

# German Supply Chain Due Diligence Act

## Policy Statement



---

# Wanzl GmbH & Co. Holding KG's Policy Statement on the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG)

## 1. ABOUT WANZL

■ **At Wanzl, we are proud to be a global leader in our fields of Retail, Material Handling, Airport, Access Solutions and Hotel Service.**

**The products we develop, produce and distribute facilitate contemporary product presentation with a focus on food retail, as well as optimised logistics processes and improved access control in various areas of application. Our company's portfolio is supplemented by a range of services.**

**Our continuous innovations raise the bar around the world and are the result of values that have been embedded in our DNA since we were founded in 1947:**

***Dynamism, reliability and progress.***

As a high-performance and value-oriented family business, we set high standards for ourselves. Our responsibility towards employees, customers, business partners, the environment and society is more than a philosophy – it is an integral part of our corporate identity.

In this constantly changing and increasingly complex business environment, it is important that we continue to be guided by clear principles. These principles express our professionalism, our sense of responsibility and our high standards of personal conduct.

In our Sustainability Policy, we set out the basic principles that we want to define our actions and create a framework within which we hope to conduct ourselves successfully. It expresses our professionalism, our sense of responsibility and our high standards of personal conduct.

We are resolute in our goal to comply with legal provisions, regulatory standards and our own ethical standards and requirements so as not to cause harm to Wanzl and all parties involved in it, including our employees, customers and business partners.

Some of the measures we take in the Wanzl Group concern the protection of human rights and environmental protection, as these are anchored in the German Supply Chain Due Diligence Act (LkSG). This policy statement on the LkSG describes our measures aimed at protecting human rights and the environment along the supply chain and in our own company.

## 2. OUR GUIDING PRINCIPLES FOR BUSINESS AND HUMAN RIGHTS

### Global Guiding Principles

We see the protection of human rights as central to our corporate responsibility. We base our commitment to respecting human rights on the UN Guiding Principles on Business and Human Rights, the 1948 United Nations Universal Declaration of Human Rights (UNHRC), the principles of the *UN Global Compact*<sup>1</sup>, the OECD Guidelines for Multinational Enterprises, the principles of the ETI Base Code and the International Labour Organisation's (ILO) core labour standards.

We are committed to respecting internationally recognised human rights in our business operations and along our value chains. In accordance with Section 2 LkSG, this includes in particular the prohibition of child and forced labour, the prohibition of all forms of slavery and discrimination, and the strengthening of freedom of coalition. We are also committed to respecting health and safety at work, paying fair wages, prohibiting forced evacuations and the inappropriate use of security forces when they involve the risk of abusing or limiting human rights, and also prohibiting corruption and pollution.

### Corporate Guiding Principles

This statement clarifies our fundamental commitment to respecting human rights, which is already reflected in other corporate policies. These include our *Code of Conduct*<sup>2</sup>, our *Code for Suppliers and Business Partners (Code for Third Parties)*<sup>3</sup>, the Corruption Prevention Policy, and the *CSR Policy*<sup>4</sup> of the Wanzl Group.

With our Wanzl Values, we are also laying the foundation for value-oriented cooperation that is characterised by respectful interaction with each other, a high level of professionalism, sustainable action, personal responsibility and enthusiasm for daily activities.

### Scope of the Guiding Principles

The principles set out here apply to our own business activities and all employees of the Wanzl Group around the world<sup>5</sup>. In addition, we expect our suppliers and all other relevant business partners to commit to complying with the principles set out herein and to implement appropriate processes to respect human rights and protect the environment. This also includes providing information on how these principles are being followed upon request.

■ **We always comply with applicable law. In cases where international human rights are restricted by local laws, we strive to promote the principles behind international standards without conflicting with local laws. Where local laws go beyond the international standards, we will observe them.**

1 Wanzl has joined the UN Global Compact and is committed to its basic principles.

See : [https://www.wanzl.com/en\\_GB/wanzl-inside/sustainability](https://www.wanzl.com/en_GB/wanzl-inside/sustainability)

2 <https://www.wanzl.com/compliance>

3 <https://www.wanzl.com/compliance>

4 [https://www.wanzl.com/en\\_GB/wanzl-inside/sustainability](https://www.wanzl.com/en_GB/wanzl-inside/sustainability)

5 [https://www.wanzl.com/en\\_GB/wanzl-inside/branches-and-agencies](https://www.wanzl.com/en_GB/wanzl-inside/branches-and-agencies)

---

# Wanzl GmbH & Co. Holding KG's Policy Statement on the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG)

## 3. IMPLEMENTATION OF DUE DILIGENCE OBLIGATIONS IN THE COMPANY

### A. Suppliers and business partners

Before signing a contract, our suppliers are checked according to criteria relating to work, occupational safety, human rights and the environment. We repeat the risk assessment for existing suppliers at regular intervals. If risks arise during the supplier evaluation, these risks are addressed at the suppliers as part of an established risk monitoring and risk elimination process and the implementation of effective remedial measures is tracked.

In order to comply with our due diligence obligations in accordance with the LkSG, we use our risk-based External Partner Risk Management (EPRM) systems to identify, analyse and reduce the potential impact of human rights and environmental risks at our suppliers.

As a company with a focus on the metal processing industry, we are aware of the industry-specific risks associated with our business activities and the raw materials used. As part of our risk analysis, we identify risks for our own field of business and our supply chain that we consider to be priorities due to their potential severity and (ir)reversibility as well as our ability to influence them. In doing so, we determine whether certain countries or sectors carry increased risks and check whether there are any high-risk suppliers. The risk areas of the environment (pollution, waste, conflict minerals, GHG emissions), social issues (forced labour, abuse, child labour, working conditions & wages, discrimination, freedom of association, health & safety, diversity, impact on the municipality) and governance (fraud & bribery) are reviewed.

We incorporate the results of our risk analysis into relevant business processes. Where risks arise, we implement appropriate prevention measures.

Our suppliers are contractually obliged to comply with our Code for Suppliers and Business Partners. We expect our suppliers to ensure that the principles set out in our Code for Suppliers and Business Partners are followed within the company, which includes reviewing compliance on an ongoing basis and sharing information with affected employees. In the event of violations, we obtain audit rights and oblige the supplier to define suitable measures for eliminating violations and document these. We require our suppliers to meet at least the legal due diligence obligations within their own supply chain. In this way, we ensure compliance with our principles along the supply chain in the best possible way.

### B. Our own field of business

#### ■ Health and safety management in the company

The health and safety of our employees is our top priority. By implementing high standards at our sites, we continuously work to create a safe and healthy working environment. Regular risk assessments serve as a guide for identifying and assessing potential hazards at the workstation. Examples include measures to manage stress and support offers to promote mental health at work. The company doctor conducts regular optional check-ups and medical fitness checks. The provision of appropriate protective equipment and special measurements of potentially harmful factors for employees (noise, pollutants) are also important to mention. There are clear procedures for emergency evacuations or in the event of industrial accidents. Our employees participate in regular training and instruction to promote health and safety-conscious behaviour at work.

### ■ Environmental protection

At Wanzl, we take the protection of the environment and the careful use of available resources very seriously. With our approach to water management, we ensure that we continuously optimise water consumption and that wastewater emissions always meet at least the prescribed legal standards. We also see it as our responsibility to continuously monitor the exhaust emissions from our production facilities and implement appropriate measures to minimise air pollution. The proper disposal of hazardous and non-hazardous waste is also a high priority. Here, our processes are geared towards ensuring that waste is treated and disposed of in accordance with applicable legal regulations. The responsible handling of hazardous substances is ensured by guidelines and procedures for storage, labelling, transport and proper handling. In addition, we invest heavily in training and instruction for our employees to ensure that they are optimally trained for handling hazardous substances.

### ■ Safety of our products

Wanzl's products are subject to product safety regulations. Compliance with legal and internal product safety requirements is an important issue for us. Wanzl has effective processes in place to ensure the quality and safety of its products.

Our products are only placed on the market if the product does not endanger the safety and health of humans, animals and the environment when used as intended or in a way that is foreseeable. To ensure this, Wanzl conducts risk assessments, tests to validate internal, standard-related and legal requirements, among other things. In addition, conformity assessments are carried out for CE marking and contact with unpackaged food. Global compliance with all legal requirements is a prerequisite for a market launch.

In addition, voluntary technical safety tests to be performed by independent testing institutes are commissioned for the majority of our products.

### ■ Our whistleblower system

If we cause or contribute to actual human rights violations through our business activities, we are committed to implementing effective remediation measures.

Wanzl enables its employees and third parties to report irregularities in our company via a *whistleblower system*<sup>6</sup>. These reports may also be submitted anonymously. Independent ombudsmen working around the world on behalf of the Wanzl Group are responsible for dealing with complaints.

Violations within our supply chain can also be reported here. In addition, anyone is able to contact their immediate superior, the local HR manager, the Health & Safety Officer, the Compliance Officer or the Sustainability Officer of the Wanzl Group if they have any complaints or questions.

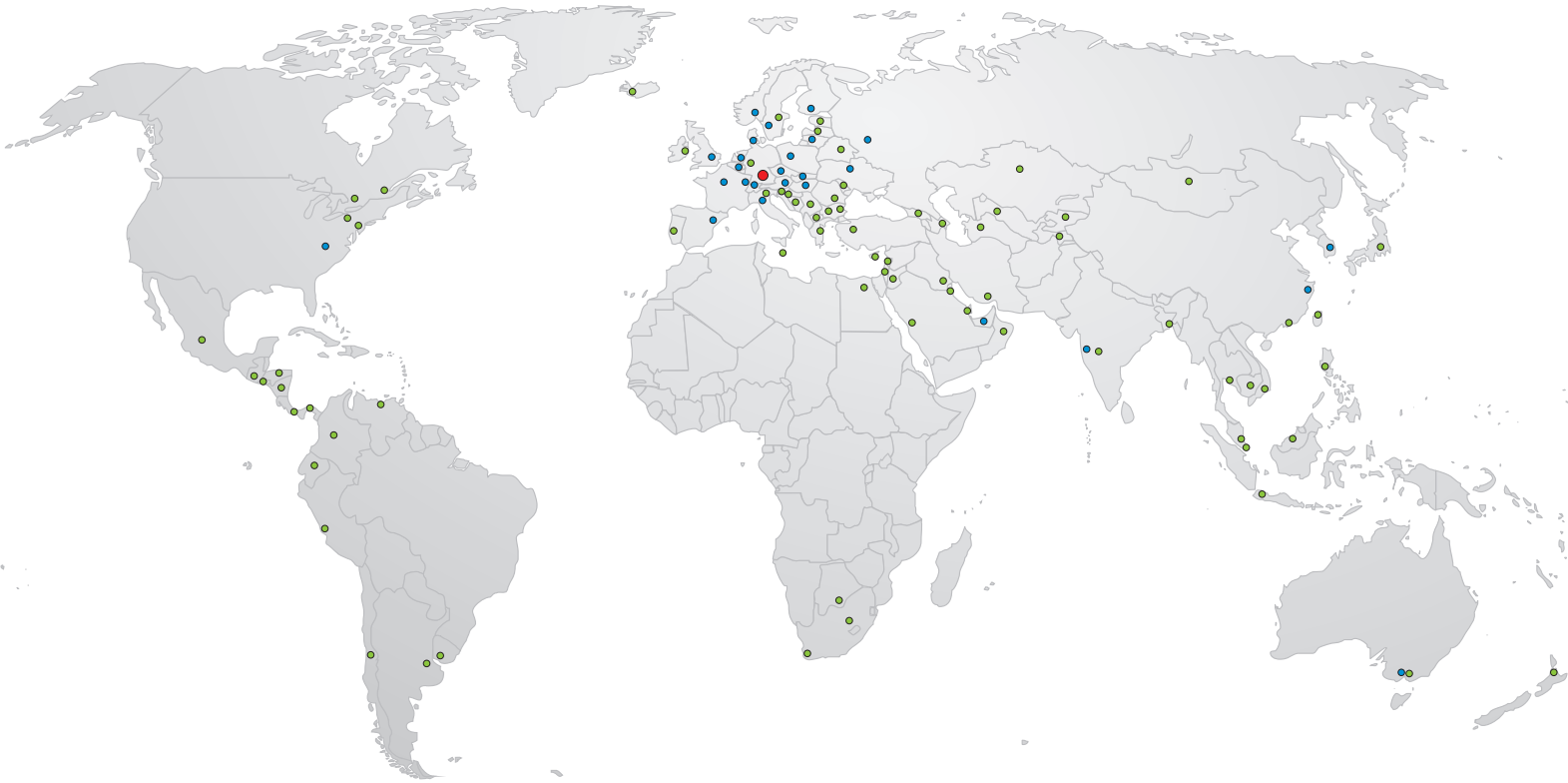
**Wanzl is committed to respecting human rights throughout the Group. We review this policy statement regularly, but at least once a year, and adapt it to new insights if necessary.**

**Leipheim, 31 March 2024**  
**Company management**

**OLIVER WEIRAUCH**, Chief Executive Officer  
**PETER ALLAART**, Chief Operation Officer  
**ALEXANDER KIENLE**, Chief Financial Officer  
**BERNHARD RENZHOFER**, Chief Sales Officer  
**ANDREAS STARZMANN**, Chief Technology Officer

<sup>6</sup> [https://www.wanzl.com/en\\_GB/wanzl-inside/compliance](https://www.wanzl.com/en_GB/wanzl-inside/compliance)





**Wanzl worldwide**

- Head Office
- Subsidiaries
- Partners



**GERMANY**  
Wanzl GmbH & Co. Holding KG  
Rudolf-Wanzl-Straße 4  
89340 Leipheim