

ZwickRoell Group Declaration of Principles¹

Commitment to the protection of human rights and the environment

Respecting human rights and honoring our environmental obligations² as well as ensuring our own business practices and our supply chain comply with them is of paramount importance to the ZwickRoell Group.

Our commitment to the protection of human rights is based on the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the International Labour Organization's (ILO) core labor standards (CLS), the OECD Guidelines for Multinational Enterprises, and the Ten Principles of the UN Global Compact.

Code of Conduct and Supplier Code of Conduct

Compliance with human rights and environmental obligations are important components of our [Code of Conduct](#), which every employee, manager, director, and other board member of the ZwickRoell Group is obliged to observe. Compliance with human rights and environmental obligations is also an integral part of our [Supplier Code of Conduct](#), which is mandatory for every supplier³ of the ZwickRoell Group. We expect suppliers with whom the ZwickRoell Group has a direct contractual relationship to ensure that the companies in their supply chain respect the standards of our Supplier Code of Conduct and to monitor compliance appropriately.

¹ The ZwickRoell Group comprises ZwickRoell SE and all of the group companies that it controls

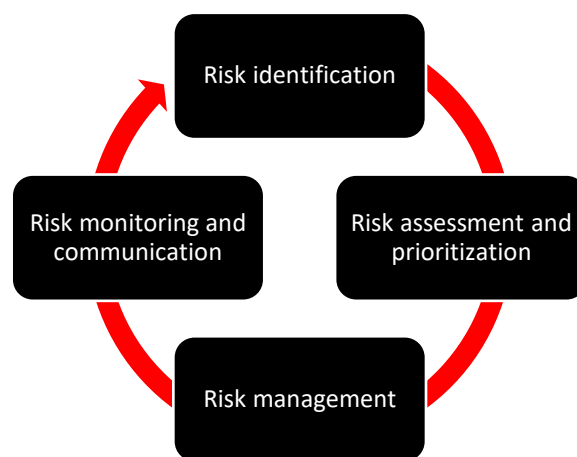
² In addition to complying with all relevant legal requirements, our environmental obligations include, in particular, compliance with the requirements of the Basel Convention, the Stockholm Convention on Persistent Organic Pollutants (POPs), and the Minamata Convention.

³ Suppliers are those business partners who deliver products to the ZwickRoell Group or provide services for the ZwickRoell Group.

Risk management

The ZwickRoell Group has established an appropriate and effective risk management system to fulfill its due diligence obligations.

1. The ZwickRoell Group conducts appropriate risk analyses on an annual and ad hoc basis to identify risks to human rights and the environment. This risk analysis is divided into an abstract and a concrete risk analysis. First, key indices and other sources are used to determine which abstract industry- and country-specific risks are present in the ZwickRoell Group's supply chain. The risks identified as abstract are then checked for plausibility as part of a concrete risk analysis, e.g., using supplier questionnaires, certificates, audits, and other evidence.
2. The identified risks are then evaluated and prioritized. The risk assessment is based on legally standardized criteria of appropriateness. The risks are then prioritized based on the assessment results. The purpose of prioritization is to ensure that the ZwickRoell Group can deploy its resources effectively to manage the identified risks.
3. The prioritized risks are then addressed through appropriate and effective preventive and remedial measures. Preventive measures are implemented to prevent the occurrence of a risk (e.g., through training). Remedial measures are intended to end violations that have already occurred and prevent similar violations from occurring the future.
4. The level of effectiveness of the measures implemented is reviewed on an ad hoc basis and at least once a year. If an effectiveness check reveals that the measures taken are not sufficiently effective, they will be adjusted.



Reporting violations (reporting office)

The ZwickRoell Group has established several reporting channels for submitting information about human rights and environmental violations:

Violations can be directly reported to supervisors, the compliance officer (compliance@zwickroell.com), the responsible compliance manager, the HR department, or a member of the ZwickRoell Group's management. In addition, the ZwickRoell Group offers whistleblowers the opportunity to report to our ombudsperson. Whistleblowers can contact the ombudsperson by telephone at +49 (89) 90 420 49 62 / +49 (170) 91 37 617 or via email at ZwickRoell-Whistleblowing@bay-gmbh.com.

Handling reports

All reports are treated confidentially regardless of the reporting channel selected. Additional information about the reporting procedure can be found in our [rules of procedure](#).

Accountability

The ZwickRoell Group's management is primarily responsible for compliance with human rights and environmental due diligence obligations. It monitors the operational implementation of the necessary processes and measures. In addition, regular and ad hoc reporting ensures that both the management and the responsible risk officers remain continuously informed about all significant human rights and environmental risks so that they can be managed effectively.

On an operational level, it is the responsibility of every manager in the ZwickRoell Group to exercise due diligence with regards to human rights and environmental obligations within their sphere of influence. This obligation relates in particular to compliance with due diligence obligations by employees and suppliers of the ZwickRoell Group. The ZwickRoell Group has also appointed a human rights officer who supports the continuous monitoring and optimization of the risk management system for human rights and the environment.

Documentation and reporting

The ZwickRoell Group documents the fulfillment of due diligence obligations to a reasonable extent and publishes an annual report in this regard. This report is available to the public for seven (7) years and is also submitted by the ZwickRoell Group to the Federal Office for Economic Affairs and Export Control (Bundesamt für Wirtschaft und Ausfuhrkontrolle).

Raising awareness among employees and suppliers

The ZwickRoell Group's [Code of Conduct](#) provides employees of the ZwickRoell Group with information about the importance of human rights and environmental obligations and requires them to comply with these obligations.

The ZwickRoell Group's [Supplier Code of Conduct](#) calls upon suppliers to respect human rights and environmental obligations. In addition, the Supplier Code of Conduct states that the ZwickRoell Group supports suppliers in addressing any risks and also asks for their support.

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