

DECLARATION OF PRINCIPLES

on respect for human
rights and the protection
of environmental rights

ZIEHL-ABEGG 



Declaration of principles on respect for human rights and the protection of environmental rights

Content

1	Responsibility to respect Human Rights and protect the Environment.....	1
2	Human Rights and Environmental due diligence at ZIEHL-ABEGG	2
3	Responsibilities	3
4	Expectations of our employees and Business Partners.....	4
5	Outlook and reporting	4
6	Final provision.....	4

1 Responsibility to respect Human Rights and protect the Environment

ZIEHL-ABEGG SE, including its subsidiaries ("ZIEHL-ABEGG Group"), as a globally active company and is aware of its high level of International interdependence in the supply chain. Legally compliant actions in our own business area are a valuable asset which also extends to the actions of our direct suppliers and, in a broader sense, the actions of our indirect suppliers. In this respect, it is in our interest to influence all processes in Germany and overseas that are necessary to manufacture our products and provide the respective services along the supply chain in such a way that Human Rights and the protection of the Environment are respected by all parties.

As a responsible Management, we therefore accept our responsibility to respect Human Rights and protect the Environment within our supply chain, which is now enshrined in the German Supply Chain Duties Act (Lieferkettensorgfaltspflichtengesetz - LkSG).

We are therefore committed to all relevant International principles for the protection of Human Rights and the Environment, in particular:

1. United Nations (UN) Universal Declaration of Human Rights
2. Conventions and Recommendations of the International Labor Organization (ILO) on labor and social standards
3. Principles of the United Nations Global Compact (UNGC)
4. UN Convention on the Rights of the Child
5. UN Convention on the Elimination of All Discrimination against Women

6. Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and
7. Minamata Convention on Mercury of 10 October 2013 (Minamata Convention)
8. Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Basel Convention)
9. Stockholm Convention of May 6, 2005 on Persistent Organic Pollutants of May 23, 2001 (BGBl. 2002 II p. 803, 804) as amended by the decision (BGBl. 2009 II p. 1060, 1061) (POPs Convention)

This policy statement describes the key measures that are taken in the course of our business activities to identify and prevent potential human rights and environmental risks.

2 Human Rights and Environmental due diligence at ZIEHL-ABEGG

Implementation of risk management

The primary goal of our risk management is to maintain transparency in our supply and value chains. For this reason, we have introduced LkSG-related risk management in our business division and with our direct and indirect suppliers.

An annual risk analysis is carried out within our supply chain. This multi-stage risk analysis looks at our own subsidiaries and our direct suppliers.

In the first step, an abstract risk analysis is carried out in which the specific country and industry risks are considered, in a second step, suppliers from high-risk countries and/or sectors are subjected to a more detailed risk analysis in a concrete risk analysis.

ZIEHL-ABEGG focuses primarily on the following risks, which are considered to be priorities:

- Failure to comply with occupational health and safety regulations and work-related health hazards
- Destruction of natural resources through environmental pollution
- Prohibition of child labour
- Prohibition of forced labour and all forms of slavery
- Prohibition of unequal treatment in employment

An event-driven risk analysis is carried out in two cases:

In the event-related risk analysis, the scope of application extends beyond the immediate suppliers and also includes suppliers in the downstream supply chain. This occurs in the event of substantiated knowledge, for example through the ZIEHL-ABEGG complaints system.

Another reason for an event-driven risk analysis is a significant change in the risk in the supply chain, e.g. due to the introduction of a new business unit, a new product or similar.

Measures

Appropriate measures are derived on the basis of the risk analysis, which are intended to have a preventive effect against risks or lead to remedial measures in the event of violations.

Remedial measures are initiated if the incident-related audit reveals a violation. A suitable concept for remedying the violation is drawn up together with the supplier, in addition, the measures may range from setting a deadline for remedying the risks and violations to terminating the business relationship.

In addition, ZIEHL-ABEGG has introduced several preventive measures, such as the publication of this policy statement, the introduction of a Business Partner Code of Conduct, which obliges the respective business partners in the supply chain to make a declaration that the supplier complies with the requirements of the LkSG, with regard to compliance with Human Rights and Environmental law.

This declaration must be signed before entering into a new business relationship, in addition, supplier selection and supplier on-boarding have been adapted.

Training courses for internal and external stakeholders have been introduced and LkSG-relevant topics have been implemented in the supplier audits.

The effectiveness of the measures are reviewed once a year as part of the risk analysis.

Complaints procedure

We have also set up an anonymous, electronic complaints procedure in which any Human Rights and Environmental risks can be pointed out and violations reported, this makes it possible to contact ZIEHL-ABEGG in a protected form.

Our own employees are trained in the requirements of Human Rights and Environmental laws and encouraged to report suspected violations of our 'Declaration of Principles' via the existing complaints system.

3 Responsibilities

The risk analysis system was primarily implemented within the Procurement Department. An interdisciplinary Steering Committee was also appointed to deal with issues relating to the LkSG.

A Human Rights Officer has also been appointed.

The Human Rights Officer is responsible for creating and conducting training and audits, external reporting on Human Rights due diligence and continuously reviewing and improving the management of Human Rights and Environmental due diligence.



Furthermore, the operational implementation of Human Rights due diligence processes is carried out in cooperation with the relevant specialist departments, in particular Procurement, Human Resources and the Compliance department, these are supported by other specialist departments. The Executive Board is ultimately responsible for the implementation of and compliance with the 'Declaration of Principles' on respect for Human Rights within the ZIEHL-ABEGG Group.

4 Expectations of our employees and Business Partners

Within the ZIEHL-ABEGG Group, we expect our employees to respect the importance of Human Rights and Environmental due diligence and to implement the measures established within the company, that they fulfill the requirements of the LkSG; in particular, that they comply with the measures associated with the risk analysis.

We expect our Business Partners in the supply chain to commit to respecting Human Rights and protecting the Environment to the same extent and to establish appropriate due diligence processes to identify and avoid Human Rights and Environmental risks.

5 Outlook and reporting

The ZIEHL-ABEGG Group is aware that the implementation of Human Rights due diligence in its own business capabilities and in supply chains is an ongoing process. The ZIEHL-ABEGG Group accepts this challenge and regularly reviews its strategic approaches and measures with the aim of continuous improvement. The ZIEHL-ABEGG Group will provide regular and transparent information on implementation and strategic developments in accordance with legal requirements.

6 Final provision

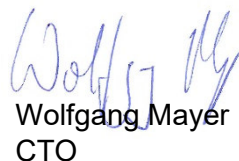
We will review this policy statement annually and as circumstances require, to ensure that it remains up to date and effective and will adapt it to changing circumstances as necessary. In this regard, the policy statement on Human Rights that originally came into force on 1 January 2024 has been revised. The current version was approved by the Executive Board of ZIEHL-ABEGG SE on 27.10.2025.



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