



# DECLARATION OF PRINCIPLE ON THE HUMAN RIGHTS & ENVIRONMENTAL PROTECTION STRATEGY

## 1. Principle

The HEINZ-GLAS Group is committed to respecting human rights and protecting the environment, which is why we are committed to respecting internationally recognised human rights and aligning our business activities with these principles.

We are also guided by internationally recognised standards and frameworks, in particular

- United Nations Universal Declaration of Human Rights
- Global Compact of the United Nations
- United Nations human rights packages (social and civil covenants)
- International labour standards of the International Labour Organization (ILO)

## 2. Responsibilities and risk management in the HEINZ-GLAS Group

The HEINZ-GLAS Group has appointed a human rights officer to monitor risk management. We have developed an appropriate and effective risk management system to ensure compliance with our corporate due diligence obligations. This is anchored in our relevant business processes. Risk management at the HEINZ-GLAS Group is carried out jointly by the parent company and the subsidiaries in Germany and abroad. There is regular dialogue and reporting between the parent company and subsidiaries.

### a) *Risk analysis in own business area and with direct suppliers*

We carry out a regular and appropriate risk analysis to determine the human rights and

environmental risks in our own business area and at our direct suppliers.

The basic criteria for the analysis are the scope of the HEINZ-GLAS Group's business activities; our ability to influence the direct perpetrator of a human rights or environmental risk or the violation of a human rights or environmental obligation; the typically expected severity of the violation, the reversibility of the violation and the likelihood of the violation of a human rights-related or environmental obligation, as well as the nature of the HEINZ-GLAS Group's contribution to the human rights-related or environmental risk or to the violation of a human rights-related or environmental obligation.

The following criteria are also taken into account:

- Worldwide Governance Indicators (WGI)
- Environmental Performance Index (EPI)
- Global Right Index

- EDGAR - Emissions Database for Global Atmospheric Research

Furthermore, objective criteria defined within the HEINZ-GLAS Group are also included in the assessment:

- Turnover
- Supplier classification
- Specific product group risk
- Successful commitment through CoC
- Evaluation of supplier self-disclosure

The aim is to identify and prioritise potential risks and take appropriate measures to minimise or avoid them. Regularly conducting (at least annually, as well as on an ad hoc basis), reviewing and updating the risk analysis is essential in order to ensure continuous improvement of the supply chain.

The assessment - according to the above criteria - results in a score value. Based on this score value, the identified risks are classified/prioritised in the form of a traffic light system (red, yellow, green). Immediate action (see below) is taken against risks rated red and amber. Risks rated green are monitored and updated with regard to the risk score through regular analyses.

According to the risk analysis, there are increased risks in the HEINZ-GLAS Group's own business area and at its direct suppliers in the areas of raw materials, colours and coatings.

#### b) *Dealing with indirect suppliers*

If we have substantiated knowledge of a possible violation of a human rights or environmental obligation, we also include our indirect suppliers in the risk analysis and take appropriate preventive and remedial measures against the perpetrator (see below).

#### c) *Measures*

##### **Preventive measures**

In order to counteract any violations of our human rights strategy and to recognise potential sources of risk in our supply chain at an early stage and counteract them in good time, the HEINZ-GLAS Group has defined the following preventive measures in particular.

*In our own business area:*

- Implementation of this policy statement.
- Code of Conduct that is binding for all employees
- Regular risk analysis (see above), including through the evaluation of our existing and potential suppliers.

- Identification and prioritisation of the identified risks.
- Optimisation and implementation of suitable strategies in the areas of procurement and purchasing, particularly with regard to identified risks.
- Regular training and awareness-raising measures for our employees.

*Towards our direct suppliers:*

- Contractual assurance of our direct suppliers to comply with the human rights and environmental principles of the HEINZ-GLAS Group through the Code of Conduct for Suppliers.
- Carrying out training and awareness-raising measures for our suppliers and working with them to ensure the prevention of human rights and environmental violations.
- Contractual assurance of appropriate control mechanisms and the risk-based implementation of these, such as supplier information and audits
- Observance and review of our human rights and environmental principles when selecting suppliers.

##### **Remedial actions**

If we determine that a violation of a human rights or environmental obligation has occurred or is imminent in our own business area or at one of our direct suppliers, we immediately take appropriate remedial measures to prevent or end this violation or to minimise its extent. In principle, these measures should lead to the cessation of the violation both in our own business area and at our direct suppliers.

However, if the nature of the breach at one of our direct suppliers is such that we cannot end it in the foreseeable future, we will immediately draw up a plan with a specific timetable for ending or minimising the breach. When developing and implementing the plan, we will take the following into account,

- that this is developed and implemented together with the polluter,
- that mergers of sector companies are used for effective enforcement of measures and to increase the influence on the polluter
- that, where appropriate, a temporary suspension will be considered during efforts to terminate or minimise the business relationship.

In the event of very serious violations, if suitable remedial measures have not been implemented after the expiry of an agreed implementation

period or if no other milder means are available, we reserve the right to terminate the business relationship with the perpetrator as a last resort.

d) *Complaints procedure*

Through our complaints procedure, we ensure that all affected persons can confidentially point out human rights and environmental risks as well as violations of human rights or environmental obligations caused by the economic activities of the HEINZ-GLAS Group in its own business area or one of our (in)direct suppliers.

Reporting channels:

HEINZ- GLAS GmbH & Co. KGaA  
Compliance  
Glashüttenplatz 1-7  
96355 Kleintettau

e-mail: [compliance@heinz-glas.com](mailto:compliance@heinz-glas.com)

Contact form:

<https://heinz-glas.integrityline.org/>

e) *Effectiveness control*

We ensure the effectiveness of our measures by reviewing them once a year and on an ad hoc basis. If necessary, the measures are updated immediately.

f) *Documentation and reporting*

We will document the fulfilment of our due diligence obligations internally on an ongoing basis and retain them for at least seven years in accordance with legal requirements. Our annual report on the fulfilment of due diligence obligations is submitted to the Federal Office of Economics and Export Control (BAFA) no later than four months after the end of the respective financial year. We also publish the annual report on our website.

g) *Expectations of employees and suppliers in the supply chain*

We expect our employees and business partners, especially suppliers, to comply with applicable laws and our defined values and principles and to pass these expectations on along the supply chain accordingly.

We have anchored our values and principles in a Code of Conduct for employees and suppliers. The Code of Conduct for Suppliers contains regulations on compliance with the values and principles as well as the obligation to pass these on to indirect suppliers involved in the fulfilment of services.