

Policy Statement

HAVI Logistics Business Services GmbH and its Commitment to the German Supply Chain Act (“Lieferkettensorgfaltspflichtengesetz”)

1. HAVI is committed to respecting human rights and environmental standards

As a global company, HAVI’s success relies on close collaboration between employees from various cultures, fueling our purpose of creating new connections between people and products to improve our future.

Our Values are

- Do What’s Right,
- Respect and Value All,
- Elevate Customers and People,
- and Think Big Together.

We recognize that as a partner to consumers and the entire supply chain, we have both the responsibility to act and the opportunity to create a better future for people, communities, and the planet. HAVI is always conscious of its social and environmental responsibilities when conducting its economic activities.

Our actions are guided by the internationally recognized frameworks and principles for the protection of human rights and the environment. These include, but are not limited to:

- United Nations Universal Declaration of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- Ten Principles of the UN Global Compact

With HAVI Group's "Better Future Blueprint" program, we adhere to a holistic framework supporting our social and environmental goals.

For example, we have defined long-term, measurable goals in the areas of environmental protection, waste & recycling, as well as social responsibility and equality, which we continuously work to implement and improve. Our commitment to advocating for human rights and environmental standards includes:

- a) No child labor:** Prohibiting child labor in any form.
- b) No forced labor:** Rejecting any form of forced labor, slavery, or human trafficking.
- c) Compensation and working hours:** Complying with the relevant national laws and regulations regarding working hours, minimum wages, and benefits.
- d) Discrimination:** Promoting a safe work environment without discrimination based on skin color, national, ethnic or social origin, gender, age, religion, political opinion, disability, sexual orientation, or other characteristics.
- e) Freedom of association:** Protecting the right to form workers' representations, strikes and to engage in collective bargaining.
- f) Occupational health and safety:** Adhering to all applicable occupational health and safety regulations to protect employees' health and minimize accidents, injuries, and work-related illnesses as much as possible.
- g) Environmental protection:** No causing harmful changes in soil, water or air pollution, harmful noise emissions, or excessive water consumption that is likely to significantly impair protected legal interests.
- h) No violation of environmental obligations** arising from the use, storage, cross-border movement, or disposal of mercury-containing or persistent organic substances or hazardous waste.

2. Expectations to employees and business partners

Complying with all applicable laws and respecting human rights and environmental standards have always been important to HAVI. We expect all our employees, business partners and suppliers to observe all applicable laws and to abide by our values.

To strengthen this commitment, we have defined a Code of Conduct for our employees that reflects these expectations. For our suppliers, we have set up a Supplier Code of Conduct stating these principles.

3. Risk analysis and risk management, prioritization of risks

The basis of our actions to fulfil the obligations of the Supply Chain Act is a comprehensive risk analysis. The risk analysis is carried out regularly (at least once a year) and on an ad-hoc basis. Experts from Quality Management, Procurement, Sustainability, Legal & Compliance and Finance departments are involved. Other departments participate if necessary.

HAVI uses internal and external data sources, as well as a third-party platform solution developed for this purpose to determine whether human rights or environmental risks exist within the business and with direct suppliers. The assessment takes into account country risks and product group risks, as well as specific findings that we obtain, for example, through audits or complaints. The risks are analyzed and prioritized based on the criteria set out in the Supply Chain Act, including influence and causal contribution.

The result of the risk analysis is an overview in which we receive an assessment of low, medium and high risks of violations of human rights and environmental standards in our own business and at our suppliers. This overview serves as a basis for defining and implementing further measures (see: Preventative measures).

As some of our customers select suppliers from whom HAVI purchases goods for resale, our risk analysis is coordinated with all respective customers.

We will disclose the risks identified in our own business and with our suppliers as part of our statutory reporting obligation (see Section 8 below). We have been and will continue to implement measures taking into account any identified risks on an ongoing basis.

4. Preventative measures

HAVI has set up measures for both employees and suppliers to deal with risks in the areas of human rights and environmental standards. Employees are trained on the HAVI Code of Conduct and receive specific training courses on the Supply Chain Act. Depending on their risk status, we encourage suppliers to sign the Supplier Code of Conduct, which expects the suppliers to comply with human rights and environmental standards. They also complete a self-disclosure questionnaire and, if necessary, to implement additional measures, such as an audit.



5. Action to be taken in the event of violations

If there is evidence that HAVI or our suppliers have violated human rights and/or environmental standards, we will take immediate remedial action to prevent, stop, or minimize the violation. In line with the Supplier Code of Conduct, we will request suppliers to provide us with information to facilitate a

thorough review and ensure the breach has been remedied. In the event that suppliers refuse to implement such measures, HAVI shall be entitled to terminate the contract with the supplier after establishing a reasonable grace period.

6. Grievance mechanisms

HAVI has established protected reporting channels for all employees and external third parties to report concerns about violations of laws and internal rules, including human rights or environmental obligations. Violations caused by a direct or indirect supplier can also be reported. Reports are forwarded to and followed up by the person responsible for upholding the Supply Chain Act and our compliance organization. The company-wide Speak Up Hotline (havi.codeofconduct.app) is supported by an independent operator which can be reached around the clock, in 35 languages, and anonymously.

All reports are investigated according to standardized company procedure. If violations are detected, we will set up measures to remedy the violation. It is part of our business model that our customers select the suppliers and HAVI then carries out the procurement, storage and distribution of the goods. We have, therefore, aligned the process with our customers on how we will cooperate in the event of reported violations, e.g., informing each other and delegating responsibilities for investigation and for remedial actions.

7. Responsibilities

In day-to-day business, managing and monitoring our human rights and environmental protection strategy is the responsibility of the person tasked with upholding the Supply Chain Act (LkSG-Manager). The respective departments will be

responsible for implementing defined measures. The activities of those responsible for the Supply Chain Act are monitored by a committee that performs the tasks of the human rights commissioner, supported by the Legal & Compliance department.

8. Publication

HAVI will publish the report on the Supply Chain Act in accordance with the legal requirements.

Duisburg, 01 January 2025



Arnd Christochowitz

HAVI Logistics Business Services GmbH