



Policy Statement on Respect for Human Rights and the Environment

BORBET is committed to respecting human rights, the environment and to being responsible for its supply chain. We respect internationally recognised human rights and take care to prevent human rights and environmental violations and to raise human rights and environmental awareness. We expect the same from our business partners and all other interested parties.

Standards and guidelines

In accordance with the United Nations Guiding Principles on Business and Human Rights (UNGP), we are committed to the principles of the following internationally recognised human rights standards and guidelines:

- The Universal Declaration of Human Rights of the United Nations (UN)
- The Conventions and Recommendations of the International Labour Organisations (ILO) on Labour and Social Standards
- Guidelines of the Organisation for Economic Co-operation and Development (OECD) for Multinational Enterprises
- UN International Covenant on Political and Civil Rights
- United Nations International Covenant on Economic, Social and Cultural Rights
- Principles of the United Nations Global Compact (UNGC)
- UN Conventions on the Rights of the Child
- UN Convention on the Elimination of All Forms of Discrimination against Women
- Charter of Fundamental Rights of the European Union
- Charter of Diversity
- European Convention for the Protection of Human Rights and Fundamental Freedoms

We also want our actions to support the United Nations' 2030 Agenda for Sustainable Development and contribute to the achievement of the Sustainable Development Goals (SDGs).

In addition to these standards, the BORBET guidelines form the basis for our actions and business activities:

- Code of Conduct for employees
- Code of Conduct for Suppliers
- Occupational safety and environmental protection guideline
- Anti-corruption guideline
- Antitrust Policy

Structure and responsibilities

At the highest management level, our Executive Board is responsible for respecting human rights and the environment in our business activities as well as in the upstream and downstream supply and value chains. Several specialised departments are involved in the operational implementation of human rights and environmental due diligence processes, providing human resources to ensure due diligence and reporting on their findings on a regular and ad hoc basis.

Our approach to human rights and environmental due diligence

Risks have always been identified, analysed and assessed in BORBET's integrated management system. Based on this, we derive measures to prevent, minimise or eliminate environmental and human rights risks. Effectiveness reviews are conducted regularly to continuously improve our processes.



BORBET is committed to respecting human rights and promoting fair working conditions - this applies in particular to our dealings with our own employees and direct suppliers. Within the scope of our possibilities, we are committed to implementing these principles with indirect suppliers and other business partners as well.

We expect all interested parties to comply with applicable laws and human rights conventions and to avoid negative impacts. Violations will not be tolerated and will be consistently pursued.

Risk analysis

An essential component of our due diligence is knowledge of potential and actual adverse human rights risks and impacts of our business activities on people along the entire value chain. With the help of our established analysis tool, we identify and prioritise relevant human rights and environmental risk areas. The company-wide risk and supplier management system is being expanded to include human rights and environmental due diligence. If a risk emerges, we conduct a concrete risk assessment in which we examine how likely a human rights violation is to occur, how well we are prepared for it and how severe the impact on people would be. In addition, we continuously look at the human rights situation in the regions of our raw material supply sources based on publications by human rights organisations and institutes. Our risk analyses form the basis for deriving appropriate corrective measures to be implemented in a timely manner. The results of the analysis of human rights and environmental risks have a direct impact on our purchasing process and supplier selection.

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Prevention measures

Our goal is to work together with the actors in the value chain, through various measures and processes, to prevent potentially adverse impacts and to promote sustainable positive development through joint approaches. These measures and processes include, among others:

- Aufbau langfristiger Lieferantenpartnerschaften
- Continuous development of our sustainable sourcing and procurement practices
- Minimum requirements for our value chain
- ORBET Code of Conduct (CoC) for suppliers: Compliance with this must be confirmed with a signature
- Certified standards and management systems at our suppliers' locations (ISO 9001, ISO 14001, EMAS, ISO 45001, ASI, etc.)
- Conduct training on environmental and human rights issues
- Risk-based verification of compliance with the CoC through audits

Complaints mechanism

We offer every person the opportunity to report violations or infringements of human rights or other concerns to us. In doing so, the whistleblower can decide for themselves which medium they feel most comfortable using.

For example, reports can be sent to the compliance officers via a hotline, an online form, by email or post. This is also possible anonymously. Further information on this can be found on our homepage



(www.borbet.de). All reports are treated confidentially and processed by the Compliance Officers in accordance with the deadlines. Confidentiality and the protection of whistleblowers are our top priorities. We ensure, as far as possible and within our sphere of influence, that whistleblowers are protected from disadvantage and punishment in connection with the information and complaints they submit. We have defined, documented and communicated processes for the whistleblowing system. The corresponding policy is accessible to all employees on our intranet. The effectiveness of our complaints procedure is reviewed regularly, at least once a year, and on an ad hoc basis. In addition, dealing with complaints and the knowledge gained from them enables us to continuously improve our human rights due diligence processes. Each individual can contribute to BORBET's ability to identify misconduct or violations at an early stage and to prevent further potential human rights violations through the measures and consequences derived from them.

Further development and reporting

Respecting human rights and considering risks and potentially negative impacts is a continuous process that makes an important contribution to achieving the Sustainable Development Goals. We provide information on implementation and developments annually as part of our sustainability reporting.


Hallenberg-Hesborn, May 2024

BORBET GmbH