



# POLICY STATEMENT

BITZER SE and the BITZER Group

**The BITZER SE**

**and**

**BITZER Group**

**policy statement  
on sustainability management,**

**the protection of human and labour rights, and environmental  
and energy management  
in the implementation of the**

**German Supply Chain Due Diligence Act (LkSG)  
guidelines**



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## 1 Obligation at the highest company level

### 1.1 A Group company's responsibility

We're well aware of our corporate responsibility for ensuring sustainable operations and upholding human rights, and are committed to ensuring sustainable operations and upholding human rights in our business activities and in our global supply and value chains.

We also expect our business partners to commit to upholding human rights, establishing appropriate due diligence processes and passing these expectations on to their own suppliers.

### 1.2 Responsible treatment of company employees

By design, our sustainable operations refrain from causing or contributing to human rights violations. We also encourage our employees at all times to act in accordance with our established principles (Code of Conduct for Employees).

### 1.3 Responsibility beyond our company borders

Wherever possible, we help our direct suppliers apply these principles and guidelines – with the aim of upholding human rights and ensuring fair working conditions and sustainable operations. We treat our employees, business partners and other stakeholders such as investors, media, politicians, local communities and NGOs with respect.

### 1.4 Responsible supply chain (direct/indirect)

As a component of the contract, the BITZER Code of Conduct for Business Partners is binding and a requirement for collaboration. With this code, we encourage our business partners to pass on our sustainability expectations to indirect business partners.

## 2 International standards

BITZER companies uphold human rights and operate in compliance with the principles of sustainable, responsible company management. We observe the following frameworks:

- UN International Bill of Human Rights and UN Guiding Principles on Business and Human Rights
- The core labour standards of the International Labour Organization (ILO)
- OECD Guidelines for Multinational Enterprises
- Ten Principles of the UN Global Compact
- Charter of Fundamental Rights of the European Union
- German Supply Chain Due Diligence Act (LkSG)
- Corporate Sustainability Reporting Directive, EU Taxonomy

We also support the UN's 2030 Agenda for Sustainable Development. We've identified five Sustainable Development Goals (SDGs) that correspond with our business activities and corporate strategy:

- SDG 8: Decent Work and Economic Growth
- SDG 9: Industry, Innovation and Infrastructure
- SDG 10: Reduced Inequalities
- SDG 12: Responsible Consumption and Production
- SDG 13: Climate Action

## 3 Context/organisation, responsibilities



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Full responsibility for sustainability management as well as human rights and environmental due diligence lies with the Management Board of BITZER SE, which is the parent company of the BITZER Group companies. Human Resources, Global Procurement and Integrated Management Systems are responsible for implementation, with the support of Corporate Finance and Treasury, Corporate Accounting, Consolidation and Tax, and Legal Services. The management teams and Managing Directors of the subsidiaries are in charge of implementing and maintaining the defined due diligence and principles on a local level as well as lawful fulfilment of the requirements of individual directives and regulations.

## 4 Corporate due diligence

### 4.1 Risk analysis and risk management

Business activities can pose potential risks with associated effects. These risks are assessed annually and as required through risk management for the purpose of analysing any potential negative consequences. For subsidiaries that are crucial (based on the number of employees, the location and the type of activity), we identify these risks with the aid of a questionnaire.

Risk analysis for our suppliers is broken down into two steps:

1. Abstract observation of branch and country risks in our supply chain
2. Concrete identification of risks in our supply chain: We also prioritise assessment results on the basis of our ability to influence the risk. We then examine our suppliers on the basis of the type of products and services, purchasing volume, the concrete self-disclosures of individual suppliers, and, if necessary, other factors and indicators in the country of risk.

Based on risk analysis, BITZER has evaluated high-priority human rights and environmental risks according to country, product and material.

### 4.2 Prevention and assistance measures

If permitted by the scope of influence, BITZER companies implement prevention and assistance measures to avoid risks associated with human rights and the environment. We conduct internal compliance audits and investigate relevant tips about potential human rights violations on a regular basis and as required to assess the efficacy of our prevention and assistance measures internally. We inform our suppliers that they must comply with our binding Code of Conduct for Suppliers, which forms the basis for collaboration and requires all suppliers to uphold internationally recognised human rights, maintain employee protection, prevent discrimination, comply with the applicable rules on environmental and climate protection, and contribute to conserving natural resources.

### 4.3 Complaints procedure

Human rights violations and grave misconduct need to be reported to ensure the appropriate form of punishment and prevent them from occurring again in the future. Human rights violations and grave misconduct – for example, conduct that violates our Code of Conduct for BITZER Group Employees and the BITZER Code of Conduct for Business Partners – can be reported – anonymously if desired – at any time using our publicly accessible whistle-blower system, the BITZER Integrity Line. The BITZER Integrity Line guidelines provide a detailed description of the complaints procedure and whistle-blower system.