

## **Supplier information**

### **on the Act on Corporate Due Diligence Obligations for the Prevention of Human Rights Violations in Supply Chains (LkSG)**

With this document, we would like to support our suppliers and business partners in minimising human right risks and environmental risks in their own business and in their supply chains. The following slides therefore provide information on the risks and due diligence requirements covered by the LkSG. In addition, this document gives insights on how Hörmann implements the requirements of the LkSG and what we expect from our suppliers and business partners.

## Human rights and environmental due diligence obligations



The LkSG applies to German companies with more than 3,000 employees from 1 January 2023 and to companies with more than 1,000 employees from 1 January 2024.



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



The LkSG obliges the companies to comply with human rights and environmental due diligence obligations in their supply chain.

- Establishing a risk management system
- Performing regular risk analyses
- Laying down preventive measures
- Taking remedial action
- Establishing a complaints procedure
- Documenting and reporting

# Which human rights risks are covered by the LkSG?

1

Child labour

2

Forced labour and slavery

3

Disregard of occupational health and safety obligations

4

Disregard of the freedom of association

5

Unequal treatment in employment

6

Inadequate remuneration

7

Harmful environment change

8

Unlawful eviction

9

Cruel treatment by security forces

## 1 Child labour

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

§ ILO Convention No. 138  
ILO Convention No. 182

## 2 Forced labour and slavery

- Prohibition of the employment of persons in forced labour
- Forced labour includes any work or service that is required of a person under threat of punishment and for which he or she has not made himself or herself available voluntarily
- Prohibition of all forms of slavery, serfdom or other forms of domination or oppression in the workplace

§ ILO Convention No. 29  
UN ICCPR

## 3 Disregard of occupational health and safety obligations

- Prohibition of disregarding occupational health and safety obligations, in particular with regard to
  - the provision of safe workplaces, workstations and work equipment
  - appropriate protective measures against chemical, physical or biological substances
  - appropriate working hours and break times
  - adequate training and instruction

§ ILO Convention No. 155  
ILO Convention No. 187

4

## Disregard of the freedom of association

- Prohibition of disregarding
  - the right to form or join trade unions
  - the right to strike
  - the right to collective bargaining
- Prohibition of discriminating employees for forming or joining a trade union

§ ILO Convention No. 87  
ILO Convention No. 98

5

## Unequal treatment in employment

- Prohibition of unequal treatment in employment, for example on the grounds of national, ethnic or social origin, sexual orientation, gender, age, health status, disability, political opinion, religion or belief
- Prohibition of the payment of unequal remuneration for work of equal value

§ ILO Convention No. 100  
ILO Convention No. 111

6

## Inadequate remuneration

- Prohibition of withholding an adequate living wage
- The adequate wage amounts to at least the minimum wage as laid down by the applicable law

7

## Harmful environment change

- Prohibition of causing any harmful soil change, water pollution, air pollution, harmful noise emission or excessive water consumption that
  - significantly impairs the natural bases for the preservation and production of food
  - denies, inhibits or destroys a person's access to safe and clean drinking water and sanitary facilities
  - harms the health of a person

8

## Unlawful eviction

- Prohibition of unlawful eviction
- Prohibition of unlawful taking of land, forests and waters, the use of which secures the livelihood of a person

9

## Cruel treatment by security forces

- Prohibition of hiring private or public security forces for the protection of a company's project if, due to a lack of instruction or control on the part of the company,
  - the prohibition of torture and cruel, inhumane or degrading treatment is violated
  - life or limb is damaged
  - the right to organise and the freedom of association is impaired

1

Violation of the  
Minamata Convention

2

Violation of the  
POPs Convention

3

Violation of the  
Basel Convention

1

## Violation of the Minamata Convention

- Prohibition of the manufacture of certain mercury-added products (i.a. batteries, switches, relays, fluorescent lamps, cosmetics, pesticides, biocides, barometers and thermometers)
- Prohibition of the use of mercury and mercury compounds in certain manufacturing products (vinyl chloride monomer production, sodium or potassium methylate or ethylate)
- Prohibition of the treatment and disposal of mercury waste in a manner that is not environmentally sound

2

## Violation of the POPs Convention

- Prohibition of the production and use of certain persistent organic pollutants (POPs)
- Prohibition of the handling, collection, storage and disposal of POPs waste in a manner that is not environmentally sound

3

## Violation of the Basel Convention

- Prohibition of exports of hazardous waste contrary to the provisions of the Basel Convention
- Prohibition of imports of hazardous waste from a non-party of the Basel Convention



Our commitment to protecting 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.



In our [Human rights policy statement](#), we have set out what is important to us and how we implement the human rights due diligence obligations.

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



Signing our [Code of Conduct for business partners](#)



Implementing appropriate measures to protect human rights in the own business and in the supply chain



Completing supplier questionnaires and responding to enquiries



Participating in training opportunities and supporting on-site audits



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

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

Subject area	Sources of information
International standards	UN Guiding Principles on Business and Human Rights ( <a href="#">EN</a> ) OECD Guidelines for Multinational Enterprises ( <a href="#">EN</a> ) ILO Conventions ( <a href="#">EN</a> )
Human rights due diligence obligations	SME Compass of the Helpdesk Wirtschaft & Menschenrechte ( <a href="#">EN</a> ) 5 Steps Towards Managing The Human Rights Impacts Of Your Business ( <a href="#">EN</a> )
Risk analysis	CSR Risk Check ( <a href="#">EN</a> ) as well as the data sources referred to therein
Preventive measures and remedial action	Decent Work Toolkit for Sustainable Procurement ( <a href="#">EN</a> )