

Policy statement according to LkSG

Contents

I. Foreword by the Management Board ...	1
II. Commitment to respect for human rights	1
III. Expectations of the Siempelkamp Group	1
IV. Approach to the implementation of human rights due diligence obligations	2
V. Responsibilities and training	2
VI. Measures	3
VII. Reporting system	3
VIII. Overall responsibility	3

I. Foreword by the Management Board

Increasing integration into global procurement and sales markets offers both opportunities and challenges: new markets and production sites are being opened up, creating jobs and prosperity. At the same time, however, there are also risks due to a lack of transparency and the often inadequate enforcement of human rights in supply chains.

As an internationally active group of companies, the Siempelkamp Group is aware of its responsibility within the global flow of goods and services. Today, more than ever before, sustainable entrepreneurial success requires companies to focus on the effects of their business activities and those of their suppliers on people and the environment.

It is important to us to take a clear stand for a sustainable society. With this in mind, the Siempelkamp Group has committed itself to a number of fundamental values. In addition to

entrepreneurial values such as competence and enthusiasm, values such as cooperation, appreciation and sustainability are also firmly anchored in our corporate culture. In the context of sustainability, we stand for

- Responsibility for the environment, our society and towards all people
- Long-term relationships and
- Sustainable processes and solutions.

With these values, we are facing up to the challenges of our time.

II. Commitment to respect for human rights

Within the framework of the aforementioned values, our aim is to strengthen human and environmental rights and to prevent, minimize and, if necessary, remedy violations of these rights.

Specifically, Siempelkamp is committed – as a minimum standard – to the UN Human Rights Charter and the ILO core labor standards.

Siempelkamp believes that this includes paying fair wages, working towards appropriate working conditions on site and preventing the exploitation of children.

For Siempelkamp, equal rights for women and men are a matter of course. No one may be disadvantaged because of gender, origin, race, language, homeland and origin, faith, religious or political views or because of a disability.

We reject corruption as well as forced labor and human trafficking.

Siempelkamp is committed to these guidelines.

III. Expectations of the Siempelkamp Group

The aforementioned results in expectations of the Siempelkamp Group's own employees, suppliers and service providers with regard to compliance with all applicable laws and regulations as well as internationally



Siempelkamp

recognized human and environmental rights standards.

Our own employees are expected to base their daily decisions on the guidelines set out in this policy statement and to comply with the requirements of the Siempelkamp Group's Employee Code of Conduct. This expectation begins with the conscious perception of violations of the aforementioned principles (including information from third parties), which are addressed and processed in order to then result in appropriate measures for the company.

The Siempelkamp Group expects its suppliers and service providers to comply with human rights due diligence and to monitor and ensure this within the wider supply chain and that they accept and comply with the Siempelkamp Group's Supplier Code of Conduct or have their own code of conduct that does not fall significantly short of the requirements of that code. This also applies to the expectation that suppliers in turn pass on these principles to their sub-suppliers and business partners, regardless of whether the suppliers of the Siempelkamp Group themselves are subject to the provisions of the Act on Corporate Due Diligence in Supply Chains (LkSG) or not.

IV. Approach to the implementation of human rights due diligence obligations

Siempelkamp is committed to respecting, protecting and upholding the human rights of individuals. We stand by this responsibility as a company regardless of the ability or willingness of states to fulfill their duty to protect human rights.

To this end, Siempelkamp is setting up a risk management system in order to be able to identify and analyze violations of human rights in good time. On this basis, measures can then

be taken to ensure compliance with human rights within the supply chain.

Part of risk management is also the group-wide analysis of all suppliers in Germany and abroad, also with the help of external service providers. This assessment, like compliance with due diligence obligations as a whole and this declaration of principles, is subject to continuous review and will be adjusted as necessary as part of the more in-depth analysis of the supplier base.

Following an initial internal risk analysis in accordance with the requirements of the LkSG, we consider compliance with labor standards and the avoidance of corruption to be the most relevant risks.

V. Responsibilities and training

The day-to-day management and monitoring of the human rights policy is the responsibility of the ESG Officer, who is also the Human Rights Officer. He monitors risk management and reports directly to the CEO of the Siempelkamp Group.

Risk management is divided into central procurement for the upstream supply chain on the one hand and the Siempelkamp Group's own business unit on the other. The responsibility for implementation lies with the operating units, which ensure the integration of this policy in their respective regions.

Respect for human rights is part of the Group-wide Employee Code of Conduct and the Siempelkamp Group Supplier Code of Conduct. All employees are offered training on the Employee Code of Conduct. Employees with a particularly prominent position in terms of respecting human rights will also be offered training on the Supplier Code of Conduct. The Group Compliance Officer is also available to answer suppliers' questions about the Supplier Code of Conduct.



Siempelkamp

VI. Measures

Human rights violations are not tolerated. This applies to our own business unit as well as within the supply chain. If violations become apparent, Siempelkamp will take measures to work towards human rights-compliant behavior within the Siempelkamp Group as well as with direct and indirect suppliers.

Another core measure for the protection of human rights within the supply chain is the review of all suppliers using external databases of established LkSG service providers and questionnaires. Siempelkamp derives priority risks from the knowledge gained from this and defines corresponding targets for risk avoidance and minimization if patterns emerge. Following the risk assessment and prioritization, Siempelkamp takes preventive and corrective measures.

The same applies if individual suppliers become conspicuous during the analysis. In this case, depending on the conspicuousness, appropriate steps are taken, initially to clarify and, if necessary, to prevent future violations. The processes and results are documented, stored and included in the annual reporting to the Federal Office of Economics and Export Control in accordance with Section 10 (2) LkSG on a materiality basis.

VII. Reporting system

We encourage our employees and third parties to report human rights and environmental risks as well as violations of human rights or environmental obligations via the existing complaints procedures. Employees have the opportunity to do so via local management, the relevant HR departments or the Compliance Hotline. Our business partners and third parties have the opportunity to report potential risks and breaches of duty via our website.

VIII. Overall responsibility

The CEO of the Siempelkamp Group is responsible for the implementation of this policy statement.

Approved by the management of G.
Siempelkamp GmbH & Co. KG

Krefeld, 1.12.2023

Martin Scherrer
(CEO)

Martin Sieringhaus
(CFO)