

## **Vandaglas Policy Statement on Respect for Human Rights, Environmental Standards, and Responsible Corporate Governance**

### **Foreword**

As Vandaglas, we are committed to upholding the highest standards regarding respect for human rights, environmental protection, and compliance requirements. This policy statement serves as a comprehensive guideline for all our actions and reflects our commitment to ethical and sustainable business practices. We actively strive to fulfil our responsibilities as a nationally operating glass processor. Our vision is to create long-term value for all stakeholders through sustainable growth.

### **Our Values and Core Principles**

Vandaglas is committed to the principles of social responsibility, fairness, and sustainability. Our roots in the mid-sized business sector shape our actions, which are characterised by entrepreneurial spirit, integrity, and respectful engagement with all stakeholders. As a foundation for our commitment, we align ourselves with international standards and continuously strive to make a positive impact.

### **Commitment to Respect for Human Rights and Social Standards**

Vandaglas is dedicated to respecting internationally recognised human rights. Our approach is guided by:

- The Universal Declaration of Human Rights of the United Nations
- The United Nations Guiding Principles on Business and Human Rights
- The Core Labour Standards of the International Labour Organization (ILO)
- The OECD Guidelines for Multinational Enterprises

We do not tolerate any form of child labour, forced labour, or slavery and actively promote the prevention of discrimination and the protection of freedom of association. All employees should work in an environment based on respect, fairness, and equal opportunities. Particular attention is given to vulnerable groups, ensuring that our business practices do not disadvantage them.

### **Environmental Responsibility**

Our goal is to respect planetary boundaries, minimise environmental impact, use resources sustainably, and employ innovative technologies to reduce emissions. Vandaglas is committed to complying with all relevant environmental laws and international standards. We promote proactive approaches to improving environmental performance, including:

- Implementation of resource-efficient processes and products
- Reduction of the CO<sub>2</sub> footprint
- Support for circular economy models
- Promotion of sustainable supply chain practices

Additionally, we strive to encourage the use of renewable energy sources and reduce waste through effective recycling programmes. The locations and production facilities of our portfolio companies are regularly reviewed to ensure they meet the highest environmental standards.

### **Integrity and Compliance**

Integrity and legal compliance are essential pillars of our conduct. We expect our employees, business partners, and suppliers to strictly adhere to all applicable laws, including the requirements of the German Supply Chain Due Diligence Act (LkSG). Corruption, bribery, and other unethical practices are not tolerated. We aim to create a working environment characterised by transparency, trust, and mutual responsibility.

### **Responsibilities and Oversight**

To ensure effective risk management, we have defined clear internal responsibilities. The implementation and monitoring of due diligence obligations are managed by a central team consisting of representatives from ESG, compliance, procurement, and human resources. This team reports directly to the executive management and regularly provides updates on progress, challenges, and necessary measures.

### **Due Diligence in the Supply Chain**

We take responsibility throughout our supply chain and are committed to identifying, assessing, and mitigating human rights and environmental risks. Suppliers must comply with our Supplier Code of Conduct, which mandates respect for human rights, fair working conditions, and environmental standards. This includes:

- Regular risk analyses and supplier assessments
- Audits and reviews to ensure compliance with standards
- Preventive and remedial measures in case of identified violations
- Promotion of long-term partnerships with suppliers who share our values

We expect our suppliers to enforce these standards within their own supply chains and to provide regular training for their employees to raise awareness of sustainability and human rights.

### **Stakeholder Engagement**

Dialogue with our stakeholders is a key part of our responsibility. We actively engage with employees, business partners, customers, authorities, and non-governmental organisations to incorporate their perspectives into our strategy. This enables us to continuously improve our measures and respond appropriately to new challenges.

### **Risk Management and Review**

An integral part of our policy statement is effective risk management. We conduct regular risk analyses to identify potential human rights and environmental risks in our business operations and supply chains. These analyses are supported by industry-specific tools and external expertise. Identified risks are documented and translated into preventive or corrective action plans, which are regularly monitored.

In addition, regular reviews of risk management are conducted to ensure that measures remain appropriate and effective. The results of these reviews are documented and incorporated into our annual reporting.

### **Grievance Mechanism**

For reporting violations, we offer an anonymous whistleblowing system available in multiple languages, accessible a <https://vandaglas.lawcode.cloud/hbx/>. This system is embedded within our corporate website and accessible to various stakeholders, including employees, suppliers, and third

parties. It guarantees confidentiality and protection against retaliation for whistleblowers. All reports are carefully examined, documented, and processed accordingly. Further details can be found in our published procedural rules under the LkSG.

### **Preventive and Remedial Measures**

To mitigate human rights and environmental risks, we have implemented a range of preventive and remedial measures. These measures form a key part of our strategy and include:

- **Code of Conduct for Employees:** Our internal code of conduct defines clear expectations regarding ethical behaviour, integrity, and the protection of human rights. Regular awareness-raising initiatives ensure that all employees understand and implement these principles.
- **Supplier Code of Conduct:** Our supplier requirements are outlined in a binding code that guarantees compliance with human rights, environmental standards, and fair working conditions. Suppliers must sign and actively implement this code.
- **Training and Awareness Programmes:** We conduct preventive and case-specific training for our employees and suppliers to foster a deep understanding of sustainability and the requirements of the LkSG.
- **Evaluation of New Suppliers:** Before entering new business relationships, we assess suppliers based on a clearly defined evaluation process. This assessment includes analysing risks related to country of origin, products, and previous business practices. Our Supplier Code of Conduct, which obliges suppliers to respect human rights and environmental standards within their own operations and supply chains, forms the basis of these business relationships.
- **Ongoing Monitoring:** Existing suppliers are regularly audited to ensure compliance with our standards. In cases of violations, we take timely and appropriate action.

Should human rights or environmental violations occur despite preventive measures, we take the following steps:

1. **Investigation and Analysis:** A comprehensive investigation determines the cause and extent of the violation.
2. **Action Plan:** Based on the analysis, we develop a detailed action plan to rectify the violation and minimise future risks.
3. **Collaboration with Affected Parties:** We work closely with affected individuals or groups to develop effective remedial measures.
4. **Termination of Business Relationships:** In cases of serious or repeated violations, we reserve the right to terminate business relationships if no satisfactory solution is reached.

### **Reporting**

We report on our progress and challenges in accordance with legal requirements. This report includes details of identified risks, implemented measures, and their effectiveness.

### **Expectations for Employees and Business Partners**

We expect our employees and business partners to implement our values and principles in their daily activities. This includes compliance with all relevant laws and internal policies as well as active support in preventing human rights and environmental risks.

**Conclusion**

With this policy statement, we affirm our clear and binding commitment to fulfilling our responsibilities as a company and employer. We invite all our stakeholders to join us in working towards a sustainable and just future. Our vision is to combine economic success with social responsibility and environmental protection.