

## **Declaration of principles on respect for human rights**

### **Our commitment to human rights**

For Th. Simon GmbH & Co. KG as a family-run company, sustainability and social commitment are top priorities in addition to top product quality. Recognition and respect for human rights and a commitment to responsibility for our value chain are of key importance. This declaration of principles expresses our traditional values and our future responsibility and applies to Th. Simon GmbH & Co. KG and the companies of the Bitburger Group.

### **Standards and guidelines**

Th. Simon GmbH & Co. KG strives to respect all internationally recognized human rights that are relevant to its business processes. In terms of content, our approach is based in particular on the following international standards and frameworks:

- Universal Declaration of Human Rights (UNO) of 1948, and European Convention for the Protection of Human Rights and Fundamental Freedoms, 1950
- Tripartite Declaration of Principles of the ILO (International Labor Organization) concerning Multinational Enterprises and Social Policy, 1977 (current status: 2006) and ILO Declaration on Fundamental Principles and Rights at Work, 1998 (mainly with the following topics: Elimination of child labor, abolition of forced labor, Non-discrimination, equal pay, freedom of association, and right to collective bargaining)
- OECD (Organization for Economic Cooperation and Development) Guidelines for Multinational Enterprises 2011
- Agenda 21 on sustainable development (a product of the UN Conference on Environment and Development in Rio de Janeiro, 1992)
- Ten Principles of the United Nations Global Compact (universally recognized principles in the fields of human rights, labor standards, environmental protection, and anti-corruption)]
- ISO 26000 standard on social responsibility
- United Nations Guiding Principles on Business and Human Rights of March 21, 2011

We also support the United Nations 2030 Agenda for Sustainable Development and, through our actions, want to contribute to achieving the Sustainable Development Goals (SDGs).

### **Requirements for us and our partners**

In order to live up to our commitment to the recognition and respect of human rights, we have implemented Group-wide guidelines that reflect our attitude towards ourselves and our business partners. These form the binding framework for our employees, business partners, and suppliers, and form the basis of our day-to-day activities.

- Code of Conduct: binding guidelines for all our actions and decisions when dealing with third parties – both within and outside our company
- Code of Conduct for Business Customers: The basis for cooperation with our suppliers, which includes social standards, regulations on environmental protection, and occupational health and safety

We encourage and support our employees, business partners, and suppliers to exercise their due diligence to avoid negative impacts, and we also encourage our suppliers to pass on our human rights requirements to subcontractors.

## **Risk analysis and implementation**

We know that due diligence with regard to human rights is an ongoing process. In order to assess the impact of our actions on human rights, we subject our business activities and relationships to repeated human rights risk analyses. The aim of risk analysis is to analyze possible human rights risk issues and to prioritize where we have identified particular risks. On this basis, we want to derive measures to avert potential risks, align our processes accordingly, and make employees, business partners, and suppliers aware of these issues.

To this end, the following areas of human rights action have been identified on the basis of the aforementioned frameworks, which may potentially be relevant along our value chain:

- Prohibition of discrimination, right to equal opportunities, and equal treatment
- Prohibition of slavery and forced labor
- Prohibition of child labor, protection of minors
- Freedom of thought, opinion, and religion
- Freedom of assembly and association
- Right to freedom and self-determination
- Right to work, fair pay, safe working conditions, and social security
- Right to health, welfare, and occupational safety
- Right to education, further training, and education

For the areas identified, we derive measures to improve the status quo on the one hand and prevent situations of concern to human rights on the other.

## **Complaint mechanisms**

Despite our care with regard to human rights, we are aware that violations may occur. Th. Simon GmbH & Co. KG therefore provides a reporting channel for complaints and reports of human rights violations. This channel is open to everyone, regardless of the existence or nature of the contractual or business relationship with Th. Simon GmbH & Co. KG or its affiliated companies. Each process is thoroughly investigated and all documents are treated confidentially.

## **Reporting and development**

We see dealing with the topic of human rights and carrying out a corresponding risk analysis as an ongoing process that must always be adapted and developed further. We therefore continuously review our risk assessment and measures and adapt them to changing circumstances if necessary.

We report on our progress in implementation and development in our annual report on the German Due Diligence Act.

## **Structure and responsibilities**

The management of Th. Simon GmbH & Co. KG is responsible for implementing and complying with this declaration. The day-to-day management and monitoring of human rights policy is the responsibility of the Compliance department. It coordinates activities where necessary, sets priorities, and directs the company-wide efforts of Th. Simon GmbH & Co. KG to respect human rights. Responsibility for implementation lies with the operating units, which ensure that this policy is integrated into their respective departments.




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