

Accumulatorenwerke HOPPECKE Carl Zoellner & Sohn GmbH
Bontkirchener Strasse 1
D - 59929 Brilon - Hoppecke

Policy statement on respect for human rights and the environment

As of December 2023

1. Our commitment to respect human rights and the environment

WE - Accumulatorenwerke HOPPECKE Carl Zoellner & Sohn GmbH and all the domestic and foreign companies affiliated with us under stock corporation law (hereinafter collectively referred to as "HOPPECKE") as a family-owned company with both regional roots and an international presence - are committed to respecting human rights and the environment.

As early as 1987, our corporate principles made it clear that we are responsible for the careful use of the resources entrusted to us – people, capital, time, the environment and raw materials – while taking social aspects into account and promoting environmentally friendly processes, technologies and products. The basic attitude of assuming responsibility, which has been part of our identity since the company was founded, also results in responsibility for our supply and value chains. We are therefore committed to respecting human rights and environmental concerns within our own business area and in our global supply chains and to counteracting human rights and environmental violations.

International frameworks and standards and internal guidelines

We base our actions on internationally recognised frameworks and standards for the protection of human rights and the environment. These include in particular, but are not limited to

- United Nations Universal Declaration of Human Rights
- Principles of the UN Global Compact (UNGC)
- ILO core labour standards (International Labour Organization)
- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- Charter of Fundamental Rights of the European Union
- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants (POPs Convention)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes

In addition to the aforementioned frameworks, we are committed to the Paris Climate Agreement. As part of the United Nations 2030 Agenda for Sustainable Development, we are making our contribution to achieving the Sustainable Development Goals (SDGs) mentioned therein.

As a group of companies focused on sustainable and value-based action, we also expect our employees and business partners – especially our suppliers – to comply with the principles of the aforementioned frameworks and standards as well as applicable laws.

Our employees are bound by the HOPPECKE Code of Conduct, which describes our expectations in this regard and our responsibility to society as a whole. Furthermore, our Environmental, Social and

Sustainable Corporate Governance Policy, which is binding for all HOPPECKE employees, sets out the fundamental values, principles and behaviours and makes up the foundation of our actions.

We also address our principles and requirements for cooperation to our business partners and suppliers through our Code of Conduct for Suppliers. The associated supplier declaration obliges them to comply with the defined standards and to pass them on to upstream supply chains.

2. Human rights and environmental aspects

As a globally active group of companies, we bear particular responsibility for our own business activities as well as for our supply and value chains. We respect human rights, comply with environmental regulations and work to prevent human rights and environmental violations in our own business activities and in our upstream supply chain.

We are particularly committed to the following human rights and environmental aspects, which we expect both our employees and our suppliers to take into account:

- Prohibition of child labour
- Prohibition of slavery and all forms of forced labour
- Prohibition of discrimination
- Ensuring occupational safety and health protection
- Compliance with statutory regulations and company standards on working hours, holidays and public holidays
- Fair, performance-related and living wage and pension scheme
- Safeguarding the right to form coalitions, associations and collective bargaining
- Safeguarding land rights
- Responsible use of natural resources
- Avoiding the negative impact of soil, water and air pollution and noise emissions on livelihoods
- Proper use of hazardous chemicals and appropriate storage and disposal of waste containing hazardous chemicals
- Working towards the use of energy-saving processes, the minimisation of greenhouse gas emissions and the reduction of energy consumption for our own business activities
- Development and use of environmentally friendly technologies and processes in our own business activities and by taking ecological aspects into account when selecting our suppliers

3. Implementation of human rights and environmental due diligence obligations

The individual measures for implementing human rights and environmental due diligence obligations are continuously reviewed and further developed in order to meet changing conditions and our business activity standards. The following key due diligence obligations represent the core of our human rights and environmental strategy.

Risk management

Our risk management identifies, assesses and prioritises human rights and environmental risks in our own business area as well as in our supply and value chains. The aim of risk management is to present the supply and value chains as transparently as possible in order to identify potential risks at an early stage and, where necessary, to implement suitable preventive and remedial measures.

This is preceded by the identification of all companies in the HOPPECKE Group that are relevant to risk management and all relevant direct suppliers that are to be subjected to a risk analysis. The risk analysis as part of risk management is then essentially carried out in two steps.

First of all, the country-related and sector-related risks of the relevant HOPPECKE Group companies and our direct suppliers are identified and categorised against existing master data (abstract risk analysis). Based on this, a prioritisation is carried out according to abstract risk, on the basis of which it is defined which HOPPECKE companies and suppliers need to be subjected to further concrete risk analysis. As part of the concrete risk analysis, the results of the abstract risk analysis are checked for plausibility. In addition to individual information on the HOPPECKE companies and suppliers, which is obtained through self-disclosures, the probability of occurrence and severity of breaches of due diligence obligations are also taken into account in order to identify concrete risks and determine their risk potential.

HOPPECKE uses a cloud-based software platform operated by an experienced third-party provider specialising in sustainability to carry out and document the risk analysis process. This also allows the exchange of relevant data and information with stakeholders to be organised more efficiently.

The risk analysis is repeated annually and as required. The result of the risk analysis and any necessary preventive or remedial measures are summarised, documented, monitored and used for continuous improvements in the supply chain in our newly implemented supplier management system for supplier evaluation and development and presented in the corresponding report to the Federal Office for Economic Affairs and Export Control ("BAFA") and in the update of this policy statement.

Preventive and remedial measures

The prevention of human rights violations and environmental offences is our top priority. Compliance with applicable laws and human rights and environmental due diligence obligations by our suppliers is a basic prerequisite for supplying HOPPECKE. As part of our preventive measures in 2024, we will therefore ask all relevant suppliers to submit a binding declaration of compliance with our Code of Conduct for Suppliers.

HOPPECKE has implemented the risk identification process described above as a key preventive measure. Based on the results of the risk analysis, suitable preventive and remedial measures are initiated where necessary.

This initially involves obtaining facts regarding the identified risk. In addition to collecting publicly available data or data from independent sources, the supplier or representative of the HOPPECKE company in question will be asked to comment on the identified risk. A personal consultation is then

held with the supplier or representative of the HOPPECKE company. If the risk is confirmed, measures and an appropriate deadline for their implementation are defined and documented as part of the joint consultation. In the event that a HOPPECKE company has directly caused a violation of human or environmental rights, we work quickly to stop the non-compliant business activities that caused the violation or to ensure that they henceforth comply with human rights and environmental law. If necessary, we support the implementation of the defined measures. After the deadline set for the implementation of the measures has expired, a further consultation will be held to determine the degree of implementation and the success of the measures. If necessary, additional measures are defined and scheduled. These measures are also documented and their implementation is continuously monitored. All of these measures are aimed at preventing or ending the violation of a human rights-related or environmental obligation in our own business area or at a direct supplier or minimising the extent of the violation.

If we have actual indications that there might be a violation of a human rights-related or environmental obligation by indirect suppliers, we will also initiate the described preventive and remedial measures accordingly.

In cases where the risk is not remedied within a reasonable period of time, as well as in cases of serious human rights violations and environmental offences (in particular in cases of criminal offences), we reserve the right to immediately terminate our joint business relationship with the suppliers concerned.

In order to continuously improve our processes with regard to compliance with human and environmental rights, we analyse the success of remedial measures. Particularly effective remedial measures can thus become useful preventive measures for comparable initial situations.

Through these remedial and preventive measures and our Code of Conduct for Suppliers, we also oblige our suppliers to comply with human rights and environmental due diligence obligations and to further develop their own corporate culture and supply chain accordingly.

The effectiveness of the measures described is reviewed continuously and on an *ad hoc* basis in order to continue to identify, prevent, end or minimise adverse human rights and environmental impacts.

Complaints procedure

In order to give employees, suppliers and other stakeholders the opportunity to advert to human rights and environmental risks and (possible) violations of human rights or environmental obligations or to report other violations or irregularities, HOPPECKE has set up a complaints procedure in accordance with § 8 of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG). The complaints office is located with our long-standing ombudsman Dr Carsten Thiel von Herff, LL.M. and can also be contacted anonymously if you prefer.

Contact details ombudsman:

Dr Carsten Thiel von Herff, LL.M.

Loebellstrasse 4

D - 33602 Bielefeld

Phone: +49 (0) 5 21 557 333 00 / Mobile: +49 (0) 151 582 303 21

E-mail: [ombudsman\(at\)thielvonherff.de](mailto:ombudsman(at)thielvonherff.de)

Reporting platform: www.report-tvh.com

Homepage: www.thielvonherff.de

Documentation and reporting

Transparent communication about human rights and environmental risks relevant to HOPPECKE as well as appropriate preventive and remedial measures are a key component of our sustainability strategy. In order to create the basis for an efficient communication process, we attach great importance to continuous documentation. In terms of risk management, we document our risk analysis using a cloud-based software platform and the preventive and remedial measures we initiate within the supply chain are monitored via a newly implemented supplier management system.

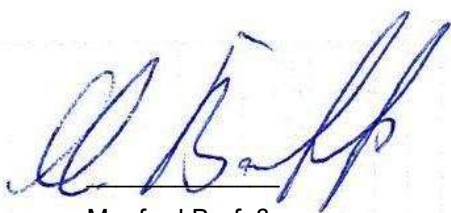
This documented information will be included in our annual report, which will be submitted to the BAFA in due time in accordance with the requirements of the LkSG and also published on our website.

Review and communication

The policy statement on human rights and environmental protection is reviewed once a year and updated accordingly if necessary.

4. Internal responsibility

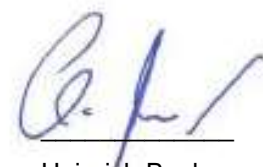
The Head of Central Purchasing at HOPPECKE is responsible for implementing our human rights and environmental due diligence obligations and the corresponding requirements of the LkSG, and is supported by the Purchasing, Compliance and Risk Management department.



Manfred Barfuß
(CPO)



Dr. Marc Zoellner
(CEO)



Heinrich Becker
(CFO)