

Human Rights Policy

hubergroup

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The expression “employee” is used gender neutral and covers female employees and male employees as well as persons designating themselves as diverse.

Human Rights Policy – Management summary

Our human rights policy applies to all employees and office-holders, named employees further on, at the group companies of the hubergroup (MHM Holding GmbH) around the world.

Respecting human rights is a macrosocial task that everyone – governments, companies, and individuals – must take responsibility for. We at hubergroup believe that we must strive for a better tomorrow and as such, are fully committed to respecting human rights in all our business operations worldwide, along our entire value chain, and all divisions and functions.

We recognize that, in principle, all our activities and business relationships can impact the entirety of human rights – positively and negatively – and that human rights due diligence is a continuous process.

Our commitment to respect human rights in all our business operations worldwide, along our entire value chain, and all divisions and functions guides our decision-making and constructive engagement both internally and externally. We are committed to ethically and lawfully conducting business in full compliance and recognize our responsibility to remedy under the United Nations Guiding Principles on Business and Human Rights (UNGPs) and applicable national laws.

This Human Rights Policy represents the core of our corporate culture. Therefore, all employees are required to make this Policy additional to the Code of Conduct and other Policies as the ethical basis for their activities for the hubergroup.

Its purpose is to help us to uphold our social responsibility towards our business partners, employees, shareholders and the public at large. To this end, the code sets out the ethical and legal framework for our actions. Its rules and principles give concrete expression to our core values.

1. Introduction

1.1 Objective

This Policy articulates hubergroup's responsibilities, expectations, and commitments regarding human rights throughout our entire value chain. It serves as a comprehensive guide for all hubergroup employees, aiming to further embed respect for human rights and corresponding behavior into our corporate culture. The Policy also provides guidance for situations that may pose potential risks to human rights.

By establishing this Policy, we demonstrate our unwavering commitment to respecting human rights both internally and externally, underscoring the paramount importance of human rights-related matters across all hubergroup operations. This document complements and reinforces our existing human rights commitments and requirements, which are already reflected in the hubergroup Code of Conduct.

Through this Policy, we aim to create a clear framework that not only defines our stance on human rights but also provides practical guidance for our employees and stakeholders. It serves as proof to our dedication to upholding human rights principles in every aspect of our business, from our internal practices to our interactions with partners and communities worldwide.

1.2 Scope and target group

This Policy applies to all hubergroup employees worldwide, including their internal interactions, and for interactions with hubergroup's external business partners, (direct and indirect) suppliers, contractors, customers, consumers, local community members, and government officials.

2. Our commitment and approach

2.1 Our commitment

Our human rights commitment is based on the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. These frameworks distinguish between the human rights responsibilities of states and businesses. We embrace internationally recognized human rights as outlined in the International Bill of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. This comprehensive approach ensures that our commitment aligns with globally accepted standards and principles, reinforcing our dedication to respecting and upholding human rights across our operations and business relationships.

The International Bill of Human Rights consists of the following instruments:

- [Universal Declaration of Human Rights \(UDHR\)](#)
- [International Covenant on Civil and Political Rights \(ICCPR\)](#)
- [The 10 principles of the UN Global Compact](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [Conventions of the International Labour Organization \(ILO\)](#)
- [International Covenant on Economic, Social and Cultural Rights \(ICESCR\)](#)

We always act in compliance with national law. In case of conflict between national law and hubergroup standards we follow the higher standard.

Our commitment encompasses respecting human rights along the entire global value chain including all hubergroup employees and their interactions with hubergroup business partners, (direct and indirect) suppliers, contractors, customers, consumers, local community members and government officials. It also applies to third parties acting on behalf of hubergroup or conducting business in facilities owned or operated by hubergroup and its subsidiaries. As a global company this is an essential requirement for sustainably developing our business. We see this as an ongoing improvement process to strengthen the awareness of human rights and their implementation.

2.2 Our approach

We acknowledge that our activities and business relationships can have both positive and negative impacts on human rights, and we recognize human rights due diligence as an ongoing process. Our decision-making and engagement, both internally and externally, are guided by human rights standards. In accordance with the UNGPs, we employ a risk-based approach that incorporates current legislation and builds upon existing internal processes.

Our comprehensive risk management system facilitates a thorough risk analysis at least annually. This analysis illuminates human rights risks throughout our entire value chain, enabling us to identify and prioritize actual and potential human rights impacts based on the UNGPs and other material considerations. When required, we conduct supplementary in-depth risk analyses for specific identified risk areas, ensuring a robust and proactive approach to human rights management across our operations.

To improve human rights on a local level the first step is to raise awareness and adapt this to local situations. We are aware that hubergroup is operating in different societies, cultures and governmental systems. The following human rights are priorities and we will increase our activities over the next years to raise awareness about human rights.

3. Human rights priorities and obligations

3.1 Covered rights and obligations

This Policy addresses corporate and individual decisions and actions which may directly or indirectly affect internationally recognized human rights. We have identified priority risk areas that are relevant across hubergroup operations, products and services, and business relationships. Said identified risk areas are based on internationally recognized human rights and reflect relevant human rights topics considering our corporate values and the result of diligent risk analyses that are subject to regular evaluation and updates, whenever necessary.

Our commitment to respect human rights encompasses rightsholders along the entire value chain, including:

- Our own employees
- Our suppliers' employees (direct and indirect suppliers)
- Our customers and consumers
- Local communities in the neighborhood of our locations
- Other potentially affected stakeholders

The human rights issues relevant to our business partners are specified in our Supplier Code of Conduct (Code). The Code is based on this Policy and the hubergroup Code of Conduct, we expect our business partners to adhere to the principles set forth in the Code and to address these principles further up and down the supply chain.

The following human rights issues capture our identified human rights priorities:

- Child Labor
- Forced Labor
- Health & Safety
- Freedom of Association
- Working Time, Wages & Benefits
- Discrimination & Harassment
- Inclusion & Diversity
- Environment

3.2 Child labor

We prohibit the use of child labor, as defined in the [ILO Conventions No. 138](#) (Minimum Age Convention) and [No. 182](#) (Worst Forms of Child Labor Convention). Children must not be hindered in their development. In the hubergroup the global minimum age for apprentice is 16 years, local laws can set a higher bar for the allowed age of workers. If young workers are employed they must not do work that is mentally, physically, socially or morally hazardous or interferes with their schooling. Their health and safety must be protected by appropriate measures.

3.3 Forced labor

We prohibit the use of any form of modern slavery, servitude and forced or compulsory labor, including bonded labor, indentured or involuntary prison labor and any form of human trafficking. As being committed to the [ILO Conventions No. 29](#) (Forced Labor Convention) and [No. 105](#) (Abolition of Forced Labor Convention), the [Protocol of 2014 to Convention No. 29](#), we commit to identifying and addressing any form of modern slavery in our operations and in our value chains.

3.4 Freedom of association

We respect the rights and freedom of employees to join organizations of their choosing. These organizations may engage in collective bargaining according to applicable legal regulations. We commit to the principles set forth in the [ILO Conventions No. 87](#) (Freedom of Association and Protection of the Right to Organize Convention) and [No. 98](#) (Right to Organise and Collective Bargaining Convention).

At all hubergroup sites worldwide, employees have the right to elect their own representatives according to local laws and regulations and we are committed to constructive and open dialogue with our employees and their representatives, as well as to the involvement of work councils and trade unions according to local laws and regulations. Employees who act as representatives shall be neither disadvantaged nor favored in any way.

3.5 Working time, wages & benefits

With our compensation, benefits, and working conditions, we aim to provide an adequate standard of living for our employees and their families.

We support and respect the right to rest and leisure of our employees in balancing their work and private lives, including applicable leave and flexible working conditions if possible. We compensate employees on both permanent and temporary employment contracts, at least the statutory minimum wage in the respective countries. We have started a process to assess and implement a living wage based on local conditions. We commit to the principle of equal remuneration for equal work as defined in the [ILO Convention No. 100](#) (Equal Remuneration Convention). We are committed to full compliance with applicable national or local wage, working time, overtime, and benefits laws and regulations.

3.6 Discrimination and harassment

Fair and equitable treatment is a fundamental principle at hubergroup. We foster a work environment where each of us can perform best, innovate, and develop.

We are fully committed to fair and respectful treatment in our own operations, value chain and local communities and commit to the [ILO Convention No. 111](#) (Discrimination Convention). Our commitment is defined by the following expectations:

- Everyone will be treated fairly and not discriminated against.
- No one will be subjected to any harassment or other unprofessional and disrespectful behavior.
- Everyone is free to share their concerns in good faith, without fear of retaliation.
- We offer a whistleblower system which offers different channels from direct to anonymous ways to raise concerns and report possible violations

No person is to be unfairly disadvantaged, favored or prejudiced because of protected characteristics such as age, disability, ethnic origin, family status, gender, gender expression, gender identity, involvement in an employee representative body, national origin, physical characteristics, pregnancy, religion, sexual orientation, skin color, social origin, union membership, volunteering, or any unlawful criterion under applicable law.

3.7 Inclusion and diversity

We are committed to fostering, cultivating, and preserving a culture of inclusion and diversity where each of us can bring our whole selves to work. We embrace and encourage our employees' unique identities and believe that our talent is one of our most valuable assets.

The collective sum of individual differences, life experiences, knowledge, innovation, self-expression, unique capabilities, and time that our employees invest in their work represents a significant part of, not only our culture and reputation, but hubergroup's achievement as well.

3.8 Health and safety

We are committed to fostering a healthy and safe working environment. In our SHE – Policy (Safety, Health and Environment Policy) we set our objectives for a safe and healthy environment for our employees, contractors, and other third parties working on the premises and the local communities. Our Health & Safety objectives for all hubergroup locations access to safe drinking water, sanitation, hygiene at the workplace, as well as access to programs on physical and mental wellbeing.

We ensure the health of our employees by implementing the appropriate health and safety measures.

These include implementing a company health and safety management system based on ISO 45001 that adequately covers the following aspects:

- Compliance with applicable local laws and compliance with international health and safety standards.
- Appropriate workplace design, safety regulations and free provision of appropriate personal protective equipment.
- Implementation of preventive controls, emergency measures, an accident reporting system and other appropriate measures for continuous improvement.

A consistent occupational safety system relies on the active cooperation of all employees, which is why we raise awareness through regular training and ask our employees to consistently report any occupational safety violations and make suggestions for improvement. The hubergroup protects and promotes good health and well-being, prevents risks of accidents and offers a wide-ranging support to preserve and to promote our physical and mental well-being.

3.9 Environment

We recognize our responsibility to respect the environment and are aware of the potential impact of our products, production and procurement activities on the environment and their associated impact on humans. We have processes in place to monitor, control and document the achievement of objectives to continuously reduce our potential impact on the environment. We commit to the [Stockholm Convention on Persistent Organic Pollutants \(POPs\)](#).

We are actively committed to environmental protection measures. These include reducing waste, using environmentally friendly materials and contributing to the circular economy. The hubergroup not only commits to full compliance with EU or other National regulations like REACH, TSCA, CLP, and GHS but also adheres to stricter industry standards such as the EuPIA Exclusion Policy. The locally required frameworks form the basis for our work. At hubergroup we ensure the active review of our environmental management system and have implemented the ISO 14001 certification for sustainable environmental management and the ISO 50001 certifications for sustainable energy management at our production locations in the next 5 years.

The Safety, Health and Environmental guideline of the hubergroup sets out the principles of environmental protection and reproduces these in detail.

4. Local communities and vulnerable groups

4.1 Local communities

We continuously strive to monitor and address the impacts of our production processes on the neighbors and local communities of our production sites. We strive to create positive impacts through local engagement and investment in science and education, health, social needs, and community projects.

4.2 Vulnerable groups

Consistent with international human rights standards, we are constantly alert to the specific needs of disadvantaged or vulnerable groups across our value chain, from indigenous peoples to individuals and groups who might benefit from hubergroup innovations.

5. Consequences of non-compliance

This Human Rights Policy brings together the applicable statutory and internal company regulations. The obligation to comply with the herein-outlined principles arises either directly from the relevant laws and internal company regulations, such as guidelines and process instructions, or as a collateral duty under the employee's contract of employment. Violations of these principles do harm to both the hubergroup and the employee and can result in sanctions under both criminal and labor law.

6. Whistleblowing

As the present Human Rights Policy cannot comprehensively cover the entire range of compliance-related topics, every employee is called upon to contact their line manager or a Compliance Officer if they are in doubt or have a question. All enquiries will be treated in strict confidence.

In order to comply with our voluntary commitment to ethical conduct and to continue to be seen as an honest and trustworthy partner in the marketplace, we appeal to any employee who discovers a potential violation of the rules set out in this Human Rights Policy to contact a Compliance Officer in strict confidence.

hubergroup offers the following whistleblowing channels:

- **Telephone**

Accessibility of compliance personnel during the respective regional office hours.

- **Fax**

Fax number for the central compliance office in Munich: +49 89 41 20 71 75

- **Face to face/physically**

These are the compliance officers of the respective hubergroup group companies (refer to the list of local compliance officers being attached to the CoC).

- **E-Mail**

This circle of recipients embraces again the compliance officers of the hubergroup (refer to the list of local compliance officers being attached). This ensures that in the absence of a regional compliance officer no processing delays occur.

- **Mail**

Strict confidentiality is guaranteed while handling the messages in the mail in- box.

Any employee who, in good faith, requests advice or gives information about wrongdoing is, in doing so, performing their duty under the present Human Rights Policy. The hubergroup gives assurance that any employee who requests advice or gives information will not suffer any disadvantage of any kind. Nonetheless, we advise of the possibility of making an anonymous report to the Compliance department.

The hubergroup will follow up any information given and will, where necessary, instigate appropriate action. All documents will be kept confidential to the extent permitted by the law. hubergroup already complies with the preconditions for the operational implementation of the EU-Whistleblowing Guideline EU 2019/1937 going life on December, 17th, 2021.

7. Compliance implementation and oversight

The hubergroup globally and actively encourages the dissemination and communication of this Human Rights Policy to employees and external stakeholders and takes steps to ensure its effective implementation. A training program will have regular training offered to all employees

Compliance with the relevant laws as well as with this policy must be regularly monitored at all hubergroup companies.

The hubergroup's compliance program is managed by the compliance organization at the level of MHM Holding GmbH and is supported by the Regional Compliance Officers and the Compliance Officers of the subsidiaries.

7.1 Revision

This Human Rights Policy is regularly evaluated, at least every 5 years, to check it still reflects the current reality of hubergroup.

8. Contact

Our Compliance Officers of the national subsidiaries or the Regional Compliance Officers as well as the Chief Compliance Officer and the Group Compliance Officer are at your service as points of contact. The actual contacts are to be found on the hubergroup intranet.

Information or complaints can be sent also anonymously to the compliance department at the following address:

MHM Holding GmbH
Compliance Department
Sonnenallee 1
85551 Kirchheim-Heimstetten, Germany
E-Mail: compliance@hubergroup.com
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