

## Minimax Viking Group – Statement of Principles in connection with the German Supply Chain Due Diligence Act (LkSG)

### I. Introduction – Respect for human rights and voluntary obligation

As one of the world's leading fire protection company, Minimax Viking Group is aware of its responsibility within a global value chain. Business success can only be maintained in the long term if, in addition to our products, the impact of our business activities conforms to societies and to the environment. In addition to our economic goals, minimizing human rights risks and environmental risks, and preventing violations of these rights are therefore fundamental components of our responsible corporate governance. As a group of companies with a history spanning more than 120 years, our commitment to respecting human and environmental rights means taking responsibility for our actions on a daily basis.

Employees and managers must respect the principles of the MV Code of Conduct in order to ensure that human and environmental rights and ethical behaviours are firmly anchored within their own business unit and throughout its supply chain. These values are also passed on to our business partners via the Business Partner Code of Conduct.

Both codes are based on the following internationally recognised standards and guidelines:

- Universal Declaration of Human Rights
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- 10 Principles of the UN Global Compact.

This statement supplements above-mentioned codes with specific requirements of the German Supply Chain Due Diligence Act (LkSG), which came into force on January 1<sup>st</sup>, 2023, and is applicable to all Minimax Viking Group companies.

### II. Implementation of human and environmental rights due diligence obligations

Our clear commitment to respect human and environmental rights forms the basis for implementing human and environmental rights due diligence obligations as part of our group's risk management. Risk management is designed to identify and counteract potentially negative effects on people and the environment in connection with our business activities. As a risk-based approach, risk management is applied both to our direct supplier relationships as well as to the group companies we control (our own business units).

#### a. Risk analysis in our own business units and with direct suppliers

Minimax Viking Group analyses the risks for violations of human rights and/or of the environment at its own business units, as well as at the level of direct suppliers on an annual and on an ad hoc basis. These analyses take in particular into account such items the German Supply Chain Due Diligence Act (LkSG) expressly refers to.

#### **Our own business units**

The risk analysis of our own business units begins with an abstract review of country risks based on selected indices from external databases. The process then uses an internal risk assessment to identify those MV companies that might bear an increased risk for violations of human rights and/or the environment as specified in the LkSG. MV companies with potentially riskier business activities are prioritised, e.g. those operating own manufacturing facilities or those having a larger workforce. The priority risks identified cover i.a. the ban on using chemicals in accordance with the PoP Convention, the ban on causing harmful soil, water and air emissions, and occupational health and safety obligations. Risk reduction measures were developed and implemented throughout the business's processes to counteract the identified risks.

### **Direct suppliers**

The risk analysis of direct suppliers is carried out via Integrity Next GmbH's cloud-based sustainability platform. Priority was given to direct suppliers with an annual turnover with Minimax Viking Group of EUR 1,000 or more in the previous financial year. Starting with an abstract risk assessment, industry-specific and country-specific risks are determined and evaluated first. As a second step, direct suppliers are divided into three defined risk categories. The results of the abstract risk analysis serve as the basis for carrying out the subsequent concrete risk analysis. The focus of this part of the risk analysis are potentially high-risk suppliers. With the help of Integrity Next, these suppliers are asked to take part in a risk assessment to determine the specific human rights and environmental risks. Direct suppliers can also improve their risk status by stating what preventive measures they use. If a direct supplier still has a high risk potential, further measures are agreed on an individual basis.

The process and results of the risk analyses are documented and are incorporated into the group's mandatory annual report to the Federal Office of Economics and Export Control on a materiality basis. They also serve as basis for continuous further improvement of our group's internal risk management.

#### **b. Preventive and remedial measures**

The guidelines and certifications of Minimax Viking Group listed below are a key measure for ensuring that our own business activities comply with the law and relevant standards. They form the binding operational framework for all employees and business partners and define specific measures and goals:

- Minimax Viking Code of Conduct
- Minimax Viking Business Partner Code of Conduct
- Certification according to internationally recognised standards
  - Environmental Management ISO 14001 and ISO 14024
  - Occupational Health and Safety Management System ISO 45001
  - Quality Management ISO 9001

Additionally, local internal procedural instructions and guidelines serve as a guide for MV employees to ensure that they always act in accordance with law.

### **Our own business units**

Through guidelines, awareness-raising and internal training for employees, an integrated procurement and purchasing strategy, and risk-based control measures for compliance with human and environmental rights, Minimax Viking Group firmly anchors human rights and environmental issues into its daily activities, thereby preventing potential violations.

Our fulfilment of duty of care in connection with the protection of employees and the environment is also reflected in our production facilities' certifications for environmental protection and occupational health and safety (e.g. DIN EN ISO 14001:2015 Environmental Management, SCC\*\* occu-



pational health and safety). Minimax Viking Group is aware of the potential impact its products and production processes might have on the environment and on people. We minimize potential negative effects on the environment by using innovative technological developments and the modern design of our production facilities and processes.

Additionally, the use of our products and systems continuously supports the reduction of human and environmental risks by preventing fires or minimising the potential consequential damage caused by fire. This applies in particular to the effective use of our products and customised solutions in active and passive fire protection.

### **Direct suppliers**

Minimax Viking counters risks identified with regards to human rights and environmental issues at our direct suppliers through systematic supply chain management. A key preventative measure in this context is our Business Partner Code of Conduct and the requirements stipulated therein, all suppliers are obliged to commit themselves to prior to entering into a contract. By developing and monitoring our supplier relationships in a targeted manner, we fulfil our duty of care towards direct suppliers. This includes the integration of human rights related and environmental aspects into the supplier assessment and agreement on various control mechanisms (e.g. information rights, supplier audits, certifications) with direct suppliers. Furthermore, direct suppliers must confirm that also their own suppliers have acquainted themselves with its content and have confirmed adherence to all requirements stipulated in Minimax Viking's Business Partner Code.

### **Remedial measures**

If Minimax Viking Group were to receive substantiated information about an imminent or actual violation of human rights or of an environmental obligation at one of its business units or within its supply chain, suitable remedial measures aimed at preventing, ending or minimising the violation would be initiated immediately. Potential remedial measures could vary based on the type and severity of the detected violation as well as of Minimax Viking Group's ability to influence its root cause. Measures concerning business partners for instance could range from a written warning to more extensive remedial measures such as training, audits and/or a business partner's replacement. Faultless compliance would form a prerequisite for further cooperation.

#### **c. Complaints procedure**

Minimax Viking Group's whistleblowing system is available worldwide through various channels to all MV employees, suppliers and third parties, who might be affected by human rights and/or by environmental rights violations, enabling them to raise their concerns and to demand remedial action. This ensures that potentially harmful effects can be identified and counteracted at an early stage in order to prevent violations going forward. The published rules of procedure ([https://www.minimax-viking.com/de/legal\\_rechtliches.html](https://www.minimax-viking.com/de/legal_rechtliches.html)) describe in detail the reporting process as well as follow-up measures and internal responsibilities. Minimax Viking ensures, as far as possible and within its sphere of influence, that whistleblowers will not be subject to recourse in connection with a report they submit. The systematic handling of reports and the insights gained from them enable Minimax Viking to continuously improve its human rights and environmental risk management process.

#### **d. Monitoring of its effectiveness**

Minimax Viking Group regularly reviews the effectiveness of above listed measures as part of an annual and, if necessary, ad hoc monitoring process. This can be done via risk-based audits and/or surveys of employees. If reports were to suggest deficiencies in the complaints handling process, the effectiveness of the existing complaints procedure would be reviewed and altered accordingly.

e. Responsibilities

Minimax Viking group's senior management has ultimate responsibility for the implementation of and compliance with this statement of principles, whereas all managing directors at business unit level or at an operating entity level, respectively are in charge of their implementation, day-to-day monitoring and adherence.

Local management is further responsible to ensure operational implementation of the internal guidelines set out in the statement of principles, both with respect to their own business unit as well as with respect to their business partners.

III. Reporting and outlook

In accordance with the provisions of the German Supply Chain Due Diligence Act, Minimax Viking Group publishes an annual report on its human and environmental rights due diligence activities. This report was first time published in 2024 and it is available online under [https://www.minimax-viking.com/de/legal\\_rechtliches.html](https://www.minimax-viking.com/de/legal_rechtliches.html).

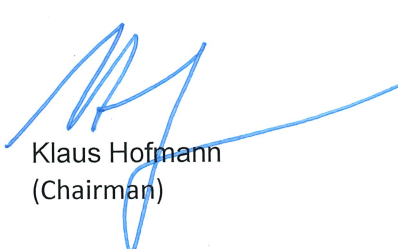
Minimax Viking is aware that the implementation of human and environmental rights due diligence activities is an ongoing process and will therefore continue to review its approach to human rights and the environment on an ongoing basis with the aim to continuously take new developments into account and to strive for constant improvement.

IV. Other provisions

This statement of principles will be made available to all Minimax Viking employees in a suitable form and will be published in accordance with the German Supply Chain Due Diligence Act on the group's homepage. It's subject to review on an ongoing basis.

No individual rights shall be deduced from this declaration, nor does this statement of principles have a retroactive effect. Please review the group's separate implementation guidelines for greater detail with regards to the content and focus of the existing management system.

Questions and comments regarding this statement of principles or other human and environmental rights related issues should be directed to MV Compliance Management ([compliance@mx-vk.com](mailto:compliance@mx-vk.com)) and/or the ESG/Sustainability department ([esg@mx-vk.com](mailto:esg@mx-vk.com)).



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