



German Supply Chain Due Diligence Act  
(LkSG)

**Policy Statement**

on the Human Rights Strategy

of the ZOLLERN Group



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# 1 Purpose

The ZOLLERN Group is one of the oldest family businesses in Germany. Its history began in 1708 with the construction of an iron smelter by Prince Meinrad II of Hohenzollern in Laucherthal.

Today, the international group is composed of four business units which are linked by the strong ZOLLERN brand. With more than 2,000 employees, several plants and subsidiaries in Europe, North America and Asia, ZOLLERN develops, produces and services a broad range of high-quality metal products. ZOLLERN is characterised by extensive technical expertise, high quality in implementation and close relationships with its customers.

Existing for centuries also means continuing to develop over this long period of time without losing sight of togetherness. In all our business activities, it is important to us to cultivate respect in our dealings with one another – with employees, managers, customers, partners, authorities – and to comply with rules and laws.

Respect for human rights is essential in all areas of our business activities. The ZOLLERN Group therefore expects all employees to adhere to the requirements of this Policy Statement. The same applies to our suppliers.

This Policy Statement is an ongoing document into which new findings, results and developments are constantly incorporated.

# 2 Our commitment to human rights

ZOLLERN's business activities are based on the guidelines of the United Nations International Bill of Human Rights. It includes the following human rights standards and guidelines:

- United Nations Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights of the United Nations
- International Covenant on Economic, Social and Cultural Rights of the United Nations

ZOLLERN is also guided by the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO). Specifically, we stand for:

## **No child labour, forced labour or other illegal work**

We do not tolerate child labour, forced labour, illegal labour or other involuntary labour – neither in our own business area nor at our suppliers.

## **Remuneration and working hours**

The remuneration and working hours of our employees are in line with the applicable national laws and ILO principles. We expect the same from our suppliers.

## **Work Safety and health protection**

We attach great importance to safety in the workplace and take care of the health of our employees.

### **Protection against discrimination and harassment**

All ZOLLERN employees are treated fairly and with respect. We do not tolerate discrimination, abuse, or harassment in the workplace. It is not permitted to treat anyone differently from others because of actual or perceived membership in a particular group or minority. We also ask our suppliers to prohibit this in their business.

## **3 The ZOLLERN risk management und risk analysis**

The aim of the risk management is to recognise human rights violations and corresponding risks in our own business area and along our supply chains and, where necessary, to take appropriate preventive and remedial measures. We have set up a Human Rights Committee to monitor the risk management.

ZOLLERN analyses its own business area and direct suppliers for human rights and environmental risks on a regular basis, i.e. once a year, and on an ad hoc basis. Indirect suppliers are analysed if there are actual indications that a violation of a human rights-related or environmental obligation by indirect suppliers is possible.

In the abstract risks assessment of our direct suppliers, we focus on the sourcing country and the sector in which the suppliers operate. If serious risks are identified, these suppliers are reviewed further. Reports received via the complaints channels offered (see point 7) are also included in the analysis.

From the end of the 2024 financial year, we will include the results of the risk analysis in our annual reporting, which will be made available to the public.

## **4 Preventive and remedial measures**

A Supplier Code of Conduct describes the requirements and principles that ZOLLERN has for cooperation with suppliers. The signing of this Code of Conduct by suppliers should be the basis and prerequisite for every business relationship with ZOLLERN and serves to prevent human rights and environmental risks and violations.

Contracts that ZOLLERN concludes with its suppliers contain compliance clauses. These contain obligations to adhere to compliance-relevant regulations and standards.

From the end of the 2024 financial year, we will include further specific preventive and remedial measures in our annual reporting, which will be made available to the public.

## **5 What we expect from our ZOLLERN employees**

We expect our employees neither to participate in human rights violations nor to tolerate violations that have been committed. We encourage all employees to report any human rights violations they notice or suspect. The following reporting channels are available to employees:

- in person to the ZOLLERN Compliance Department,
- by telephone via the ZOLLERN Compliance Hotline,



- via the external independent lawyer of trust,
- by letter or
- by e-mail.

Of course, all employees also have the option of reporting anonymously.

## 6 What we expect from our suppliers

ZOLLERN expects all its suppliers to be committed to respecting human rights – towards their employees and in their own supply chains.

We have drawn up the ZOLLERN Supplier Code of Conduct. The signing of this Code of Conduct by suppliers should be the basis and prerequisite for every new business relationship with ZOLLERN.

## 7 The complaints procedure of the ZOLLERN Group

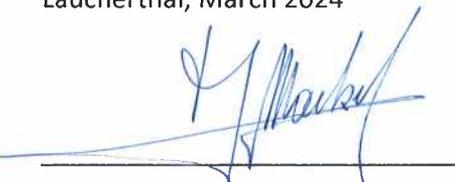
Employees as well as third parties can report indications and suspected cases of human rights violations in

<b>by phone via the ZOLLERN Compliance Hotline</b>	<b>+49 (0) 7571 70-733</b>
<b>by phone or e-mail to the external independent lawyer of trust</b>	Kanzlei Reinhart, Augsburg office, +49 (0) 821 81511911, reinhart@kanzlei-reinhart.de
<b>by letter</b>	ZOLLERN GmbH & Co. KG Hitzkofer Straße 1 72517 Sigmaringendorf
<b>by e-mail</b>	lksg@zollern.com

our own business area and along our supply chains. Anyone can make a report:

Our Compliance department accepts the reports. It is also possible to submit complaints anonymously. Details of the complaints procedure can be found in German, English, French and Chinese on the ZOLLERN website: Compliance (zollern.com).

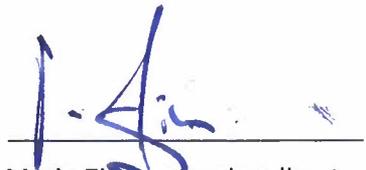
Lauchenthal, March 2024



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