

**SENEBOGEN**

**DECLARATION OF PRINCIPLES**  
on Respect for Human Rights and the  
Environment

# DECLARATION OF PRINCIPLES ON RESPECT FOR HUMAN RIGHTS AND THE ENVIRONMENT



## 1. Foreword by the Shareholders

As an internationally leading manufacturer of material handling machines and cranes, SENNEBOGEN is aware of its responsibility within global goods and service flows. We can only be successful in business in the long term if the impacts of both our business activities and those of our suppliers are in harmony with people and the environment. Therefore, our goal is to strengthen human and environmental rights, prevent their violations, minimize such impacts, and provide remedies.

This commitment applies to both our own business activities and our global supply chains. As a family-owned company with more than 70 years of tradition, a commitment to respecting human and environmental rights means taking responsibility for our actions and for the impacts of our decisions on people throughout the entire supply and value chain. Values such as solidarity, community, and sustainability are firmly anchored in our corporate culture. Our core business, the manufacture and sale of material handling machines and cranes, is directly and indirectly connected with the lives of many people every day.

Therefore, it is important to us to take a clear stance for a sustainable society. SENNEBOGEN recognized the importance of sustainability for all of us many years before the Supply Chain Due Diligence Act (LkSG) came into effect and therefore early on expanded its product range to include machines with electric motors. In addition to material handling machines that can be powered by battery storage, we offer numerous machines with hybrid systems that stand out for exemplary fuel savings. Thus, SENNEBOGEN has been contributing to a significant conservation of environmental resources for a long time without any legal obligation to do so.

## 2. Our Commitment to Respect for Human Rights and the Environment

The SENNEBOGEN Group is committed to respecting human rights and the environment and to taking responsibility for its supply and value chain. It is therefore natural for us to respect human rights and environmental concerns both within our own business operations and in our global supply chains, and to ensure that human rights and environmental violations are prevented and that affected parties have access to remedies.

### Standards and Guidelines

SENNEBOGEN is committed, in accordance with the United Nations Guiding Principles on Business and Human Rights (UNGP), to the standards of the following internationally recognized human rights and environmental reference instruments:

- Universal Declaration of Human Rights of the United Nations
- Principles of the United Nations Global Compact (UNGC)
- Guidelines of the Organisation for Economic Co-operation and Development (OECD) for Multinational Enterprises
- International Covenant on Civil and Political Rights (1966) of the United Nations
- International Covenant on Economic, Social and Cultural Rights (1966) of the United Nations
- Conventions and Recommendations of the International Labour Organization (ILO) on labor and social standards
- Charter of Fundamental Rights of the European Union
- UN Convention on the Rights of the Child
- European Convention on Human Rights
- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants (POPs Convention)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes

The implementation of the principles enshrined in these instruments and the protection of the rights highlighted by these agreements are embedded in the daily actions of all employees of the SENNEBOGEN Group. This is also reflected in SENNEBOGEN's approach to implementing human rights due diligence.

The SENNEBOGEN Group expects all employees and business partners to comply with applicable laws and regulations as well as internationally recognized human rights and environmental standards. The SENNEBOGEN Group expects its own employees to align their daily decisions with the guidelines mentioned in this declaration of principles as well as with the SENNEBOGEN Group's Code of Conduct. The SENNEBOGEN Group expects its suppliers to accept and adhere to the Supplier Code of Conduct. At the same time, they are encouraged to pass on these expectations to their own suppliers and business partners.

### **3. SENNEBOGEN Group's Approach to Implementing Human Rights and Environmental Due Diligence**

Respecting human rights and environmental rights is an ongoing process. The implementation of specific measures is subject to continuous review and development in response to changing conditions. SENNEBOGEN implements the following measures to comply with the Supply Chain Due Diligence Act:

#### **Structure and Responsibilities**

SENNEBOGEN has defined responsibilities within risk management for ensuring and maintaining all human rights and environmental due diligence obligations. At the highest management level, the management team is responsible for respecting human rights and environmental rights in our business activities as well as in the upstream and downstream supply and value chains. SENNEBOGEN

has created the position of Human Rights Officer ([menschenrechtsbeauftragter@sennebogen.de](mailto:menschenrechtsbeauftragter@sennebogen.de)). This officer monitors risk management in accordance with the Supply Chain Due Diligence Act and ensures operational implementation through coordination and monitoring activities. The Human Rights Officer reports annually to the management.

Several departments are involved in the operational implementation of the processes. They provide the personnel resources necessary to ensure compliance with the LkSG. Risk management ensures that the human rights strategy is embedded in all relevant processes.

### **Risk Analysis**

A key component of our due diligence is knowledge of potential and actual adverse human rights risks and the impacts of our business activities on people and the environment throughout the entire supply and value chain. Through appropriate processes, relevant human rights and environmental risk areas as well as potentially affected parties from our own business area and direct business relationships are identified and prioritized.

This includes, above all, the analysis of human rights and environmental risks and impacts from all products and services procured by SENNEBOGEN. Therefore, the company-wide risk and supplier management is being expanded to include human rights and environmental due diligence obligations. If necessary (e.g., with a supplier with increased risk), additional relevant processes and measures will be initiated.

### **Remedial Measures**

In the event of a violation of a human rights and/or environmental obligation in our own business area or with direct suppliers, remedial measures will be taken immediately to end the violation or minimize its extent. The remedial measure depends on the nature of the identified violation and is decided on a case-by-case basis.

In the event of a violation by direct suppliers, SENNEBOGEN will work with the respective supplier to develop and implement a plan to end the violation. In case of delays, obstacles, or refusal to implement remedial measures by the supplier, specific measures (including the termination of the business relationship) will be decided on a case-by-case basis. The effectiveness of remedial measures will be reviewed as needed.

### **Complaint Mechanism**

An appropriate and effective complaint management system is an important part of SENNEBOGEN's human rights strategy. Complaint procedures allow individuals or groups or their representatives who are affected by negative impacts on human rights to present their concerns. This enables potentially adverse impacts to be identified early and appropriate measures to be taken to prevent violations, avoid them in the future, and provide remedies.

SENNEBOGEN has implemented a complaint procedure on its website, through which employees as well as other potentially affected groups can report violations of human rights and environmental concerns at any time. The reported information and substantiated suspicions of possible human

rights violations are handled in accordance with the provisions of the LkSG. The confidentiality and anonymity of whistleblowers are maintained.

SENNEBOGEN ensures, as far as possible and within our sphere of influence, that whistleblowers are protected from disadvantage and punishment in connection with the complaints they submit. Complaints are received directly by the management and the Human Rights Officer. The complaint is investigated – for example, through discussions with suppliers, on-site visits, or interviews with the affected parties. Based on the results, effective measures are identified, initiated, and monitored.

### **Reporting**

In accordance with legal requirements, the annual report with all legally required information will be published no later than four months after the end of a fiscal year and made available on our website for at least seven years.

## **4. Final Provisions**

The declaration of principles on respecting human rights and assuming social responsibility, as well as on the management of human rights and environmental risks, comes into effect on the day of its signing. It was adopted by the shareholders of the SENNEBOGEN Group in March 2024.

Straubing, March 25, 2024



Thorsten Resch, Managing Director