

Human Rights Policy Statement

Introduction

The [Fedderson Group](#) is characterised by a special structure in its organisation. Founded by Karl Detlef Feddersen in 1949, the group of companies is today divided into three business segments, which are subordinate to K.D. Feddersen Holding GmbH and the K.D. Feddersen Foundation from an organisational perspective. The shareholdings in the companies of these business segments of the Feddersen Group are held by K.D. Feddersen Holding GmbH. The sole shareholder of K.D. Feddersen Holding GmbH is the non-profit K.D. Feddersen Foundation, which has been operating a sheltered accommodation for the elderly in Hamburg since 1984. Karl Detlef Feddersen established the foundation in 1958 out of a desire to give something back to society.

„Acting on behalf of people – acting through global trade“

Karl Detlef Feddersen, founder of the Feddersen Group

We are still guided by this motto today. In the Feddersen Group, we see it as our duty to promote the responsible use of resources. As a globally active group of companies, we thus not only fulfil our entrepreneurial goals, but are also committed to the environment and society.

Since 2021, our Corporate Innovation Lab [port_F](#) has supported us in building new networks, developing and implementing innovative business ideas, e.g., on the topic of circular economy, and making knowledge usable to consciously shape the future of our Group.

At [BIO-FED](#), a branch of AKRO-PLASTIC GmbH, our experts develop innovative and application-oriented bioplastics solutions.

Many bioplastic compounds from BIO-FED are biodegradable under appropriate environmental conditions, thus already reducing microplastics and plastic contamination in the environment when recycling does not take place. Biobased and biomass-balanced compounds contribute to the reduction of the carbon footprint through the use of non-fossil resources.

With [ISCC PLUS](#) and certification, we have created new opportunities to demonstrate the sustainability of individual products and supply chains as a whole. Central goals are:

- Reducing the consumption of fossil, finite resources
- Forcing of the use of sustainable resources
- Proof of responsible production
- The traceability of the certified material throughout the entire supply chain

[Compliance](#) is a top priority in the Feddersen Group. With the court-proof organisation implemented in the German companies, we have already taken a number of measures, such as a resilient and established structural and procedural organisation, documented structures together with procedural and work instructions, binding principles of management work and the systematic analysis of risks.

On 1 October 2021, the Feddersen Group created a central staff unit for [CSR management](#) at K.D. Feddersen Holding GmbH. The CSR staff unit deals with all issues relating to the topic of corporate social responsibility, e.g., they were in charge of developing the group's sustainability strategy. After creating a materiality matrix, goals and measures were defined for our most important fields of action. These consider, among other things, human rights and environmental risks. In a web-based application these are documented in a structured format and continuously monitored. The resulting goals and measures are reviewed and adjusted annually. In regular meetings, the responsible departments are reviewed by the CSR management with regard to the implementation of these measures.

Accepting responsibility

The Feddersen Group's management considers it an obligation to ensure that human rights are respected in its supply chains. We see this as an ongoing and individual process, which we are happy to fulfil with due corporate diligence. Our actions are therefore guided by the internationally valid human rights conventions and recommendations of the United Nations, among others.

The Sustainable Development Goals (SDGs) of the United Nations are essential for the companies of the Feddersen Group. These [17 goals](#) include, e.g., overcoming poverty and disadvantage. These must go hand in hand with strategies that improve health and education, reduce inequality and boost economic growth in a sustainable way. This also includes combating climate change and working to preserve our oceans and forests.

For the concrete implementation within the Feddersen Group, we have established processes to identify human rights or environmental risks and their potential impacts as well as concepts of measures to prevent, mitigate or end adverse impacts on human rights.

In line with our corporate guidelines, we operate an integrated management system based on a court-proof organisation, consisting of documented principles, procedures and methods, which are stored as company-specific action and work documents in our Excellence documentation in the IMS portal.

In addition, we conclude contractual agreements with our national and international business partners. We conscientiously respond to the self-disclosures requested by our suppliers, customers and service providers as well as to surveys conducted by them. With the same self-image, we initiate regular surveys in which we ask our business partners for information on human rights and environmental issues, among other things, by means of standardised questionnaires.

We also provide training in the relevant business areas and build the skills and capacity of our employees to fulfil our due diligence obligations. In the case of particularly high-risk suppliers, we take human rights risks into account in our strategic business decisions and in product development.

Within the Feddersen Group, personnel and department-specific responsibilities are defined and this policy statement will be continuously developed. The competencies are described transparently and comprehensibly in our integrated management system.

The companies of the Feddersen Group aim to leave an intact world for future generations by using the available global resources sparingly and responsibly. We expect such behaviour from our

employees as well as from our business partners. To this end, social, ecological and economic aspects must be considered.

Identifying risks

It is essential for the Feddersen Group to be aware of the impact of its own actions with regard to human rights, and in particular to recognise deteriorations in the human rights situation at an early stage and prevent them if possible. We are aware that the decisions we make in our current business activities can have human rights consequences elsewhere.

Therefore, we regularly scrutinise our activities in our current business, just as we carefully prepare strategic decisions and activities affecting the future.

We consider the possible risks and distinguish between impacts:

- which are caused directly by the companies of the Feddersen Group,
- to which the companies of the Feddersen Group contribute through direct contractual relationships with business partners, or
- with which the companies of the Feddersen Group are indirectly connected due to their business relationships, their business activities, their products or services despite the absence of direct contractual relationships, e.g., in the case of a large number of intermediaries.

Context-dependent factors of a location are always considered in our risk analyses. If necessary, we also contact independent sources such as international non-governmental organisations.

Within the framework of our established integrated management system, risk management with annual and occasion-related risk analyses as well as risk-based process thinking has been our practice for many years ([certified](#) according to DIN EN ISO 9001 : 2015, for example).

The results from the risk analyses have identified a shared focus in relation to raw materials. The raw materials purchased by the companies of the Feddersen Group are regularly reviewed critically. In the event of human rights or environmental risks, concrete strategies and action plans are drawn up. As described in the introduction, one of these actions is product-specific certification in accordance with ISCC PLUS and REDcert².

Minimising risks

When risks or violations related to human rights or the environment are identified, the Feddersen Group initiates and documents appropriate preventive and remedial measures in order to track their continuous implementation. The severity of the potential and actual impact on human rights is considered. If the companies of the Feddersen Group become directly aware of violations of human rights at one of our business partners or if we become aware that processes are not being carried out properly, we feel compelled to fundamentally reconsider the business relationship and, after unsuccessful attempts with milder means, to terminate it, if necessary.

Where necessary and appropriate, specialised training to support employees, and in other cases training of suppliers, customers or service providers, are each used as a means of improving the situation.

The Feddersen Group's possible measures also include the adaptation of processes or supply chains, for example through tried and tested procurement procedures or cooperation with suppliers to improve their handling of human rights risks. In this context, joining an industry initiative is a feasible way to create synergy effects in the implementation of industry-specific human rights due diligence with corresponding reporting.

To ensure that the effectiveness of the measures can be verified, the responsibility for monitoring compliance with human rights and environmental due diligence is clearly regulated and anchored in our integrated management system.

Informing and reporting

Through our integrated management system, we make the necessary information available to employees in a transparent and up-to-date manner. We also publish relevant reports, certificates and conduct guidelines on our website. We want to demonstrate that we are aware of our corporate responsibility and consider the actual or potential impact of our actions on human rights in our decisions.

Enabling complaints

We at the Feddersen Group consider it our obligation to identify misconduct and non-compliance with rules as early as possible and to initiate appropriate counter measures. Because only if rules and standards are adhered to can we prevent damage to our companies, our business partners and our employees and thus identify actual or potential impacts on human rights.

This is where the use of our certified and standardised [Whistleblower Portal](#) comes into effect. Since 4 September 2020, both the employees of the Feddersen Group and any external legal or natural person have the opportunity to anonymously report information via the web-based Business Keeper Management System (BKMS) of [EQS Group AG](#). This is done via a protected, encrypted dialogue between the reporter and the responsible recipient on a communication platform secured according to the latest technology. The reports can be made in German, English, Portuguese and Chinese. The reports are documented in a legally secure manner and the processing of the reports is traceable. Confidentiality is guaranteed at all times with the BKMS portal.

With the establishment of the Whistleblower system, we have created an important element to complement risk management as well as to ensure responsible corporate governance.

The management of K.D. Feddersen Holding GmbH is responsible for the implementation of and compliance with this policy statement on human rights.

Volker Scheel

Managing Director