



Policy statement in accordance with the Supply Chain Due Diligence Act

I. Preamble

Our shareholders, customers, business partners, public authorities, and the general public are entitled to expect lawful, competent, and responsible conduct from us at all times. For us, this means that we strictly comply with the legal systems of all countries in which we operate and respect the respective moral standards. In addition, we assume responsibility as a company for both society and the environment. Alongside unwavering integrity, environmental protection, occupational health and safety are indispensable elements of our actions. These principles form the foundation of our business conduct and are rooted in a value system that has evolved over decades, reflected in our corporate guidelines and our daily operations.

We are fully committed to this standard arising from our convictions. In line with our understanding of entrepreneurial thinking and local accountability, all employees – in addition to our shared corporate responsibility – are individually obligated to comply with legal and company-specific principles within their respective areas of responsibility. We provide each individual with the necessary support and backing to fulfil this responsibility.

To ensure compliance with the German Supply Chain Due Diligence Act (LkSG) across the affiliated companies of the TSR Group, the management of TSR Group GmbH & Co. KG hereby adopts the following Policy Statement:

II. Scope

This Policy Statement applies to the business operations of TSR Group GmbH & Co. KG within the meaning of the LkSG, in its role as the holding company of the TSR Group. The TSR Group is part of the REMONDIS Group (RETHMANN Group) and includes all companies in which TSR Group GmbH & Co. KG holds, directly or indirectly, at least 50.01% of the capital and voting rights, or otherwise exercises control.

In cases where this Policy Statement is not directly binding for certain entities within the TSR Group, the managing directors of the relevant minority shareholdings of TSR Group GmbH & Co. KG are, where legally required, instructed to ensure that this Policy Statement is observed within their respective companies and all associated subsidiaries.

In terms of content, this Policy Statement covers all environmental and human rights-related legal positions and due diligence obligations as set forth in the LkSG.

III. Human Rights and Environmental Expectations for Employees and Suppliers

We expect both our employees and suppliers to act in accordance with our principles, which are outlined in our Code of Conduct¹ and General Terms and Conditions of Purchase. We do not accept any violation or disregard of the principles set forth in these documents, either within our company or with external partners. We can only fulfill our corporate responsibility if we collectively adhere to the applicable legal, ethical, social, and environmental standards unconditionally, while ensuring a fair and respectful collaboration.

Our human rights responsibility is guided by internationally recognized standards, particularly the European Convention on Human Rights and the core labor standards of the International Labour Organization. This includes the prohibition of child and forced labor, the right to freedom of association, as well as the principle of non-discrimination and equal opportunities. We strongly reject any form of discrimination. We also commit to complying with labor law minimum standards,

¹Available at: <https://www.tsr.eu/verantwortung/>

such as those concerning working hours, remuneration, and social benefits.

IV. Risk Management

(1) Responsibilities

The responsibilities for risk management in accordance with the LkSG are distributed as follows:

The responsibility for monitoring and ensuring the functioning of the risk management system lies with our Human Rights Officer. He is supported by employees and is in regular and frequent communication with the management as well as with the responsible parties of the parent company, the REMONDIS Group, to ensure a unified and efficient approach.

The task of the responsible parties is to develop and adjust the concept for compliance with the legal requirements. They take on communication with the Federal Office for Economic Affairs and Export Control, report to management, collect documentation, and prepare the annual report. For this purpose, they maintain close communication with other topic leaders within the TSR Group and the REMONDIS Group.

(2) Risk Management in Business Operations and Direct Suppliers

To comply with international human rights standards, national laws, and internal group guidelines, the TSR Group regularly conducts risk analyses to ensure human rights and environmental due diligence. This allows potential and actual negative impacts in our business activities and along our supply chain to be identified, assessed, and appropriately addressed at an early stage. Environmental concerns are an integral part of our risk management, such as through measures to reduce emissions and protect natural resources.

The TSR Group develops and updates a procedure for assessing the risk situation within its own business area and with immediate suppliers. The goal of this procedure is to obtain a well-founded overview of the human rights and environmental situation in the business area and with immediate suppliers, supported by software. If substantiated knowledge is available, indirect suppliers are also included. If a risk or violation of protected rights is identified, the TSR Group immediately initiates appropriate preventive or remedial measures.

The analysis of human rights risks and impacts is conducted annually and updated as necessary in the event of significant changes in business activities. At the same time, the policy statement is expanded to include identified risks in order to ensure the transparency required by the LkSG.

(3) Whistleblower System

The TSR Group places great importance on allowing both internal and external parties to report any indications of misconduct. Our partners and third parties have the opportunity to report potential violations of this policy statement and the human and environmental rights highlighted in the LkSG, either anonymously or personally, via our whistleblower system at:

Email: compliance@remondis.de
Phone: +49 2306 106 210

By letter: REMONDIS Sustainable Services GmbH
Department: Compliance
Brunnenstraße 138, 44536 Lünen

The whistleblower system is organized group-wide and is centrally managed by REMONDIS Sustainable Services GmbH. Incoming reports and notifications are immediately forwarded to the responsible department, "Compliance & Revision" at TSR Group GmbH & Co. KG.

The TSR Group ensures that the individuals responsible for handling the complaint procedures guarantee impartial action. These individuals are not subject to instructions and are obligated to confidentiality.

Our procedural regulations² specify the detailed handling of the complaint procedure and the reports received through it.

We ensure compliance with applicable data protection regulations in all measures under the LkSG. Personal data is processed solely for the intended purpose and in accordance with legal requirements.

(4) Reporting

The management is regularly informed, at least twice annually, about the compliance with the obligations under the LkSG.

The implementation of human rights due diligence in our own business activities, as well as in supply and value chains, is an ongoing process. We regularly review our approaches and measures with the aim of continuously improving our human rights and environmental due diligence processes.

Lünen, in December 2023,

The Management of TSR Group GmbH & Co. KG and the Human Rights Officer

²Available at: https://www.tsr.eu/fileadmin/user_upload/tsr_24/downloads/lksg/TSR_Group_Rules_of_Procedure.pdf

TSR

THE METAL COMPANY

TSR Group is a member of the REMONDIS Group, one of the world's leading recycling, service and water companies. The Group has branches and associated businesses in more than 30 countries in Europe, Asia and Australia. It employs more than 45,000 people who work for millions of citizens and many thousands of companies. The highest levels of quality. Working for the future.

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