



fischer 

Declaration of Principles for Human Rights

fischer group of companies.

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1. Human rights and environmental expectations

The fischer Group of Companies is aware of its **responsibility** to protect human rights and the environment, also and in particular with regard to the risks along the global value chains. With this Declaration of Principles, the **management** of the fischer Group of Companies intends to create **transparency** about fischer's commitment to compliance with **human and environmental rights** and to strengthen **trust** in fischer's **performance and integrity**.

We are committed to a global value system and want to protect and defend it. For fischer, sustainable corporate conduct means responsible behavior that strives for longterm economic success in harmony with ecological responsibility and social justice.

This Declaration of Principles is closely linked to various documents and regulations at fischer, in particular the Code of Conduct and the Business Partner Code of Conduct for the fischer Group of Companies, and focuses on the protection of human rights and the environment.

The fischer Group of Companies pursues the goal of avoiding human rights violations and environmental pollution. We also expect this from all our partners. We are guided by the following values and definitions and comply with them.

Human rights

Human rights are a universal value and are enshrined in the International Bill of Human Rights. Respecting and protecting them is fundamental for fischer. In safeguarding human rights, the fischer Group of Companies is guided by the following international standards:

- ILO Declaration on Fundamental Principles and Rights at Work
- 10 principles of the UN Global Compact
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises

The fischer Group of Companies **condemns child labor** in any form and supports its abolition. The focus is particularly on the worst forms of child labor; in no case may the safety, health and physical and mental development of children be endangered or impaired. We do not tolerate human trafficking, forced labor or modern slavery in our company or among our partners. We place a high priority on respecting and **protecting local communities and minorities** worldwide.

Women and children are disproportionately affected by inequality, violence, harassment, low income, combined with a lack of education and inadequate healthcare. That is why the fischer Group of Companies is particularly committed

to protecting the rights of women and children and supporting those affected by unequal treatment. It is our fundamental belief that all people, regardless of age or gender, have the right to live freely, make their own decisions and be treated with dignity. **Women's and children's rights** are human rights.

When external personnel are contracted, fischer ensures that they are appropriately instructed and monitored. Particular care is required when contracting private or public security personnel. When contracting such security personnel, any interference of the freedom of association and the right to unionize as well as the fear of repression must be prevented. Any use of force, torture or other treatment that endangers life or limb is prohibited.

Land, forest and water rights must be respected for the sustainable protection of people's livelihoods. Illegal forced evictions must be avoided.

Working conditions

fischer stands for **fair working conditions**, appropriate payment and working hours that comply with legal requirements. We recognize the right to **freedom of association** and the **right to collective bargaining**. The **health and safety** of our employees and our business partners is of great importance to us.

We absolutely **do not and will not tolerate harassment and discrimination**. At fischer, we value diversity and respect all people regardless of their sexual identity, gender, origin, appearance, language, age, disability and religious or political beliefs.

All employees have the **same rights**; this is a fundamental principle for the fischer Group of Companies. This includes **fair and equal treatment** without discrimination or bias, from the initial selection and hiring through to the point an employee leaves the company. We treat people with disabilities with respect and recognize their value as an integral part of fi-

scher. From the very beginning, we strive for an **inclusive community** in which people with and without disabilities can participate in a self-determined, equal and unrestricted manner.

Environment and sustainability

We focus on entrepreneurial activity in harmony with the environment and the responsible use of resources. At fischer, we recognize the importance of all aspects of sustainability. Throughout our entire value chain, we try to avoid environmental pollution and minimize the consumption of resources by striving for continuous improvements in the procurement, production and use of our products.

Our environmental management system is certified and reliable.

In order to avert environmentally related risks, the fischer Group of Companies complies with the following international standards, among others, as amended:

- Minamata Convention on Mercury of October 10, 2013 (Minamata Convention)
- Stockholm Convention on Persistent Organic Pollutants of May 23, 2001 (POPs Convention)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989 (Basel Convention)

Responsibility for raw materials

The mining and processing of various materials, especially raw materials, involves environmental and human rights risks. The fischer Group of Companies avoids and averts these risks. Particularly in the case of raw materials originating from conflict and risk areas, increased due diligence is required. We comply with the due diligence and monitoring obligations for conflict minerals.

European context

The European Union deals with environmental, social and corporate governance issues in many areas. The focus here is on binding sustainability requirements for and the decarbonization of goods as well as ensuring due diligence obligations for companies.

The fischer Group of Companies sees the European regulations and considerations as the basis for its sustainable and responsible actions and aligns its business decisions with the standards and principles standardized there.

Respect for national legal systems

If individual points of this Declaration of Principles for the Protection of Human Rights are contrary to national regulations, fischer is committed to providing the best possible support to people within the applicable legal framework. Partners in such countries require close monitoring and we expect the implementation of appropriate preventive and remedial measures in the event of human rights and environmental risks.

2. Method for fulfilling due diligence obligations

The fischer Group of Companies can only achieve its objective of avoiding human rights violations and environmental pollution in its daily business operations with a comprehensive and integrated management system.

We strive for a system of continuous improvement and always observe the **principles of appropriateness and effectiveness**. A **PDCA-cycle** provides orientation.

We Plan our approach. Define responsibilities and carry out an initial risk analysis.

During implementation (Do), we base our management and documentation on the risk analysis in order to implement an effective human rights process. In addition to the risk analysis, this process includes the implementation of appropriate preventive and remedial measures and a qualified complaints procedure. We also aim to create expertise and awareness through communication and training.

A regular **Check** of the process ensures monitoring and the measurement of effectiveness and efficiency.

We Act to continuously protect and improve human rights. We are constantly learning and reporting on human rights risks and how we deal with human rights violations.

Organization

The fischer Group of Companies takes verifiable protective measures to protect against human rights violations and environmental risks, which is why responsibilities are defined in our various corporate divisions. Coordination and management is the responsibility of the Human Rights Committee with representatives from the Legal and Insurance, Purchasing, Global Logistics, Quality and Supplier Management, Human Resources and Sustainability, Environment and Energy departments.

As an overarching measure, fischer has appointed a Human Rights Officer. The Human Rights Officer acts as the interface between the Human Rights Committee and the management of fischer. Their key tasks include monitoring the human rights and environmental risk management of the fischer group companies that fall within the scope of the LkSG (German Supply Chain Act).

Risk management

The fischer Group of Companies has an operational corporate risk management system in which the key risks for the company and effective risk management strategies are documented.

More extensive due diligence obligations have led fischer to further develop and align its risk management to legal regulations.

As an effective risk management system, our management system for **human rights and environmental due diligence** includes an in-depth risk analysis and the introduction of specific and appropriate preventive and remedial measures. A secure complaints procedure also enables the anonymous reporting of information. Documentation and reporting are also part of the system.

Risk management is embedded as an integral part of all relevant business processes.

Risk analysis

The fischer risk analysis follows a structured approach to prioritize the risks in its own business area and in the supply chain, which covers the requirements of the German Supply Chain Act (LkSG) and other applicable regulations, particularly European regulations.

In order to establish this approach within the company and to set up processes in compliance with national and international standards, fischer has worked together with a renowned international management consultancy specialist in human rights. In this project, the company's own business division and the most significant supply chains were reviewed.

As part of the risk analysis, we evaluate our partners based on a country and sector risk and weigh them according to severity and probability of occurrence. This assessment is a basis for an initial prioritization. As part of a second prioritization phase, further criteria such as fischer's ability to influence the risk and the partner are included in the analysis. The risk analysis forms the basis for determining how the risks must be managed and which risk management strategy is most effective.

Results of the risk analysis

fischer is a global company and focuses on the specific situation of people and their living conditions in the respective countries.

This means that prevailing risks in certain regions and cultures must be taken seriously in our own business area and in the supply chain. Overall, human rights and environmental risks occur with varying degrees of intensity and frequency around the world.

The risk analysis revealed that fischer has foreign subsidiaries and suppliers in high-risk countries. For these countries, it is particularly important to maintain reliable processes to protect their own workforce. To assess the country risk, 21 reference indices such as the Global Rights Index, the Global Slavery Index and the Children's Rights in the Workplace Index were used. As a result, there are potentially increased and in some cases very high risks for Asia and increased risks in South America.

The prioritized management of risks for the fischer Group of Companies results from the combination of risks for certain business divisions and activities as well as the risk assessment of the countries in which fischer operates. Based on its risk analysis, fischer prioritizes the issues of equal treatment in employment and fair pay in **its own business area**.

In terms of prioritization of issues, child labor and its most severe forms as well as forced labor and other forms of modern slavery along the **supply chains**, should be noted, especially in the lower parts of the analyzed sectors. In addition, occupational health and safety is a common risk for almost all supply chains. The topics mentioned are stated in the fischer Code of Conduct and fischer Business Partner Code of Conduct. We also expect our partners to adhere to our strong framework of values. With regard to the risk of fischer activities (products) to customers and society, the risks are primarily in the areas of product safety and disposal.

Preventive and remedial measures

Based on the risk analysis, preventive and corrective measures are defined for the identified risks and a concept for implementing the measures is defined.

fischer's prevention measures include training and education on human rights and environmental issues that impart knowledge and skills and create a high level of awareness of prevention and responsibility. Stable processes were established and updated with the aim of advancing our effective systems and documenting them appropriately. In addition, the contractual framework was adapted and documents and guidelines were created or extended:

- Code of Conduct
- Business Partner Code of Conduct
- Declaration of Principles for Human Rights
- fischer terms and conditions of purchase
- Sustainability brochure
- Sustainability strategy
- Supplier Self Assessment Questionnaire
- Process description for supplier onboarding

If fischer discovers that a violation of a human rights-related or environmental obligation has occurred or is imminent in its own business area or with a direct business partner, appropriate remedial measures will be taken immediately to prevent or end this violation or to minimize the scale of the violation. fischer expects the same from its business partners. Remedial measures may include the provision of requested documents and evidence, the performance of a self-assessment or audits. As a last option, the business relationship may also be terminated with immediate effect.

Risk monitoring is an integral part of risk management and ensures that measures remain effective. All identified risks are regularly reviewed. The review covers both the risks and the progress and effectiveness of corresponding countermeasures.

Complaints procedure

The fischer Group of Companies sees an effective complaints procedure as an important element in fulfilling its due diligence obligations. fischer wants to react promptly and quickly to violations of the law and possible irregularities and will take remedial action. The first point of contact for fischer employees is the direct reporting manager or the compliance department. In addition, the fischer whistleblower system is open to internal and external persons for the prompt and secure reporting of information.

Please also refer to sections 4 and 5 of this Declaration regarding the **complaints procedure**.

Indirect suppliers

The fischer whistleblower system is accessible to all external persons, including indirect suppliers, and can be used without restrictions. In the event fischer receives indications of a possible violation of a human rights or environmental obligation by an indirect supplier, we take the legally required measures as required.

Documentation and reporting

We fulfill our due diligence obligations by reporting annually, in a timely manner and in the appropriate format, on any human rights and environmental risks or breaches of duty that have occurred during the previous financial year. The report includes detailed account of the resulting measures, including their impact, effectiveness and consequences. If no risks or breaches of duty are identified, we also report on these.

As part of fulfilling our due diligence obligations, documentation is regularly prepared; this documentation is not public and is kept for at least seven years from the date of creation. The protection of business secrets and personal data as well as any other confidential information is observed.

3. Implementation of this policy statement

Compliance - Commitment

The management of the fischer group of companies considers itself, its managers and employees to be responsible for complying with and implementing this Declaration of Principles.

We expect our business partners to comply with our Declaration of Principles for Human Rights and to conduct their business in accordance with due diligence obligations.

Our business partners must ensure in an appropriate manner that their partners also respect and protect human rights and comply with the values of this Declaration of Principles. Furthermore, they are also obliged to enforce their own due diligence obligations with their partners.

Dealing with violations and reports

Violations of this Declaration of Principles for Human Rights or of applicable laws and regulations are not permitted and must be reported immediately.

Reports can also be submitted via the **fischer whistleblower system**. The whistleblower can choose to submit their report anonymously or by providing their contact information.

It is important to note that anyone who reports a violation or suspected case of wrongdoing must not face any form of adverse treatment. At fischer, we are committed to providing special protection for whistleblowers.

All reports and information are promptly followed up on. fischer ensures a confidential and discreet process in accordance with applicable legal requirements.

4. Contact

Questions concerning this Declaration of Principles for Human Rights can be directed to the **legal department** of the fischerwerke GmbH & Co KG.

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The fischer Declaration of Principles for Human Rights is regularly reviewed and further revised. Violations of the law, including and in particular human rights violations, can be reported quickly and securely via the **fischer whistleblower system**.



**fischer
whistleblower system**

fischer.integrityline.com/setup

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fischer stands for

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