

**HOYER**

# **Declaration of principles**

on the human rights strategy  
pursuant to para. 6 sec. 2 LkSG

**hoyer.de**

To VISKA B.V. & Co KG (hereinafter referred to as „Hoyer“ together with the affiliated companies within the meaning of para. 15 AktG), compliance with the law, integrity and sustainability are important components of the corporate strategy, in line with the motto: Committed to tradition, conscious of responsibility.

The name of the Hoyer family is representative of the company and its actions. It is therefore particularly important to us as a family that we, our employees and suppliers live up to our values and the values of our company every day. We strive to continuously improve working conditions, protect human rights and the environment and actively take responsibility for our environment, our region, our employees and our society.

Hoyer sources raw materials, goods and services from various industries worldwide to manufacture its products. We also expect our national and international suppliers to fulfil these values of integrity and sustainability in their supply chain.

## **1. Compliance with applicable laws and guidelines**

### **Our values**

Every action for Hoyer is carried out consistently and without exception in conformity with applicable laws. This includes the fulfilment of supply chain due diligence obligations, the applicable national and international regulations and, in particular, the national legislation and standards of the countries in which suppliers are based. Appropriate behaviour is a basic prerequisite for a business relationship with Hoyer. This company shows no tolerance for offences. Hoyer intervenes in the event of possible incidents in accordance with the applicable laws and, if there is influence, terminates violations immediately. To this end, Hoyer has implemented effective and appropriate processes.

Hoyer respects and recognises the importance of the following conventions:

### **Human rights:**

- International Human Rights Charter of the United Nations (UN)
- Principles of the United Nations Global Compact (UN)
- Rights and core labour standards of the International Labour Organization (ILO)

### **Environment:**

- Paris Agreement on climate change to reduce climate-damaging emissions
- Basel Convention on Transboundary Movements of Hazardous Waste
- Stockholm Convention on Persistent Organic Pollutants
- Minamata Convention on Mercury

Hoyer is guided by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Hoyer is committed to complying with all applicable laws, regulations and human rights principles while protecting the environment. The success of Hoyer is linked to its commitment to ethical behaviour. This policy statement sets out the measures we take to ensure this commitment in our business activities and in our supply chain.

Our policy statement is in line with the requirements of the Hoyer Code of Conduct and reflects the family's values to a large extent.

## **2. The protection of human rights and the environment at Hoyer**

### **2.1 Measures for effective risk management and fulfilment of due diligence obligations**

The following measures ensure that Hoyer complies with all applicable laws and regulations for the protection of human rights and due diligence obligations in the supply chain. The measures are based on our own risk management system, which aims to identify and reduce risks in connection with human rights and the environment. Through these measures, we ensure that the values of our company are upheld on a daily basis.

#### **(a) Risk management**

Hoyer ensures the protection of human rights through a detailed risk management system for the effective and appropriate handling of risks. It is anchored in all relevant business processes, as all relevant internal stakeholders must implement the part of the system that is decisive for them and define clear responsibility for the process. The procurement and purchasing departments as well as other relevant staff departments are involved in the risk management system. The department responsible for the overall process communicates regularly with those responsible in all the departments mentioned.

Both the responsible departments and the Human Rights Officer report to the Executive Board regularly and at least once a year on human rights risks and any changes to them. This ensures continuous monitoring. Hoyer documents the measures taken to protect human rights and fulfils the applicable reporting obligations.

People and the environment are interrelated in many ways. Hoyer is aware of the potential consequences of environmental risks for human rights. The risk management system is designed to minimise environmental and human rights risks as comprehensively as possible.

By implementing this far-reaching risk management system, Hoyer prevents and minimises negative impacts on human rights and the environment in connection with its business activities. The system promotes environmentally conscious and sustainable behaviour in all business activities. For Hoyer, dialogue with relevant stakeholders is important. Hoyer therefore involves them appropriately in the fulfilment of their duties of care. The risk management system is designed to take their interests into account.

### **(b) Risk analysis**

A detailed risk analysis is carried out at least once a year and supplemented by event-driven risk analyses. Any risk analysis is carried out in accordance with legal requirements and ensures that Hoyer fulfils its human rights and environmental obligations. It relates to both the company's own business area and the supply chain. The risk analysis serves to identify and prioritise potential risks. The appropriate prioritisation is based on legal requirements. Risks are analysed and assessed in cooperation with the relevant specialist departments, which have the necessary expertise. In line with the great importance of human rights and environmental protection, the results of the risk analysis are communicated to Hoyer's management on a regular and event related basis. Continuous optimisation of the risk analysis process is guaranteed. Hoyer strives to improve its understanding of human rights and environmental risks and to continuously expand its ability to identify, assess and manage risks.

### **(c) Preventive measures**

Hoyer pursues the goal of effectively reducing human rights and environmental risks. Hoyer takes effective and appropriate measures to this end.

### **(i) Own business division**

Hoyer has taken various measures to implement this declaration of principles in its own business division. The relevant prevention measures take into account the legal requirements and regulations. In order to fulfil human rights and environmental expectations and address risks, Hoyer has implemented guidelines on procurement strategies and purchasing practices. Human rights and environmental expectations are integrated into the onboarding process for new suppliers. In addition, Hoyer's binding Code of Conduct emphasises the importance of protecting human rights and the environment and minimising the corresponding risks. Employees are continuously trained in this regard, taking into account their areas of responsibility, in order to regularly communicate expectations to them. These comprehensive measures ensure that violations in our own business area are prevented as far as possible and that risks are minimised as comprehensively as possible. We implement appropriate risk-based control measures to ensure that this declaration is complied with.

### **(ii) Supply chain**

Just as we as the owner family fulfil the values of our company highlighted in this policy statement and expect

our employees to do the same, we also place high demands on our suppliers, in line with our motto: Committed to tradition, conscious of responsibility.

We therefore also take effective and appropriate preventive measures with our direct suppliers. In order to safeguard the human rights and environmental expectations taken into account when selecting suppliers, Hoyer obtains contractual assurances from suppliers. These expectations are contractually agreed with suppliers by means of a code of conduct for suppliers. This includes the appropriate transfer of expectations to the deeper supply chain. The expectations are explained in detail in the Code of Conduct. As a family-run company, stability and reliability are of great importance to Hoyer. We therefore support and encourage our suppliers by taking appropriate measures to achieve continuous improvement in the supply chain. An appropriate measure could be, for example, regular training of the supplier's employees so that they are empowered to minimise human rights and environmental risks.

### **(d) Remediation**

We prevent and minimise the occurrence of adverse human rights impacts and have implemented procedures for remediation if we are found to have caused or been involved in such impacts. Potential violations are analysed immediately and appropriate remedial measures are implemented in accordance with the applicable laws. Hoyer has developed an internal guideline for this purpose.

Remedial measures are always aimed at ending violations as quickly as possible for all affected parties and interest groups. When developing remedial measures, we always check whether and how we can put an immediate end to a breach, particularly in our own business area.

In the event of (imminent) breaches at suppliers, we work with them to prevent or end the breach or minimise its extent. If the violation cannot be resolved in the foreseeable future, Hoyer will work with its direct suppliers to develop a remedial action plan.

Hoyer will make appropriate use of all available contractual assurances in order to terminate a breach. The last resort is to terminate the business relationship if suppliers are responsible for serious violations or do not take appropriate measures to end or minimise the violation.

### **(e) Complaints procedure**

Hoyer has established a complaints procedure that allows individuals to easily report human rights and environmental risks and violations.

We cultivate a culture of open communication. Employees, direct and indirect suppliers and persons affected by the business activities of Hoyer or Hoyer's suppliers (or their representatives) should be free to ask questions or report potential cases of misconduct without fear of retaliation.

This proactive approach serves as an early warning system that enables Hoyer to counter emerging risks or infringements promptly and effectively. By implementing the measures described above, Hoyer endeavours to defuse or eliminate problems at an early stage.

You can send information at any time online via our integrity channel or by post to our person of trust.

Confidentiality is guaranteed and your report will be assessed independently, objectively and impartially. You should not fear retaliation for reporting a complaint, as long as you do so in good faith. It is irrelevant whether the report subsequently proves to be false.

If you have any questions about the values and obligations described in this policy statement, please do not hesitate to contact our designated person of trust.

Further information on the complaints procedure and the rules of procedure can be found here: Hoyer Integrity Channel.

#### **(f) Measures against indirect suppliers**

Hoyer will take action against indirect suppliers in the event of substantiated knowledge of a possible violation. Should substantiated information become available, we will immediately take effective and appropriate remedial and preventive measures. The aim is always to put an end to infringements as quickly as possible or at least to minimise their extent.

#### **(g) Documentation and reporting**

Hoyer documents the due diligence measures taken in accordance with applicable law.

All documentation is stored for a period of seven years from its creation.

A report on Hoyer's fulfilment of its due diligence obligations is published annually and made available for a period of seven years. Trade and business secrets are taken into account during publication.

## **2.2 Expectations on employees and suppliers**

Hoyer's core value is its constant commitment to improving working conditions and protecting human rights and the environment. This applies to our own business activities as well as to the business activities of our direct suppliers as contractual partners and all links in the supply chain.

These expectations are communicated to our employees through our Code of Conduct. Internal training ensures in an appropriate manner that our employees develop a common understanding of the relevance of human rights and environmental issues with us and can fulfil expectations. Guidelines for prevention and remedial measures, and in particular a guideline for procurement strategies and purchasing practices, make the above expectations tangible for our employees and enable them to put them into practice.

Hoyer is committed to identifying and minimising risks along the entire supply chain. We take the above-mentioned laws, guidelines and values into account as part of our procurement strategies. Hoyer will only work with suppliers and business partners who comply with applicable laws and regulations and, in particular, who are committed to upholding our expectations and values. We also have the same expectations of other parties along our supply chain. To help us and our suppliers live this corporate strategy and our values every day, the Hoyer Supplier Code of Conduct sets out our specific expectations on suppliers. The Code of Conduct stipulates that the joint optimisation of the protection of human rights and the environment is a prerequisite for the cooperation with Hoyer. It also includes the expectation that values are appropriately addressed by the suppliers along their supply chain. Risk-based and appropriate training and further education as well as control mechanisms ensure that our expectations are met.

## **3. Further development of the human rights strategy - monitoring and reporting**

Hoyer views the fulfilment of due diligence obligations in the supply chain as an ongoing and dynamic process. We are aware that the world is constantly changing and that Hoyer will therefore face new challenges and conditions that will require continuous adaptations and additions to the human rights strategy. We have prioritised the task of monitoring these changes and reacting to them in good time. Hoyer will therefore regularly monitor the implementation of the measures introduced and review the extent to which they can be optimised. Relevant developments in the risk situation and indications that the effectiveness of preventive measures - including the complaints mechanism - or remedial measures is impaired are taken into account comprehensively. This human rights strategy is updated accordingly, particularly in the event of changes in the risk situations at indirect suppliers' premises.

## **4. Contact**

Mr Andreas Sprotte  
Rudolf-Diesel-Straße 1  
27374 Visselhövede



Holger P. Stemmler



Thomas Hoyer



Markus Hoyer

Executive Board of VISKA B.V. & Co. KG