



Human Rights Commitment Statement

Status 01.01.2025

Preface Management



The bilstein group (consisting of Ferdinand Bilstein GmbH + Co. KG and Bilstein Handels GmbH + Co. KG with its affiliated companies worldwide, hereinafter also referred to as “we”) is aware of its responsibility to respect human rights in all areas of its business activities. Our companies are committed to respecting and promoting human rights – both in our own business operations and along our global supply chains. Through transparency, responsibility and respect, we strive to create an environment in which the dignity and rights of all people are honoured and promoted – in Germany, in Europe and around the world.

We are convinced that long-term economic success is only possible through sustainable and responsible behaviour. Our principles are based on international standards and norms that ensure respect for human rights. We are actively committed to recognising human rights risks at an early stage, preventing them and remedying them where necessary.

The bilstein group expects all employees, business partners and especially our suppliers to commit to

the same ethical principles. Only through close and responsible cooperation we can guarantee sustainable, human rights-orientated business practices.

This human rights commitment statement provides a binding framework that clearly defines the responsibility and handling of human rights issues within the bilstein group and along our supply chains. We consider the implementation of this statement to be essential for respectful and successful cooperation and as the basis for our responsibility towards the people who work in and around our company.

A handwritten signature in black ink, reading 'Karsten Schüßler-Bilstein'.

Karsten Schüßler-Bilstein
Management

A handwritten signature in black ink, reading 'Jan Siekermann'.

Jan Siekermann
Management



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Our Commitment to Human Rights and Corporate Responsibility

We are explicitly committed to respecting internationally recognised human rights and are committed to implement human rights and environmental due diligence obligations both in our own business operations and along our global supply chains. We take responsibility for the impact of our business activities and are committed to recognising human rights and environmental risks at an early stage, preventing them and remedying them effectively.

Our actions are guided by the internationally recognised United Nations Guiding Principles on Business and Human Rights. These Guiding Principles form the basis of our commitment to fulfil our human rights due diligence obligations and to ensure that human rights are respected both in our own business processes and by our business partners.

Our human rights obligations are based on the following international frame of reference:

- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights

- International Covenant on Economic, Social and Cultural Rights
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights
- Core labour standards of the International Labour Organization (ILO):
 - a) freedom of association and the effective recognition of the right to collective bargaining;
 - b) the elimination of all forms of forced or compulsory labour;
 - c) the effective abolition of child labour;
 - d) the elimination of discrimination in employment and occupation;
 - e) a safe and healthy working environment.
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Companies

We are guided by these standards when designing our processes, internal guidelines and measures for human rights due diligence.



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Expectations of Employees and Business Partners

We expect our employees to respect the dignity and rights of people in the course of their work and to live these principles in their daily actions. Our Code of Conduct forms a binding framework for all employees.



Code of Conduct



Our business partners are obliged to comply with the human rights and environmental standards we have defined. We require a corresponding commitment to

responsibility from all business partners. The Code of Conduct for Business Partners forms the basis for these requirements and is anchored in the contracts with our business partners.



Supplier Code of Conduct



We regularly review the performance of our business partners and, if necessary, implement appropriate measures to ensure that our high standards are met.

Implementation of Human Rights Due Diligence Obligations

We realise our human rights and environmental due diligence obligations in accordance with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. In doing so, we pursue a risk-based approach that aims to recognise, avoid and mitigate potential negative impacts of our business activities, our supply chains and other business relationships at an early stage.

Our approach is based on the OECD recommendations for responsible corporate governance ("Responsible Business Conduct") and includes, among other things,

systematic risk analyses, the involvement of relevant stakeholders, the implementation of preventive and remedial measures and the continuous review of the effectiveness of these measures.

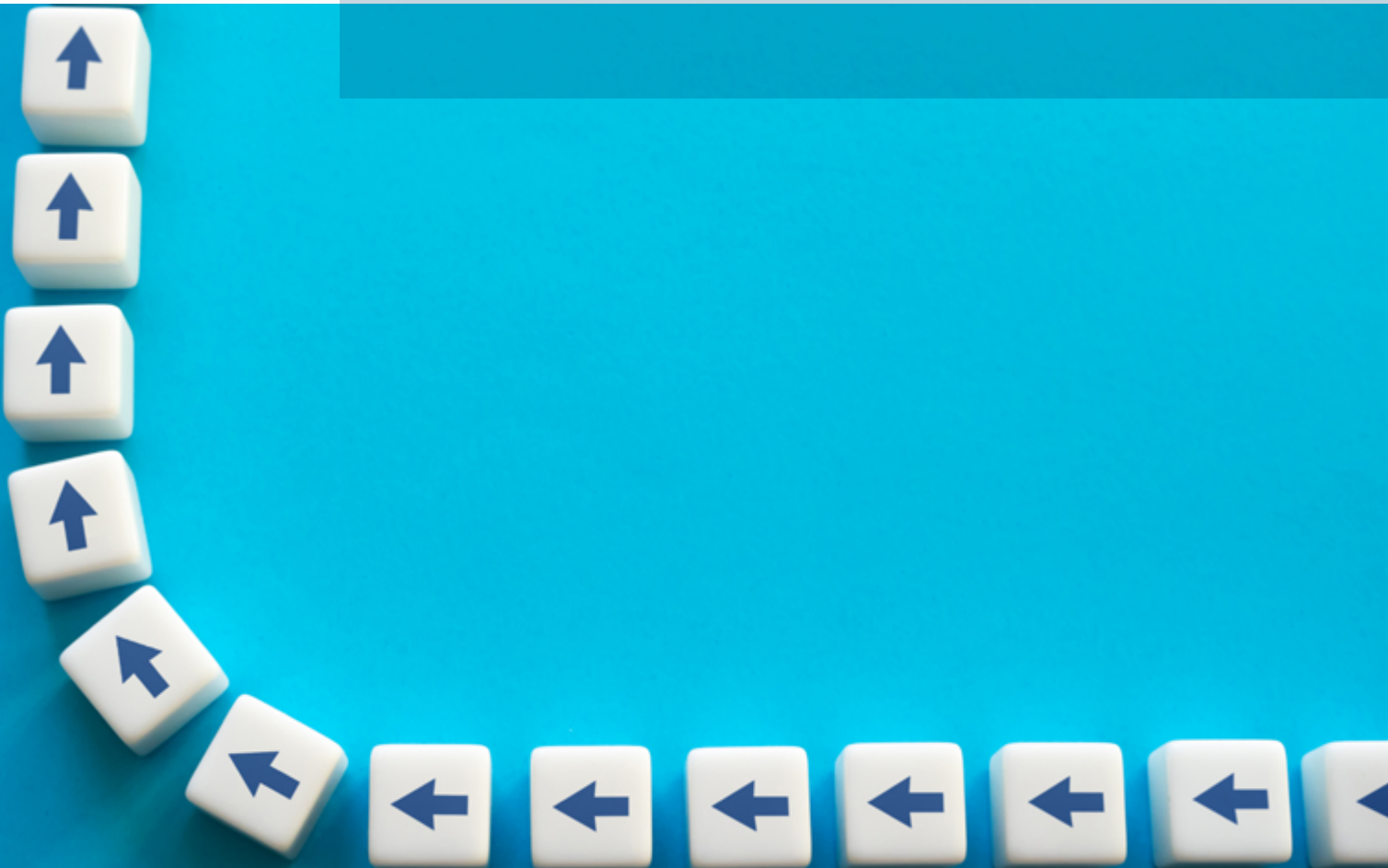


Risk Analyses

Our risk management system includes regular risk analyses that identify potential human rights and environmental risks in our own business area and along the supply chain. These analyses are carried out on the basis of internal and external information, including the results of audits, feedback from our complaints system and our stakeholders. Country and industry-specific risk factors are included in the risk assessment. Particular attention is paid to high-risk raw materials and production processes as well as critical regions.

The results are incorporated into specific action plans, the implementation and effectiveness of which are continuously monitored.

Risk analyses are carried out annually and on an ad hoc basis.





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Stakeholder

The following stakeholder groups are at the centre of our human rights responsibility:

- our employees at national and international locations,
- employees in our supply chains and
- other rights holders such as local communities.

We are aware that there are particularly vulnerable and marginalised people within these groups who are exposed to a higher risk of discrimination and human rights

violations due to social or structural disadvantages. The protection of these groups is of particular importance to us.

A continuous and open dialogue with stakeholders is therefore a central component of our due diligence obligations.

Prevention and Continuous Improvement

To ensure a unifying minimum standard, the key human rights and environmental principles are set out in the following documents:

- The Code of Conduct obliges all employees to strictly comply with the relevant laws as well as the internal rules and principles for respecting human rights. This code ensures that all employees respect human rights in their daily work and actively integrate them into their activities.



Code of Conduct



- The Code of Conduct for Business Partners obliges our suppliers and business partners to comply with human rights and environmental principles, to implement appropriate due diligence processes and to pass on this expectation to their own suppliers and partners. We ensure that this commitment is passed on throughout the entire supply chain in order to promote holistic responsibility.



Supplier Code of Conduct



We implement targeted preventive measures to fulfil our human rights and environmental due diligence obligations. These include, among other things:

- internal guidelines on energy efficiency, environmental management, occupational health and safety,
- an established grievance mechanism,
- anchoring our values in a responsible corporate philosophy,
- targeted training for our employees,
- supplier assessments and audits of identified high-risk suppliers,
- contractual regulations with business partners on compliance with human rights standards and
- supporting measures and offers of cooperation for our suppliers to further develop their due diligence obligations.





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Remedy for Human Rights Violations

If, despite all precautions, human rights violations occur, we take appropriate measures to remedy the situation and make amends. We ensure that misconduct is clarified, appropriate consequences are drawn and processes are adapted.

Whenever we learn of actual human rights violations at our direct suppliers, we expect and demand that they immediately put an end to them and take measures to

prevent further violations. If necessary, we offer our suppliers support to implement the necessary improvements and fulfil the requirements with regard to human rights and working conditions.

Should a continued breach of our standards persist despite these efforts, we reserve the right to terminate the business relationship with the supplier concerned as a last resort.

Grievance Mechanism



Advo Whistle



We provide a transparent and accessible group-wide grievance mechanism (iWhistle) through which both internal and external persons can submit reports of human rights risks or violations - anonymously, confidentially and in various languages. Every report is carefully checked and processed.

In addition, our employees of course have the opportunity to address concerns or complaints to the works council, their superior and the management.

Responsibilities

The responsibility for respecting human rights in its own business area and along the supply chain lies with the management of the bilstein group.

Specifically designated departments are responsible for operational implementation. The control and further development of human rights risk management is carried out in close coordination with the relevant departments. Appropriate responsibilities have been defined internally for monitoring risk management.

Review

This policy statement is reviewed annually and as required and updated as necessary to ensure that it complies with current legal requirements and international standards.

Changes are communicated transparently both internally and externally.

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