

# Declaration of principles on human rights

Stantus: March 2025



## **Our commitment**

Respect for human rights is a matter of course for the Andreas Schmid Group. We are expressly committed to internationally recognised human rights. Human rights are universal, inalienable and indivisible rights of every human being that serve to ensure the dignity and equality of all people.

## Scope

This declaration of principles describes our strategy for protecting human rights and the environment. It applies to all employees of the entire Andreas Schmid Group in all divisions of the company, both in the United Kingdom and abroad. We expect our business partners, customers and suppliers to recognise and respect human rights, to establish appropriate due diligence processes of their own and to address these issues appropriately with their business partners throughout the entire supply chain.

# Promotion of human rights and good working conditions

Based on our risk analysis, which most recently did not reveal any specific human rights or environmental risks within the meaning of the Supply Chain Due Diligence Act, either in our own business or among our direct suppliers, we have established the following fundamental human rights and environmental expectations for our employees and suppliers. In the event of specific identified risks, further individual contractual assurances and appropriate control mechanisms must be agreed with the business partner concerned.

- Prohibition of forced labour: There is no form of forced or compulsory labour at the Andreas Schmid Group. We reject all forms of forced labour, including labour obligations, military labour, (modern) slavery and debt bondage. Compliance with legal regulations on the employment of workers is mandatory. Any violation will not be tolerated. The Andreas Schmid Group rejects the use of forced or illegal compulsory labour by its suppliers and subcontractors and ensures that this is checked before entering into business relationships.
- Prohibition of child labour: The Andreas Schmid Group does not tolerate any form
  of child labour. The Andreas Schmid Group will also check this with its suppliers and
  subcontractors before entering into business relationships. When selecting personnel,
  the legal requirements regarding minimum age and legal regulations for underage
  workers are observed.
- Protection against discrimination: Discrimination on the basis of ethnic or national origin, gender, religion, ideology, age, disability, sexual orientation, skin colour, political opinion, social background or other characteristics protected by law will not be tolerated. The Andreas Schmid Group does not tolerate sexual harassment or other personal attacks against individuals or groups. The employees of the Andreas Schmid Group are committed to combating discrimination and promoting diversity and inclusion. All fellow human beings should be treated with respect and appreciation, and a working atmosphere characterised by trust, tolerance, professionalism, performance and mutual respect should be fostered. It is important that we offer everyone the same opportunities at the Andreas Schmid Group.



- Health and safety at work: Promoting the health of our employees is a top priority.
  We consider compliance with occupational health and safety laws, the development of
  our own standards and the continuous training of managers and all other employees
  to be fundamental principles of our corporate policy and our responsibility towards the
  employees of the Andreas Schmid Group.
- **Working hours and remuneration:** The Andreas Schmid Group complies without exception with the statutory regulations on working hours, rest breaks and remuneration, in particular minimum wage laws. We expect the same from our business partners.
- Environment and sustainability: Operational environmental protection and sustainability are an integral part of the corporate philosophy of the owner, the Executive Board, the Supervisory Board and the management of the individual companies of the Andreas Schmid Group and are a high priority for everyone. We are committed to protecting the environment. In order to increase sustainability, we are committed to continuously improving our environmental management system and fulfilling our binding obligations in this regard. We document this with our voluntary certification according to ISO 14001.

# **Risk Management**

Within the Andreas Schmid Group, processes for implementing the legal due diligence obligations under the Supply Chain Due Diligence Act are established and responsibilities are defined as part of risk management. Responsibility for the risk management system lies with the Executive Board of the Andreas Schmid Group. Compliance with due diligence obligations for all areas of the Andreas Schmid Group is hereby ensured and regularly reviewed for completeness.

#### Risk analysis

The core element of risk management is the identification of potential human rights and environmental risks. The Andreas Schmid Group reviews its suppliers and business partners, as well as its own business areas, annually and as necessary with regard to potential risks relating to human rights and the environment. The results form the basis for further measures within the framework of risk management. All identified risks are assessed and classified according to defined criteria. In particular, country- and industry-specific classifications and risks, publicly available information, and information and commitments provided by our business partners are used as a basis for risk assessment. If necessary, the identified risks are weighted and prioritised appropriately, in particular using the criteria specified in Section 3 (2) of the LkSG. The results of the risk analysis are communicated internally to the relevant decision-makers, in particular to the Management Board.

#### **Preventive measures**

The type and scope of preventive measures depend on the respective identified risks and specific risk profiles. If a risk is identified, appropriate measures must be taken to prevent or minimise human rights and environmental risks. Our preventive measures focus on raising awareness among all employees of the Andreas Schmid Group on the topics of human rights, the environment, sustainability and compliance. We also aim to raise awareness by obtaining self-disclosures from suppliers and requiring our business partners to commit to meeting our compliance targets and guidelines on a risk-based basis.



The implementation of the measures defined and compliance with the human rights strategy contained in this policy statement are monitored on a risk-based basis, both within our own business and in relation to our business partners.

#### Remedial measures

If risk analyses, complaints or reports reveal violations of human rights or environmental obligations, we at the Andreas Schmid Group will take appropriate remedial action without delay. The measures will be determined on a case-by-case basis and will aim to prevent or end the (imminent) violation or minimise its extent. If the violation occurs at a business partner and cannot be ended in the foreseeable future, a concept for ending or minimising it must be drawn up and implemented immediately, including a specific timetable. If this does not remedy the situation or if the violation is particularly serious, termination of the business relationship may be necessary as a last resort.

#### Information and complaint mechanisms

Correct behaviour in accordance with the law and regulations, as well as compliance with the internal rules of conduct established in the course of corporate compliance, particularly in the areas of human rights and environmental protection, are a matter of course for the owner, the Executive Board, the Supervisory Board and the management of the individual companies of the Andreas Schmid Group and have the highest priority for all. To protect whistleblowers and affected parties, a whistleblower system has been set up that allows human rights and environmental risks as well as violations of human rights or environmental obligations to be reported. All reports of any kind are reviewed and handled with care and confidentiality, without exception. The protection of whistleblowers and affected parties against retaliation, exclusion, false accusations and other disadvantages is a top priority. Details can be found in the rules of procedure for the complaints procedure in accordance with the Supply Chain Due Diligence Act published on the Andreas Schmid Group website.

## **Indirect suppliers**

If we have actual indications that a human rights or environmental obligation may have been violated by an indirect supplier, we will also carry out a risk analysis in this regard, take appropriate preventive measures and develop and implement a concept to prevent, end or minimise such violations.

### **Documentation and reporting obligations**

Compliance with the legal due diligence obligations is documented in accordance with the Supply Chain Due Diligence Act. The Human Rights Officer is responsible for monitoring risk management within the company and reports to the Executive Board at least once a year on his work. The annual report required by the Supply Chain Due Diligence Act is submitted to the competent authority in due time and published on our website.

# Regular review

The effectiveness of the procedure described for complying with human rights and environmental due diligence obligations is reviewed annually and on an ad hoc basis, and the measures are adjusted immediately if necessary. Findings from the processing of information received through the complaints procedure are taken into account in this context.

Andreas Schmid Logistik AG
The Executive Board