

## CTDI Europe's Human Rights Policy

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CTDI Europe recognizes its responsibility to respect human rights and protect the environment throughout its supply chain, in line with our Business Code of Conduct, and is committed to the Universal Declaration of Human Rights, the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work (the ILO Core Conventions) and the UN Global Compact. We align our corporate actions with the internationally applicable standards and guidelines for human rights. The management of CTDI Europe supervises the implementation of and compliance with the "Declaration of Principles on Respect for Human Rights".

We fulfil our responsibility for people and the environment through appropriate and effective risk management for the above-mentioned protected goods by taking the following measures:

The preparation of a risk analysis is a natural part of management. The identified risks are minimized by preventive measures, which cover the entire company as well as our direct suppliers, to a reasonable extent and after prioritization has been carried out.

Immediate risks to people and the environment in the direct supply chain are addressed through measures implemented without delay. In the case of serious and immediate hazards to people and the environment, we work with the direct supplier to develop an action plan to reduce and, if necessary, eliminate the hazard.

If developed action plans are not implemented or do not lead to the defined goal, we reserve the right to terminate the business relationship with the direct supplier.

Our suppliers are carefully selected, also on the basis of their preventive measures to protect human rights.

We describe our expectations of our employees in our Business Code of Conduct and train them regularly about its content. The same applies to our suppliers and the Supplier Business Code of Conduct.

Complaints about human rights violations or disregard for our organization's environmental standards can be referred externally to our Whistleblowing system at any time. This complaints procedure is equally accessible to all suppliers in our supply chain through our website <https://www.ctdi.eu/>.

If we obtain information about violations of our guidelines through this complaints mechanism, these are examined and evaluated according to an internal procedure and, if necessary, measures are worked out together with the relevant supplier as described above.

A report is communicated annually to the management outlining the risks, the measures taken, the effectiveness of the measures and an effectiveness evaluation of the system. This report is posted on our organization's website for at least 7 years and sent to the authority in charge according to required time schedules.

We additionally review all described measures once a year as well as on an ad hoc basis for their appropriateness and continuously develop them further.

This policy is valid as of 17.01.2025 and replaces the former policy from 01.07.2024.



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