

Human Rights Policy

Rules of conduct regarding respect for and respect for human rights

SENSECA Group

Created by	Director ESG & Safety		
Authorised from	COO/CFO		
Date of validity	20-06-2024		

Date	Version	Name	Title
29-04-2024	1.4	Marco Bick	Director ESG & Safety

Gender Notice

For better readability, the generic masculine is used in this document. The personal designations used refer to all genders – unless otherwise indicated.



Table of contents

- 1. Introduction4
- 2. Definitions4
- 3. Circumference.....4
 - 3.1. Child labour and young workers.....4
 - 3.2. Forced or compulsory labour and human trafficking.....4
 - 3.3. Harassment5
 - 3.4. Discrimination5
- 4. Working conditions.....5
 - 4.1. Wages, salaries and benefits5
 - 4.2. Working time5
 - 4.3. Freedom of association and assembly6
- 5. Occupational health and safety6
- 6. Governance6
- 7. Grievance mechanisms.....6
- 8. Reparation6
- 9. Scope of Application7
- 10. Responsibilities.....7
- 11. Date of validity7

1. Introduction

At SENSECA, we are aware of our responsibility towards society and act accordingly. We recognize the co-responsibility of the company and our employees for the common good.

For this reason, we are committed to the United Nations Universal Declaration of Human Rights and actively advocate for its observance. We therefore have a zero-tolerance policy towards the use of child labour, forced or compulsory labour and human trafficking, as well as harassment and discrimination.

SENSECA suppliers and business partners are expected to comply with due diligence on human rights, labour and environmental risks in accordance with our guidelines and the recommendations of the OECD Guidelines for a Responsible Supply Chain and the UN Guiding Principles and other relevant standards for responsible business conduct.

2. Definitions

Our human rights policy supports internationally recognized human rights and standards as described in the following sections:

1. the International Charter of Human Rights
2. the UN Guiding Principles on Business and Human Rights (UNGPR)
3. International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and Indicators of Forced Labour
4. the ten principles of the UN Global Compact
5. the OECD Due Diligence Guidelines for Responsible Supply Chain Industries
6. UNICEF's children's rights and business principles, and
7. the Convention on the Elimination of All Forms of Discrimination against Women

3. Circumference

SENSECA's key commitments to uphold human rights consist of numerous obligations in our own operations and value chain, including our procurement, production, logistics, distribution processes and other business activities and partners.

3.1. Child labour and young workers

We do not tolerate child labour. The legally stipulated age restrictions in accordance with the Youth Employment Protection Act apply, on the basis of which children under the age of 15 and young people who are required to attend full-time schooling are not employed by us. Excluded from this are pupils, internships or other company internships during full-time compulsory schooling that support the child's development. When employing young people and young employees, we also pay particular attention to compliance with the legal regulations on working hours, rest breaks and dangerous work. This includes prohibiting any activities that are classified as dangerous and could endanger the physical or mental health and development of the young employee.

3.2. Forced or compulsory labour and human trafficking

All activities in our working environment are carried out voluntarily by our employees and without coercion or threat of punishment.

Furthermore, in the recruitment process, we ensure that all employment relationships are based on a written contract and, if necessary, that the terms of the employment relationship are explained and understood by the employee in a language that is well understood by him.

With the help of these measures, we try to contribute to the complete avoidance of forced labor, debt bondage, involuntary prison labor and slavery or human trafficking, which should not be used by any company and are strongly condemned by us.

3.3. Harassment

We respect and protect the dignity of our employees and treat them with respect. We are committed to ensuring that all employees can work in a working environment free of sexual, psychological and physical harassment.

Harassment of employees is therefore strictly prohibited. This includes harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, psychological or physical coercion, or verbal abuse of employees, as well as threats of such treatment.

Should such or similar treatment by one of our employees or business partners become known, immediate and immediate termination or termination of the employment or business relationship will follow.

3.4. Discrimination

We offer equal opportunities for all employees and do not tolerate any kind of discrimination on the basis of ethnic origin, national or social origin, gender, religion or belief, political opinion, disability, age, sexual identity or membership of an employee organization, or for any other grounds.

Medical tests or physical examinations of an employee or potential employee for the purpose of discrimination are not allowed in any situation.

If necessary, arrangements are made for the practice of religious practices within reasonable limits.

4. Working conditions

Together, productivity and humanity are indispensable for sustainable corporate success. The economic success of our company can only be ensured by and with our employees. For this reason, the following regulations apply.

4.1. Wages, salaries and social benefits

Wages, salaries, social benefits and other claims arising from the employment relationship (e.g. absences due to illness or vacation days) are paid by us directly after the end of each pay period in accordance with the legal regulations.

Overtime is paid in accordance with the agreed regulations (usually employment contract, otherwise Working Hours Act).

A pay stub that contains adequate information to verify compensation for the work performed for each pay period is prepared for each pay period and given to the employee.

The corresponding legal rules and regulations apply to the use of temporary or external employees.

4.2. Working time

We ensure that the applicable working time regulations are observed. This includes that the actual working hours correspond to the contractually agreed working hours.

Any overtime worked in excess of this is performed by the employee on a voluntary basis and should not exceed a working week of a maximum of 48 hours (in exceptional situations a maximum of 60 hours).

We also ensure that the laws and regulations on maximum working hours and vacation time are complied with.

4.3. Freedom of association and assembly

We respect our employees' right to freedom of association and collective bargaining, as well as the right to form interest groups.

We grant our employees the right to protect their interests on the basis of national legislation.

If applicable, this also includes collective bargaining autonomy. An employee must not suffer any disadvantages as a result of membership in a trade union.

5. Occupational health and safety

The protection of our employees is our top priority. For this reason, we have drawn up extensive regulations on occupational health and safety, which are regularly trained.

Personal protective equipment is provided by us and is freely accessible to every employee. General protective devices such as fire detectors and emergency exits as well as protective devices for machines are available in accordance with the legal regulations.

Emergency instructions and exercises are carried out annually. We also ensure that all necessary permits and licenses, as well as inspection and test reports, are in place and up to date.

For more information on occupational health and safety, please refer to our Occupational Health and Safety Policy.

6. Governance

Our management has adopted this Human Rights Policy Policy on behalf of the SENSECA Group and our Compliance Officer oversees overall compliance with the guidelines.

Our Sustainability, Governance, Sales and Human Resources teams manage the implementation of the guidelines and report regularly to the management and management team.

7. Grievance mechanisms

We continuously strengthen the reach and efficiency of our grievance mechanisms through a confidential whistleblowing system for our own employees and suppliers, external individuals or organizations, civil society organizations or communities.

Human rights defenders across the value chain can use our grievance mechanisms without fear of retaliation or other threats.

Further information on the topic of complaint mechanisms can be found in our Whistleblower Policy.

8. Reparation

If human rights-related risks or violations are identified, we work with all parties involved to gain access to remedies for the victim and to end or minimize the risks or violations.

We also examine the root causes, including our purchasing practices, to prevent such risks or violations from happening again

In particular, we work to prevent and remedy impacts on vulnerable groups such as women, children, minorities, youth and migrants. We work with public organizations, initiatives and/or local stakeholders when we need to increase our influence and/or expertise

9. Scope of Application

This policy applies to all employees (m/f/d) of the company at all companies belonging to the SENSECA Group.

10. Responsibilities

This guideline is reviewed once a year to ensure that it is up to date. The following functional officers are responsible for the environmental directive:

- Compliance-Manager
- HR-Manager

11. Date of validity

This guideline will come into force on 20.06.2024 and replaces all previous regulations.

Date	Name	Title	Signature
20-06-2024	Jürgen Schneider	COO/CFO	