

Declaration of Principles of Protecting Human Rights and the Environment

We are committed to respecting human rights

valantic (consisting of valantic GmbH and its affiliated companies in accordance with § 15 ff. German Stock Corporation Act) wants to live up to its responsibility in society and towards its employees as well as its customers and business partners. It is therefore committed to clear principles as a framework for its entrepreneurial and business activities.

For us, economic success and moral commitment are not a contradiction in terms, but are essential prerequisites for sustainable, positive economic activity.

As a company with high standards of compliance, diligence and integrity, it is particularly important to us to adequately address human rights risks in our business activities and in our supply chain. We are guided in particular by the following standards and frameworks:

- United Nations Universal Declaration of Human Rights (UN-UDHR)
- Conventions and recommendations of the International Labor Organization (ILO) on labor and social standards
- Principles of the United Nations Global Compact (UNGC)
- We also comply with local laws wherever we operate

We define specific requirements for ourselves and our partners

In order to live up to our claim regarding the recognition and respect of human rights at valantic, we have implemented guidelines that reflect our attitude towards ourselves, our employees and our suppliers. The following two guidelines are particularly relevant:

- **Code of Conduct**

With the Code of Conduct, we have created a guideline that summarizes all the key principles and rules for our business activities. It thus forms the basis for our daily collaboration with each other, customers and business partners. In addition to human rights and environmental issues the Code also contains provisions on combating corruption and other related issues.

- **Supplier Code of Conduct**

It is our declared aim to implement our principles and values together with our business partners. We therefore require our business partners to act in accordance with the same or similar principles as we do and to support us in doing so. These principles, values and legal requirements are set out in our Supplier Code of Conduct, which all relevant business partners must undertake to comply with. We identify risks and address them appropriately.

At least once a year, we assess potential risks relating to human rights and environmental pollution both in our own business areas and with regard to our supplier base. Risks can be prioritized and addressed on the basis of these risk analyses. To this end, we conduct expert interviews with central departments and carry out a structured assessment of our suppliers' countries of origin and sectors, among other things. The risks prioritized on the basis of these analyses include the following points that could potentially be relevant along our value chain:

- Risks of discrimination
- Health & safety risks
- Environmental risks

Wherever we identify risks - be it in our own business area or at our suppliers - these are minimized by taking appropriate measures.

Guidelines and work instructions, e.g. on health and safety measures, have been implemented to limit these risks in our own business area. Compliance with the requirements is regularly reviewed by the relevant responsible parties and the Legal and Compliance Team.

With regard to supplier risks, additional information on the individual risks is requested from our suppliers by means of a questionnaire, depending on the level of risk determined on the basis of supplier countries and product groups. After a thorough review of the questionnaire, the risks are reassessed and, where necessary, individual risk minimization measures are defined for each relevant supplier.

We are aware that despite our careful handling of human rights, violations can occur. That is why we have a complaints procedure and have set up a whistleblower system through which affected parties, whistleblowers or other stakeholders can report grievances at any time. This applies not only to our own business area, but also to suppliers and sub-suppliers. Whistleblowers who report a grievance for ethical and moral reasons make an important

contribution to upholding social values and the rule of law and therefore also contribute to the success of our company.

We are continuously improving our efforts and report on them

We regularly evaluate the effectiveness of our established measures in order to continuously improve them. This also includes critically scrutinizing existing processes time and again and tightening them up where necessary.

We report annually on both the risks we have identified and the measures we have taken to counter these risks. We also evaluate the effectiveness of our measures and draw conclusions for future activities.

The management of valantic GmbH is responsible for the implementation of and compliance with this declaration. The Management Board is supported in this by the coordination and control function anchored in the Legal and Compliance Team and ESG Team, which provides regular information about risks and measures taken.

MÜNCHEN, 13.12.2023

H. von Daniels

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