

beeline group



Declaration of Principles on Respect for Human Rights (Human Rights Policy)

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***We - beeline GmbH, including its affiliated companies
(together: the beeline group) - are committed to
respecting human rights and protecting the
environment.***

1 Policy statement - Positioning

Our corporate culture is based on values that guide our actions and decisions towards long-term success, define expectations on employees and managers and assure our business partners quality, sustainability and ethical business practices.

We are convinced that long-term economic success can only be guaranteed if human rights are recognised, respected and protected, as well as the environment. In order to fulfil our social responsibility, beeline is committed to acting sustainably and responsibly.

The beeline group's policy statement on respect for human rights sets out the expectations we as a company have on our employees and our business partners with regard to human rights and the environment, how we intend to fulfil our duty of care and continuously improve our efforts to ensure this.

2 Standards and expectations on employees and business partners

We want to fulfil our environmental and social obligations in our company and along our supply chain. Our actions are based on internationally recognised frameworks and principles for the protection of human rights and the environment. The following frameworks in particular represent authoritative standards and guidelines for us:

- Universal Declaration of Human Rights of the United Nations (UN)
- United Nations Guiding Principles on Business and Human Rights (UNGPR)
- Principles of the United Nations Global Compact (UNGC)
- UN Convention on the Rights of the Child
- OECD Guidelines for Multinational Enterprises
- Minimata Convention of 10 October 2013 on Mercury (Minimata Convention)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Basel Convention)

The values and standards enshrined therein are also reflected in our own rules and regulations, which are a binding framework for all our employees and business partners:

- beeline Code of Conduct (Our Code of Conduct)
- beeline Supplier Code of Conduct (Our Supplier Code)

The beeline group expects all employees and business partners to comply with applicable laws and regulations and internationally recognised human rights and environmental standards. The beeline group also expects its own employees to base their daily decisions on the guidelines set out in this policy statement and the beeline group's Code of Conduct. The beeline group also expects its suppliers to accept and strictly adhere to the Supplier Code of Conduct. At the same time, they are requested to pass on this expectation to their suppliers and business partners.

3 Priority risks

In the area of our business activities, we have identified human rights and environmental risks, particularly in the upstream value chain. A non-negligible number of our products and product raw materials come from countries where compliance with constitutional principles is not always a matter of course. We are aware that children, women, indigenous communities, migrants and migrant workers in particular, as well as other collective, family or individual minorities, can be affected by human rights violations.

We have carried out a risk analysis in our own business area and at our direct suppliers. Our risk analysis was prepared for the first time in 2023 on the basis of the guidelines of the Federal Office of Economics and Export Control (BAFA). The aim of the risk analysis is to identify real and potential risks and the impact of our business activities on compliance with human rights and the environment. These risks were assessed in order to derive targeted and sustainable measures to further minimise or avoid the risk. If we have substantial knowledge of violations, we will also include indirect suppliers and partners in our risk analysis. It is essential that each of our business partners identifies risks within their own supply chain and takes appropriate measures.

We have identified the following risks in our supply chain: Working conditions and freedom of association, child labour, chemical management, environment and waste, and discrimination.

For many years now, the beeline group has established fixed processes to identify and subsequently exclude potential risks. Comprehensive and uniform management of these risks helps to prevent and minimise any violations of the human rights and environmental rights of those potentially affected, while at the same time protecting the reputation and credibility of the beeline group. The beeline group understands the management of human rights and environmental risks as a continuous process that is firmly integrated into operational procedures.

4 Preventive and remedial measures

We use the knowledge gained from the results of our latest risk analysis to further improve existing preventive measures with the aim of applying them consistently in our supply chains. For several years now, we have defined specific and binding requirements for safeguarding human rights and avoiding environmental risks in our Supplier Code of Conduct. Compliance with these requirements is ensured by numerous in-house auditors and certified agencies on the basis of the audit requirements we have drawn up in order to eliminate the above-mentioned risks and support our suppliers. Our due diligence activities and requirements are constantly reviewed for their effectiveness across all areas and further optimised and synchronised.

5 Complaints procedure

Appropriate and effective complaint management is an elementary component of the beeline group's human rights strategy. This enables us to recognise human rights and environmental risks along our supply chain at an early stage and remedy violations (early warning system). The complaints procedure for suppliers, our "Supplier Complaints Line" (<https://beeline.speakup.report/de-DE/suppliers/home>), is aimed at all persons or groups of persons who are directly or indirectly affected by a violation of rights under the LkSG in Germany or abroad or who have knowledge of such a violation. Employees of beeline can also submit complaints via our internal whistleblower system (<https://beeline.speakup.report/de-DE/general/home>).

6 Structure and responsibilities

The management of the beeline group is ultimately responsible for the implementation of and compliance with the policy statement on respect for human rights of the beeline group. There is regular and ad hoc internal reporting to the management on human rights-relevant results of the continuous risk analysis, information from the complaint mechanisms and information on the effectiveness of remedial and preventive measures taken. This ensures that information-based decisions can always be made.

A central human rights officer of the beeline group is appointed to monitor the risk management system. Among other things, this officer is responsible for ensuring that training and audits are created and carried out, that external reporting on human rights due diligence is carried out and that the management of human rights and environmental due diligence is continuously reviewed and improved. It is supported by the Compliance department. The relevant specialist departments, in particular the Strategic Sourcing department, are responsible for the operational implementation of the human rights due diligence processes.

7 Reporting and further development

The report on the LkSG for 2023 will be made available and published in good time in accordance with the legal requirements, taking into account the guidelines of the Federal Office of Economics and Export Control (BAFA). The annual report on the LKSG is publicly accessible on our company website for 7 years.

The implementation of human rights due diligence is an ongoing development process. With this in mind, we are committed to the continuous development and improvement of our human rights strategy and the associated processes.

For the beeline group

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