

HUMAN RIGHTS

POLICY STATEMENT



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WACK GROUP is a world's leading group of companies in the field of hard surface cleaning with over 300 employees operating in 7 countries. We align our business activities to meet the needs of our stakeholders and the environment, offer sustainable solutions, and become the first choice as a supplier, partner and employer.

This Human Rights Policy Statement complements WACK GROUP's Code of Conduct, the basis and benchmark for all guidelines and regulations that ensure responsible and ethically irreproachable conduct within the group of companies.



10 PRINCIPLES OF THE UN GLOBAL COMPACT

HUMAN RIGHTS

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Principle 2: Make sure that they are not complicit in human rights abuses.

LABOUR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: The elimination of all forms of forced and compulsory labour.

Principle 5: The effective abolition of child labour.

Principle 6: The elimination of discrimination in respect of employment and occupation.

ENVIRONMENT

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Undertake initiatives to promote greater environmental responsibility.

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

ANTI-CORRUPTION

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

1. OUR COMMITMENT

Respecting Human Rights is a core value of WACK GROUP. We are committed to respecting all internationally recognized human rights as relevant to our operations and we base our human rights policy statement on

- ✓ The Ten principles of the UN Global Compact
- ✓ The Universal Declaration of Human Rights
- ✓ The International Labour Organization's Declaration on the four Fundamental Principles and Rights at Work
- ✓ The OECD Guidelines for Multinational Enterprises
- ✓ The UN Guiding Principles on Business and Human Rights
- ✓ The UN Sustainable Development Goals

We believe these rights are inherent for all human beings and we acknowledge that they are interrelated, interdependent, and indivisible. We recognize that while states have a duty to protect human rights, companies have a responsibility to respect human rights.

We accept the responsibility we have for our employees and take seriously our responsibility to minimize the environmental impact of our business. Social accountability and responsible sourcing as stated in WACK GROUP's Supplier Code of Conduct are fundamental parts of our daily activities and the principles of this Policy Statement are reflected there. This enables us to deliver sustainable and dependable long-term growth as well as create and secure jobs worldwide.

Our guiding principle is that we always act in accordance with legal regulations in all regions and countries which we operate. Where national law and international human rights standards differ we will ensure we adhere to national law as a minimum standard.



International
Labour
Organization

ILO Declaration on Fundamental Principles and Rights at Work:

- 1) Freedom of association and the effective recognition of the right to collective bargaining
- 2) The elimination of all forms of forced or compulsory labour
- 3) The effective abolition of child labour
- 4) The elimination of discrimination in respect of employment and occupation.



UN Guiding Principles on Business and Human Rights

The State duty to
protect

Corporate
responsibility

Access to remedy

2. SCOPE

This policy statement applies to our employees globally. These standards require all employees around the world to act in a reasonable and lawful manner towards colleagues, partners and communities. We expect our partners to share our commitment to respect human rights with their business partners.

3. PRIMARY HUMAN RIGHTS

Having analyzed potential human rights risks related to our business and operations we focus on the following Human Rights:

a) Child labour

We reject all forms of child labour. In accordance with the relevant ILO principles, we do not employ children under the legal minimum age for employment in the respective country or legal system. Employees under the age of 18 only perform work in accordance with legal requirements of their country of employment e.g. with regards to working hours and working conditions and subject to any requirement regarding education or training.

b) Forced labour

We reject all forms of forced and compulsory labour. All labour must be voluntary, We do not tolerate any forms of forced labour including bonded labour, indentured labour, military labour, modern forms of slavery and any form of human trafficking.

c) Diversity and Inclusion

We promote an inclusive work environment that values the diversity of our employees. We are committed to equal opportunity and reject any forms of discrimination or harassment based on gender, ethnic origin, nationality, social origin, religion, age, disability, sexual orientation and identity or any other characteristics protected by applicable law. The basis for employee selection and promotion at WACK GROUP is qualification, performance, skills and experience

d) Freedom of Association and Collective Bargaining

We respect our employee's right to join or not to join a trade union or employee representation of their choice, free from threat or intimidation. We recognize and respect the right to collective bargaining in accordance with applicable local law. Employees who act as representatives are neither disadvantaged nor favored in any way.

e) Working conditions

Remuneration and benefits:

The remuneration of our employees is based on the applicable laws, supplemented by the relevant national minimum wage laws, and on the respective national labour market. In accordance with the relevant ILO principles, we are also committed to the principle of equal pay for work of equal value regardless of gender or other discriminatory distinctions. We pay workers in a timely manner and clearly convey the basis on which workers are being paid.

Working hours:

We comply with all applicable local laws regarding working hours including overtime, rest breaks and paid vacation.

Health & Safety:

The safety, health and well-being of our employees is of utmost importance. We comply with the applicable occupational health and safety laws and are committed to furthering our own standards for the continuous improvement of occupational safety.

f) Data Privacy

We respect the privacy of all individuals and the confidentiality of any personal data we hold about them. Our Data Privacy Policy provides appropriate safeguards for transmission of personal data belonging to its employees, customers and suppliers within WACK GROUP. WACK GROUP's Data Protection Management safeguards compliance with the respective data protection regulations.

g) Environment

We are committed to environmental protection. We recognize that our business activities impact the environment and the climate. To this end we have measures and dedicated programs in place to avoid or at least minimize these negative impacts

4. DUE DILIGENCE

Our commitment to respect Human Rights is reflected in WACK GROUP's policies e.g. Supplier Code of Conduct and procedures. In order to comply with international Human Rights standards, national law and WACK GROUP's policies we undertake appropriate Human Right due diligence as a means to identify, assess and address potential and actual adverse human rights impacts in our business activities and supply chain.

5. REMEDY & GRIEVANCE MECHANISM

If it is determined that there is a risk of adverse human rights impact caused or contributed by our business activities, we have a procedure in place to ensure the activity is assessed, changed, discontinued and/or remediated. We encourage our employees, partners and third parties to address suspected violations of this Human Rights Policy Statement through the established accessible grievance. In addition, the respective supervisors, local management and the HR department are available as contact persons for our employees.

6. CONSEQUENCES OF BREACH

If infringements are reported, we will take appropriate measures for proper clarification. We will take corrective measures. Consequences under civil and criminal law will depend on how and in what circumstances an individual has contravened this Policy Statement. Where a breach of legislation is proven in this regard, we also reserve the right to refer the matter to the relevant authorities for further action.

7. GOVERNANCE

Accountability for the implementation of this policy is overseen by the Board of management of the group of companies and the managing directors of the national companies. This ensures that every part of our business is clear about the responsibility to respect human rights and its day-to-day implementation.

8. AWARENESS

We sensitize our employees to our values and principles in order to prevent negative consequences of our actions on human rights. We will continue to communicate this policy statement to our employees and partners.

9. STAKEHOLDER-ENGAGEMENT

We communicate and report on our human rights-related commitments, activities and statements, consistent with this Human Rights Policy, as part of our annual reporting. We monitor the progress in implementing this policy statement in WACK GROUP's business activities. In addition, we regularly review and assess how we can optimize and strengthen our approach to human rights and environmental protection within our sphere of influence.

10. DOCUMENTATION & REPORTING

We regularly report on our human rights commitments, activities and declarations in our Sustainability Report and on our website (www.wack-group.com/nachhaltigkeit). As part of our corporate due diligence, we permanently document our human rights risk management process internally.

11. ADVANCEMENT

We regularly evaluate and review our approach to human rights and guarantee to continuously optimize and develop our human rights due diligence obligations.

11. FINAL PROVISION

WACK GROUP's Human Right Policy Statement is adopted by the Board of management on April 2023.