

Supplier training

regarding the German Supply Chain Due Diligence Act

With this training, we want to support our suppliers and business partners in minimizing human rights and environmental risks in their field of business. The following slides therefore provide information on the risks and due diligence requirements covered by the German Supply Chain Due Diligence Act. In addition to the contents of the German Supply Chain Due Diligence Act, this training clarifies how we implement the requirements that are placed on us and what we expect of our suppliers and business partners.

What is the intent of the German Supply Chain Due Diligence Act?

Human rights and environmental due diligence



The German Supply Chain Due Diligence Act will apply from 01.01.2023 to companies with more than 3000 employees, and from 01.01.2024 to companies with more than 1000 employees.



The purpose of the Act is to protect fundamental human rights and to ensure compliance with environmental standards in global supply chains.



The German Supply Chain Due Diligence Act obliges the affected companies to comply with human rights and environmental due diligence in the supply chain.

- Establishing a risk management system
- Carrying out a risk analysis
- Implementation of preventive measures
- Implementation of remedial measures
- Establishment of a complaints procedure
- Documentation and reporting

What human rights risks does the German Supply Chain Due Diligence Act address?

1

Child labour

2

Forced labour and slavery

3

Disregard of occupational safety

4

Disregard of the freedom of association

5

Unequal treatment/discrimination

6

Inadequate remuneration

7

Causing a harmful environmental change

8

Illegal eviction

9

Cruel treatment by security personnel

What human rights risks does the German Supply Chain Due Diligence Act address?

1 Child labour

- Prohibition of employment of a child under the age at which compulsory education ends
- Regardless of the end of compulsory education, the age of employment may not be less than 15 years, unless exceptions apply under ILO Convention No. 138
- Prohibition of the worst forms of child labour (including slavery, prostitution, drug trafficking) for children under 18 years

§ ILO Convention No. 138
ILO Convention No. 182

2 Forced labour and slavery

- Prohibition of employment of persons in forced labour
- Forced labour includes any work performance that is demanded of a person under threat of punishment or that this person is not providing voluntarily
- Prohibition of all forms of slavery, slave-like practices, servitude, or other forms of domination or oppression in the workplace environment

§ ILO Convention No. 29
ICCPR

3 Disregard of occupational health and safety

- Prohibition of disregard of applicable occupational health and safety regulations, in particular with regard to
 - the provision of safe workplaces, workstations and work equipment
 - suitable protective measures against chemical, physical or biological substances
 - the observance of working hours and breaks
 - adequate training and instruction

§ ILO Convention No. 155
ILO Convention No. 187

What human rights risks does the German Supply Chain Due Diligence Act address?

4

Disregard of the freedom of association

- Prohibition of disregarding the
 - right to form or join associations or unions
 - right to strike
 - right to collective negotiations
- Prohibition of discrimination against employees due to union activity or membership



ILO Convention No. 87
ILO Convention No. 98

5

Unequal treatment/discrimination

- Prohibition of unequal treatment in employment, for example on the basis of national and ethnic origin, social origin, sexual orientation, gender, age, health status, disability, political or religious view
- Prohibition of payment of unequal remuneration for work of equal value



ILO Convention No. 100
ILO Convention No. 111

6

Inadequate remuneration

- Prohibition of withholding a fair remuneration
- Adequate is at least the minimum remuneration determined according to the applicable law

What human rights risks does the German Supply Chain Due Diligence Act address?

7

Harmful environmental change

- Prohibition of causing harmful soil alteration, water or air pollution, noise emission or excessive water consumption, that
 - affects the natural basis for food production,
 - denies, impedes or destroys a person's access to safe drinking water or sanitary facilities
 - harms the health of a person

8

Illegal eviction

- Prohibition of illegal eviction
- Prohibition of illegal expropriation of land, woodlands and bodies of water, whose use is essential to the life of a person

9

Cruel treatment by security personnel

- Prohibition of hiring private or public security personnel to protect a business project if, due to a lack of instruction or control on the part of the company, the use of the security personnel
 - disregards the prohibition of torture and cruel, inhuman or degrading treatment,
 - injures life or limb or
 - impairs the freedom of association and coalition

What environmental risks does the German Supply Chain Due Diligence Act address?

1

Violation of the Minamata Convention

2

Violation of the POPs Convention

3

Violation of the Basel Convention

What environmental risks does the German Supply Chain Due Diligence Act address?

1

Violation of the Minamata Convention

- Prohibition of the manufacturing of certain mercury-added products (including batteries, switches, relays, fluorescent lamps, cosmetics, pesticides, biocides, barometers and thermometers)
- Prohibition of the use of mercury and mercury compounds in certain manufacturing processes (chlor-alkali production, acetaldehyde production)
- Prohibition of non-environmentally safe treatment and disposal of mercury waste

2

Violation of the POPs Convention

- Prohibition of the production and use of certain persistent organic pollutants (POPs)
- Prohibition of non-environmentally safe handling, collection, storage and disposal of POP waste

3

Violation of the Basel Convention

- Prohibition of export of hazardous waste contrary to the provisions of the Basel Convention
- Prohibition on the import of hazardous waste from a country that is not a Party of the Basel Convention

How do we implement the requirements of the German Supply Chain Due Diligence Act?

Our commitment to the protection of human rights

As a global family business, the Hörmann Group is aware of its responsibility within global supply and value chains. The Hörmann Group respects human dignity and is committed to protecting human rights as well as promoting diversity and equal opportunities.



What is important to us and how we implement the requirements of the German Supply Chain Due Diligence Act, is described in our [human rights policy statement](#).

What expectations do we have of our suppliers and business partners?

We expect our business partners and suppliers to adequately protect human rights both in their own business and in the upstream supply chain and to comply with all applicable rules and laws.



Signing our [Code of Conduct for Business Partners of the Hörmann Group](#)



Integration of appropriate measures for the protection of human rights in the own field of business and at sub-suppliers



Completing supplier questionnaires and responding to requests



Participation in training programs and support during on-site audits



Reporting violations of human rights or environmental obligations through our anonymous [complaints procedure](#)

If the suspicion of a violation of a human rights or environmental obligation in our supply chain is confirmed, we work with our suppliers and business partners to immediately develop appropriate measures and systematically implement them.

Topic	Informationsquellen
International Standards	United Nations Guiding Principles on business and human rights (EN) OECD Guidelines for Multinational Enterprises (EN) ILO framework of fundamental principles and rights at work (EN)
Human rights due diligence	SME Compass of the Helpdesk Business & Human Rights (EN) 5 steps towards managing the human rights impacts of your business (EN)
Risk analysis	CSR Risk Check (EN) as well as the data sources mentioned therein
Taking measures	Decent Work Toolkit for Sustainable Procurement (EN)