

NWI Group's Policy Statement in accordance with the Supply Chain Due Diligence Act (SCDDA)

Declaration of principles on respect for human rights and protection of the environment

Introduction

The NWI Group expressly acknowledges its responsibility to ensure respect for human rights and the protection of the environment in its business activities and along its supply chains. This policy statement is based on the requirements of the German Supply Chain Duty of Care Act (LkSG), international human rights standards, including the UN Guiding Principles on Business and Human Rights, and recognized environmental standards.

Our aim is to minimize the human rights and environmental risks in our value chain and to build sustainable business relationships.

1. Our self-image and values

Die NWI Group verpflichtet sich, in all ihren Geschäftsaktivitäten:

- **Protect human rights** as defined in the Universal Declaration of Human Rights and the core labor standards of the International Labor Organization (ILO).
- **Comply with environmental standards** based on international agreements such as the Paris Agreement on Climate Change, the Minamata Convention and the Stockholm Convention.
- Promote the implementation of these principles in cooperation with employees, business partners and stakeholders.

2. Scope of application

This policy statement applies to:

- **Our own business activities:** All NWI Group sites, operations and employees.
- **Our direct suppliers:** Business partners and suppliers with whom we have a contractual relationship.
- **Indirect suppliers:** Where there are specific indications of human rights or environmental risks.

3. Human rights and environmental principles

We are committed to upholding and promoting the following principles:

Human rights

- **Prohibition of child and forced labor:** We do not tolerate child labor or any form of forced or bonded labor in our supply chain.

- **Equality and non-discrimination:** We promote diversity and equal opportunities and reject all forms of discrimination.
- **Fair working conditions:** We are committed to safe and healthy workplaces and fair pay.
- **Freedom of association:** The rights to freedom of association and collective bargaining are fully respected.

The environment

- **Protection of natural resources:** We strive to use resources efficiently and minimize environmental damage.
- **Avoidance of hazardous substances:** We pay attention to the responsible use of chemicals and the avoidance of pollutant emissions.
- **Climate protection:** We are committed to reducing greenhouse gas emissions throughout our value chain.

4. Our due diligence obligations

We are committed to the following measures to implement our responsibility:

a. Risk analysis

- Regular identification and assessment of human rights and environmental risks in our business activities and supply chain.
- Focus on particularly risky sectors, products or regions.

b. Preventive measures

- Integration of human rights and environmental requirements into our internal guidelines and contracts with business partners.
- Implementation of training and awareness-raising measures for employees and suppliers.
- Promotion of sustainability initiatives in our supply chain.

c. Remedial actions

- Develop and implement concrete action plans to remedy non-compliance.
- Working closely with suppliers to ensure human rights and environmental standards.
- In case of serious violations: Termination of business relationships as a last resort.

d. Grievance mechanism

- Provide an anonymous, accessible and transparent grievance mechanism for internal and external stakeholders.
- Comprehensive investigation and documentation of all reported cases.

e. Documentation and reporting

- Preparing an annual report on the fulfillment of our due diligence obligations.
- Disclosure of our measures and progress in accordance with the requirements of the LkSG.

5. Cooperation with stakeholders

The NWI Group strives to work closely with relevant interest groups such as non-governmental organizations, trade unions, local communities and government agencies. Together we want to ensure a human rights and environmentally friendly supply chain.

6. Responsibility and accountability

Responsibility for the implementation of this declaration of principles lies with the management of the NWI Group. We have set up an internal coordination office to monitor and ensure compliance with due diligence obligations.

7. Continuous improvement

We see compliance with human rights and environmental standards as a dynamic process. We are therefore committed to continuously reviewing our strategies and measures and adapting them to new challenges.

Closing words

The NWI Group stands for sustainable and responsible corporate governance. With this policy statement, we reaffirm our commitment to the protection of human rights and environmental standards in our business activities and supply chain.

19.12.2024, Frankfurt
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