

1 Preface

As an internationally active company, JEAN MÜLLER is aware of its responsibility and is therefore committed to respecting human rights and protecting the environment in the course of its business activities. This commitment extends not only to its own business activities, but also to stakeholders along the value chain, such as suppliers and other business partners. The aim is to identify any violations and address them with appropriate measures.

In this policy statement, we describe the progress we have made in implementing our due diligence obligations to respect human rights and protect the environment in the course of our business activities. We are guided by the requirements of the German Supply Chain Due Diligence Act (LkSG) and the provisions of our own Code of Conduct.

We see the implementation of due diligence obligations as a continuous improvement process. Despite the utmost care, risks or incidents can always occur in practice. We therefore ask all our employees, suppliers and other business partners to always inform us of opportunities for improvement and thus to take joint responsibility for respecting human rights and protecting the environment.

This policy statement applies to JEAN MÜLLER and all its affiliated companies worldwide.

2 Commitment to respecting human rights and protecting the environment

Our Code of Conduct establishes a binding framework for respecting human rights and protecting the environment. It applies at all locations worldwide, and all employees are expected to behave in accordance with the Code of Conduct. We expect the same from our suppliers and business partners.

We are committed to the international principles regarding the protection of human rights and the environment. This includes, but is not limited to:

- Compliance with applicable laws and regulations,
- Responsible and economical use of natural resources,
- Reduced use of hazardous substances,
- Compliance with occupational health and safety regulations,
- Protection of sensitive and confidential data,
- Fair competition,
- Equal treatment of all employees free from any discrimination,
- Prohibition of forced labour,
- Prohibition of child labour,
- Right to fair wages,
- Recognition of the right of all employees to form employee representatives and to conduct collective and wage negotiations,
- Compliance with regulations on working hours,
- Prohibition of corruption and bribery.

3 Risk Management

In order to adequately fulfil our responsibility to respect human rights and protect the environment, we have implemented a corresponding risk management approach. With this approach, we aim to ensure compliance with relevant human rights and environmental standards within the scope of our own business activities as well as in the upstream and downstream value chain.

JEAN MÜLLER has developed a Code of Conduct to help identify legal risks and prevent violations. It is also intended to raise awareness of due diligence obligations among all employees and business partners. To reduce the risk of breaches of duty in the upstream supply chain, we aim to contractually oblige all our suppliers to accept our Code of Conduct or to present their own, at least equivalent, Code of Conduct or a similar declaration. We use a risk-based approach to achieve this goal. At the core of our risk management is an annual risk analysis that follows a three-step process (see Chapter 4 Risk Analysis).

In addition, we regularly exchange information with the most relevant suppliers at a technical level with regard to human rights and environmental risks in order to jointly advance relevant issues. Furthermore, we plan to take additional risk factors relating to respect for human rights and environmental protection into account in the future when selecting suppliers.

4 Risk Analysis

Risk analysis at JEAN MÜLLER is carried out in a three-step process:

1. Identification of potential and actual risks using the CSR risk check¹. This includes, among other things, gathering basic information, analysing business areas, products, countries of origin and locations, locating potential and actual risks in the value chain, and identifying actual risks through supplier analyses.
2. The risks identified in step 1 are assessed using the risk analysis tool provided by the Business and Human Rights Helpdesk². Human rights and environmental risks along the value chain (raw material extraction, production of intermediate products, direct suppliers, own sites/production, downstream value creation) are considered in terms of their extent, scope and the opportunity for redress.
3. An in-depth risk analysis is carried out for identified particularly high risks. The specific measures for an in-depth review are determined on a case-by-case basis. These may include, for example, on-site dialogue with (potentially) affected parties, the involvement of internal and external expertise in the field of human rights, or specific training for staff and suppliers. Furthermore, the in-depth risk analysis is also taken into account in our existing PDCA cycle (e.g. continuous improvement process and supplier selection and assessment within the framework of ISO 9001).

As part of our annual risk analysis, no high risks were identified either in our own business area or among our direct suppliers. With regard to indirect suppliers, we addressed potential risk issues with our relevant direct suppliers and also found no high risks. Furthermore, we are not aware of any incidents that have actually occurred.

5 Preventive Measures

We have established common principles and values for our own business area to guide our cooperation. In addition, our Code of Conduct applies to all our employees at all locations worldwide. Our direct suppliers are primarily based in Germany. We strive to ensure that, in the future, all suppliers accept our Code of Conduct or have their own Code of Conduct that is at least equivalent or a similar declaration. We use a risk-based approach to achieve this goal.

With the support of the risk analysis described above, we strive to prevent any actual breaches of duty from occurring. If we have indications that a human rights or environmental duty may have been breached by indirect suppliers, we work with the direct supplier to develop a corrective action plan with a specific timetable. If such a breach does occur, appropriate remedial measures are put in place (see Chapter 6).

6 Remedial measures

If we determine that a violation of a human rights-related or environmental obligation has already occurred or is imminent in our own business operations or at a direct supplier, we will immediately take appropriate remedial measures to prevent or end this violation or minimise its extent.

7 Appeal Process

Complaints can be submitted via a whistleblower hotline within our own business area.

8 Documentation and Reporting

We report on our activities in the form of this policy statement. In addition, we document the implementation of the annual risk analysis internally.

9 Regular Review

The policy statement is regularly reviewed on the basis of the annual risk analysis and adjusted as necessary. It is also reviewed and adjusted as necessary in the event of risks arising in specific circumstances.

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