

Policy Statement of the LEHVOSS Group on Human Rights and the Environment

(March 2026)

1. The LEHVOSS Group

Lehmann&Voss&Co. KG and its subsidiaries (the *LEHVOSS Group*) offer a broad portfolio of chemical and mineral specialities for a wide range of industries and sectors, based on the flexible combination of the three sourcing models distribution, trading and production. We are a trusted partner for our customers, distinguished by strong technological expertise, personal consultancy and tailored service solutions. We consistently pursue the internationalisation of our activities.

As a company operating in the chemical sector, we seek to enhance enterprise value without exposing the Group to existential risks or neglecting social, legal or environmental considerations.

Our actions are guided by the values set out in "[Our Values, Our guidelines](#)". As a family-owned business, we adopt a long-term perspective while remaining adaptable in order to ensure sustained success. Our core principles are mutual respect and sound, legally compliant and socially responsible entrepreneurship.

This Policy Statement sets out our fundamental commitment to respecting human rights and protecting the environment. This commitment is already reflected in our Code of Conduct and our Code of Conduct for Business Partners, as well as in our participation in the Responsible Care Initiative of the German Chemical Industry Association.

2. Scope of Application

This Policy Statement applies to all business activities of the LEHVOSS Group.

In addition, we expect our suppliers and other business partners to commit to the principles set out herein and to implement appropriate processes to respect human rights and protect the environment. This includes an obligation to provide relevant information, upon request, on how compliance with these principles is ensured. Our detailed expectations regarding human rights, labour, environmental and climate-related standards are set out in the LEHVOSS Code of Conduct for Business Partners, which is hereby expressly referenced.

3. Principles on Human Rights and Environmental Protection

We regard the protection of human rights and the environment as a core element of our corporate responsibility.

Our commitment to human rights is based on the Universal Declaration of Human Rights of the United Nations and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We are committed to respecting internationally recognised human rights and to addressing them within our existing and continuously evolving processes, both in our own operations and along our value chain. This commitment includes:

- the prohibition of child labour and forced labour;
- the assurance of fair and ethical recruitment practices, including the prohibition of deceptive recruitment, the retention of identity documents and the charging of unlawful recruitment or placement fees;
- the prohibition of all forms of slavery and discrimination;
- the promotion of equality and equal pay for work of equal value, irrespective of gender;
- the protection of freedom of association and collective bargaining rights;
- compliance with occupational health and safety standards;
- the payment of adequate and fair remuneration;
- compliance with statutory and collective working time, rest and leave requirements and, where applicable, alignment with ILO working time standards;
- the prohibition of forced evictions and the use of security forces where there is a risk of human rights violations;
- the prevention of environmental pollution and compliance with applicable environmental legislation;
- consideration of climate-related environmental impacts and support for climate protection measures and the reduction of greenhouse gas emissions, in line with the objectives of the Paris Agreement, based on appropriate and risk-based measures.

In addition to the UN Universal Declaration of Human Rights and the ILO Declaration, and as a participant in the UN Global Compact, we commit to its Ten Principles and align our actions with:

- the UN Guiding Principles on Business and Human Rights;
- the OECD Guidelines for Multinational Enterprises;
- the United Nations Sustainable Development Goals (SDGs) of the 2030 Agenda.

For many years, the LEHVOSS Group has maintained certified environmental management systems. Production sites in Hamburg-Wandsbek, Germany (since 2021), Pawcatuck, USA (since 2023), and Kunshan, China (since 2024) are certified to ISO 14001. The Kunshan site has additionally been certified to ISO 45001 (occupational health and safety management system) since 2024, and the Solingen site has been certified to ISO 50001 (energy management system) since 2014.

Furthermore, the LEHVOSS Group is committed to the:

- Minamata Convention on Mercury;
- Stockholm Convention on Persistent Organic Pollutants (POPs); and
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal.

As part of its due diligence obligations, the LEHVOSS Group also considers substance groups subject to heightened regulatory risk (including PFAS and substances of very high concern (SVHC)), as well as climate- and product-related environmental impacts such as microplastics.

4. Implementation Measures

We consistently comply with applicable national legislation. Where international human rights standards exceed local legal requirements, we endeavour to promote the underlying principles without contravening local law. Where local law provides for higher standards, these standards are applied.

To give effect to our commitments, we are progressively implementing appropriate, risk-based due diligence processes to identify, assess, prevent and mitigate human rights- and environment-related impacts and risks.

As a company operating in the chemical sector, we are aware that our business activities can contribute to the protection of human rights in various ways. At the same time, we recognise that our operations may be associated with potential human rights and environmental risks, which require particular attention and appropriate risk management.

We carry out structured risk analyses covering our own operations, our supply chain and our products and services, and document and evaluate the results.

The findings of these risk analyses are integrated into relevant business, procurement and governance processes, depending on the nature and severity of the identified risks. For this purpose, the LEHVOSS Group uses a Group-wide digital supplier management system through which business partners are also required to provide relevant information.

Where risks are identified, appropriate preventive measures are implemented.

- Supplier selection and evaluation: We take human rights and certain environmental criteria into account when selecting and evaluating our suppliers and implement appropriate control measures.
- Obligation for suppliers to provide ESG risk disclosures, substance data (PFAS, microplastics, SVHC) and other sustainability information within the framework of contractual agreements and defined digital systems.
- Training: We will introduce and continuously expand risk-based training on human rights and environmental topics in the relevant business areas.
- Measures for the health and safety of our own employees and visitors to our facilities: The health and safety of our employees is our top priority. By implementing uniformly high standards at all our sites, we are continuously working to create a safe and health-promoting working environment. Our employees take part in regular training courses to promote safety-conscious behaviour.

- As part of our product stewardship, we continuously review the safety of our products with regard to health and environmental risks.
- We are reviewing our portfolio and looking for environmentally friendly alternatives.

Where the LEHVOSS Group causes or contributes to actual adverse human rights or environmental impacts, we are committed to implementing effective remedial actions.

Potential compliance breaches, as well as human rights- or environment-related risks or violations, can be reported via our [anonymous whistleblowing channel](#), which also serves as a grievance mechanism in line with human rights due diligence requirements. The LEHVOSS Group strictly prohibits retaliation, intimidation or disadvantage against individuals who raise concerns or exercise their rights in good faith.

5. Responsibility

Overall responsibility for compliance with the commitments set out in this Policy Statement lies with the Executive Management of the LEHVOSS Group. Operational implementation is the responsibility of the Group's business units and central functions, including Central Purchasing and the central Human Resources function. Oversight and advisory monitoring are performed by an independent expert committee, coordinated by the Legal & Sustainability function, which reports to Executive Management. As part of the Group-wide ESG programme, a Steering Committee has been established to support risk analyses, materiality assessments and sustainability controls.

6. Review and Effectiveness

This Policy Statement is reviewed and updated on a regular basis.

Hamburg, 20 March 2026



Knut Breede Dr Thomas Oehmichen Soenke Thomsen Aage Barfuß

Executive Management of Lehmann&Voss&Co. KG