

DECLARATION OF PRINCIPLE ON RESPECT FOR HUMAN RIGHTS

The Pankl Group is operating internationally and is committed to monitoring and improving the human rights situation along its supply chains and promoting sustainable social development. Pankl recognizes the opportunities and challenges of increasing integration into global markets and respects all human rights, regardless of whether the respective states show the willingness and ability to protect these rights.

Through the risk management, Pankl strives to identify human rights violations in its supply chains at an early stage and takes measures to ensure compliance with human rights. Among other things, this includes fair wages, appropriate working conditions, the prevention of child labor, equal rights, and non-discrimination.

Pankl rejects corruption, forced labor and human trafficking, and sensitizes its employees accordingly. Pankl's established processes enable to monitor compliance with these principles, detect violations of these principles and take appropriate action. Pankl accepts information from third parties at any time to identify problems at an early stage and continuously improve the sustainability of its supply chains. Various information channels are available to whistleblowers for this purpose.

The Pankl Group uses several external service providers to ensure compliance with all the above-mentioned guidelines and standards. These support the Pankl Group, for example, in the context of risk analysis and the recording of information and complaints.

The Pankl Group continuously examines where there are risks of human rights and environmental violations in its own business operations and supply chains. The Pankl Group identifies and assesses the relevant human rights issues and potentially affected groups through a risk analysis process that

is updated annually and as required. This is done both for its own business activities and for direct suppliers. In addition, this process is also carried out for the Pankl Group's indirect business relationships as required.

Based on an abstract consideration of the risks, the Pankl Group identifies, considering vulnerable groups, in particular industry-, raw material- and country-specific risks in its own business area and supply chains. In the second step, suppliers and companies with an increased risk position are examined for priority human rights and environmental risks as part of a concrete risk analysis. The expertise and experience of the responsible employees, who are in constant contact with suppliers and civil society organizations, is always incorporated into this process.

The results of the risk analyses are continuously integrated into the Pankl Group's corporate decision-making processes, particularly regarding internal business strategies and the selection and management of suppliers. The risk analysis serves as the basis for setting appropriate targets and for preventive and corrective measures.

Effective grievance management is another key component of the Pankl Group's human rights strategy. The complaints procedure enables the early identification of potentially adverse effects and the implementation of appropriate measures to prevent violations, avoid future incidents and take remedial action.

The Pankl Group has introduced a complaints procedure that allows not only employees but also other potentially affected groups of people to report violations of human rights and environmental concerns at any time. The publicly accessible rules of procedure describe the reporting process for these topics. All reported information and well-founded

suspicions regarding possible human rights violations are processed in a transparent, balanced, and predictable manner for all parties involved. The confidentiality and anonymity of the whistleblowers are protected. The Pankl Group ensures, as far as possible and within its sphere of influence, that whistleblowers are protected from discrimination and punishment in connection with the complaints they submit.

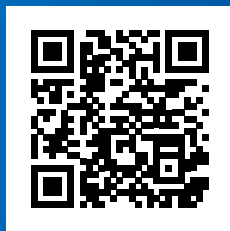
Internal processes have been developed for dealing with infringements, both in our own business area and at a business partner.

In addition to the internal standards, the Pankl Group is particularly committed to the following internationally recognized standards:

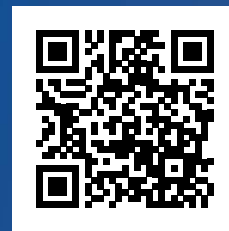
- The United Nations Universal Declaration of Human Rights
- The conventions and recommendations of the International Labor Organization (ILO) on Labor and social standards
- Charter of Fundamental Rights of the European Union.

The ultimate responsibility for the implementation of this declaration of principles lies with the Management Board of Pankl AG and is steered from there to the respective divisions.

Respect for human rights is part of the group-wide Code of Conduct, which is also communicated to the suppliers. The content of the Code of Conduct is part of the training courses that all employees of the Pankl Group must complete annually.



complaints procedure



Code of Conduct