

Werhahn Slavery and Human Trafficking Statement 2021

Organisational Structure, Business Operations and Supply Chains

Werhahn Group

Wilh. Werhahn KG with its corporate seat in Neuss, Germany, is a family-run business which puts emphasis on a relationship of mutual trust with its employees, customers and business partners. Business activities of Wilh. Werhahn KG and its subsidiaries (collectively the Werhahn Group) comprise three corporate divisions - Building Materials, Consumer Goods and Financial Services - with six business units. Werhahn Group employed approximately 10,200 employees and has generated a turnover of around 4 billion Euro worldwide in the financial year 2021.

The Werhahn Group is committed to act ethically and with integrity in its business dealings and to take the appropriate steps to preserve the fundamental rights and freedoms of its employees. Any activities such as forced or compulsory labour, human trafficking or other forms of slavery will not be tolerated within the Werhahn Group or its supply chains. Essential ethical values and standards of conduct are stipulated in Wilh. Werhahn KG's Code of Conduct, which applies throughout the Werhahn Group.

Business Operations

Core business of the Consumer Goods division is the production of high-quality kitchenware (such as knives, cookware, cutlery, etc.) and beauty products (e.g. manicure sets). Production companies of the Consumer Goods division are located in Germany, France, Belgium, Italy, Japan, India and China. Business operations of the Building Materials division comprise the production of building materials (such as asphalt, natural stones, slate and building chemistry products) and are run in Germany, Spain, Sweden, Czech Republic, Hungary, Poland, Russia and Ukraine. Financial Services are rendered in Germany, Austria and the Netherlands only.

Employees and Organisational Policies

Employees

We can assure that all employees within the Werhahn Group, whether temporary or permanent workers, work for us on their own free will. We ensure this by a transparent and reliable recruitment system applied on a global and local basis by always applying our general standards as defined in our Code of Conduct.

Code of Conduct

The Werhahn Code of Conduct has been implemented within all Group companies on a worldwide basis (majority owned subsidiaries either apply the Werhahn Code of Conduct or a Code of Conduct with a similar content).

The Werhahn Code of Conduct explains the value system of the Werhahn Group and defines the behavioural standards for all employees. It is based on the following core principles:

- We behave in a human and respectful manner, and are honest and loyal. We respect the dignity and personality of every individual and tolerate no discrimination, harassment or abuse whatsoever.
- We take responsibility for our actions.
- When identifying vested interests, we ensure that these do not conflict with the interests of the Werhahn Group.
- We act sustainably and protect resources, health and the environment.
- We do not tolerate any corruption (we do not bribe anyone or accept any bribes).
- We are fair in competition and abide by the rules of competition law.

Training

In addition to providing the Werhahn Code of Conduct, Werhahn Group offers - depending on the respective corporate division and in particular within the Consumer Goods division - further training to its employees (such as face-to-face compliance training or online training in the group's core languages).

Helpline

The Werhahn Group moreover provides their employees inter alia the opportunity to anonymously raise possible concerns with regard to a breach of statutory provisions or internal guidelines via a toll-free helpline. A possible breach of human or other rights (e.g. through modern slavery or human trafficking) could also be reported via the helpline. Following the report of a potentially critical incident, such incident will be noticed and comprehensively assessed by competent experts. Should the incident in fact constitute an infringement of statutory provisions or guidelines, appropriate measures will be taken immediately in order to sort out the respective issue.

Relationship with Suppliers

Supply Chains

The supply chains differ significantly depending on the respective corporate division. Suppliers and sub-suppliers in the Consumer Goods division are mainly located in Europe, East Asia and Southeast Asia. As far as the Building Materials division is concerned, a large part of (preliminary) products is either produced or supplied directly within the division, which guarantees an ideal overview of the production and work conditions. The main suppliers of the Building Materials division are located in Europe, in particular in Germany and Spain, but also in the Czech Republic, Belarus and Poland. Supplementary supplies are delivered by suppliers worldwide.

Code of Conduct and Corporate Principles regarding Suppliers

Since November 1st, 2017, the holding company of the Consumer Goods Kitchen division is member of amfori BSCI (www.amfori.org) and has committed itself to comply with the amfori BSCI Code of Conduct as well as to transfer these standards to its supply chain. Being a cross-industry standard, the amfori BSCI Code of Conduct is the basis for supplier relationships and needs to be signed by suppliers prior to entering any supply relationship. It comprises and emphasizes social principles which need to be fulfilled by suppliers. Thereby, it involves:

- Prohibition of discrimination, bonded labour, child labour as well as any kind of disciplinary measures
- The rights of freedom of association and collective bargaining
- Fair and legally compliant remuneration
- Decent working hours
- Ethical business behaviour
- Compliance with workplace health and safety as well as environmental standards
- Special protection for young workers

With the introduction and implementation of a Code of Conduct for Suppliers, the business units of the Building Materials division also expect their suppliers to comply with the following rules:

- Legal Compliance
- Prohibition of forced labour and child labour
- Non-discrimination of employees
- Ensuring equal opportunities, diversity and equal treatment
- Safety at work
- Environmental protection
- Fair competition

To take responsibility and secure social standards among suppliers the Consumer Goods division applies different instruments. Prior to starting any business relationship with suppliers, production sites are visited by own employees. Besides other business relevant criteria social conditions form part of the standardized evaluation procedure. During business relationships, further site visits and audits are carried out with suppliers on regular basis. Latter are mostly conducted by third party auditing companies and involve factory tours, the review of documents, and interviews with employees and the management. BSCI sets the ground for supplier monitoring and development activities. To raise the supplier's awareness for social standards and to strengthen knowledge on social topics at site, suppliers are encouraged to participate in trainings. Accompanying BSCI, SA 8000 standard is acknowledged by the Consumer Goods division.

The employment of instruments follows a risk-based approach. Should a supplier fail to comply with the division's applicable legal and/or social standards, remediation will be requested immediately after becoming aware of such failure. Respective incidents are recorded. Depending on the severity of the potential misconduct, conditions are closely investigated (e.g., through additional audits), evaluated and tracked. In case of major failures or ongoing non-compliance the business relationship will be terminated.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Werhahn Group's slavery and human trafficking statement for the financial year ending December 31, 2021.

Neuss, June 2022

signed by

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of Wilh. Werhahn KG

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