

Putzmeister Holding GmbH

Declaration of principles on respect for human rights and the environment pursuant to § 6 para. 2 of the Supply Chain Care Act („LkSG“)

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I. Preamble

Since 1958, the Putzmeister Group has been developing, manufacturing, and selling high-quality and highly reliable machines for the production, conveying, distribution and introduction of concrete, mortar and high-density solids for preparation, temporary storage, processing and transportation of these materials.

As a company, we are not only an economic but also a social player. The Putzmeister Group is therefore fully committed to its responsibility in the global economic fabric, especially with regard to the observance and promotion of human rights and environmental standards. This commitment reflects our efforts to ensure sustainable and ethical responsible business.

In our role as a player in international markets, we are aware of the potential impact of our business activities on human rights and the environment. For this reason, the Putzmeister Group is committed to actively identifying and evaluating risks for human rights violations and environmental impacts in our own business and in our supply chains and to taking appropriate measures to minimize and mitigate risks to take action. This commitment forms the basis of our actions and our corporate policy.

This policy statement serves as a guideline and obligation for all companies of the Putzmeister Group. It forms the foundation of our strategy, processes and business relationships and ensures that we fully comply with our commitment to respect for human rights and the environment.

II. Our approach and actions to respect human rights and environmental due diligence

1. Risk management

The Putzmeister Group has implemented a comprehensive risk management system aimed at identifying, assessing and minimising human rights and environmental risks throughout our supply chain. This system is an integral part of our business strategy and is integrated into all relevant business processes. Our risk management is subject to constant review and further development.

Our Group Board is responsible for the respect of human rights and the environment in our business activities and for the observance and implementation of legal due diligence obligations. The Group Board determines the framework conditions for compliance with due diligence obligations.

For operational monitoring and coordination of risk management, the position of the Human Rights Officer (compliance@putzmeister.com) has been created. In order to fulfil this task, the necessary resources are made available to the Human Rights Commissioner and corresponding powers are granted. It reports to the Group Board at least once a year and on specific occasions.

2. Risk analysis

To identify potential risks in our supply chain, Putzmeister takes a risk-based approach. The Putzmeister Group carries out annual risk analyses for each Group company as well as for specific occasions in order to identify and evaluate human rights and environmental risks in its own business area and with direct suppliers. These risk analyses form the basis for establishing effective preventive and remedial measures.

Risk analysis in its own business area

As part of the risk analysis in their own business unit, the risks are identified on the basis of a qualified assessment. The identified risks are then evaluated on the basis of their size, scope and reversibility as well as the probability of occurrence and classified into risk levels.

With the update of this policy statement, we expect to publish information on the identified risks for 2024, their prioritization and defined preventive measures by the end of 2024.

Risk analysis for direct suppliers

Putzmeister uses a digital risk analysis tool to carry out the risk analysis at its direct suppliers. For this purpose, an abstract risk analysis is first carried out for classification by risk classes (e.g., country and industry risk). Various indices and values (e.g., World Justice Index, UN Sector Mappings, ITUC Global Right Index, Environmental Justice Atlas) are used to calculate the country risk. The stored risks result in a low, medium or high risk classification.

From a medium risk level, a concrete analysis is carried out. It includes a detailed risk analysis of the suppliers prioritized as high-risk suppliers from the abstract analysis. Various measures are derived from this, such as questionnaires or audits, in order to clarify the risks and, if necessary, to derive further targeted measures for prevention or remedy.

With the update of this policy statement, we expect to publish information on the identified risks for 2024, their prioritization and defined preventive measures by the end of 2024.

Preventive measures

If Putzmeister determines risks in its own business or with its suppliers as part of the risk analysis, it immediately takes appropriate preventive measures. In addition, we incorporate the results of our risk analyses into the relevant business processes. Our purchasing processes for suppliers and procurement itself provide for various measures for risk assessment and minimization.

In our own business area, we have established the following measures, regardless of risk:

- Publication of this Policy
- Code of Conduct
- Regular training for employees on the content of the Code of Conduct

With regard to our direct suppliers, we have implemented the following measures in particular:

- Control questionnaire for medium or highly identified suppliers in the risk area
- Consideration of human rights and environmental expectations when selecting our direct suppliers based on the Supplier Code of Conduct
- Implementation of risk-based control measures (e.g., supplier audits and/or supplier qualifications, request for self-assessments and certificates)

In addition, individual prevention measures can be taken that relate to a specific risk situation or category.

3. Remedies

If Putzmeister determines that the violation of a human rights-related or environmental obligation in its own business or with a supplier has already occurred or is imminent, remedial measures will be taken immediately. The selection of the measures to be carried out in the company's own business area and with the suppliers is made on a case-by-case basis on the basis of the nature of the infringement.

In our own business, we take appropriate corrective measures to prevent or end the violation if there is a reasonable suspicion or concrete indication of possible human rights and environmental violations.

We expect our direct suppliers to cooperate fully in investigating and ending potential human rights and environmental violations. In the event of serious breaches, if appropriate remedies are not implemented within an agreed period of time or if milder measures are not sufficient, we reserve the right to take legal action until the termination of the business relationship.

4. Whistleblower system

Putzmeister has implemented an appropriate and effective complaint and reporting procedure to ensure that human rights violations and environmental damage can be clarified, punished appropriately and prevented in the future.

Putzmeister offers all employees and all external third parties protected reporting channels to report violations of external and internal rules, including human rights or environmental risks as well as violations of human or environmental obligations, resulting from the economic activity of a direct or indirect supplier.

All reports and notices are forwarded to our Compliance department and treated confidentially and in compliance with national and international laws and standards.

The whistleblower system can be reached via the following link: <https://putzmeister.integrityline.com>

Alternatively, you can also contact our Compliance department with your request, which can also be used to provide information:

Putzmeister Holding GmbH
Compliance
Max-Eyth-Straße 10
72631 Aichtal
Tel: +49 7127 599-545
E-Mail: compliance@putzmeister.com

5. Efficiency control

The aforementioned procedures for the implementation of human rights and environmental due diligence according to the LkSG are regularly - at least once a year - and reviewed on a case-by-case basis. The risk analysis for the individual prohibited assets of the LkSG also includes continuous monitoring of risk developments.

In the case of direct suppliers, we check the adequate implementation of human rights and environmental due diligence obligations in the form of supplier assessments, supplemented if necessary by in-depth supplier audits. Independent of this, case-related tests are carried out.

Findings from the processing of information from the complaint procedure are taken into account when reviewing the procedures.

6. Documentation and reporting

The fulfilment of due diligence obligations is continuously documented internally and these documents are stored for at least seven years in an audit-proof manner. Putzmeister prepares an annual report for the previous financial year on the fulfilment of its due diligence obligations and publishes it no later than four months after the end of the respective financial year. This report is transmitted to the Federal Office of Economics and Export Control (BAFA) and published on our website (www.putzmeister.com).

7. Expectations for employees and suppliers in the supply chain

We expect and demand that our employees respect and comply with applicable laws and human and personal rights. We expect our business partners to be equally committed to respecting human rights and protecting the environment and to establish appropriate due diligence processes to identify and avoid human rights and environmental risks.

All suppliers of the Putzmeister Group are obliged to comply with our minimum requirements regarding human and employee rights, environmental and climate protection, sustainability, compliance management, corruption prevention, antitrust law and money laundering prevention. Our Supplier Code of Conduct is an integral part of our contracts with our suppliers.

Putzmeister Holding GmbH

Christoph Kaml

CEO