



Pfeifer & Langen

Policy statement on our human rights strategy

Pfeifer & Langen GmbH & Co. KG is one of Europe's leading sugar manufacturers. Guided by the values of a long-established family business, we are committed to long-term, sustainable thinking and action, as well as responsible business practices.

This policy statement sets out our position and requirements regarding human rights due diligence within the company and across the supply chain. Compliance with human rights due diligence is an integral part of our corporate values.

Scope

Our group not only respects human rights within its own business activities, but also works to ensure compliance with these fundamental rights throughout its supply chains. Sustainable procurement and thus also the implementation of the German Supply Chain Due Diligence Act (LkSG) are firmly anchored in our corporate strategy.

This policy statement applies to Pfeifer & Langen GmbH & Co. KG as well as to all companies affiliated with Pfeifer & Langen GmbH & Co. KG and subject to its operational control.

Fundamental principles and expectations

Pfeifer & Langen GmbH & Co. KG is committed to value-oriented conduct, which is reflected in the fundamental principles of its own code of conduct. These principles embody our understanding of ethically, morally and legally correct behaviour.

This also includes compliance with human rights and environmental due diligence obligations based on the LkSG and internationally recognised standards. Pfeifer & Langen GmbH & Co. KG is committed to promoting the implementation of human rights due diligence within its sphere of influence.

Structure and responsibilities

The implementation of the LkSG is managed and monitored by the Consumer Protection, Nutrition Policy and Sustainability Department of Pfeifer & Langen GmbH & Co. KG.

Operational responsibility lies with the company's Human Rights Officer.

The implementation and further development of the due diligence management system in accordance with the LkSG is carried out with the involvement of relevant specialist departments. This also includes training courses.

The management of Pfeifer & Langen GmbH & Co. KG reviews compliance with the obligations arising from the LkSG at least once a year.

Due diligence management system

The aim of the due diligence management system is to prevent or mitigate potential and actual adverse impacts on human rights and the environment through various measures.

The cornerstone of the management system is this policy statement (Section 6 (2) LkSG). Key components of the implemented process are risk analysis as well as preventive and remedial measures. The implemented complaints mechanism allows internal and external stakeholders to report any risks they observe anonymously.

All components of the risk management system are subject to continuous review and updating.

Risk analysis

An ongoing annual risk analysis includes the identification of potential and actual risks in our own business area and among direct suppliers. Indirect suppliers are subject to a risk analysis on an ad hoc basis. The results of the risk analysis are communicated at regular intervals to the relevant departments and to management.



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Key risk areas

The potential for human rights and environmental risks within the meaning of the LkSG is classified as low for the business areas of Pfeifer & Langen GmbH & Co. KG until further notice.

Sector- and country-specific risks may arise in the direct supply chain, in particular forced labour, health and safety at work, and unequal treatment.

Preventive and remedial measures

In the event of a potential or actual risk in its own operations area or the supply chain, the company will immediately take preventive or remedial measures. These may include information provided by suppliers, e.g. in the form of third-party certifications, codes of conduct and initiatives that comprehensively counteract the risk. Individual audits and training courses may also be carried out.

A final assessment of the supplier or risk assessment is carried out on the basis of the identified risk in combination with the preventive and remedial measures taken.

Complaints mechanism

Violations of this declaration and the provisions of the LkSG must be reported immediately. This may be done either directly to the specialist departments or via the web-based whistleblower system ([EQS Integrity Line](#)). In addition, each company involved has implemented a whistleblower system on its corporate website.



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Effectiveness review

The effectiveness of the due diligence management system is reviewed at least once a year and on an ad hoc basis. The systemic review is carried out in consultation with the relevant specialist departments.

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