

Declaration of Principles on Respect for
Human Rights SÜDZUCKER GROUP



Declaration of Principles on Respect for Human Rights

We, as Südzucker Group¹, are aware of our corporate responsibility and are committed to respecting human rights. This includes the prevention, minimization and elimination of human rights risks and risks to the environment as defined by the German Supply Chain Due Diligence Act (LkSG), as well as the redress of violations. We want to implement this claim through suitable structures in our own business area and in our global supply and value chain.

The scope of our corporate duty of care in accordance with the LkSG extends to Südzucker Group's own business operations, including all group companies over which we have a decisive influence, as well as to our employees and business partners along our global supply and value chain.

We base our corporate actions and our human rights due diligence processes on the following internationally recognized standards and comply with all relevant national and international laws, regulations and provisions:

- i. Universal Declaration of Human Rights
- ii. UN Guiding Principles on Business and Human Rights
- iii. Core Labor Standards of the International Labor Organization (ILO)
- iv. OECD Guidelines for Multinational Enterprises
- v. Ten principles of the UN Global Compact (UNGC)
- vi. Regulations of the Supplier Ethical Data Exchange (SEDEX)

We expect our employees and managers to commit to respecting human rights to the same extent. This expectation also applies to our business partners, from whom we expect the implementation of due diligence obligations by means of suitable due diligence processes. Furthermore, our business partners should also pass on this expectation to their own suppliers and business partners.

¹ The "Südzucker Group" refers to Südzucker AG and all companies in which Südzucker AG directly or indirectly holds a majority interest. The statement of principles is adopted by Südzucker AG as the parent company for its controlled companies. The exception is AGRANA Beteiligungs-AG and its subsidiaries in which it holds a direct or indirect majority shareholding (AGRANA Group). AGRANA Group has published its own declaration of principles, which can be viewed at the website of AGRANA Group.

The following human rights-related principles are anchored in both our Code of Conduct and our Supplier Code of Conduct:

- Occupational health and safety
- Diversity, equal opportunities and protection against discrimination
- Fair remuneration
- Prohibition of child labor
- Prohibition of forced labor
- Freedom of association and the right to collective bargaining
- Appropriate deployment of security forces
- Protection of natural resources and the environment

In our efforts to respect human rights, we at Südzucker Group focus in particular on the following groups of people: Our own employees at national and international locations, including our trainees, employees of service providers and workers in our direct and indirect value chain, especially in the production and processing of raw materials. We also take the following vulnerable groups of people into account: Workers in our downstream value chain (customers) and people without union representation or with an indirect link to the value chain, such as members of local communities. All of these groups of people could potentially face risks to their human rights.

Within our due diligence processes, we have also identified groups of people who are potentially exposed to particularly high risks. By this we mean groups of people who are socially marginalized or less heard. The protection of vulnerable groups is a particularly high priority within our due diligence obligations.

Respect for the applicable regulations on the protection of human rights is an integral part of our corporate responsibility. All employees commit to respecting the dignity and personal rights of every colleague as well as third parties with whom the company has a business relationship. As Südzucker Group, we only want to work with business partners who share our principles and efforts to prevent human rights violations. If negative human rights impacts are identified within our own business processes or with our business partners, Südzucker Group will ensure that these impacts are remedied appropriate.

Implementation of the due diligence obligations

Business model

Our business model is based on the use of plants and other agricultural raw materials to develop, produce and market high-quality food, food ingredients, animal feed, ethanol and other products. Various sources, processes and technologies are used for the procurement and processing of plant-based raw materials, which are continuously being developed with a focus on sustainability and efficiency. Our product portfolio includes sugar, sugar specialties and glucose syrups, functional ingredients, frozen and chilled pizza, portion packs, ethanol, animal feed, starch, fruit preparations and fruit juice concentrates.

Südzucker Group operates worldwide through its special products, starch and fruit segments. The business activities of the sugar and CropEnergies segments are mainly focused on Europe. Our raw material and sales markets are connected worldwide. Our business model aims to act sustainably, conserve resources in production by using low-emission and energy-efficient technologies and utilize agricultural raw materials as fully as possible.

Many of our production sites are located in rural regions where agriculture plays a central role. We see compliance with legal regulations, human rights and working conditions as well as the promotion of healthy and safe nutrition as key pillars of our business. Our employees bring a diversity of experience, skills, knowledge, personalities and cultures and make a significant contribution to the success of our company.

Responsibilities and risk management

The overall responsibility for our corporate due diligence obligations lies with Südzucker Group's Executive Board. The Executive Board has established the Group Human Rights Committee, which supports it and the Group companies in an advisory and coordinating role in fulfilling due diligence obligations.

The tasks of the Group Human Rights Committee include, among others, monitoring risk management with regard to human rights, evaluating regular risk analyses, as well as further developing risk management by reviewing violations and deriving suitable measures. The Group Human Rights Committee consists of the management functions of Corporate Human Resources, Corporate Sustainability, Corporate Procurement and the Chief Compliance Officer Südzucker Group. It is chaired by the Corporate Human Rights Team Lead of the Südzucker Group.

Risk management in our own business area and in the supply chains

To implement our human rights due diligence obligations, we have developed a group-wide approach to identify and avoid corresponding risks in our own business area and at our direct suppliers. As Südzucker Group, we want to prevent risks, minimize them and take appropriate remedial action in the event of violations.

We rely on a systematic, integrated and risk-based approach to fulfill our responsibility to respect human rights. We use established management processes to identify and assess potential risks or violations in order to continue to identify and take action against them. This includes an annual Group-wide risk analysis, the derivation of measures, the monitoring of the implemented processes and the further development of the measures. In doing so, we incorporate findings from various sources and exchange formats and consider industry-specific human rights and environmental risks, among other things, in order to ensure compliance with and promotion of human rights in all areas of our business activities.

The results of our risk analyses are an important building block for determining appropriate measures. These are carried out regularly within Südzucker Group, once a year or as required, and cover both our own business operations and our supply chains. The identification of potential risks is based, among other things, on the analysis and evaluation of selected and internationally recognized country- and industry-specific indices. The implementation and results of the risk analyses are evaluated and monitored by the Group Human Rights Committee. The findings are used, among other things, to further adapt and create guidelines, processes and trainings.

Measures to implement our due diligence obligations with regard to the risks identified in the risk analyses are intended to ensure that potentially affected groups of people are protected and risks are minimized. To this end, we have established processes that focus primarily on open communication (whistleblower system) and exchange (e.g. in industry initiatives or networks).

An appropriate whistleblower system within the meaning of the German Act for Better Protection of Whistleblowers (HinSchG) and LkSG is an important part of our risk management and helps us to take effective remedial action and improve our processes through the knowledge gained. All reports are received centrally by the Chief Compliance Officer of Südzucker Group. For reports that fall within the area of responsibility of the human rights officer, which in the case of Südzucker Group is represented as the Group Human Rights Committee, Südzucker Group's Chief Compliance Officer contacts the committee and submits the matter to it for further review. Human rights-related reports are processed by the Group Human Rights Committee and, depending on the report, by other relevant persons. All persons entrusted with the processing are obliged to maintain

confidentiality when dealing with whistleblower reports. Until the matter is finally closed, there is an ongoing exchange between the Chief Compliance Officer of Südzucker Group and the committee for clarifying the facts and, if necessary, coordination regarding the measures to be taken. Südzucker Group ensures that the persons entrusted with the implementation of the whistleblower procedure act impartially. We also ensure that all whistleblowers are adequately and effectively protected from disadvantage or punishment. If a violation is reported, the whistleblower receives confirmation of receipt within seven days and feedback within three months of submitting the confirmation of receipt. The works council is informed by the management board once a year about all reports received and the resulting cases.

Further information on the whistleblower system can be found, among other places, on the Südzucker Group website: [Sustainability: Human rights | Südzucker Group](#)

Remedial measures are defined and determined specifically for each individual case with the involvement of the relevant specialist department and, on a case-by-case basis, with external experts to incorporate the perspective of the affected group. The definition includes an assessment of the extent to which we as Südzucker Group cause, contribute to or are associated with the negative impacts. If a violation of the declaration of principles is attributable to individual employees, this may result in measures under labor law. The effectiveness of the defined remedial measures is reviewed regularly and on an ad hoc basis.

Continuous further development of the implementation of our due diligence obligations

As we see our duty of care with regard to respecting human rights as an ongoing task, we regularly review our processes and measures and adapt them where necessary. Our aim is to identify, prevent, minimize or eliminate risks or violations relating to our duty of care at an early stage.

Communication and reporting

We regularly report on the current status of our human rights-related management system in accordance with the requirements. This includes risk analyses, measures to minimize risks and the evaluation of the effectiveness of risk management. We make the results publicly available.

Our identified potential key risks

As Südzucker Group, we take our human rights due diligence obligations very seriously and consider all potential risks in our management approach. As part of our risk analyses, which cover both our own business operations and our supply chains, we have identified the following human rights-related risks as priorities:

- Occupational health and safety
- Diversity, equal opportunities and protection against discrimination
- Fair remuneration
- Prohibition of child labor

Based on this risk analysis, we have developed and implemented Group-wide preventive measures to minimize risks for our own business area and along the supply chains.

Measures for prevention and risk minimization in our own business area and along the supply chain

Our managers and employees contribute significantly to the success of the company through their professional expertise, experience, social skills and commitment. We therefore attach great importance to the continuous development of our employees. The various HR policy measures are designed in such a way that they support the Group strategy and enable our employees to work successfully under changing conditions.

Südzucker Group's code of conduct is a central component of our risk minimization strategy. In the code of conduct, we commit ourselves to acting responsibly and respecting human rights both in our own business area and along our entire value chain. The Code of Conduct is a promise we make to ourselves, our colleagues and our partners to put Südzucker Group's values into practice. These values include taking responsibility for our actions, treating each other with respect, creativity as a driver of progress and working together to combine our strengths. In addition, training is offered in our own area to promote respect for human rights. This includes, for example, mandatory training to raise awareness and impart specific expertise on the implementation of our due diligence obligations.

We have also implemented measures along our supply chains to minimize the risks of human rights violations. Our Supplier Code of Conduct obliges our suppliers to recognize our ethical and legal principles and provides guidelines for sustainable procurement. Compliance with social criteria in our main agricultural supply chains is evaluated and documented as part of the RedCert2 certification process, which verifies compliance with the sustainability criteria of the Sustainable Agriculture Initiative (SAI).

When defining measures, we already take into account the review of their effectiveness and adjust them if necessary. In addition, we have developed individual measures to minimize human rights risks, examples of which are listed below.

Potential key risks and preventive measures based on the risk analysis

The human rights risks prioritized based on the risk analysis for our own business area and our supply chains, as well as the resulting preventive measures, are described below:

Occupational health and safety

Safety in the workplace is our top priority. We ensure safe and hygienic working conditions that comply with the applicable legal requirements in the area of occupational health and safety. Regular optimization programs are aimed at implementing suitable measures to reduce the risk of accidents and improve working conditions. Our aim is to reduce accidents at work and occupational illnesses as well as to prevent injuries.

All employees should be familiar with the applicable laws, regulations and internal company guidelines on occupational health and safety. For this reason, regular training courses are held on health and safety at work and in the workplace. In addition, the work organization ensures the necessary work breaks to protect the health and safety of employees.

Diversity, equal opportunities and protection against discrimination

As Südzucker Group, we are committed to diversity and tolerance. This is also reflected in the firm anchoring of Diversity & Inclusion in our Group strategy. We do not tolerate any discriminatory or harassing actions in our company, e.g. based on social or national origin, gender, ethnic origin, religion, age, illness or disability, sexual orientation, political beliefs or other personal characteristics. Everyone has the right to fair and respectful treatment.

Fair remuneration

We comply with the labor laws and international standards applicable in the respective countries. Everyone has the right to fair remuneration that enables an adequate standard of living. The remuneration paid to employees must comply with all applicable laws on wages and salaries, including provisions on minimum wages, overtime, statutory benefits, working hours and paid leave.

Prohibition of child labor

We do not accept any form of child labor and, in accordance with ILO Convention 138, comply with the labor laws applicable in the respective countries regarding the minimum age of employees. In addition, in accordance with ILO Convention 182, we prohibit the hiring of persons under the age of 18 for positions that require hazardous work. We are committed to protecting young employees in particular from performing work that is likely to jeopardize their education, health and physical, psychological, social or mental development.

Further human rights risks and preventive measures

In addition to the main risks described above, the following employment-related human rights are relevant to us as a company and are therefore also taken into account preventively in our management approach:

Prohibition of forced labor

We do not accept any form of forced or compulsory labor and implement the prohibition of modern slavery, human trafficking and all other slavery-like practices. This includes servitude or other forms of

power or oppression in the workplace, such as economic or sexual exploitation or humiliation. We comply with all applicable national and international laws, rules and regulations as well as international standards (e.g. ILO). Work should always be done on a voluntary basis and must never take place under threat or other means of pressure or cost. We also respect the right of our employees to terminate their employment relationship.

Freedom of association and the right to collective bargaining

We respect the freedom of association and thus the right of all employees to form and join local, national or international associations or organizations. We recognize the right of employees to collective bargaining and respect the rights of trade unions. Employees and their representatives must not face any personal or professional disadvantages as a result of exercising these rights. This also includes the right of all employees to take collective action (including the right to strike) in the event of conflicts of interest. The exercise of this right may only be subject to such restrictions as are provided for by law and are necessary in a democratic society in the interests of national security, public order or to protect the rights and freedoms of others. Our employees are regularly informed and consulted by the Executive Board and management, for example at work meetings and departmental meetings or through internal newsletters and the company's ideas management system.

Appropriate deployment of security forces

If we use external security personnel to protect our company processes, they must adhere to our code of conduct, just like all employees. In addition, security service providers are also obliged to comply with corresponding international guidelines and measures.

Protection of natural resources and the environment

The core of our business model is the processing of agricultural raw materials into high-quality products. In order to maintain the company's economic basis in the medium and long term, it is necessary to secure the availability of these raw materials in the long term. This is why the principle of sustainability has traditionally been an integral and practiced part of our Group strategy.

We want to align our actions along the entire value chain - from the agricultural raw material to the finished product - in all parts of the company and regions as well as at all levels in terms of sustainability. We pay particular attention to minimizing our resource requirements, including energy and emissions, water consumption and wastewater as well as waste and potential environmental impacts of our business activities.

All processes and standards must at least meet or exceed the legal requirements. Land use must be compatible with nature and the landscape and comply with the laws on nature conservation, property and land use rights.

Final provisions and contact

Liability and whistleblower system

As Südzucker Group, we consider open communication to be an essential part of our corporate culture. We expect our employees to report violations of applicable law, including human rights and environmental risks within the meaning of the LkSG, our Code of Conduct and our corporate guidelines.

If questions or concerns arise about processes that do not comply with our Code of Conduct and our due diligence obligations, these should be raised openly with superiors, the Works Council, the Corporate Human Rights Team, the Chief Compliance Officer of Südzucker Group or the local Compliance Officer. In addition, the “Compliance Line of Südzucker Group” ([Home – BKMS System](#)) is available as a confidential, optionally anonymized procedure for reporting incidents. The whistleblower system is open to our employees, temporary workers, business partners, who wish to report potential misconduct or legal violations resulting from Südzucker Group's business activities, as well as third parties.

Information can be reported via the following channels:

- **Südzucker Group reporting channel:** “Compliance Line of the Südzucker Group”, operated by an external provider, EQS Group GmbH, with the EQS Integrity Line software: <https://suedzuckergroup.integrityline.app/>. Additional compliance lines are available for individual divisions/subsidiaries. Information on this can be found in the internal whistleblower guidelines.
- **Via E-Mail:** compliance@suedzucker.de
- **Via Mail:** Südzucker Group, Chief Compliance Officer, Maximilianstr. 10, 68165 Mannheim
- **Via Compliance hotline:** +49 621 421 639
- **Verbal or written:** To the Managing Director / Plant Manager of each Südzucker Group site or the supervisor, the employee representative, the Corporate Human Rights Team or the Chief Compliance Officer or the responsible local Compliance Officer.

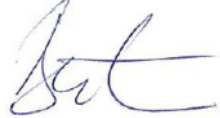
If there are any inquiries about this policy statement or the implementation of our due diligence obligations, please feel free to contact us by email (human.rights@suedzuckergroup.com). You can also find further information on our website on human rights. (<https://www.suedzuckergroup.com/de/unternehmen/nachhaltigkeit/gesellschaft/menschenrechte>)

Signatures of the board members:

Dr. Niels Pörksen



Stephan Büttner



Hans-Peter Gai



Dr. Stephan Meeder

