



Human Rights
and due diligence related to human rights

Policy Statement

Adolf Würth GmbH & Co. KG

SCOPE

The Adolf Würth GmbH & Co. KG pledges to comply with and implement the policy statement at all its operating facilities within Germany, all the shops, and with all the business relationships of Adolf Würth GmbH & Co. KG. It is the responsibility of each and every employee of Adolf Würth GmbH & Co. KG to implement the commitment of Adolf Würth GmbH & Co. KG to human rights in their day-to-day work and sphere of influence. The overall responsibility for due diligence related to human rights lies with the management of company. The sustainability management headed by the human rights officer Carina Lebsack is tasked with implementing due diligence related to human rights.

OUR RESPONSIBILITY

Out of a sense of responsibility for sustainability and human rights, Adolf Würth GmbH & Co. KG joined the United Nations Global Compact, the world's largest and most important initiative for responsible corporate governance. In addition, Adolf Würth GmbH & Co. KG complies with the guidelines and standards of the Universal Declaration of Human Rights, the principles of internationally recognized standards on responsible corporate governance, and the Rio Declaration on Environment and Development. With this commitment, we want to apply our values to the supply chain and contribute to more sustainable business practices.

Risk management

Adolf Würth GmbH & Co. KG carries out systemic risk assessments for the materials, products, and processes they use in order to fulfill the requirements for due diligence related to human rights. The human rights-related risk analysis of the supply chain takes into account the risks of the sourcing countries, and industries. In addition, the risk analysis considers the influences that the business model and purchasing practice of Adolf Würth GmbH & Co. KG have on its suppliers. Information from external sources and experiences from corresponding internal company areas such as auditing and procurement are included in the risk classification. Our risks are primarily found in the upstream value chain. The results of the risk analysis serve as the basis for selecting and evaluating future suppliers. In the latest risk analysis, the topics of anti-corruption, environmental protection, human and labor rights, occupational safety, responsibility along the supply chain, and conflict minerals were identified as particularly relevant for Adolf Würth GmbH & Co. KG.

In the business units

At Adolf Würth GmbH & Co. KG, all employees are sensitized to compliance issues. Among other things, the training courses include an in-depth examination of human rights and compliance with them. In addition, the content of the non-discrimination policy and the Supplier Code of Conduct of Adolf Würth GmbH & Co. KG as well as the principles of a sustainable supply chain. In the Würth Akademie's Sustainability

Management qualification program, we address the widespread strategies for implementing sustainability in the company and our supply chains. All training courses are fundamentally aimed at sensitizing, informing and activating employees in order to proactively promote the joint protection of human rights due diligence.

In the value chain

All of the business partners and suppliers of Adolf Würth GmbH & Co. KG and their direct and indirect partners commit to respecting, complying with, promoting and acting in accordance with the principles laid down. If a company qualifies as a supplier for Adolf Würth GmbH & Co. KG, they commit to complying with Adolf Würth GmbH & Co. KG's **Code of Compliance** and **Supplier Code of Conduct** within the scope of their supplier agreements. As a result, suppliers are also obliged to comply with ethical business practices, human rights, and environmental standards. In terms of content, the requirements of the Supplier Code of Conduct are based on the ten principles of the UN Global Compact, which can be derived from the Universal Declaration of Human Rights, the core labor standards of the International Labour Organization (ILO) and the Rio Declaration on Environment and Development.

With regard to environmental and social aspects, there are defined exclusion criteria for human rights, which can be summarized as follows:

- Child labor, forced labor and non-compliance with working time guidelines
- Business practices that pollute the environment (e.g., waste water discharge)
- Product-related environmental damage (e.g., hazardous product ingredients)
- Lack of a quality management system
- Gross violations of occupational health and safety.

If any of these criteria apply to a supplier, they are asked—depending on the severity of the violation—to take corrective measures by a specified time, and then the successful implementation of those measures is verified. If no improvements have been made, this can be cause to terminate the supplier relationship. However, our preference is for the general conditions in the factories of our suppliers to improve instead of just changing suppliers.

Adolf Würth GmbH & Co. KG offers internal and external persons the possibility to report complaints and indications of human rights violations via the email address given below.

Adolf Würth GmbH & Co. KG

sustainable.procurement@wuerth.com

A CONTINUOUS PROCESS

Adolf Würth GmbH & Co. KG will regularly review its position, including the implementation of its strategy, critically and continuously develop it further. The policy statement is reviewed annually and on a case-by-case basis (together with the Supplier Code of Conduct) and, if necessary, revised with findings from the risk analysis. In our annual report, we inform all of the stakeholders about the further development of our strategy to prevent human rights violations in our supply chains.

For more information on human rights, please refer to the **[Adolf Würth GmbH & Co. KG's sustainability report](#)**.