



Declaration of principle on respect for human rights

Preamble

The BPW Group is aware of its social responsibility to protect human rights and the environment along the supply chain. Fairness and social responsibility are an integral part of the corporate identity and are anchored in the Group's Code of Conduct.

BPW Bergische Achsen Kommanditgesellschaft, as the parent company and company with personal liability of the managing partners, focuses its business activities on sustainability and the development of partnership-based relationships with suppliers, customers, employees and other interest groups. This is accompanied by a voluntary commitment to responsible, ethical and lawful conduct in accordance with the ten principles of the UN Global Compact.

Compliance with the ILO core labor standards, the Minamata, Basel and POP Conventions and the UN Human Rights Charter form the cornerstones of BPW's actions. In the context of its own business activities, the BPW Group sees its responsibility to respect the rights of others and to prevent, avoid and end negative impacts on human rights. The BPW Group thus complies with the legal requirements of the Supply Chain Due Diligence Act (LkSG).

The BPW Group expects its employees and suppliers to behave in accordance with these international standards and principles of conduct.

Approach and responsibility

For the BPW Group, respect for human rights is a continuous process and a cross-functional task that evolves in line with changing external and internal conditions. For this reason, the BPW Group has integrated its due diligence obligations into the main business processes and the risk management system.

The management of BPW Bergische Achsen Kommanditgesellschaft is responsible for respecting human rights in its own business operations and along the supply chain. The management has appointed a human rights officer in order to continuously comply with the due diligence obligations as part of the risk management system. At least once a year and whenever circumstances require, the Management Board obtains information from the Human Rights Officer on the implementation of the due diligence obligations.

Risk analysis and priority risks

The risk analysis covers all legal positions specified in the LkSG and is carried out annually and on an ad hoc basis. All company-related business areas and direct suppliers of the BPW Group are considered. The risk analysis is the responsibility of BPW Bergische Achsen Kommanditgesellschaft and is carried out in cooperation with the companies of the BPW Group. If there is substantiated knowledge of a violation of human rights or environmental due diligence obligations by indirect suppliers, an event-driven risk analysis is carried out.



The aim of the risk analysis is to determine and assess the actual and potential impact of the BPW Group's business activities on the human rights and environmental legal positions of the LkSG.

The risk analysis begins with an abstract index-based analysis, taking into account specific country, product and industry risks. Suppliers identified as having an increased risk disposition are examined in greater depth in a concrete risk analysis. The specific risk assessment is carried out using evidence and individual questionnaires. In the BPW Group division, a specific risk assessment is always carried out.

At the end of the risk analysis, the specific priority risks in the company's own business area and at direct suppliers are determined. Based on the prioritization, it is possible to focus on relevant topics in the further due diligence process and develop appropriate preventive and remedial measures.

Based on the current risk analysis, the key issues for the BPW Group's own business area are unequal treatment of employees and harmful soil, water and air pollution. For the direct supply chain, forced labor, slavery, occupational health and safety and harmful soil, water and air pollution have been identified as key issues.

Remedial and preventive measures

Based on the specific risks, the BPW Group takes preventive measures. The approach is risk-based, i.e. areas in which the highest human and environmental risks have been identified are prioritized. To ensure a uniform approach, a catalog of measures has been developed that includes the following points, among others:

- Publication of this declaration of principles on respect for human rights
- Implementation of the internal BPW Code of Conduct
- Further training and awareness-raising for employees and suppliers
- Code of conduct for suppliers
- Considering human rights and environmental requirements when selecting suppliers
- Certifications according to recognized standards
- Contractual control mechanisms

The aim of the preventive measures is to minimize risks arising from our own business activities in order to prevent violations of human rights or environmental due diligence obligations.

If a breach of human rights or environmental due diligence obligations by the business activities of the BPW Group is identified or is imminent, BPW Bergische Achsen Kommanditgesellschaft will take appropriate remedial action immediately. The aim of the remedial measures is to end the breach of duty or, if this is not directly possible, to minimize the effects of the breach of duty. The remedial measures are developed individually, with the catalog of measures providing guidance.

The BPW Group takes a holistic approach when taking remedial and preventive measures. The scope of the measures depends on the ability to influence, the (potential) contribution to causation and the severity and extent. The BPW Group endeavors to take the interests of (potentially) affected parties into account when developing measures. Close cooperation with suppliers is particularly important here.



Complaints procedure

An appropriate and effective complaints procedure is an important component of the BPW Group's due diligence process. It enables employees and persons outside the company to report human rights and environmental risks and violations of duty. The complaints procedure helps to identify potentially adverse human rights and environmental impacts at an early stage and to take appropriate and effective action.

In addition to the telephone and electronic mail channels, the anonymized whistleblower system [Trusty](#) is also available as a complaints mechanism. The digital whistleblowing system is available in 14 languages.

All reported information and well-founded suspicions of possible human rights violations are treated in strict confidence and in accordance with the publicly accessible [rules of procedure](#).

Effectiveness monitoring and reporting

The effectiveness of the risk management system, including risk analysis, preventative and remedial measures and the complaint procedure, is reviewed annually and on an ad hoc basis. Based on the results of the effectiveness review, due diligence processes and the declaration of principles are adapted where necessary.

In the sustainability report, the corporate group provides information on its human rights and environmental activities. In addition, BPW Bergische Achsen Kommanditgesellschaft will submit an annual report to the Federal Office of Economics and Export Control on the fulfillment of human rights and environmental due diligence obligations in the past financial year. The report is published four months after the end of the financial year and for the first time in 2025 for the 2024 financial year. The report is based on the documentation in the due diligence process, which is kept for seven years. The report will also be available on the website for seven years from the date of publication.

Wiehl, 09.09.2024

**BPW Bergische Achsen
Kommanditgesellschaft**

A handwritten signature in blue ink, appearing to read 'A. Kotz', is positioned above the printed name.

Achim Kotz

Managing partner with personal liability