



HUMAN RIGHTS POLICY

This policy sets out Sommer GmbH's commitment to respecting human rights.

We recognise the fundamental human rights enshrined in the United Nations (UN) Universal Declaration of Human Rights and the core labour standards of the International Labour Organisation (ILO). Our company is committed to upholding and promoting human rights standards in all our business practices.

This policy supplements the Sommer GmbH Code of Conduct.

1. SCOPE

This policy applies to all employees of Sommer GmbH. We expect our business partners and suppliers to comply with comparable human rights standards.

2. PRINCIPLES AND OBLIGATIONS

2.1. RESPECT FOR HUMAN RIGHTS

- We respect the dignity, equality and rights of all people.
- Discrimination on the basis of gender, age, origin, religion, disability, sexual orientation, or other personal characteristics is not tolerated.
- Discrimination in professional development, qualification, and promotion is prohibited. Decisions regarding development opportunities and promotions are made solely on the basis of performance, qualifications, and experience.
- We do not tolerate any form of harassment, abuse, or inhumane treatment.

2.2. FAIR WORKING CONDITIONS

- We are committed to fair wages and reasonable working hours in accordance with applicable laws and collective



agreements.

- Forced labour or child labour is prohibited in any form.
- Freedom of association and the right to collective bargaining are respected.

2.3. HEALTH AND SAFETY

- We provide a safe and healthy working environment.
- Risks to the health and safety of our employees are continuously minimised.
- All employees receive training on health and safety standards.

2.4. SUPPLY CHAIN AND BUSINESS PARTNERS

- We expect our business partners to comply with our human rights standards.
- Human rights violations in the supply chain are actively addressed.
- Violations of these standards may result in the termination of business relationships.

2.5. ENVIRONMENTAL PROTECTION AND COMMUNITIES

- We respect the right of local communities to a healthy environment.
- We minimise the negative impact of our business activities on people and nature.

3. COMPLAINT MECHANISMS AND REPORTING SYSTEMS

- All employees and business partners have the opportunity to confidentially report human rights violations via existing internal reporting channels.



- We guarantee that whistleblowers are protected and do not have to fear any negative consequences.
- Complaints received are taken seriously and investigated fairly.

4. IMPLEMENTATION AND REVIEW

- This policy is regularly reviewed and updated to ensure it meets the highest human rights standards.
- Managers are responsible for implementing this policy within their respective areas.
- All employees receive regular training on human rights and ethical behaviour.

5. FINAL PROVISIONS

Sommer GmbH is committed to maintaining high ethical standards and to continuously working to improve the human rights situation within its sphere of influence.

6. APPROVAL

This Human Rights Policy has been approved by the management of Sommer GmbH.

Status: 29 August 2024

On behalf of the management

Steffen Theurer

Dirk Theurer