rights and environmental risks in our own business areas:

Risk area

- Environmental pollution
- Substances of concern
- Health and safety
- Waste
- Forced labor and mistreatment
- Child labor
- Discrimination
- Impact on local communities
- Working conditions & wages
- Collective bargaining and freedom of association
- Leadership

As a result of the risk analysis, we have identified and prioritized the following potential human rights and environmental risks at our direct suppliers:

Risk area

- Environmental pollution
- Substances of concern
- Health and safety
- Waste
- Forced labor and mistreatment
- Child labor
- Discrimination
- Impact on local communities
- Working conditions & wages
- Collective bargaining and freedom of association
- Leadership

### 3.3 PREVENTIVE MEASURES

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We subject identified risks to an appropriateness check as part of our risk management and increase our investigative efforts on an ad hoc basis. If there is an actual risk that our business activities could cause or contribute to negative effects on human rights, we have developed efficient processes to counter these risks. Appropriate preventive measures are a fundamental part of these processes.

The BWF Group has implemented Group-wide guidelines to express our commitment to respecting human rights in our own business areas and with our business partners. The following guidelines serve as a binding framework for the daily actions of our employees, suppliers and business partners.

- The **Code of Conduct** forms the basis for our social, ethical and ecological values for ourselves and our business partners. It formulates our requirements and expectations of our employees and suppliers based on the identified risks. We communicate it to internal and external stakeholders.

We ensure the implementation of the aforementioned guidelines through the following preventive measures in our own business areas:

- Regular **training** for employees in the Purchasing, Quality Management and Sustainability departments ensures a high level of quality in the implementation of our human rights strategy. Employees from the Purchasing department receive additional training on our purchasing practices and procurement strategies with regard to human rights and are sensitized to the relevance of the issues.
- Employee information on the Code of Conduct via the intranet.

We counteract actual human rights or environmental risks that we have identified with our direct suppliers with appropriate preventive measures as part of our risk management.

- We apply strict criteria when selecting a direct supplier and take specific environmental and human rights risks into account. We ensure compliance with human rights and environmental standards for as long as the business relationship lasts.
- We require our direct suppliers to comply with our human rights and environmental expectations, which we have set out in the Code of Conduct.
- To ensure the implementation of our human rights and environmental expectations, we organize training courses for our direct suppliers.

If we have actual indications that violations are possible at an indirect supplier, we immediately involve the originator in our risk management and risk analysis and develop appropriate preventive and remedial measures.

### 3.4 COMPLAINTS PROCEDURE

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The BWF Group recognizes that despite due diligence in the area of human rights, violations can occur. We provide those affected in our own business operations, at our suppliers and along our entire supply chain, as well as affected third parties, with confidential access to an appropriate complaints procedure to report violations. We communicate our complaints procedure internally and publicly on our website and investigate all reported concerns confidentially.

### 3.5 REMEDIAL MEASURES

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If the violation is in our own business areas, we will ensure that the violation is terminated. If the violation is with one of our direct suppliers or with an actor in our supply chain, we will endeavor to remedy the situation appropriately by taking the following corrective action:

- We expect and demand that our suppliers immediately put an end to actual human rights violations. We develop a concept for ending the violation with defined deadlines and responsibilities together with the party responsible. If necessary, we support our business partners in implementing the required measures. We reserve the right to pause or terminate the business relationship if the violation is not ended.

### 3.6 EFFICACY TESTING

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The BWF Group ensures its due diligence with regard to human rights with the measures described. However, global circumstances and our business environment are constantly changing. We therefore review the effectiveness of all the measures described annually and on an ad hoc basis and make adjustments where necessary. Our established tools include on-site visits, audits, quick checks and working with indicators. We see respect for human rights as an ongoing process in which we strive for continuous improvement.

### 3.7 RESPONSIBILITIES

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The BWF Group ensures compliance with the human rights strategy internally through clear structures and responsibilities. The company management is responsible for compliance with the human rights strategy at a strategic level. An internally appointed employee oversees and monitors all operational processes and measures.

### 3.8 DOCUMENTATION & REPORT

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The BWF Group documents all human rights due diligence activities in its own business areas and in the supply chain and reports annually on the current human rights due diligence processes in the Supply Chain Due Diligence Act report. The report is publicly available to interested parties on our website. The complaints procedure and other documents on human rights due diligence are also available on our website. This policy statement is communicated internally and externally and is publicly available on our website.

A blue ink signature of Maximilian Offermann, consisting of stylized, flowing letters.

**Maximilian Offermann, M.A.**  
Managing Partner BWF Group

A blue ink signature of Dr. Philipp von Waldenfels, featuring a prominent vertical stroke and a series of loops.

**Dr. Philipp von Waldenfels, LL.M.**  
Managing Partner BWF Group

A blue ink signature of Dietmar Winkler, with a large, stylized 'D' and 'W'.

**Dietmar Winkler**  
Chairman of the Works Council