

Human rights policy

Respect for human rights is an essential value of HEGELMANN GROUP. We make every effort to respect and promote human rights in accordance with the International Bill of Human Rights, International Labor Organization Declaration on Fundamental Principles and Rights at Work, and the UN Guiding Principles on Business and Human Rights. This is our focus in our relationships with our employees, those in our value chain, and the communities in which we operate, and is the foundation of our Human Rights Policy.

Hegelmann Human Rights Policy aligns with our Code of Ethics, Business, and Environmental policies covering diversity, environment, health and safety, and employee relations. Hegelmann is dedicated to the principles that all persons should be treated with respect.

Community and Stakeholder

The following parties are considered stakeholders in our human rights policy, among others: shareholders, employees, communities/Neighbours, contractors, producers/vendors/suppliers, governments, and applicable unions.

We are aware that the communities in which we work are a part of us, and that each location has a number of interconnected "community." Hegelmann is devoted to working with Stakeholders who appreciate honesty, justice, and respect for all people as much as we do. When appropriate, we interact with our communities about issues related to human rights that are significant to them. We want to make sure through dialogue that we are paying attention to, taking notes from, and considering their points of view as we run our company. We think it's usually best to deal with local problems locally.

Respect for Human Rights

Hegelmann recognizes the importance of maintaining and promoting the fundamental human rights of employees by operating under programs and policies that:

- Promote a workplace free of discrimination and harassment.
- Prohibit child labor, forced labor, and human trafficking.
- Provide fair and equitable wages, benefits, and other conditions of employment in accordance with local laws.
- Provide safe working conditions.
- Recognize employee's rights to freedom of association.

Forced Labor and Human Trafficking

Hegelmann companies will not engage in any component of its business that involves the use of slave or involuntary labor, including debt slavery or human trafficking, whether it be bonded, prison, military, compulsory, or indentured lobar.

Discrimination and Harassment

Every employee, in our belief, is entitled to a fair working environment and to be treated with respect. Hegelmann prohibits discrimination based on age, race, colour, religion, sex, national origin, marital status, disability, citizenship, sexual orientation, gender identity or expression, military service, and any other feature protected by law.

Everyone is entitled to the right to work without intimidation or fear. Hegelmann's stance was made plain from the first day of orientation: we do not tolerate abusive behaviour or harassment. It is expected of employees to report circumstances that make it difficult for them to do their duties. Our procedures explicitly forbid retaliation against employees who voice concerns, and formal channels are available for employees who need guidance or a solution. We control how our business is run so that workers feel treated fairly and with respect.

Diversity and Inclusion

Hegelmann companies is dedicated to being a high-performing company founded on the basis of a diverse and inclusive workforce. Individuals and teams are working to combine a wide range of abilities, preferences, and views in pursuit of common goals. Employees are expected to engage in open and honest communication, be accepting of others' differences, be open to conversation, and assume the best intentions of others.

Child Labor

Under no circumstances is a person under the age of 17 allowed to work for innocent. We also forbid hiring anyone who is under the legal minimum age for employment (applicable by law) or the age at which obligatory schooling must be completed. No means should be used to exploit children. Underage workers are not permitted to do hazardous tasks or night-time shifts. To guarantee that this policy is enforced, thorough age verification checks should be performed before hiring anyone. If children are discovered to be employed, a strategy must be put in place that emphasizes the child's needs and allows them to continue receiving a quality education until they are no longer considered children.

Freedom of Association

We respect employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

Our experience has demonstrated that open communication and a place where employees can express their concerns, comments, and ideas leads to improved operations, products, processes, and safety that will support ongoing growth and prosperity for all stakeholders, including employees.

Workplace Safety

Hegelmann companies is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.

Workplace Security

Hegelmann companies prohibits violence, harassment, intimidation and other unsafe or disruptive conditions due to internal or external threats.

Work Hours, Wages, and Benefits

Hegelmann compensates employees competitively relative to the industry and local labour market. We operate in full compliance with applicable wage, work hours, overtime and benefits laws.

Guidance and Reporting for Employees

We strive to create workplaces in which open and honest communication among all employees is valued and respected. The Company is committed to complying with applicable labor and employment laws wherever we operate. In addition, we work to achieve full employee engagement as the foundation of our mutual success; strive to create a culture that champions respect and inclusion; offer competitive wages and benefits; and implement clear health and safety practices. Any employee who believes a conflict exists or has come to exist between the language of this policy and the laws, customs and practices of the place where he or she works, or who has questions about this policy or would like to confidentially report a potential violation of this policy should raise those questions and concerns with his or her direct manager, local management, Human Resources or corporate management or through anonymous reporting features in Hegelmann.

Signed for and on behalf of the Executive Board:

Shareholde

December 2022