



Brochure | Compliance

# Human and Environmental Rights Commitment Statement

# Our **commitment** to respecting human and environmental rights

## Our approach

For us in the SEEBURGER Group<sup>1</sup> (“SEEBURGER”), respect for human rights is a fundamental component of responsible corporate governance. As a participant in the United Nations Global Compact, we are committed to upholding human rights, respecting the rights of employees and their representatives and protecting the environment.

**At SEEBURGER, we respect internationally recognized human rights and take into account the following international standards and national laws, among others:**

- + Universal Declaration of Human Rights
- + International Covenant on Civil and Political Rights
- + International Covenant on Economic, Social and Cultural Rights
- + Declaration of the International Labor Organization (ILO) on Fundamental Principles and Rights at Work
- + United Nations Guiding Principles on Business and Human Rights
- + 10 principles of the UN Global Compact
- + OECD Guidelines for Multinational Enterprises
- + Supply Chain Due Diligence Act (LkSG)

SEEBURGER’s commitment is based on our **shared values**, is expressed in the **SEEBURGER Code of Business Conduct** and affirms our purpose:

Accelerating business to improve the lives of people

<sup>1</sup> The “SEEBURGER Group” refers to SEEBURGER AG and the affiliated Group companies.

# Relevant human rights and environmental issues

Based on the regular analysis of potential human and environmental rights risks in our own business activities and our supply chain, we are particularly committed to the following human and environmental rights:

## **Ban on child labor**

We are strictly opposed to all forms of child labor as defined by the relevant ILO conventions. We reject all measures that violate the rights of children and endanger their freedom and development through harmful working conditions. Children must be protected and supported at all stages of their development.

## **Prohibition of slavery and forced labor**

At SEEBURGER, we are strictly against forced or compulsory labor and any form of slavery, including modern forms of slavery and human trafficking. Employment relationships are always based on free will and may be terminated with due notice.

## **Safeguarding the right to form a coalition, association and collective action**

SEEBURGER recognizes the right to freedom of association. This includes, among other things, the right of employees to form an employee representative body (e.g., trade union or works council), to join an employee representation body and the right to strike and collective bargaining.

## **Prohibition of discrimination**

For us, any form of discrimination is unacceptable. At our company, everyone has the same opportunities to grow and develop. Our goal is a working environment free of prejudice and that all employees – regardless of age, ethnic origin and nationality, gender and gender identity, physical and mental abilities, religion and ideology, sexual orientation and social background – are valued. For this reason, we have signed the Diversity Charter ([About the initiative – For diversity in the world of work – charta-der-vielfalt.de](https://www.charta-der-vielfalt.de)).

## **Safeguarding occupational safety, the right to health in the workplace and working hours**

Protecting and promoting the physical and mental health of our employees is a top priority for SEEBURGER. We are committed to complying with the applicable laws, international norms and local standards. Within the framework of applicable law, we ensure that we provide safe and healthy working conditions, work breaks, an appropriate limitation of working hours and regular paid leave. We promote a preventive approach.

## **Appropriate remuneration for work performed**

We follow the principle of equal pay for work of equal value. We ensure appropriate, legally compliant and performance-related remuneration for our employees, regardless of gender, origin or other diversity characteristics.

## **Education**

We invest in training and company programs to maintain and improve the long-term employability of our employees. In this way, we contribute to the employability of all employees in line with the concept of lifelong learning.

## **Environmental rights**

At SEEBURGER, we are committed to our responsibility to protect the environment and are aware of the potential impact of our business activities on the environment and people. We therefore observe both human rights and environmental due diligence obligations in our own Group companies as well as with regard to our suppliers and business partners. We strongly condemn any kind of negative impact on and destruction of the environment by individuals or companies.

Our global business activities and supply chains expose us to the risk of adverse effects on human rights and the environment. In order to minimize this risk as far as possible, our actions focus in particular on people in situations of increased vulnerability.

## **Potentially affected parties**

Those who, due to their characteristics (such as age, gender, ethnic background, socio-economic status), are more susceptible to social, economic, cultural, political or health-related disadvantages.



# Our approach to **implementation**

## **Commitment and compliance**

This Commitment applies to the entire SEEBURGER Group worldwide. We must all familiarize ourselves with the requirements of this declaration and comply with them. It is a binding basis for us to implement the core elements of our human rights and environmental due diligence obligations.

## **Responsibilities and control**

We have defined corresponding responsibilities and processes for the exercise of and compliance with all human rights and environmental due diligence obligations.

Overall responsibility lies with the entire SEEBURGER Executive Board. The responsible member of the Executive Board is Co-CEO Michael Kleeberg. The managers of each location are responsible for local implementation.

In addition, SEEBURGER has created the position of Global Chief Compliance Officer (Dr. Zsófia Körmendy), who is responsible for the global compliance and risk management system, also within the scope of the LkSG<sup>2</sup>. The Global Chief Compliance Officer reports to the Co-CEO Michael Kleeberg.

The entire Supervisory Board is also informed by the Executive Board and the Global Chief Compliance Officer at regular meetings about compliance and sustainability issues, including human rights and labor standards.

## **Risk analysis**

In order to identify and analyze human rights and environmental risks along the supply chain, we carry out regular (at least annual) and event-driven risk analyses in our own business areas and in relation to direct suppliers. We use the results as a basis for creating and, if necessary, adapting preventive measures, such as internal guidelines, processes and awareness-raising measures.

## **Preventive measures**

In order to live up to our responsibility to respect human rights and the environment, we have established extensive preventive measures, such as a global compliance management system, global sustainability management system, Code of Business Conduct, Integrity Line, as well as regular internal audits and training and awareness-raising measures.

We strive for a high degree of ecological and social sustainability in our purchasing activities. The essential basis for a successful relationship between our suppliers and SEEBURGER is their commitment to respect our Supplier Code of Conduct (**Supplier Code of Conduct**) and its requirements in accordance with this declaration of principles.

We already take the relevant requirements into account when selecting suppliers.

<sup>2</sup> Supply Chain Due Diligence Act

## Dealing with violations of this policy statement and remedial action

An appropriate and effective grievance management system is an integral part of our due diligence processes to effectively prevent and remedy violations within our group of companies or in our value chain. We take violations of human and environmental rights seriously and provide publicly accessible and confidential reporting channels through which any person can report actual or suspected violations by SEEBURGER, business partners or suppliers at any time.

Our Integrity Line (**SEEBURGER: Report an issue**) is open to anyone. Affected parties can use the system to submit reports of all kinds and complaints about the conduct of SEEBURGER or direct and indirect suppliers, either by name or anonymously. Reports and complaints are processed by the Global Chief Compliance Officer Dr. Zsófia Körmendi, who is impartial, independent and sworn to secrecy. In addition, the responsible CO-CEO Michael Kleeberg is informed about the reports and complaints. Confidentiality and whistleblower protection are our top priority.

To this end, every well-founded suspicion or specific complaint about possible human or environmental rights violations in our own business areas or along the supply chain is carefully and consistently investigated.

If a violation is only identified after it has occurred, our efforts are focused on minimizing the impact on those affected and remedying the violation as quickly as possible. In our own business areas, the business activities causing the violations are prevented or made compliant with human rights and environmental standards. If we obtain substantiated knowledge of human rights violations in our supply and value chain, we work with the responsible parties in cooperation with our business partners to develop a corrective action plan to remedy the human rights violation. Depending on the severity of the violation, we reserve the right to take appropriate action.

## Effectiveness test

The effectiveness of these due diligence processes and the underlying complaints procedure is reviewed at least once a year and on an ad hoc basis. This ensures that adverse human rights or environmental impacts are identified, prevented, remedied or mitigated.

For direct suppliers, we review the implementation of human rights and environmental due diligence obligations through risk-based information surveys and, if necessary, risk-based audits.

We are committed to continuously developing our human rights and environmental due diligence processes.

## Reporting

We report on our progress in implementation and development in our annual sustainability report. In our sustainability reporting, we inform the public about our human rights and environmental commitments as well as our due diligence processes and their effectiveness. It also reports on the human rights and environmental risks and impacts identified in the reporting period as a result of our business activities along the global supply and value chains and describes the preventive and remedial measures implemented. The report is also published on our website [www.seeburger.com](http://www.seeburger.com).

# Contacts for questions, information and complaints



## Global Chief Compliance Officer and Group Data Protection Officer

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## Integrity Line

SEEBURGER: [Report an issue](#)

## Compliance-Team

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