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Foreword



Dear business partners,

For over 50 years, we have been advancing and optimizing **Sortimo International GmbH** and making it what we are today, primarily with the help of our employees. **Sortimo International GmbH** is represented in Germany with nine branches and over 20 Sortimo stations, as well as nine international subsidiaries and two joint ventures in the core markets of Europe and the USA.

It is of the utmost importance for us to continue to stand up for the respect and protection of human rights, to secure our successes in this area and to preserve our reputation. The consistent pursuit of our human rights-oriented values has made a decisive contribution to promoting and protecting these fundamental rights

As an internationally active company, we have to meet a wide variety of legal and cultural requirements every day. Based on all these requirements, we have created the present Human Rights Directive, which **bundles, renews and makes more transparent** the previously applicable requirements of Sortimo International GmbH.

Every member of **Sortimo International GmbH** feels responsible for ensuring that the principles laid down in the Human Rights Directive are always adhered to and that our values are actively lived. There must be no exception to this. No short-term economic or personal success or advantage justifies disregarding our success, reputation and goals. We will not tolerate violations of the rules set out in this Human Rights Policy and will strictly counter them with sanctions in order to be able to guarantee a fruitful cooperation with you in the future.

Her

Management of Sortimo International GmbH

Reinhold Braun
MD Shareholder

Klaus Emler
MD Shareholder

Matthias Klupsch
Managing Director CFO

Dr. Peter Siegle
Managing Director SCM

Thomas Unger
Managing Director CRM

This Human Rights Policy applies to Sortimo International GmbH and its group companies listed below.

- Sortimo Grundstücks- und Beteiligungs GmbH, Zusmarshausen
- Sortimo Speedwave GmbH, Zusmarshausen
- Sortimo Services & Technology GmbH, Zusmarshausen
- Sortimo by GRUAU SAS, France
- Sortimo International Ltd., Great Britain
- Sortimo Ges.m.b.H., Austria
- Sortimo BV, Belgium
- Sortimo A/S, Denmark
- Sortimo AS, Norway
- Sortimo AB, Sweden
- Sortimo Iberica Comercio Y Servicios S.L., Spain
- Sortimo Nederland B.V., Netherlands
- Sortimo Italia S.r.l., Italy

Our core messages on human rights

Our expectations: What everyone at Sortimo should know and do

Protecting human rights means protecting people from harm. We all want to live in safety, and we have a role to play in keeping others safe. This applies not only to our own employees, but also to contractors, workers in supply chains, customers and society as a whole.

We all have a sense of what is right and what is wrong. Trust it and act accordingly. Whenever you think something is wrong, speak your mind and get help.

Talk to your manager, HR or compliance officer. You can also use the Sortimo whistleblower system.

You will never be punished for speaking your mind. When in doubt, action is better than doing nothing.

Always be vigilant

People can be injured anywhere in our operations, in all countries and in any context. Please be mindful wherever you are.

Do not cause harm

Always consider whether Sortimo's products, services and activities can cause harm to (including your own) people, and how to prevent this. Do not follow harmful instructions.

Inform others

Employees, employees in supply chains or people outside Sortimo may not know that they have certain rights or how to raise concerns. Share your knowledge and make them aware of the Sortimo whistleblower system and our ombudsman's office.

Speak up

Please speak your mind if you notice something that doesn't feel right or is causing harm to someone (you or a collaborator). Contact our Compliance Officer, the HR department or your employee advisory board. There will be no retaliation against employees who speak their minds in good faith.

Contacts

At Sortimo, we have the following contact persons for questions and concerns regarding human rights.

- Managerial staff
- Corporate HR
- Employee Advisory Board
- Compliance Officer
- Occupational Safety Specialist

- **Maximilian Hartung**
SECUWING GmbH & Co. KG | Data Protection Agency
Frauentorstraße 9
86152 Augsburg | Germany
Telephone: +49 (0) 821 90786450
Fax: +49 (0) 821 90786459
Email: sortimo@ethics-hotline.eu
Threema ID: ZB5XNM5N
- Sortimo's **whistleblower system** is supervised by trusted persons at the Ombudsman's Office and is available to everyone at this link: [Sortimo whistleblower system](#)

I. Introduction

Sortimo respects and supports internationally recognized human rights in all places where we operate. The foundations of our pledge are the [International Charter of Human Rights](#), the [UN Guiding Principles on Business and Human Rights](#) (UNGPs), the [Ten Principles of the UN Global Compact](#), the [UN Sustainable Development Goals](#), the [OECD Guidelines for Multinational Enterprises](#), the [OECD Due Diligence Guidelines](#) and the [UN Sustainable Development Goals. German Supply Chain Due Diligence Act](#) (LkSG).

For Sortimo, compliance with all laws in all countries in which we operate is a fundamental principle. To the extent this policy goes beyond applicable laws, we will follow our policy. If there is a conflict between our policy and applicable laws, we will comply with the law, but act in the spirit of our policy as much as possible. If Sortimo determines that we have caused or contributed to negative human rights impacts, we actively participate in improving the situation together with the affected parties in order to remedy the grievances. Depending on the type of misconduct, various mechanisms are used to reduce or rule out the risk of the maladministration occurring again. We will regularly assess our remedies to ensure their effectiveness and success.

This Human Rights Policy brings together and complements human rights aspects from other Sortimo guidelines and guidelines, including:

- [Code of Conduct](#)
- [Supplier Code of Conduct](#)
- Compliance Manual
- Work regulations
- Working time regulations
- HR processes as guiding principles

Scope

This guideline applies to all companies that directly or indirectly belong to or are controlled by Sortimo International GmbH. Where Sortimo holds a minority stake, we will use our influence to ensure that the same or similar standards are met.

As part of our promise, we expect our suppliers, contractors, customers and first-level business partners to respect human rights and conduct human rights due diligence. As far as possible and relevant, we will support them in their efforts.

II. Our Pledge to Respect Human Rights

We respect and protect the rights and dignity of anyone who works for us, directly or indirectly, in a permanent or fixed-term employment relationship. We also know that we can have an impact on society with our activities and with our products. Therefore, the following section outlines how we protect the rights of people (1) in our own operations and (2) in our partners and in society.

By taking responsibility to respect human rights wherever we operate, we contribute to achieving our goals in relation to the UN's Sustainable Development Goals.

1. Own business (permanent employees and temporary workers)

- We are committed to providing **reasonable working hours** to ensure that there is enough time for recovery. The working hours may not exceed the maximum working hours prescribed by law at the respective location. In any case, the normal weekly working time should not exceed 48 hours. Overtime is paid in accordance with the applicable laws.

Example: If your manager asks you to work more than the maximum working hours mentioned above, you have

the right to refuse. When you start working for Sortimo, you have the right to have your working hours expressly specified in your contract or a corresponding document. If you disagree with your manager about your working hours, you can contact your HR department.

- We provide **wages and benefits** in accordance with applicable laws and standards in each industry, and strive to pay a reasonable wage that is higher than the minimum wage applicable in each country.

Example: As an employee at Sortimo, your salary and employer benefits are determined and documented at the beginning of your employment. Any deduction from your salary must have a legal basis, i.e. your manager cannot make or threaten to make such a deduction at will. If you find a violation of the above standards, please contact your HR department.

- We are committed to effective **safety in the workplace** and are constantly striving to improve it in order to guarantee a safe working environment for our employees. We are committed to taking the best possible precautions to prevent accidents and occupational diseases. We comply with the minimum legal requirements and strive to exceed them when laws do not provide adequate protection. Our managers are required to train and supervise employees to the extent necessary to ensure compliance with occupational health and safety standards.

Example: You have the right to require adequate protective equipment in the workplace and to refuse to perform activities that are not sufficiently safe. You have a duty to inform your supervisor or occupational health and safety officer if you discover an unsafe work area at your workplace or at a supplier or customer. This obligation also applies to hazards that could affect persons who are not employed by Sortimo, e.g. temporary workers, employees of suppliers, customers or visitors.

- We do not tolerate any form of **forced labor, modern slavery, or human trafficking** at any of our global locations. Practices such as forced overtime, withholding of identity documents and debt bondage can constitute modern forms of slavery and are therefore prohibited. We are committed to adhering to ethical principles when hiring workers, especially for at-risk groups such as migrant workers. Sortimo employees are free to terminate their employment with reasonable notice.

Example: We will never ask you to provide your passport or other identification documents or work overtime under threat of losing your job or reducing your regular wage. If this happens to you in your work at Sortimo or if you observe such practices in others, please report this immediately to your HR department and the Ombudsman's Office. Pay particular attention to temporary workers and colleagues employed by temporary employment agencies, as they are at a higher risk of becoming victims of such practices.

- We don't let **children work for us**. We follow the laws and international standards regarding the minimum working age. We support legal apprenticeships, internships and similar programs for young people aged 15 to 17, provided that all relevant laws and regulations are complied with and the job does not involve hazardous work.

Example: If you notice something that doesn't seem right when it comes to young people, contact your HR department or the ombudsman's office. These can be indirect signs of the presence of children (toys or children's clothing), e.g. at Sortimo or at suppliers. Please note that child labour is a sign of a particular vulnerability of the children and families involved. If you ever suspect this issue, please be particularly sensitive to this vulnerability when fulfilling your reporting obligation. Sortimo does not tolerate any form of child labour, but is committed to finding solutions that protect those who are most at risk when child labour is exposed.

- Everyone who works for us must be treated with respect and dignity. We are committed to providing **equal opportunities and an inclusive environment** (gender, sexual orientation, origin, ethnicity, nationality or religion) to everyone who works or wants to work for Sortimo. This also includes **equal pay for equal work**. Discrimination of any kind will not be tolerated, although we recognize that creating a truly non-discriminatory environment is an ongoing process. We are committed to a culture of learning and empathetic listening to different views on what it means to work for Sortimo.

For example, if you are not allowed to work overtime solely because of the color of your skin, or if you are denied a promotion, or if another work-related decision is made, you may be a victim of discrimination. Please do not remain silent in this case, but contact an executive or a third party you trust to have the matter investigated. If you see this happening to someone else, please encourage them to do the same.

- We do not tolerate any form of (physical or psychological) **harassment**. This explicitly includes sexual harassment and bullying.

Example: We know that in addition to severe cases of harassment, there are also more subtle forms of misconduct that contribute to an atmosphere of discomfort and can lead to a harassing work environment. This includes, but is not limited to, the use of unwanted nicknames by superiors or collaborators, stereotypes with racial or gender overtones, and general microaggressions. The threshold for harassment may vary depending on the addressee and context, and the fact that such statements are often vague may discourage those affected from coming forward. We therefore strongly encourage anyone who believes they are the target of any kind of harassment to come forward and, if necessary, seek help.

- We respect our employees' rights to **freedom of association, freedom of association and collective bargaining**. In countries where the right to collective bargaining is restricted by law, for example, or where employees have not appointed representatives, we strive to find alternative ways for an open dialogue between employees and management.

Example: As an employee at Sortimo, you are free to discuss your employee rights with your colleagues in order to form organised groups that advocate for the improvement of your working conditions. Managers or supervisors must not punish these activities. If you are intimidated by such activities, please use the Sortimo whistleblower system and/or contact the Staff Advisory Board.

- We guarantee and protect the **freedom of expression** of our employees and their right to express their opinions.

Example: At Sortimo, we encourage you to share your thoughts with your employees and the public in accordance with the Code of Conduct. However, because of our commitment to providing an inclusive work environment, you are not permitted to make abusive, defamatory, discriminatory or verbally harassing comments.

- We reject all forms of **corruption**, including extortion and bribery. We know that corruption increases the risk of human rights violations. Our operating principles and guidelines for responsible conduct are set out in our Code of Conduct and are implemented through our Anti-Corruption Principles. Our Compliance Officer ensures that these principles and guidelines are anchored throughout the Sortimo Group.

Example: As an employee at Sortimo, you are not allowed to offer money or other benefits to civil servants or potential customers in order to speed up official approval procedures or to obtain orders. Likewise, you must not accept money and benefits from potential business partners. If you are unsure about making a payment or accepting money or other benefits, ask the Compliance Department for help.

- We respect **the privacy of our employees** and protect their personal data in accordance with applicable laws.

Example: As an employee, you do not have to provide your manager with information about medical matters. You have the right to refuse to provide information about your illness if you take sick leave. If you feel pressured to disclose private information about yourself at work that does not seem appropriate, please contact the HR department and/or the Sortimo whistleblower system.

- Our **security management** focuses on ensuring the safety of employees, business partners, customers and visitors and protects the tangible and intangible assets of Sortimo International GmbH. We operate our security risk management in accordance with applicable laws and good practices in all our markets. We are committed to continuously improving our procedures for identifying and addressing security-related human rights risks. We instruct all our security staff not to use illegal or disproportionate means and methods, such as torture, and monitor them to ensure they follow our instructions and do not compromise the health and safety of others. We do not use security staff and security services for the purpose of restricting freedom of association.

Example: All security employees employed by Sortimo or acting on behalf of Sortimo must treat all persons humanely and respect their dignity and privacy. They must take all reasonable measures to avoid the use of force and must not engage in harassment, including sexual harassment, under any circumstances. If you see something that doesn't seem right, please contact the Compliance Manager or our external ombudsperson or use the Sortimo whistleblower system to make a report or file a complaint.

2. Our relationship with our partners and society

Our relationships with our partners and society are driven by the following promises and expectations, which set out how we seek to reduce negative impacts on individuals. Whenever possible, we form long-term relationships that allow us to work together towards positive impact.

- We expect our **suppliers and contractors of goods and services** to respect human rights and to communicate these expectations to their own suppliers and contractors through our Supplier Code of Conduct for Suppliers. Through our supply chain management, we seek to support them in improving their human rights due diligence where possible, e.g. through supplier audits and assessments and by including human rights risks in the supplier selection process.
- We also expect our **business partners in the downstream value chain** to respect human rights and conduct human rights due diligence checks. This applies in particular when Sortimo employees carry out work at partner or customer sites.
- Protecting the health and safety of everyone who comes into contact with our products is a very important goal for Sortimo. That is why we have set up comprehensive management systems to maintain and continuously improve **the safety, quality and sustainability of our products and systems**. We seek to identify and reduce potential impacts that our products and services may have on health and the environment. This starts with research and development and continues through production and use by customers and end users to disposal. When we integrate new technologies into our products, we take great care to integrate appropriate data protection as well.
- We are committed to **incorporating the due diligence requirements of the UN Guiding Principles on Business and Human Rights** into our strategic business decisions.
- We know that our activities can have an impact on the well-being of **communities** near our operations. We monitor our emissions and other potential impacts on neighboring communities, such as the use of water, and seek to actively engage with local stakeholders to find solutions that are beneficial to all stakeholders.
- We recognize **climate change** and its impact on people and their rights as one of the most pressing challenges of our time. As an internationally active industrial company, we are committed to taking responsibility for climate protection, as evidenced by our ambitious climate strategy.

III. Human Rights Risk - Management System

Roles and responsibilities

People and their rights can be affected by any activity and location of our company. Everyone at Sortimo has a role to play in integrating the promises and objectives set out in this policy into their work and their behaviour towards others.

We strive to sensitize all managers, employees and contractors of Sortimo International GmbH to the issue of human rights and to strengthen their sense of responsibility. We recognize that the human rights due diligence process is a long-term one and are committed to a continuous improvement process.

Management is responsible for ensuring that this policy is followed in their respective countries.

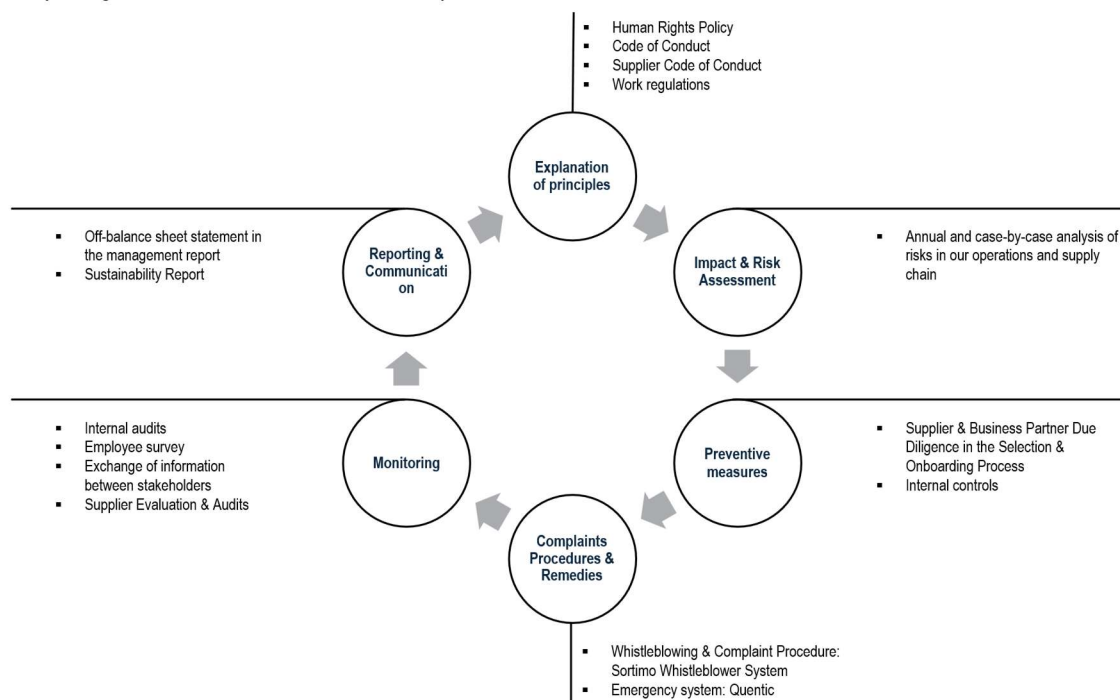
We have defined the roles and responsibilities for the implementation of this policy and assigned specific tasks to the individual corporate functions, such as purchasing, human resources, safety and health management. Our Compliance Officer has been tasked with overseeing the human rights risk management system.

Risk analysis and due diligence

To implement this policy, we have established a human rights risk management system.

We have conducted a human rights risk analysis of both our own operations and the supply chain and identified the human rights risks listed above as priority points of attack. We will repeat this risk analysis annually and on a case-by-case basis as needed.

To avoid identified human rights risks, we will establish processes and amend existing ones, such as our Supplier Code of Conduct, supplier due diligence process and supplier audits. We have established a grievance mechanism to allow our employees and external stakeholders to report risks and incidents, and we will actively work with our suppliers to address identified risks. We are prepared to terminate business relationships if the risks cannot be adequately mitigated in the context of such cooperation.



The chart below shows the elements of our human rights due diligence process that help us prevent or mitigate negative impacts on people and, if necessary, provide redress. They are described in more detail in our Corporate Responsibility Report (Code of Conduct) and in the off-balance sheet statement in our Management Report.

IV. Concerns and Complaints

We encourage all employees who suspect behavior that is inconsistent with the promises and guidelines set forth in this policy to contact their line manager. If there is a conflict with your direct supervisor, we recommend that you ask a neutral third party, such as the HR department or the employee advisory board, for help.

The Sortimo Employee Advisory Board acts as a representative and representative for employee rights and can be contacted in the event of complaints.

Employees and all external stakeholders, e.g. employees of our suppliers, can contact the following offices with their concerns safely and, if desired, anonymously (see contact details above):

- Managerial staff
- Corporate HR
- Employee Advisory Board
- Compliance Officer
- Occupational Safety Specialist
- Emergency system: Quentic

- **Maximilian Hartung**
SECUWING GmbH & Co. KG | Data Protection Agency
Frauentorstraße 9
86152 Augsburg | Germany
Telephone: +49 (0) 821 90786450
Fax: +49 (0) 821 90786459
Email: sortimo@ethics-hotline.eu
Threema ID: ZB5XNM5N

- Sortimo's **whistleblower system** is supervised by trusted persons at the Ombudsman's Office and is available to everyone at this link: [Sortimo whistleblower system](#)

In line with the requirements of the UN Guiding Principles on Business and Human Rights, we will investigate reported cases and address reported issues that have been confirmed.

We do not tolerate any form of retaliation against employees who raise concerns or report misconduct in good faith.

We will continuously work to improve the effectiveness of our complaint management system in line with the requirements of the UN Guiding Principles on Business and Human Rights.

V. Monitoring, Reporting and Evaluation

Sortimo continuously monitors compliance with these human rights guidelines through the risk management system – if necessary also with external support – in accordance with the prescribed accounting standards.

Sortimo shall sanction any violations of these Human Rights Guidelines in the appropriate manner and shall ensure that any grievances are immediately remedied and, if necessary, requirements and guidelines are adapted.

Imprint

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