



Policy Statement on Respect for Human Rights and the Environment

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Foreword

The GEMÜ Group is a leading global manufacturer of valves, measurement and control systems for liquids, vapors, and gases. As an internationally active family-owned company, we rely on entrepreneurial foresight as well as stability and reliability for our employees, customers, and other business partners. Integrity, a sense of responsibility and compliance with the law have always characterized our actions.

Our corporate culture is characterized by mutual respect and a keen awareness of the ecological, economic, and social spheres of influence of our actions. We take social responsibility seriously and are committed to upholding the highest ethical standards in an increasingly interconnected world. This includes respect for human rights and compliance with ecological standards in all areas of our business activities and along our global supply chains.



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1 Our Commitment to respect Human Rights and the Environment

Our policy statement on human rights and environment outlines our long-term commitment to responsibly and appropriately implementing human rights and environmental due diligence obligations. It serves as a guideline, complements our code of conduct, and strengthens our high ethical standards. We continuously work to identify and assess human rights and environmental risks at an early stage and to mitigate them through appropriate measures. In doing so, we actively contribute to improving the human rights situation and promoting sustainable economic success – both within our company and in our collaboration with our partners.

Together, we are committed worldwide to promoting and protecting human rights and environmental standards. We comply with applicable laws and regulations, respect internationally recognized standards, and are committed to preventing human rights and environmental violations during our business activities, as well as enable those affected by such violations to access remedies and complaint channels.

1.1 REGULATORY BASIS

Our commitment to respecting human rights and the environment is based on the following internationally recognized standards:

- Universal Declaration of Human Rights (United Nations)
- Principles of the United Nations Global Compact (UNGC)
- Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- Core Labor Standards of the International Labor Organization (ILO) on labor and social standards
- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal

1.2 OUR EXPECTATIONS OF OUR EMPLOYEES AND SUPPLIERS

Our commitment is further reflected in our established company policies, such as the **GEMÜ Code of Conduct** and the **GEMÜ Supplier Code of Conduct**. Additionally, we have implemented certified management systems, including the quality management system (ISO 9001), the information security management system (ISO 27001) and the environmental management system (ISO 14001). These policies and certifications, together with this policy statement, define the framework for action regarding our human rights and environmental expectations and are regularly expanded and updated.

The framework applies to our employees in all business areas worldwide and requires them to act respectfully and in compliance with the law towards colleagues, partners, and society. We expect our suppliers to also commit to this, implement appropriate due diligence processes, and pass these expectations on to their suppliers.

2 Our Strategy for Implementing Human Rights and Environmental Due Diligence

2.1 RISK MANAGEMENT AND RESPONSIBILITIES

To implement our human rights and environmental due diligence obligations, we have established a risk management system that is managed and controlled by an interdisciplinary team, while overall responsibility lies with the management. The risk management system consists of the following elements.

2.2 RISK ANALYSIS

Our risk management is based on a comprehensive risk analysis, through which we examine the human rights and environmental impacts of our business activities. We identify potential risks for our business and our direct suppliers, with a focus on child labor, forced labor, environmental pollution, and occupational safety. This is done by analyzing internal and external data sources, such as country- and industry-specific risk assessments, critical news monitoring and the evaluation of supplier self-assessments. The identified risks are evaluated and prioritized based on criteria such as probability, influence, severity, and contribution to the cause. If we obtain substantiated knowledge of potential violations by indirect suppliers, the risk analysis and the other elements of risk management are extended to include them.

2.3 PREVENTIVE ACTION

Based on the results of the risk analysis, appropriate preventive measures are derived for our own business area as well as for direct suppliers.

In our own business area, we have established the following measures in particular:

- Publication of this Policy Statement
- **Code of Conduct** and binding guidelines
- Training of relevant business areas
- Optimization of selection and procurement strategies and supplier evaluation
- Certified management systems (ISO 14001, ISO 27001, ISO 9001)

Regarding our direct suppliers, we have implemented the following measures:

- Supplier assessments, supplemented by in-depth audits if necessary
- Commitment of direct suppliers to our **Supplier Code of Conduct**
- Training of relevant business partners
- Agreement on risk-based control measures

2.4 CORRECTIVE ACTION

Should human rights or environmental violations nevertheless be detected, we promptly initiate remedial measures both in our own business area and with our suppliers. These are implemented under the local responsibility of the respective sites and, if necessary, supplemented by appropriate sanctions to effectively end the violation or minimize the extent of the violation.

Depending on the severity of the violation, we require suppliers to implement targeted improvement measures within a specified time frame. We carefully monitor the implementation of these measures and provide support as needed. If the improvements are insufficient, we reserve the right to suspend or terminate the business relationship. However, our primary goal is always to achieve sustainable improvement in the conditions at our suppliers.

2.5 GRIEVANCE MECHANISM

An effective and appropriate complaint and reporting procedure is a central component of our risk management. We encourage everyone to openly address concerns or suspected violations of our policies, including this statement. For this purpose, we have established a comprehensive whistleblower system (www.gemu-group.com) that is available to all individuals – both inside and outside our company. This system offers an anonymous reporting option if required, supports multiple languages, and ensures a neutral investigation where the involved parties are heard, appropriate measures are taken, and a root cause analysis is conducted.

The specific procedures are described in detail in the rules of procedure for the complaints system. We will investigate all reported violations, take appropriate remedial action, if necessary, implement preventive steps and consistently punish violations.

Our suppliers are encouraged to inform their employees about this complaint system and to ensure that their own suppliers also have access to these channels and can use them if needed.

2 Our Strategy for Implementing Human Rights and Environmental Due Diligence

2.6 EFFECTIVENESS MONITORING

To continuously improve our processes, we review the effectiveness of the elements of our risk management at least once a year and as needed.

2.7 DOCUMENTATION AND REPORTING

The fulfillment of our due diligence obligations is continuously documented internally and regularly reported to management. Our annual reporting on this is carried out in accordance with legal requirements.

