

# HOFFMANN SE POLICY STATEMENT.

On respect for human rights.











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The term “Hoffmann or Hoffmann Group” covers all group companies of Hoffmann SE in accordance with Sections 15 et seq. of the German Stock Corporation Act (AktG). Our partner companies Hch. Perschmann GmbH, Gödde GmbH and Oltrogge & Co. KG are not included solely for the purpose of this document.

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# MESSAGE FROM THE EXECUTIVE BOARD

Chief Executive Officer

**MARTIN  
REICHENECKER**



Operations &  
General Services

**ALEXANDER  
ECKERT**



Sales &  
Marketing

**CLAUDIA  
LENDERS**



Finance &  
Corporate Services

**MANFRED  
ROSENBERGER**



Product Management &  
Engineering

**BORRIES  
SCHÜLER**





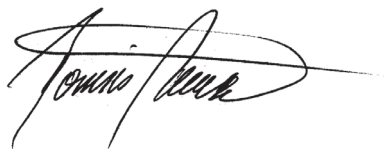
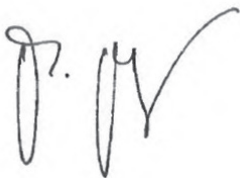
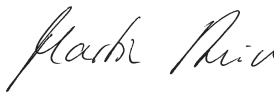
We empower people to achieve their best. At Hoffmann, we are committed to our social responsibility and cultivate a value-oriented corporate culture that enables our employees to perform at their best and thus lay the foundation for our sustainable success for more than 100 years. We are continuously striving to develop further in the areas of the environment, social affairs and corporate governance, to set and achieve ourselves ambitious goals for the future.

Through our parent company's participation in the United Nations Global Compact, we also support the ten principles of the UN Global Compact in the areas of human rights, labour, the environment, and anti-corruption.

In cooperation with our business partners, we want to strengthen respect for human rights along our value chains. We expect all our partners to comply with internationally recognized human rights standards, to comply with their due diligence obligations, and to pass on these expectations along their value chain.

We are convinced that economic performance and sustainable action are not mutually exclusive but go hand in hand. That is why we want to commit ourselves even more to environmental protection, social issues, and responsible corporate governance in the future. Together we want to shape sustainability.

The Executive Board of Hoffmann SE



Munich, April 2025







# 01 WE ARE COMMITTED TO RESPECTING HUMAN RIGHTS.

Hoffmann wants to live up to its responsibility in society and towards its employees as well as its customers and business partners. We are therefore committed to clear principles as a framework for our business activities.

Economic success and moral commitment are not contradictory for us, but are an indispensable prerequisite for sustainable positive economic activity.

As a company with high standards for compliance, due diligence and integrity, it is particularly important for us to adequately address human rights risks in our business areas and in our supply chain. In doing so, we base our approach particularly on the following standards and frameworks:

- United Nations Universal Declaration of Human Rights (UN-UDHR).
- International Labor Organization (ILO) Declarations on Fundamental Principles and Rights at Work.
- Principles of the United Nations Global Compact (UNGC).
- United Nations Guiding Principles on Business and Human Rights and their implementation within the framework of the National Action Plan (NAP) on Business and Human Rights.
- Basel, Minamata and Stockholm Convention.
- OECD Guidelines for Multinational Enterprises.
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.



## 02 WE DEFINE SPECIFIC REQUIREMENTS FOR US AND OUR PARTNERS.

In order to live up to our commitment of recognizing and respecting human rights at Hoffmann, we have implemented guidelines that reflect our attitude towards ourselves, our employees and our suppliers. The following two guidelines and an accompanying training concept are particularly relevant:

### HOFFMANN CODE OF CONDUCT

With the Hoffmann Code of Conduct, we have created a guideline that summarizes all the essential principles and rules for all our activities. It thus forms the basis for our daily interactions with each other, with customers and with business partners. In addition to human rights and environmental issues, the Code of Conduct also contains guidelines on anti-corruption and other related topics.

### HOFFMANN SUPPLIER CODE OF CONDUCT

It is our declared objective to implement our principles and values together with our business partners. We therefore require our business partners to act in accordance with the same or similar principles as we do and to support us in doing so. These principles,

values and legal requirements are set out in our Hoffmann Supplier Code of Conduct.

### COMPREHENSIVE TRAINING CONCEPT FOR OUR OWN EMPLOYEES AND OUR SUPPLIERS

We train all employees on the legal requirements regarding human and environmental rights as well as internal regulations in order to sensitize all employees to identify, reduce and/or avoid human rights and environmental risks. We also train our procurement departments on specific topics with a high level of detail and a particular focus on the risks identified in the risk analysis.

Participation in these training courses is mandatory for all employees on a cyclical basis. In addition, we also provide our suppliers with extensive training material on the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz).

## 03 WE ESTABLISH RELEVANT PROCESSES COMPANY-WIDE.

We take a holistic, integrated and risk-based approach to human rights due diligence. The responsibilities for effective implementation are clearly defined throughout the company. The Compliance Management department at Hoffmann SE is responsible for the overall concept of complying with human rights and the associated environmental rights. For the upstream supply chain, our purchasing department has established a global risk-based management system to implement appropriate human rights due diligence processes.

To support and monitor these due diligence obligations, the Executive Board of Hoffmann SE appointed the Compliance Officer of Hoffmann SE as the Human Rights Officer in December 2023. Other departments such as occupational health and safety and quality management report regularly and on an ad hoc basis not only to the functionally responsible positions, but also to the Human Rights Officer in accordance with the defined requirements in the context of the German Supply Chain Due Diligence Act.











## 04 WE IDENTIFY RISKS AND ADDRESS THEM APPROPRIATELY.

At least once a year, we assess potential risks regarding human and environmental rights, both with regard to our own business areas and our suppliers. Based on these risk analyses, we prioritize risks and address them.

Therefore, we conduct the internal risk analysis in a two-stage process. First, the human rights and environmental risks in our own business area are evaluated in a structured manner in expert interviews with the corporate departments. This initial assessment is then validated by the subsidiaries of Hoffmann SE. The risks prioritised on the basis of the risk analysis in our own business area fall into the following category:

- Health & safety risks

The external risk analysis starts with an analysis of the country and industry risk of our relevant suppliers with regard to human rights and environmental risks. Based on these results, supplier assessments are initiated as part of a specific risk analysis, from which a supplier-specific risk score is determined. Based on this risk score and Hoffmann's ability to influence the supplier, appropriate preventive measures are initiated. Risks along our value chains are primarily related to the following areas:

- Health & safety risks
- Freedom of association
- POPs & mercury
- Other human rights
- Environmental pollution
- Unequal treatment
- Forced labour and slavery

Based on the risk analyses and the risks identified therein, we develop holistic risk minimization measures in close cooperation with the purchasing functions, compliance management and other internal stakeholders. These measures are embedded both in internal procurement processes and in cooperation with our business partners.

They include the following measures, among others:

1. We train all employees on the legal requirements relating to human and environmental rights.
2. We develop and implement suitable purchasing strategies and standards to minimize identified risks and prevent them in the future.
3. We are continuously developing our two codes of conduct and other relevant guidelines (e.g. health & safety measures) in order to adapt them to current events and new findings.
4. We demand that our suppliers fulfill the requirements of the Hoffmann Supplier Code of Conduct, complete the accompanying training and implement the requirements in their supply chains appropriately.
5. We regularly review adherence to our requirements along the supply chain through our compliance managers in cooperation with the purchasing departments.
6. We support the Human Rights Officer in his task of monitoring the risk management.

Depending on the level of risk, additional information is initially obtained from our suppliers, for example by requesting risk strategies and action plans or by conducting human rights audits. Following a more detailed examination of the risks, we work with the suppliers to define how these risks can be minimized or eliminated. In addition, we offer all our suppliers training on human rights and environmental due diligence along the supply chain.

We are aware that even though we are committed to human rights, violations can still occur. We have therefore set up a complaints procedure, which includes in particular our anonymous web-based whistleblower system, through which affected individuals or other stakeholders can report grievances at any time.

Whistleblowers who report a grievance on ethical and/or moral grounds help significantly to preserve social values and the rule of law and thus also contribute to the success of our company.

## 05 WE ARE CONTINUOUSLY IMPROVING OUR EFFORTS AND REPORT ON THEM.

We regularly evaluate the effectiveness of our established measures in order to continuously improve them. This also includes critically analyzing existing processes on a regular basis and refining them where necessary.

We report annually and on an ad hoc basis both on the risks identified and on our measures to deal with them. We also evaluate the effectiveness of our

measures and derive conclusions for future activities.

The Management Board of Hoffmann SE is responsible for the implementation and compliance with this declaration. In doing so, the Executive Board is supported by Compliance Management and the Human Rights Officer, who regularly provide information on risks and measures taken.

