



TOGETHER FOR HUMAN RIGHTS IN OUR SUPPLY CHAINS.

REQUIREMENTS AND OBLIGATIONS TO RESPECT THE HUMAN RIGHTS AND ENVIRONMENTAL CONCERNS IN THE CONTEXT OF SUPPLIER RELATIONSHIPS WITH THE BENTELER GROUP

July 2025



TOGETHER FOR HUMAN RIGHTS IN OUR SUPPLY CHAINS.

OBJECTIVES OF THIS TRAINING:

This training on human rights due diligence and the associated requirements of the BENTELER Supplier Code of Conduct is intended to provide an initial understanding of human rights risks and due diligence obligations for supplier.

It is intended to help understand responsibility from a company's point of view, identify risks and take appropriate measures for prevention and remedy.



BENTELER is required by law not to maintain relationships with suppliers who violate human rights or cause associated environmental risks.



In addition, it has long been our policy not to build relationships with suppliers who are not committed to international human rights and/or who do not accept the principles of our BENTELER Supplier Code of Conduct.



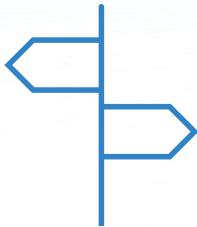
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TOGETHER FOR HUMAN RIGHTS IN OUR SUPPLY CHAINS.

CONTENT:

- CORPORATE RISKS FOR HUMAN RIGHTS
- PREVENTION OF POSSIBLE HUMAN RIGHTS VIOLATIONS
- LEGISLATION AND DUE DILIGENCE OBLIGATIONS TO PROTECT HUMAN RIGHTS AND ENVIRONMENTAL VIOLATIONS
- EXEMPLARY STEPS FOR CONDUCTING A RISK ANALYSIS
- BENTELER REQUIREMENTS FOR THE PROTECTION OF HUMAN RIGHTS AND OF THE ENVIRONMENT
- INTERNATIONAL ORGANISATIONS AND HUMAN RIGHTS CONVENTIONS
- EXPECTATIONS FOR BENTELER SUPPLIERS
- INSTRUCTIONS ON APPLICATION AND OBLIGATION AS WELL AS POSSIBLE CONSEQUENCES
- BENTELER WHISTLEBLOWER SYSTEM AND FURTHER INFORMATION



YOU CAN FIND A DETAILED VERSION IN OUR BENTELER SUPPLIER CODE OF CONDUCT.



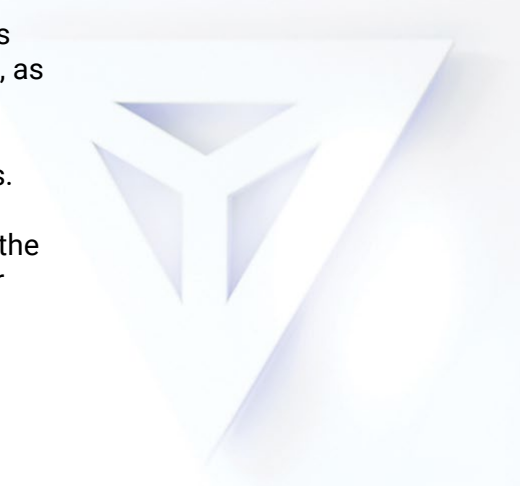
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HUMAN RIGHTS

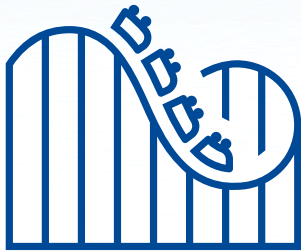
HUMAN RIGHTS BELONG TO ALL PEOPLE.

They have an unrestricted validity - regardless of any criteria such as skin color, gender, nationality, ethnicity, language, religion or educational status.



CORPORATE RISKS FOR HUMAN RIGHTS

THERE ARE NUMEROUS CIRCUMSTANCES THAT CAN JEOPARDISE THE RESPECT AND OBSERVANCE OF HUMAN RIGHTS ALONG THE VALUE AND SUPPLY CHAIN. THESE INCLUDE, FOR EXAMPLE:



Threats result from complex, volatile, economic and social interdependencies.

CHILD LABOUR: Children have to work in dangerous conditions, and their obligation to work prevents them from accessing education

ENVIRONMENTAL RISKS: Impairment of local ecosystems (water, air, soil)

POOR WORKING CONDITIONS: no adequate pay, respect for labour rights, extreme conditions that pose safety and health risks

UNLAWFUL LAND DEPRIVATION: Conflicts over the use of land may affect the rights of indigenous peoples and local communities

DISCRIMINATION: due to lack of privacy, surveillance, or based on gender, ethnicity, or other factors

PREVENTION OF POSSIBLE HUMAN RIGHTS VIOLATIONS:

FROM A COMPANY'S POINT OF VIEW, THERE ARE MANY POSSIBILITIES FOR PREVENTION, FOR EXAMPLE:

- I. PREVENTION OF FORCED LABOUR IN SUPPLY CHAINS:**
Strict supplier audits, exclusion of suppliers with links to high-risk regions, transparency reports
- II. PREVENTION THROUGH OCCUPATIONAL HEALTH AND SAFETY:**
Training, safety equipment, regular inspections, compliance with international labour standards (ILO)
- III. PREVENTION OF ENVIRONMENTAL AND LAND RIGHTS VIOLATIONS IN RAW MATERIAL MINING:** Cooperation with certified mines (e.g. via the Aluminum Stewardship Initiative), involvement of local communities, environmental impact assessments
- IV. ENFORCEMENT OF A BAN AND PROTECTION AGAINST CHILD LABOUR IN THE EXTRACTION OF RAW MATERIALS:** traceability of the supply chain, cooperation with NGOs, investments in local education programs
- V. PROTECTION AGAINST DISPLACEMENT AND RELOCATION OF COMMUNITIES:**
Free, Prior and Informed Consent (FPIC), fair compensation, social impact assessments
- VI. IMPROVEMENT OF LACK OF TRANSPARENCY AND CONTROL:**
Digital supply chain tracking systems, disclosure obligations, integration of ESG criteria into procurement processes

LEGISLATION AND DUE DILIGENCE OBLIGATIONS (LKSG*)

Objectives of the law:

Strengthening human rights and environmental protection in global supply chains

Obligation of German companies to comply with defined due diligence obligations

Responsibility applies to:

- the company's own business area
- direct contractors
- indirect suppliers

Advantages of the law:

For people in the supply chain:

- Better protection against exploitation and environmental destruction

For companies:

- Legal certainty and a clear basis for action
- Promoting sustainable and resilient procurement channels

For consumers:

- More security when buying fairly manufactured products
- Greater responsibility of large companies for fair production conditions

Key obligations for companies:

- **Risk management:** Identifying, assessing and prioritizing risks in the supply chain
- **Statement of Principles:** Publication of a Declaration on Respect for Human Rights
- **Measures to prevent breaches:** Implementation of prevention and remedial measures
- **Grievance mechanisms:** Establishing channels for supply chain complaints
- **Transparency:** Regular reporting on supply chain management



Federal Ministry of Labor and Social Affairs (BMAS)

[Information page on the Supply Chain Act](#)

Federal Office of Economics Affairs and Export Control (BAFA)

[Information page on the UN Guiding Principles and OECD Guidelines](#)

DUE DILIGENCE OBLIGATIONS TO PROTECT HUMAN RIGHTS AND ENVIRONMENTAL VIOLATIONS

RISK ANALYSIS

Regular and/or event-related analyses to identify risks in supply chains.

PREVENTION

Measures to avoid risks in the company's own business area and with suppliers.

REMEDIES

Immediate action in the event of detected violations in order to mitigate and end them.

COOPERATION AND INFORMATION

Ensuring contractual assurance and empowerment through training and cooperation.

Drafting a declaration on the company's policy on respect for human rights.

POLICY STATEMENT

Establishment of a procedure to enable the submission of information and complaints.

COMPLAINT PROCEDURE

Regular reports on risks and related measures.

DOCUMENTATION AND REPORTING

EXEMPLARY STEPS FOR CONDUCTING A RISK ANALYSIS

1. Structuring and analysing the supply chain:

Overview of all direct and indirect suppliers. Categorization by industry, location, type of products supplied.

2. Identification of risk sources:

Derivation of risks per country and product. Examples: In a country, environmental regulations in production could be inadequate.

3. Assess and prioritize risks:

Probability and severity of possible human rights violations and environmental violations as "high" or "medium", e.g. according to the possible influence of one's own company.

4. Carry out regular and event-related analysis:

Annually updated risk analysis, additionally occasion-related in the event of a breach or new/changed business relationship.

5. Communicate and publish results:

Transparency towards stakeholders.

6. Deriving and documenting measures:

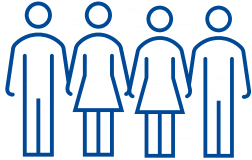
Preparation of a prevention program and documentation of the measures.



Data sources for risk analysis:

Audits, NGO reports, ILO risk data, supplier surveys, information from grievance mechanisms, statistics

BENTELER REQUIREMENTS FOR THE PROTECTION OF HUMAN RIGHTS (1/2):



- RESPECT FOR THE HUMAN RIGHTS OF ALL EMPLOYEES
- PROTECTION ALSO FOR ALL EMPLOYEES (E.G. TEMPORARY WORK)
- NO CHILD LABOUR (MINIMUM AGE 15 YEARS)
- NO FORCED LABOR OR HUMAN TRAFFICKING
- FREE CHOICE OF EMPLOYMENT
- NO RESTRICTION OF FREEDOM OF MOVEMENT
- ACCESS TO DRINKING WATER AND SANITATION
- PROTECTION DURING PREGNANCY
- COMPLIANCE WITH WORKING HOURS, REST BREAKS AND HOLIDAYS

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BENTELER REQUIREMENTS FOR THE PROTECTION OF HUMAN RIGHTS (2/2):



- LEGALLY COMPLIANT WAGES AND BENEFITS
- HUMANE TREATMENT (ABUSE, VIOLENCE)
- PROHIBITION OF DISCRIMINATION
- INFORMATION IN UNDERSTANDABLE LANGUAGE
- RELIGIOUS PRACTICE POSSIBLE IN PRINCIPLE
- FREEDOM OF ASSOCIATION
- RIGHT TO TRADE UNIONS AND WORKS COUNCILS
- RIGHT TO COLLECTIVE BARGAINING AND STRIKE
- COMMUNICATION WITHOUT REPRISALS

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BENTELER REQUIREMENTS FOR THE PROTECTION OF THE ENVIRONMENT:



- SUPPORT FOR THE CLIMATE TARGET AND MEASURES FOR CO2 REDUCTION
- ENVIRONMENTAL PROTECTION MEASURES
- COMPLIANCE WITH ENVIRONMENTAL PERMITS
- PROTECTION OF RESOURCES
- REGULATIONS FOR THE HANDLING OF HAZARDOUS SUBSTANCES
- RESPONSIBILITY FOR DISPOSAL AND RECYCLING
- WATER PROTECTION AND PREVENTION OF CONTAMINATION
- COMPLIANCE WITH LEGAL REQUIREMENTS, LABELLING AND DISPOSAL OBLIGATIONS
- PROHIBITION OF LAND DEPRIVATION
- TRAINING OF EMPLOYEES

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INTERNATIONAL ORGANISATIONS AND HUMAN RIGHTS CONVENTIONS

The Office of the High Commissioner for **Human Rights (OHCHR)** is the leading UN organization in the field of human rights. It promotes and protects all human rights and fundamental freedoms worldwide and provides a complaints mechanism for human rights violations.

The **UN Global Compact** is a voluntary initiative that calls on companies worldwide to align their strategies and activities with ten universal principles in the areas of human rights, labor standards, environmental protection and corruption prevention.

The **International Labour Organization (ILO)** is a specialized agency of the United Nations that was founded in 1919. Its main mission is to promote social justice and decent working conditions worldwide. To this end, it formulates international labour standards, monitors compliance with them and supports developing countries. The ILO also promotes social dialogue between governments, employers and workers.



EXPECTATIONS FOR BENTELER SUPPLIERS

CODE OF CONDUCT FOR SUPPLIERS

As a supplier of BENTELER, you must declare your agreement to the requirements of our BENTELER Supplier Code of Conduct.

FULFILMENT OF DUE DILIGENCE OBLIGATIONS

As part of corporate responsibility, you must take appropriate measures to ensure the protection of human rights in your own business and at your upstream suppliers, such as:

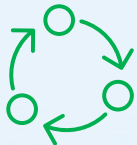
- Creation of own rules of conduct for employees and suppliers
- Integration of contractual clauses to ensure compliance with human rights and environmental concerns along the supply chain

WARRANTY OF TRANSPARENCY

We expect you to respond promptly and appropriately to assessments and inquiries about corporate diligence, protection of human rights and compliance with environmental standards.

REPORT FROM RISK CASES

They enable the reporting and indications of possible violations, risks or concerns with regard to the observance of human rights and environmental concerns.



If a suspicion is confirmed in our supply chain, we work together with our suppliers to take appropriate measures to remedy the situation and to integrate them efficiently into future processes.

INSTRUCTIONS ON APPLICATION AND OBLIGATION

I. DEFINITION SUPPLIER

Suppliers are all suppliers of raw materials, materials or goods as well as all business partners who provide services for BENTELER.

II. WHAT IS THE REASON FOR THE OBLIGATION FOR BENTELER SUPPLIER?

Regardless of the number of employees or their headquarters, all suppliers of BENTELER are obliged to comply with human rights and requirements from the BENTELER Supplier Code of Conduct through existing contractual relationships with companies of the BENTELER Group. Compliance with contractual obligations is urgently required and is associated with requirements for transparency and information sharing in the event of risks to human rights and environmental violations.

III. SETTING UP A DEDICATED COMPLAINTS CHANNEL

If you are unable to set up your own complaint channel, please refer your employees and your own suppliers to the BENTELER whistleblower system or similar reporting systems that are suitable for protection against human rights violations and environmental violations.

POSSIBLE CONSEQUENCES FOR VIOLATIONS



If a supplier of BENTELER does not comply with the basic principles laid down in the BENTELER Supplier Code of Conduct, or is not intended to take preventive measures and eliminate possible risks, BENTELER shall be entitled to terminate the business relationship with this supplier by termination for good cause or a comparable legal institution under local law – insofar as this applies.

The Supplier shall compensate jointly and severally for damages incurred by BENTELER or a business partner of BENTELER as a result of misconduct by the Supplier or its business partners.

The Supplier is obligated to provide information on all topics relating to the BENTELER Supplier Code of Conduct and its implementation without delay upon request from BENTELER.

It is at the discretion of BENTELER to refrain from terminating the business relationship and instead to take alternative measures if the supplier credibly assures and can prove that it has immediately initiated measures to avoid future violations.

BENTELER WHISTLEBLOWER SYSTEM:



B-AWARE

For the legally compliant documentation of information about possible violations, the BENTELER Group has set up the B-AWARE whistleblower system, which offers the possibility to report grievances and suspected cases of violations of laws, regulations or guidelines, if legally permissible, also anonymously.

The possibility of using the complaints procedure is not limited to our business area but is available for use by all BENTELER stakeholders.



BENTELER Whistleblower system

[Go to the website](#)

FURTHER INFORMATION



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Federal Ministry of Labour and Social Affairs (BMAS)

[Information page on the Supply Chain Act](#)

Federal Office of Economics Affairs and Export Control (BAFA)

[Information page on the UN Guiding Principles and OECD Guidelines](#)

Human Rights

Universal Declaration of Human Rights in over 400 languages:
[OHCHR | Universal Declaration of Human Right language search](#)

International Labour Organization (ILO)

Agreements on fundamental principles and rights at work
[International Labor Organization | NORMLEX](#)

10 principles of the UN Global Compact

[UN Global Compact Network](#)

OECD Guidelines for Multinational Enterprises

[Organisation for Economic Co-operation and Development](#)

ILOSTAT Database of Labour Statistics

[ILOSTAT - ILO Databases and Labour Statistics](#)

International Covenant on Economic, Social and Cultural Rights (ICESCR)

[UN | Human Rights Instruments - ICESCR](#)

International Covenant on Civil and Political Rights (OHCHR)

[UN | Human Rights Instruments - OHCHR](#)