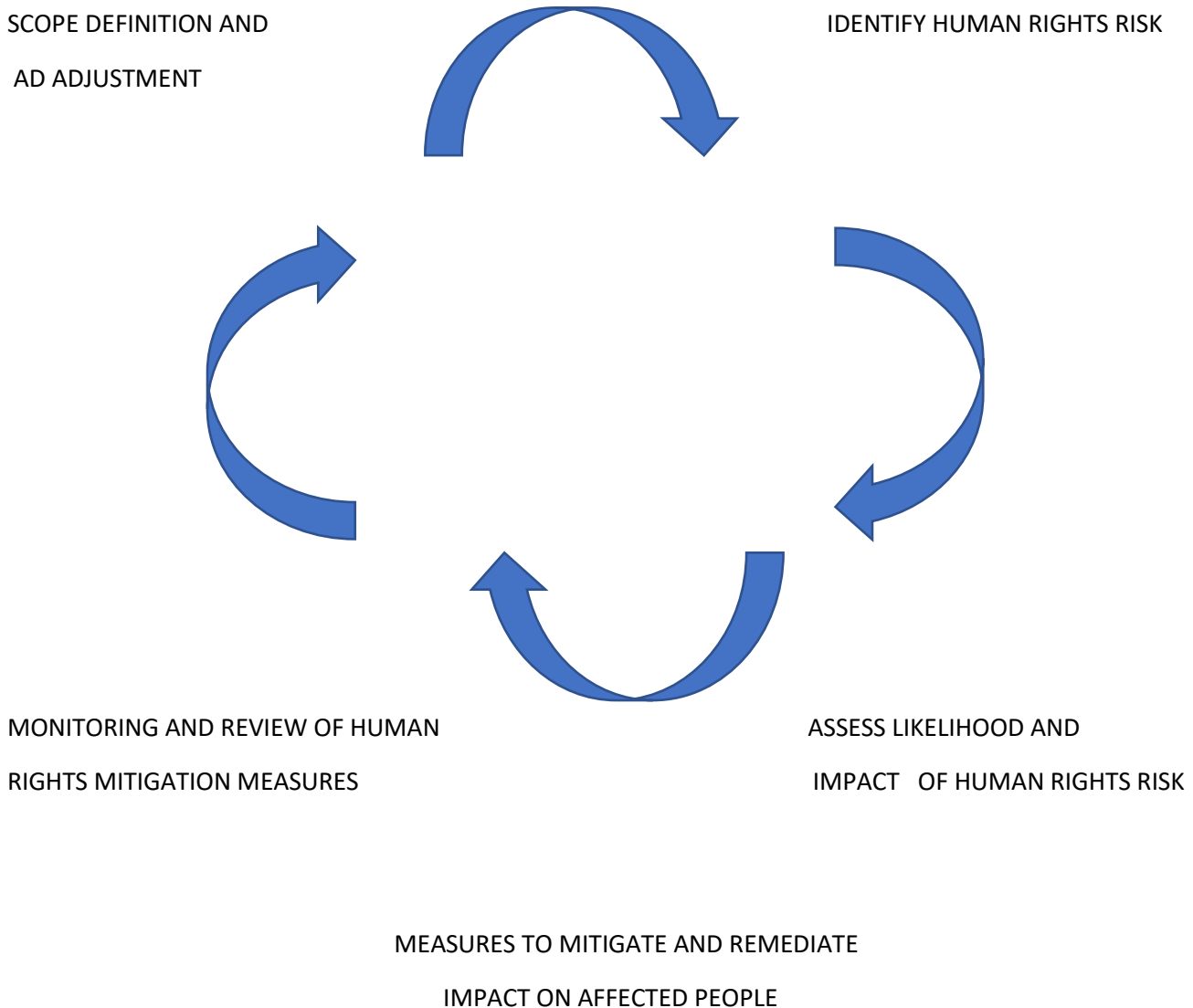


GENERAL-OXO- HUMAN RIGHTS AND SOCIAL RESPONSABILITY

We take responsibility not only for our own products but also for the people who develop, produce and sell them. We are therefore committed to respecting human rights along our entire value chain and expect the same from our employees, business partners and third parties directly or indirectly related to GENERAL - OXO. To meet this goal, we have established a process for complying with human rights due diligence obligations, which is updated at regular intervals.

HUMAN RIGHTS RISK MANAGEMENT



RESPECT FOR HUMAN RIGHTS

Respect for human rights along our entire value chain is fundamental to us – as explained in the Policy Statement by the GENERAL-OXO Managing Board. This position is applied throughout our organization through the GENERAL -OXO Code of Conduct, the GENERAL -OXO Supplier Code of Conduct and the GENERAL-OXO Human Rights Policy. In this way, our own employees and those of our partners around the world are covered by the rules, which are based on international standards.

RISK ANALYSIS OF HUMAN RIGHTS IMPACTS

Human rights-related risks such as occupational health and safety are also an elementary component of the company's management of risk, in which a defined process (Due Diligence) is applied. This involves analyzing and classifying risks and determining specific measures depending on their type and assessment. We carry out risk assessments for the entire value chain – from the production of raw materials to administration and transportation, through to the sale of the products to the customer. In our human rights due diligence process, we focus on materiality, severity of consequences and the possibilities for compensation. It also takes into account so-called "vulnerable groups" which are generally at increased risk of potential human rights violations. These include children, women, migrant and foreign workers, local communities, and indigenous peoples. As we bear a particularly large responsibility for our own employees and have a direct influence on how we deal with human rights issues, we also consider them as a separate group in our risk analysis. Our assessment is based on various risks, such as the sector risks defined by the Organization for Economic Co-operation and Development (OECD).

RESULTS OF THE CURRENT RISK ANALYSIS

The current analysis shows that there is an increased risk of potential human rights violations especially in our supply chain and in the sourcing of raw materials. The results of this analysis are also in line with the results of our materiality analysis. In this context, relevant risk areas such as child and forced labor (including modern slavery), working hours, occupational health and safety, freedom of association and collective bargaining, fair remuneration, and discrimination were assessed. Due to severe consequences of actual violations in the areas of child and forced labor, these risks were prioritized. In addition, an increased risk for children and migrant and foreign workers in the areas of child labor, forced labor and occupational health and safety was identified.

TARGETED MEASURES

The results of the risk analysis show us where we need to take targeted action to minimize human rights risks. In doing so, we pursue an approach that aims to reduce the likelihood of human rights violations occurring from the start. To this end, we have introduced targeted measures for our supply chain that prevent negative impacts on human rights or, in the event of a negative impact occurring, make amends. For example, we require all our suppliers to comply with certain social standards that we have defined in our GENERAL-OXO Supplier Code of Conduct and monitor their compliance at regular intervals. In addition, we provide our suppliers with guidelines for particularly sensitive issues, for example with the GENERAL-OXO Child Labor and Forced Labor Policy. Extensive information on our social management in the supply chain, such as social audits and engagement on key issues.

COMPLAINTS PROCEDURE

However, if our preventive measures are not sufficient to prevent negative human rights impacts in individual cases, we give those affected the opportunity to report them. We provide our own employees with several internal complaint channels. In addition, GENERAL-OXO employees, our partners and suppliers, as well as the Company's customers and other third parties, have the option to directly contact the GENERAL-OXO Ombudsman, an external lawyer of trust, with questions and complaints about social standards, working conditions or human rights. Employees in the supply chain are also free to use other options.

It is important for us to report continuously and transparently on our activities and goals.



GENERAL -OXO views sustainability as a continuous improvement process, which contributes to ensure the long-term success of the company through forward-looking management of opportunities and risks. In the implementation and further development of its sustainability strategy, GENERAL-OXO conducts dialog and collaborates with its stakeholders, focusing its efforts on the Sustainable Development Goals (SDGs) of the United Nations. With its sustainability activities and projects, GENERAL-OXO makes a significant contribution to the SDGS 4, 5, 6, 8, 10, 12, 13 and 17.

TAKING SOCIAL RESPONSIBILITY

GENERAL-OXO supports the following three Sustainable Development Goals of the United Nations: Sustainable Development Goal 4 (quality education), 5 (gender equality) and 10 (reduced inequalities). The GENERAL-OXO Corporate Citizenship Strategy: How we create value. In our Corporate Citizenship Strategy, we look at our entire value chain. The focus is on projects that are related to the company's business activities, for example, creating better conditions in regions where we source or process our raw materials. Our projects in our value chain focus on facilitating access to education, promoting equal opportunities and providing short-term emergency aid. In its implementation, GENERAL-OXO relies on cooperation with international organizations and recognized partners. One of our corporate goals is to inspire people towards success – and our Corporate Citizenship Strategy does the same. That is why GENERAL-OXO helps people to develop their potential for success and strengthen their self-confidence and character. The basis for this is good educational opportunities.

FAIR WORKING CONDITIONS ARE THE HIGHEST AIM

Work has to be humane, safe, and fair. These are the foundations of the GENERAL-OXO Supplier Code of Conduct, which the company and its suppliers pledge to follow. They define a minimum standard for countries where local laws have weaker provisions and are a prerequisite for collaboration with GENERAL-OXO.

THE SOCIAL STANDARDS: COMMITTED TO GOOD WORKING CONDITIONS

The GENERAL-OXO Supplier Code of Conduct forms the basis of cooperation with suppliers. Social standards are an important framework for partners, especially in countries where national legislation does not adequately protect workers. The GENERAL-OXO Supplier Code of Conduct is based on internationally recognized standards such as the Core Conventions of the International Labour Organization (ILO) and the United Nations Universal Declaration of Human Rights. Among other things, it prohibits child and forced labor and prescribes decent working conditions and adequate wages. The Supplier Code of Conduct also guarantees the right to freedom of association and collective bargaining. In addition, it contains provisions on environmental standards to be observed. The Supplier Code of Conduct is reviewed regularly to ensure that it is up to date. In this process, feedback from various stakeholders is taken into account.

REGULAR AUDITS

When we select new partners, we review whether they fulfill the social standards defined by GENERAL-OXO. Only those who pass the three-stage selection process are included in the supplier portfolio. These social compliance audits are repeated regularly over the course of the business relationship – partially announced, some unannounced. Each audit is followed by an extensive report. Detailed information about the requirements, along with training courses, help the suppliers comply with the standards.

SUPPORT FOR IMPROVEMENTS

If violations of the Supplier Code of Conduct are discovered, corrective action plans are developed together with the supplier to rectify the situation. If no improvement has been made, GENERAL-OXO will ultimately end the partnership with the supplier as a last resort.

Stabio, 07/07/2021