

Purpose

The purpose of this policy is to affirm Jungbunzlauer's commitment to respect human rights and to prohibit child and forced labour within our organisation and across our supply chains. As a signatory of the United Nations Global Compact (UNGC), we are committed to operate our business according to highest ethical, social and environmental standards, we align our objectives with the UN Sustainable Development Goals (SDGs), and we actively promote decent work throughout our value chain. Thereby we seek for a positive impact on humanity.

Scope

This policy outlines our commitment to free choice of employment and to compliance with national labour laws, the UN Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, the UNICEF Children's Rights and Business Principles and the UN Guiding Principles on Business and Human Rights (UNGPs).

It applies to everyone engaged or employed by any company of the Jungbunzlauer Group, as well as to all business partners to whom our Supplier Code of Conduct is applicable.

Jungbunzlauer requires that these internal and external stakeholders comply with all national and international human rights laws applicable to them and that they act in accordance and compliance with this policy.

Policy statement

Jungbunzlauer has made a clear commitment to uphold human rights, including prohibiting child and forced labour, as stated in our Code of Conduct.

1. No child labour

We consider child labour as any activity not complying with ILO Minimum Age Convention, 1973 and ILO Worst Forms of Child Labour Convention, 1999, have written procedures in place to verify the age of employees and to comply with all applicable national laws regarding the employment of young workers. We do not practice or tolerate any form of child exploitation and do not employ children before they have completed their compulsory education and reached at least the age of 15.

2. No forced labour, compulsory labour or human trafficking

We oppose all forms of forced and compulsory labour. This includes practices such as prison labour, indentured labour, bonded labour, slave labour, and human trafficking.

3. No land grabbing

We respect the rights of individuals and communities, including Indigenous peoples, to their land and property. This includes respecting their cultural rights, right to self-determination, and right to non-discrimination. We have a zero-tolerance for land grabbing, and for the exploitation of water, forest or mineral resources in ways that violate human rights.

4. Rights of communities where we operate

We respect the human rights of individuals in communities affected by our activities, with a particular attention to vulnerable and marginalised groups. We seek to identify any potential negative human rights impacts and to take appropriate steps to avoid, minimise, or mitigate them.

Implementation

To put this policy into practice, we work to continuously identify human rights impacts, avoid and address them, continuously monitor the effectiveness of our measures and periodically report on our performance. We are aware that addressing human rights is not something that we can do alone. Collaboration with governments, non-governmental organisations, employees, suppliers, customers, communities, and other relevant stakeholders is essential.

Jungbunzlauer conducts thorough due diligence to assess risks within our organisation and supply chains. We train employees and conduct a SEDEX Members Ethical Trade Audit (SMETA) for each of our large production sites every two years. We carefully select suppliers and ensure they are familiar with our Supplier Code of Conduct. For goods sourced from countries of origin with an enhanced or heightened risk of child labour, as identified by UNICEF in its Children's Rights in the Workplace Index, we assess potential risks using an adverse media screening tool. We also evaluate additional suppliers for other ESG risks, including forced labour and human trafficking in the production sites of the goods sourced by Jungbunzlauer.

Objectives and targets

- Extend access to third-party whistleblowing system to external stakeholders by end of 2025.
- Maintain 0 identified or suspected case of child labour, forced labour or human trafficking in the production sites of the goods sourced by Jungbunzlauer by 2030.
- Implement comprehensive human rights due diligence processes compliant with the requirements of the EU Corporate Sustainability Due Diligence Directive by 2030.

Grievance mechanism

Jungbunzlauer takes all reports of potential misconduct very seriously. We encourage our internal and external stakeholders to inform us of possible ethical or legal violations, and we commit to investigate thoroughly any arising issue and to solve it. If feeling uncomfortable with transparent reporting, our stakeholders can also communicate any identified or suspected misconduct anonymously via our third-party whistleblowing system (external stakeholders from 2nd half of 2025).

Responsibilities and review

This policy has been approved by the Executive Committee of the Jungbunzlauer Group and is subject to a regular review at least every two years.

Reference

This policy should be read in conjunction with the following documents of the Jungbunzlauer Group:

- Code of Conduct
- Supplier Code of Conduct
- Working Conditions Policy
- Modern Slavery and Human Trafficking Statement