

# Declaration of Principles on Respect for Human Rights FREIBERGER GROUP



## Declaration of Principles on Respect for Human Rights

We, as Freiberger Group<sup>1</sup>, are aware of our corporate responsibility and are committed to respecting human rights. This includes the prevention, minimization and elimination of human rights risks and risks to the environment as defined by the German Supply Chain Due Diligence Act (LkSG), as well as the redress of violations. We want to implement this claim through suitable structures in our own business area and in our global supply and value chain.

The scope of our corporate due diligence in accordance with the LkSG extends beyond the Freiberger Group's own business operations to our employees and our business partners along our global supply and value chain. Together with the Südzucker Group, we align our corporate actions and our human rights due diligence processes with the following internationally recognized standards and comply with all relevant national and international laws, regulations and provisions:

- i. Universal Declaration of Human Rights
- ii. UN Guiding Principles on Business and Human Rights
- iii. Core Labor Standards of the International Labor Organization (ILO)
- iv. OECD Guidelines for Multinational Enterprises
- v. Ten principles of the UN Global Compact (UNGC)
- vi. Regulations of the Supplier Ethical Data Exchange (SEDEX)

We expect our employees and managers to commit to respecting human rights to the same extent. This expectation also applies to our business partners, from whom we expect the implementation of due diligence obligations by means of suitable due diligence processes. Furthermore, our business partners should also pass on this expectation to their own suppliers and business partners.

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<sup>1</sup> The "Freiberger Group" refers to Freiberger-Holding GmbH and all companies in which Freiberger Holding GmbH directly or indirectly holds a majority interest. This declaration of principles is adopted by Freiberger Holding GmbH as the parent company for its controlled companies. The Freiberger Group is part of the Südzucker Group.

The following human rights–related principles, which are part of the Südzucker Group's Code of Conduct and Supplier Code of Conduct, are also observed and consistently implemented by the Freiberger Group:

- Occupational health and safety
- Diversity, equal opportunities and protection against discrimination
- Fair remuneration
- Prohibition of child labor
- Prohibition of forced labor
- Freedom of association and the right to collective bargaining
- Appropriate deployment of security forces
- Protection of natural resources and the environment

In our efforts to respect human rights, we focus on the following groups of people: Our own employees at national and international locations, including our trainees, employees of service providers and workers in our direct and indirect value chain, especially in the production and processing of raw materials. We also take the following vulnerable groups of people into account: Workers in our downstream value chain (customers) and people without union representation or with an indirect link to the value chain, such as members of local communities. All of these groups of people could potentially face risks to their human rights.

Within our due diligence processes, we have also identified groups of people who are potentially exposed to particularly high risks. By this we mean groups of people who are socially marginalized or less heard. The protection of vulnerable groups is a particularly high priority within our due diligence obligations.

Respect for the applicable regulations on the protection of human rights is an integral part of our corporate responsibility. All employees commit to respecting the dignity and personal rights of every colleague as well as third parties with whom the company has a business relationship. We only want to work with business partners who share our principles and efforts to prevent human rights violations. If negative human rights impacts are identified within our own business processes or with our business partners, Freiberger Group will ensure that these impacts are remedied appropriate.

## Implementation of the due diligence obligations

### Business model

Our business model is based on the development, production and marketing of frozen and chilled products with a focus on pizza. We also develop, produce and market frozen snacks and ready meals. Our focus is on the production of private labels for national and international food retailers as well as for the bakery and food service sectors. We rely on selected raw materials and state-of-the-art production technologies to offer tasty and high-quality products.

Our value chain includes the procurement, processing and refinement of ingredients through to the efficient distribution of our products. We rely on modern, sustainable technologies to optimize our processes in terms of quality, resource conservation and energy efficiency.

Our aim is to offer innovative, practical and enjoyable food that meets the needs of our customers and consumers. Our strategy is geared towards long-term, sustainable growth, a high level of innovation and close cooperation with our customers in order to best meet their needs.

Many of our production sites are located in rural regions. We see compliance with legal regulations, human rights and working conditions as well as the promotion of healthy and safe nutrition as key pillars of our business. Our employees bring a variety of experience, skills, knowledge, personalities and cultures to the table and make a significant contribution to the success of our company.

### Responsibilities and risk management

Overall responsibility for our corporate due diligence obligations lies with the Executive Board. The Group Human Rights Committee of the Südzucker Group also supports the Freiberger Group in an advisory and coordinating capacity in fulfilling its due diligence obligations.

The tasks of the Südzucker Group Human Rights Committee include, among others, monitoring risk management with regard to human rights, evaluating regular risk analyses, as well as further developing risk management by reviewing violations and deriving suitable measures. The Group Human Rights Committee consists of the management functions of Corporate Human Resources, Corporate Sustainability, Corporate Procurement and the Chief Compliance Officer Südzucker Group. It is chaired by the Chief Compliance Officer of Südzucker Group.

## Risk management in our own business area and in the supply chains

To implement the human rights due diligence obligations, we as a subsidiary of the Südzucker Group have helped to develop a group-wide approach to identifying and avoiding corresponding risks and have adopted it for Freiberger; this also includes our business division and that of our direct suppliers. We want to prevent risks, minimize them and take appropriate remedial action in the event of violations.

We rely together with the Südzucker Group on a systematic, integrated and risk-based approach to fulfill our responsibility to respect human rights. We use established management processes to identify and assess potential risks or violations in order to continue to identify and take action against them. This includes an annual Group-wide risk analysis, the derivation of measures, the monitoring of the implemented processes and the further development of the measures. In doing so, we incorporate findings from various sources and exchange formats and consider industry-specific human rights and environmental risks, among other things, in order to ensure compliance with and promotion of human rights in all areas of our business activities.

The results of our risk analyses are an important building block for determining appropriate measures. The risk analyses are carried out together with the Südzucker Group on an annual and ad hoc basis and cover both our own business operations and the Freiberger Group's supply chains. The identification of potential risks is based, among other things, on the analysis and evaluation of selected and internationally recognized country- and industry-specific indices. The implementation and results of the risk analyses are evaluated and monitored by Südzucker Group's Group Human Rights Committee. The findings are communicated to the management of the Freiberger Group and used, among other things, to further adapt and create guidelines, processes and training

Measures to implement our due diligence obligations with regard to the risks identified in the risk analyses are intended to ensure that potentially affected groups of people are protected and risks are minimized. To this end, we have established processes together with the Südzucker Group that focus primarily on open communication (whistleblower system) and exchange (e.g. in industry initiatives or networks).

An appropriate whistleblower system within the meaning of the Whistleblower Protection Act (HinSchG) and the LkSG is an important part of our risk management and helps us to take effective remedial action and improve our processes through the knowledge gained. The Freiberger Group is integrated into the Südzucker Group's whistleblower system. All reports are received centrally by

Südzucker Group's Chief Compliance Officer. The Group Human Rights Committee also assumes the function of human rights officer in the Südzucker Group for its subsidiaries such as the Freiberger Group. For reports that fall under the responsibility of the Human Rights Officer, Südzucker Group's Chief Compliance Officer contacts the Group Human Rights Committee and submits the matter for further investigation. The Group Human Rights Committee is also in regular contact with those responsible at the Freiberger Group. Human rights-related reports are processed by the Group Human Rights Committee and, depending on the report, by other relevant persons. All persons entrusted with the processing of reports are obliged to maintain confidentiality when dealing with reports from whistleblowers. Until the matter is finally closed, there is an ongoing exchange between the Chief Compliance Officer of the Südzucker Group, the Compliance Officer of the Freiberger Group, the responsible persons of the Freiberger Group and the committee for clarifying the facts and, if necessary, coordination regarding the measures to be taken. Südzucker Group ensures that the persons entrusted with the implementation of the whistleblower procedure act impartially. Südzucker Group also ensures that all whistleblowers are adequately and effectively protected from discrimination or punishment. If a violation is reported, the whistleblower will receive confirmation of receipt within seven days and feedback within three months of submitting the confirmation of receipt. The Executive Board of Freiberger Holding GmbH is regularly informed about the work of Südzucker Group's Chief Compliance Officer, the Freiberger Compliance Officer and the Südzucker Group Human Rights Committee.

Further information on the whistleblower system can be found, among other places, on the Südzucker Group website: [Sustainability: Human rights | Südzucker Group](#)

Remedial measures are defined and determined specifically for each individual case with the involvement of the relevant specialist department and, on a case-by-case basis, with external experts to incorporate the perspective of the affected group. The definition includes an assessment of the extent to which we as Freiberger Group cause, contribute to or are associated with the negative impacts. If a violation of the declaration of principles is attributable to individual employees, this may result in measures under labor law. The effectiveness of the defined remedial measures is reviewed regularly and on an ad hoc basis.

## Continuous further development of the implementation of our due diligence obligations

As we see our duty of care with regard to respecting human rights as an ongoing task, we regularly review our processes and measures and adapt them where necessary. Our aim is to identify, prevent, minimize or eliminate risks or violations relating to our duty of care at an early stage.

## Communication and reporting

We regularly report on the status of compliance with our due diligence obligations, including our risk analyses, risk minimization measures and the evaluation of the effectiveness of risk management. We make the results publicly available.

## Our identified potential key risks

We take our human rights due diligence obligations very seriously and take all potential risks into account in our management approach, which was developed jointly within the Südzucker Group. As part of our risk analyses, which cover both our own business operations and our supply chains, we have identified the following human rights-related risks as priorities:

- Occupational health and safety
- Diversity, equal opportunities and protection against discrimination
- Fair remuneration
- Prohibition of child labor

Based on this risk analysis, we have developed to and implemented together with the Südzucker Group preventive measures to minimize risks for our own business area and along the supply chains.

## Measures for prevention and risk minimization in our own business area and along the supply chain

Our managers and employees contribute significantly to the success of the company through their professional expertise, experience, social skills and commitment. We therefore attach great importance to the continuous development of our employees. The various HR policy measures are designed in such a way that they support the Group strategy and enable our employees to work successfully under changing conditions.

Südzucker Group's code of conduct, which also applies to us, is a central component of our risk minimization strategy. In the code of conduct, we commit ourselves to acting responsibly and respecting human rights both in our own business area and along our entire value chain. The Code of Conduct is a promise we make to ourselves, our colleagues and our partners to put Südzucker Group's values into practice. These values include taking responsibility for our actions, treating each other with respect, creativity as a driver of progress and working together to combine our strengths. In addition, Südzucker Group wide training is offered in our own area to promote respect

for human rights. This includes, for example, mandatory training to raise awareness and impart specific expertise on the implementation of our due diligence obligations.

We have also implemented measures along our supply chains to minimize the risks of human rights violations. The Südzucker Group Supplier Code of Conduct obliges our suppliers to recognize our ethical and legal principles and provides guidelines for sustainable procurement. Compliance with social criteria in our main agricultural supply chains is evaluated and documented as part of the RedCert2 certification process, which verifies compliance with the sustainability criteria of the Sustainable Agriculture Initiative (SAI).

When defining measures, we already take into account the review of their effectiveness and adjust them if necessary. In addition, we have developed individual measures to minimize human rights risks, examples of which are listed below.

## Potential key risks and preventive measures based on the risk analysis

The human rights risks prioritized based on the risk analysis for our own business area and our supply chains, as well as the resulting preventive measures, are described below:

### Occupational health and safety

Safety in the workplace is our top priority. We ensure safe and hygienic working conditions that comply with the applicable legal requirements in the area of occupational health and safety. Regular optimization programs are aimed at implementing suitable measures to reduce the risk of accidents and improve working conditions. Our aim is to reduce accidents at work and occupational illnesses as well as to prevent injuries.

All employees should be familiar with the applicable laws, regulations and internal company guidelines on occupational health and safety. For this reason, regular training courses are held on health and safety at work and in the workplace. In addition, the work organization ensures the necessary work breaks to protect the health and safety of employees.



## Diversity, equal opportunities and protection against discrimination

We are committed to diversity and tolerance. We do not tolerate any discriminatory or harassing actions in our company, e.g. based on social or national origin, gender, ethnic origin, religion, age, illness or disability, sexual orientation, political beliefs or other personal characteristics. Everyone has the right to fair and respectful treatment.

## Fair remuneration

We comply with the labor laws and international standards applicable in the respective countries. Everyone has the right to fair remuneration that enables an adequate standard of living. The remuneration paid to employees must comply with all applicable laws on wages and salaries, including provisions on minimum wages, overtime, statutory benefits, working hours and paid leave.

## Prohibition of child labor

We do not accept any form of child labor and, in accordance with ILO Convention 138, comply with the labor laws applicable in the respective countries regarding the minimum age of employees. In addition, in accordance with ILO Convention 182, we prohibit the hiring of persons under the age of 18 for positions that require hazardous work. We are committed to protecting young employees in particular from performing work that is likely to jeopardize their education, health and physical, psychological, social or mental development.

## Further human rights risks and preventive measures

In addition to the main risks described above, the following employment-related human rights are relevant to us as a company and are therefore also taken into account preventively in our management approach:

### Prohibition of forced labor

We do not accept any form of forced or compulsory labor and implement the prohibition of modern slavery, human trafficking and all other slavery-like practices. This includes servitude or other forms of power or oppression in the workplace, such as economic or sexual exploitation or humiliation. We

comply with all applicable national and international laws, rules and regulations as well as international standards (e.g. ILO). Work should always be done on a voluntary basis and must never take place under threat or other means of pressure or cost. We also respect the right of our employees to terminate their employment relationship.

## Freedom of association and the right to collective bargaining

We respect the freedom of association and thus the right of all employees to form and join local, national or international associations or organizations. We recognize the right of employees to collective bargaining and respect the rights of trade unions. Employees and their representatives must not face any personal or professional disadvantages as a result of exercising these rights. This also includes the right of all employees to take collective action (including the right to strike) in the event of conflicts of interest. The exercise of this right may only be subject to such restrictions as are provided for by law and are necessary in a democratic society in the interests of national security, public order or to protect the rights and freedoms of others. Our employees are regularly informed and consulted by the Executive Board and management, for example at work meetings and departmental meetings or through internal newsletters.

## Appropriate deployment of security forces

If we use external security personnel to protect our company processes, they must adhere to our code of conduct, just like all employees. In addition, security service providers are also obliged to comply with corresponding international guidelines and measures.

## Protection of natural resources and the environment

The core of our business model is the processing of food raw materials into high-quality products. In order to maintain the company's economic basis in the medium and long term, it is necessary to secure the availability of these raw materials in the long term. This is why the principle of sustainability has traditionally been an integral and practiced part of our Group strategy.

We want to align our actions along the entire value chain - from raw foodstuffs to the finished product - in all parts of the company and regions as well as at all levels in terms of sustainability. We pay particular attention to systematically minimizing our resource requirements, including energy, water and raw materials, as well as emissions such as wastewater and waste, and other potential environmental impacts of our business activities. All processes and standards must at least meet or

exceed the legal requirements. Land use must be compatible with nature and the landscape and take place within the laws on nature conservation, property and land use rights.

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## Final provisions and contact

### Liability and whistleblower system

Open communication is an essential part of our corporate culture. We expect our employees to report violations of applicable law, including human rights and environmental risks as defined by the LkSG, Südzucker Group's Code of Conduct and the group and company guidelines.

If questions or concerns arise about processes that do not comply with Südzucker Group's Code of Conduct and our due diligence obligations, these should be raised openly with superiors, the Works Council, Südzucker Group's Corporate Human Rights Team, Südzucker Group's Chief Compliance Officer or the local Compliance Officer. In addition, the "Südzucker Group Compliance Line" (Home – BKMS System) is available as a confidential, optionally anonymized procedure for reporting incidents. The whistleblower system is open to our employees, temporary workers, business partners and external third parties who wish to report potential misconduct or violations of the law resulting from the Freiberger Group's business activities.

Information can be reported via the following channels:

- **Südzucker Group reporting channel:** "Compliance Line of the Südzucker Group", operated by an external provider, EQS Group GmbH, with the EQS Integrity Line software: <https://suedzuckergroup.integrityline.app/>. Additional compliance lines are available for individual divisions/subsidiaries. Information on this can be found in the internal whistleblower guidelines.
- **Via E-Mail:** [compliance@suedzucker.de](mailto:compliance@suedzucker.de)
- **Via Mail:** Freiberger Holding GmbH Freiberger Compliance Officer, Zerpenschleuser Ring 1, 13439 Berlin or the Südzucker Group, Chief Compliance Officer – persönlich, Maximilianstr. 10, 68165 Mannheim
- **Via Compliance hotline:** +49 621 421 639
- **Verbal or written:** To the Managing Director / Plant Manager of each Freiberger Group site or the supervisor, the employee representative, the Corporate Human Rights Team or the Südzucker Group Chief Compliance Officer or the responsible local Compliance Officer.

If there are any inquiries about this policy statement or the implementation of our due diligence obligations, please feel free to contact us by email ([human.rights@suedzuckergroup.com](mailto:human.rights@suedzuckergroup.com)). You can also find further information on our website on human rights: (<https://www.suedzuckergroup.com/de/unternehmen/nachhaltigkeit/gesellschaft/menschenrechte>)

Signatures of the board members:

  
*Dr. Thorid Klantschitsch*

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*Oliver Heinisch*

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*Thomas Schulz*

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*Carsten Stahn*

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