

Policy statement on respect for human rights and environmental standards

SCHÜCO RESPECTS INTERNATIONALLY RECOGNISED HUMAN RIGHTS, REJECTS ALL EXPLOITATIVE WORKING CONDITIONS AND AVOIDS NEGATIVE ENVIRONMENTAL IMPACTS

As an internationally active company, we are convinced that compliance with and protection of human rights and the environment should form the basis of economic activity. We can only be successful if our business activities are in harmony with people and the environment, and we are aware of this responsibility.

We are committed to respecting the following international standards:

- International Human Rights Charter, including the United Nations (UN) Universal Declaration of Human Rights
- 8 core labour standards of the International Labour Organisation (ILO)
- 10 principles of the UN Global Compact
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights
- Minamata, POP and Basel Conventions

We are committed to respecting internationally recognised human rights and to aligning our business activities with them. Where national law and international human rights standards differ, we will follow the higher standard; where they conflict, we will endeavour to respect internationally recognised human rights as far as possible. This includes, in particular, the prohibition of child labour, forced labour and all forms of slavery and discrimination. We see diversity in practice and its appreciation as having a positive impact on our organisation and on society. That is why we are guided by the holistic promotion of diversity in accordance with the *Diversity Charter* along the seven dimensions of age, ethnic origin and nationality, gender and gender identity, physical and mental abilities, religion and worldview, sexual orientation and social background. Our commitment also includes the prohibition of forced evictions and the causing of harmful environmental pollution. The same applies to the use of security forces if this involves the risk of disregarding or restricting human rights. We also attach great importance to compliance with freedom of collective bargaining and association, the implementation of a high level of occupational safety and the payment of fair wages.

In order to live up to our standards, we have derived guidelines and principles from the aforementioned international standards and anchored them throughout the company. They form the binding framework for all employees and business partners:

- **Schüco Code of Conduct:** In our Code of Conduct, we define the basic legal and ethical rules that the entire Schüco Group is obliged to comply with.
- **Supplier Code of Conduct:** The Supplier Code of Conduct regulates the Schüco Group's requirements for responsible procurement and is intended to encourage our suppliers to comply with specific environmental, legal, social and ethical requirements.
- **Organisational instructions for compliance with due diligence obligations in Schüco's supply chains (in accordance with LkSG and other certifications):** The internal instructions define

and document the applicable rules and prohibitions within the Schüco Group in connection with the Supply Chain Due Diligence Act (LkSG) and other certifications.

This commitment applies to our own business area as well as to our business activities throughout our entire supply and value chain. The management of the Schüco Group is responsible for implementation and compliance. The appointed human rights officers play a particularly important role in implementing human rights due diligence in the supply and value chains. They work closely with the Sustainability, Purchasing and Legal and Compliance departments and report regularly to the management.

SUSTAINABILITY IS A CORPORATE RESPONSIBILITY

As a company in the construction industry, we take long-term responsibility and, with our products and services, have the leverage to make an active contribution to a more sustainable world. Our claim: we want to be pioneers for effective sustainability in the construction industry. Through our actions, we want to contribute to the United Nations Sustainable Development Goals and thus support their objectives. The Sustainable Development Goals form the basis of our understanding of sustainability and ensure that we understand sustainability as a holistic challenge that goes far beyond climate and environmental protection. For us, sustainability is not an abstract idea, but a concrete task that we tackle every day in each of our six defined areas of action: environment, products, business development, supply chain, employees and society.

As a developer and supplier of system solutions for windows, doors and façades, Schüco has more than 1,000 products in its portfolio, whose components come from national and international suppliers. In addition to suppliers in the service sector, the purchasing department lists product-related suppliers such as manufacturers of aluminium and PVC-U profiles, fittings and security technology. We source our products from suppliers worldwide, the majority of whom are based in Europe, and value long-term business relationships characterised by partnership and cooperation.

We are involved in various industry initiatives and partnerships. This allows us to cover aspects that go beyond our sphere of influence, such as compliance with human rights in upstream stages of the value chain, and to promote transparency, quality and sustainability standards throughout the supply chain:

- As a founding member of the Climate Economy Foundation (formerly Foundation 2°), we are committed to successfully implementing the energy transition and operating in a more resource-efficient manner.
- Since 2018, we have been working with WWF Germany as part of a partnership to make an effective contribution to greater sustainability in the construction industry. This cooperation focuses on climate protection and responsible raw material procurement. In addition, we have a critical partner at our side in the WWF, which reviews the effectiveness of our measures in the supply chain and ensures that we continuously work in a solution-oriented and goal-oriented manner.
- We are a founding member of the Aluminium Stewardship Initiative (ASI), a global multi-stakeholder association that works across industries to establish environmental and human rights standards along the aluminium value chain, and a member of the Aluminium Recycling Initiative () AIUIF and the VinylPlus initiative – the sustainability programme of the European PVC industry.

We expect our business partners to also respect human rights and internationally recognised labour and social standards and to commit to establishing appropriate due diligence processes. Our business partners also include our suppliers who directly or indirectly provide products or services to Schüco.

IMPLEMENTATION OF CORPORATE DUE DILIGENCE

We regularly analyse our own business activities and our suppliers to identify potential risks of human rights violations or environmental protection violations. We do this on the basis of an annual risk analysis and real-time risk monitoring. In addition, we carry out ad hoc risk analyses, for example, if there are changes in business activities, if the risk situation changes in other ways, or if we become aware of possible violations at indirect suppliers.

The results of the risk analyses are incorporated into our business processes. For the identified areas, we derive appropriate measures that both improve the status quo and have a preventive effect. In the metal industry in particular, we encounter increased risks, which we analyse in more detail as part of our established processes. People – and therefore health and safety – are our top priority. We set standards that are designed to ensure compliance with legal requirements, a safe working environment and the protection of fundamental corporate values in an increasingly digital and global environment, and we are constantly developing these standards further. We conduct training courses for our employees to raise their awareness and promote appropriate behaviour in their everyday work. With regard to our supply chains, we rely on a combination of various measures: we formulate specific requirements for suppliers and service providers, take human rights and environmental criteria into account when selecting suppliers, and carry out control measures.

COMPLAINTS PROCEDURE

Despite our diligence with regard to human rights and the environment, we are aware that violations can occur. At Schüco, it is very important to us that violations of human rights, social standards, working conditions, environmental regulations or any other type of violation of legal provisions and internal regulations are prevented wherever possible and, if not, investigated.

To this end, we have set up a transparent complaints system within which violations of laws and compliance guidelines can be reported. Schüco employees and anyone directly or indirectly affected by Schüco's business activities, such as customers, suppliers, service providers and their employees, have the option of contacting Schüco's legal counsel directly. The legal advisor acts as an independent solicitor. They are not subject to any instructions from Schüco regarding the handling of reports of violations of laws or Schüco's internal rules.

Schüco guarantees confidentiality for all whistleblower channels. The confidential lawyer is available to all whistleblowers free of charge.

CONTACT DETAILS OF THE SCHÜCO TRUSTED LAWYER

Dr Carsten Thiel von Herff, LL.M.
c.thielvonherff@thielvonherff.de
Tel. +49 521 55 7 333 0
Mobile: 00800 – OMBUDSMAN
www.report-tvh.com

You can contact our compliance organisation at the following email address: compliance@schueco.com .

FURTHER DEVELOPMENT AND REPORTING

We are aware that implementing human rights and environmental due diligence in our own business area and with regard to direct and indirect suppliers is an ongoing process. This process, the strategic approaches and measures are subject to constant review and continuous development, depending on changing conditions and our business activities. We provide regular and transparent information on the implementation of human rights and environmental due diligence in our annual report to the management. In addition, the requirements of the Supply Chain Due Diligence Act are an integral part of the Schüco Group's sustainability reporting in accordance with the Corporate Sustainability Reporting Directive (CSRD).

Bielefeld, 19 December 2025

Andreas Engelhardt
Managing Partner

Philipp Neuhaus
Chief Financial Officer (CFO)