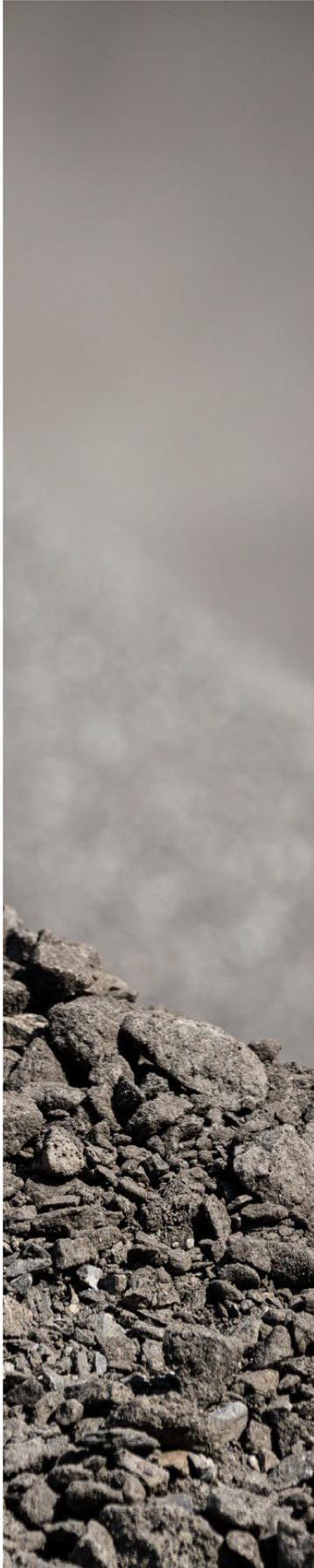


# DECLARATION OF PRINCIPLES OF THE FIXIT GRUPPE

to respect and protect human rights.

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**FIXIT   GREUTOL   HASIT   KREISEL   RÖFIX**

## Respect and protection of human rights



### Foreword

As the umbrella organization for the five building material brands FIXIT, GREUTOL, HASIT, KREISEL and RÖFIX, the FIXIT GRUPPE has been one of the leading suppliers in the building materials sector for many years. It develops and produces trend-setting building materials and systems for façades, walls and floors - in 18 countries across Europe, at a total of 69 locations.

In accordance with our corporate philosophy "Preserving values, shaping a sustainable future with building materials", our aim is not only to be economically successful, but also to firmly anchor responsibility for people and the environment in our daily work. Protecting and respecting international standards of conduct and environmental standards are integral components of the FIXIT GRUPPE's sustainability strategy.

For us, "preserving values" therefore also means ensuring compliance with human rights in all our business activities and along the supply chain. This is a central component of our actions and our commitment to the people we work with and for.

To this end, we have drawn up a declaration of principles on human rights. It is aimed at all employees and partners of the FIXIT GRUPPE and is generally binding.

Important human rights principles are, for example

- the ban on child labor
- the prohibition of forced labor and slavery
- health and safety in the workplace
- diversity, inclusion and equal treatment in the group
- fair pay etc.

With the Declaration of Human Rights, we have made an important statement and want to continue to live our values and make a positive contribution to society in the future.

Hanswilli Jenke  
**CEO FIXIT GRUPPE**

## 1. Introduction

The FIXIT GRUPPE was founded in September 2006 as an umbrella organization for the five building material brands FIXIT, GREUTOL, HASIT, KREISEL and RÖFIX. With 69 locations in 18 European countries and around 2,300 employees, the FIXIT GRUPPE is one of Europe's leading system providers in the building materials sector.

As an international Group, we are aware of our social and environmental responsibility. Protecting and respecting international standards of conduct and environmental standards are integral components of our sustainability strategy. We respect and value diversity in our company and in the countries and societies in which we operate.

This policy statement sets out our human rights strategy and includes our commitment to responsible corporate governance, our principles and objectives in relation to respecting human rights and the environment, including the promotion of diversity, equality and inclusion.

## 2. Legal basis and scope of application

Within the company and along the supply chain, the FIXIT GRUPPE is committed to compliance with internationally applicable human rights and corresponding guidelines and standards, such as the Universal Declaration of Human Rights of the United Nations General Assembly (UDHR), the European Convention on Human Rights (ECHR), the guidelines and standards of the International Labor Organization (ILO), the United Nations Guiding Principles on Business and Human Rights and the ten principles of the UN Global Compact (UNGIC).

This policy statement is aimed at all managers, employees and customers of the FIXIT GRUPPE. It is generally binding and is published on the website and intranet of the FIXIT GRUPPE and thus made available to every employee, every business partner and every customer.

## 3. Commitment to respect and protect human rights

The FIXIT GRUPPE is expressly committed to respecting and protecting human rights. All its managers, employees and business partners are obliged to act, behave and actively contribute to the protection of human rights in accordance with globally recognized human rights principles as defined in the United Nations Universal Declaration of Human Rights.

### a. Ban on child labor

The FIXIT GRUPPE rejects any form of child labor and demands respect for the minimum age for admission to employment in accordance with the respective national regulations and the exclusion of any form of exploitative child labor.

### b. Prohibition of forced labor and slavery

The FIXIT GRUPPE rejects all forms of forced labor and all forms of slavery, such as extreme economic or sexual exploitation and humiliation, debt bondage and human trafficking.

**c. Health and safety in the workplace**

The FIXIT GRUPPE focuses on prevention and the effective reduction of potential health and safety risks in the working environment. With our minimum standard for health and safety in the workplace, we have created a framework to minimize the risk of injuries, accidents and work-related illnesses among our employees. Regular training and first aid courses regularly prepare our employees for what to do in an emergency. All of our national companies and business partners are obliged to act in accordance with their national and international occupational health and safety standards.

**d. Diversity, inclusion, equal treatment**

The FIXIT GRUPPE does not tolerate any form of violence, harassment or discrimination. We promote diversity and inclusion, follow our principles of conduct and treat every person with respect, regardless of nationality, ethnic or social origin, age, religion or belief, any disability, sexual orientation or identity and political opinion. We stand for equal opportunities in employment and occupation and implement equal participation of women and men at all (management) levels. The proportion of women in management positions is already higher than the corresponding proportion in the overall workforce. For us as a modern employer, diversity (of thought), inclusion and equal opportunities are indispensable strategic success factors and integral components of a modern HR policy.

**e. Fair remuneration**

The FIXIT GRUPPE pays all employees an appropriate wage, which is based on the applicable legal regulations and the respective national labor market. We guarantee compliance with the respective national regulations working hours and regular paid vacation.

**f. Freedom of association and collective bargaining**

The FIXIT GRUPPE respects the relevant statutory regulations on freedom of association, co-determination and cooperation with employee representatives. We are committed to honest, fair dialog and partnership-based cooperation with our works councils.

**g. Environmental and climate protection**

The FIXIT GRUPPE is committed to environmental and climate protection in line with the United Nations' environmental, social and governance criteria (ESG criteria). As part of our sustainability strategy, we have defined measurable climate targets and launched interdisciplinary projects to minimize our own negative ecological and climate-related impacts and at the same time increase our own efficiency.

**h. Data protection and information security**

The FIXIT GRUPPE guarantees absolute data protection compliance and information security, especially with regard to the protection of personal rights and privacy. We collect, process and use personal data in accordance with the European General Data Protection Regulation (EU GDPR) and the applicable national data protection regulations. We move with the times and invest in state-of-the-art IT systems and technologies. To support this, our employees are regularly trained in data protection and cyber security.

## **4. Measures to fulfill the human rights due diligence obligation**

### **a. Corporate governance and due diligence**

The FIXIT GRUPPE 's rules and regulations comprise a series of specialist guidelines and specifications to ensure internal and external compliance. The FIXIT GRUPPE 's Code of Conduct is of particular importance. This contains fundamental rules of conduct and is binding for all managers, employees and business partners of the FIXIT GRUPPE. Furthermore, the FIXIT GRUPPE has recognized the Code of Conduct of the German Association of Materials Management, Purchasing and Logistics (BME). The BME Code of Conduct sets out a minimum standard across countries and industries to safeguard compliance risks in supply and value chains. Both codes of conduct take into account globally recognized corporate social responsibility standards and apply throughout the Group.

### **b. Compliance requirement**

Observance of the law and compliant behavior are among the fundamental values and principles of the FIXIT GRUPPE. This clear commitment to compliance unites all our employees across national borders and cultures. Violations of applicable laws and regulations and/or internal rules of conduct are not tolerated and are proactively prevented with the help of effective measures.

### **c. Risk management**

Our risk management identifies and assesses all significant compliance and corporate social responsibility (CSR) risks at an early stage, including human rights and environmental risks as well as corruption. A comprehensive, Group-wide risk inventory is carried out annually. Measures for dealing with identified risks are documented in action plans, reported to Group management and regularly reviewed for their effectiveness.

### **d. Whistleblower system**

The FIXIT GRUPPE focuses on prevention and thorough investigation of suspected compliance violations. Effective control mechanisms are used to minimize grievances in a focused manner and consistently avoid repeated misconduct. Our whistleblower system includes a wide range of confidential reporting channels such as an online reporting platform, a 24/7 hotline and an (email) mailbox. All employees and business partners of the FIXIT GRUPPE are actively encouraged to submit targeted and plausible information on compliance violations. All reports are recorded, documented and processed under the strictest data and whistleblower protection.

### **e. Quality assurance**

Our production facilities are located exclusively in Europe and abroad. We primarily serve local markets and rely on cooperation with local suppliers and business partners. Our products are made from carefully selected, certified raw materials and materials and have renowned quality seals and certificates, including VOC A+, IBR, VTA, EPD and TÜV. Uniform procedures, standardized processes and ongoing quality controls along the entire value and supply chain ensure that our products meet the highest quality standards.

### **f. Supplier evaluation**

Our suppliers are subject to regular risk analysis and evaluation with regard to human rights and environmental aspects. When selecting suppliers, our purchasing managers take social, environmental and business ethics aspects into account.

Criteria. We committed to ensuring that our direct suppliers human rights and act in accordance with internationally recognized sustainability standards. Larger, internationally active suppliers are obliged by us in writing to comply with the BME Code of Conduct. Our whistleblower system can also be used to report human rights or environmental violations by our indirect suppliers.

## **5. Responsibilities for the implementation of human rights**

### **Duty of care**

The Group Management of the FIXIT GRUPPE is responsible for the implementation of and compliance with the Declaration of Principles for the Respect and Protection Human Rights.

In the group and national companies of the FIXIT GRUPPE, the managing directors are responsible for the operational implementation of the declared human rights principles.

In order to develop, implement and manage suitable (preventive) measures, we form interdisciplinary teams with experts from the Sustainability, Legal, Purchasing, Human Resources, Group Auditing and Compliance departments. Therefore, there will be no appointment of a single person as Human Rights Commissioner.

## **6. Reporting**

Regular reporting on human rights due diligence within the company and along the supply chain is included in the management reports of the FIXIT GRUPPE.