


Mitgeltende Unterlage		Declaration of Principles on Human Rights		
Revision	Bereich	Geltungsbereich		
00	18 Unternehmens- leitung / Politiken	ARYZTA Bakeries Deutschland GmbH Hiestand Beteiligungsholding AG (CH) & Co. KG		

1. OUR COMMITMENT

ARYZTA Bakeries Deutschland GmbH and its sole shareholder, Hiestand Beteiligungsholding AG (CH) & Co. KG (together "ARYZTA") implement all requirements of the German Supply Chain Due Diligence Act (LkSG) for the fulfillment of human rights and environmental due diligence obligations and comply with their implementation. Respect for human rights is a fundamental value of ARYZTA. We are committed to respecting all internationally recognized human rights that are relevant to our operations.

We believe that these rights are inherent to all human beings and recognize that they are interrelated, interdependent and indivisible. While states have a duty to protect human rights, we recognize that businesses have a responsibility to respect human rights.

We take responsibility for our employees and take our responsibility to minimize the impact of our business on the environment seriously. Social responsibility and responsible sourcing in accordance with ARYZTA's Supplier Code of Conduct are essential components of our daily activities. The principles of this policy statement are reflected in it. This enables us to generate sustainable and reliable long-term growth and secure jobs worldwide.


It is our guiding principle that we always comply with the applicable legal regulations in all regions and countries in which we operate. Where national laws and international human rights standards differ, we ensure that we comply with national laws as a minimum standard. We then work with our operations and partners to find ways to comply with these human rights standards as far as possible.

In implementing its human rights and environmental due diligence, ARYZTA is subject to the requirements of the German Supply Chain Due Diligence Act ("LkSG"). In accordance with Section 6 (2) LkSG, the LkSG requires, among other things, the publication of a declaration of principles setting out the company's strategy for protecting human rights and fulfilling its environmental obligations. Key elements of this policy statement include a description of the procedures ARYZTA uses to comply with its legal obligations and a description of the human rights and environmental risks and expectations of our employees and suppliers identified on the basis of an annual risk analysis.

We see the comprehensive risk analysis as a core requirement of the LkSG as an important basis for continuous progress in our human rights and environmental due diligence. The results of our risk analysis are regularly reviewed so that our declaration of principles can be updated if necessary.

2. SCOPE OF APPLICATION

This declaration of principles applies to our employees in all areas of the company worldwide. We expect all employees worldwide to implement these standards and to behave appropriately and lawfully towards colleagues, partners and communities.

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We expect our partners to pass on our commitment to respect human rights to their business partners and to act ethically and with integrity.

3. COMMITMENT TO HUMAN RIGHTS

We respect and support all internationally recognized human rights. However, certain aspects and areas are particularly relevant for us as a sales company of the globally active ARYZTA Group and require special attention from us:

In addition to rights in the workplace - in particular the guarantee of safety, health, appropriate remuneration, freedom of association and the strict prohibition of inhumane practices such as discrimination, forced or child labor, human trafficking and torture - we also attach great importance to the protection of non-work-related rights.

We connect with a network of communities along our value chain and strive to increase our positive impact on these communities. Our multi-local business model emphasizes local sourcing, local insights and local relationships and therefore enables us to have a positive impact on local human rights compliance. We strive to be an employer of choice in these communities and give back to our network of partners. The topic of human rights is an integral part of our integrity and risk management. The particular challenges of our industry and global business relationships are taken into account.

4. DATA PROTECTION


We respect the privacy of all individuals and the confidentiality of all personal data we hold about them. ARYZTA's Privacy Policy provides appropriate safeguards for the transfer of personal data of employees, customers and suppliers within ARYZTA. ARYZTA's data protection management ensures compliance with the relevant data protection regulations.

5. ENVIRONMENT

We are committed to environmental protection. We are aware that our business activities have an impact on the environment and the climate. We have therefore introduced measures and special programmes to minimize this impact both in our own business and in our supply chain. We focus on regenerative practices and sustainable production. Reducing food waste and water consumption is at the core of how we work. Our multi-local business model reduces the number of food miles. We care for our planet.

6. DUE DILIGENCE

Our commitment to respect human rights is reflected in ARYZTA's policies, such as the Global Code of Conduct for Employees, the Global Code of Conduct for Suppliers and in our operations. To comply with international human rights standards, national laws and ARYZTA's policies, we conduct appropriate human rights due diligence to

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identify, assess and address potential and actual adverse human rights impacts in our business activities and supply chain.

7. INTERNAL RESPONSIBILITY - ESTABLISHMENT OF A HUMAN RIGHTS OFFICE

A Human Rights Office has been set up at ARYZTA to monitor and manage the risk analysis measures and the monitoring and implementation of related preventive measures. The Human Rights Office is made up of six permanent members: the Chief Compliance Officer as Chairman, the Group General Counsel, the Group Procurement Officer, the Head of ESG, the Chief HR Officer and the legal counsel of Aryzta Bakeries Deutschland GmbH. The main task of the Human Rights Office is to define Aryzta's human rights and sustainability strategy and to monitor ARYZTA's risk management in order to comply with the due diligence obligations of the LkSG and future CSDD laws. The Human Rights Office is also responsible for monitoring the training and information concept for relevant ARYZTA employees and for complaints management, as well as for the preparation and publication of ARYZTA's annual report on the fulfillment of the due diligence obligations of the LkSG in the past financial year.

8. PROCEDURE DESCRIPTION


Establishment of risk management and implementation of regular risk analyses

Identifying risks and potential impacts and deriving effective measures are core elements of implementing human rights and environmental due diligence. We see the fulfillment of this responsibility as a continuous improvement process. The early identification of human rights and environmental risks plays a key role in an effective risk management system.

ARYZTA takes a risk-based approach to identifying potential risks in our supply chain. The existing processes for risk analysis already largely cover the prohibitions of the LkSG and in some cases go beyond the prohibitions standardized in the LkSG. We have now further specified the risk analysis with regard to the requirements of the LkSG.

The risk analysis is carried out in two phases: (1) risk analysis for the individual prohibitions of the LkSG and (2) overall risk analysis. As part of the risk analysis for the individual prohibitions, we determine whether ARYZTA's business operations or the business activities of ARYZTA's direct suppliers (also indirect suppliers in accordance with Section 9 (3) LkSG if there is substantiated evidence) violate human rights or environmental legal interests or whether there is a risk of such a violation. We have developed guidelines for carrying out the risk analyses, which include the weighting and prioritization of individual risks (in accordance with Section 5 (2) and Section 3 (2) LkSG). This involves determining the risks for potentially affected parties and the environment, not the risks for ARYZTA itself, which are nevertheless also assessed.

We have created a comprehensive process for our overall risk analysis in accordance with the LkSG and for weighting and prioritizing the risks identified, in particular on the basis of the criteria specified in Section 3 (2) of the

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00	18 Unternehmens- leitung / Politiken	ARYZTA Bakeries Deutschland GmbH Hiestand Beteiligungsholding AG (CH) & Co. KG		

LkSG, and for determining any preventive measures required over and above the existing regulations and procedures.

This risk analysis process is carried out regularly - at least once a year - and on an ad hoc basis under the supervision of the Human Rights Office, especially if we have substantiated knowledge of actual indications that a human rights or environmental breach of duty by an indirect supplier may be possible. We use our experience from ARYZTA's compliance risk management for this purpose. The results of the risk analysis are communicated by the Human Rights Office - at least twice a year - to the management of ARYZTA.

9. PREVENTIVE MEASURES

We incorporate the results of our risk analyses into relevant business processes and our supplier management system. Our purchasing processes for suppliers and procurement itself provide for various measures to assess and minimize risks, including a multi-stage supplier evaluation process and approval processes in supplier management and the purchasing system.


In our own business division, we have established the following measures in particular, depending on the level of risk:

- Publication of this policy statement
- Global code of conduct for employees that is binding for all employees
- Regular employee training on respecting human rights and the environment.

We have established the following measures in particular for our direct suppliers:

- Sending out a questionnaire on human rights and environmental issues
- Consideration of human rights and environmental expectations when selecting our direct suppliers on the basis of the Global Supplier Code of Conduct
- Obtaining contractual assurances for the compliance and implementation of expectations of our suppliers along the supply chain
- Agreement and implementation of risk-based control measures.

In addition, prevention measures can be taken on a case-by-case basis that relate to a specific risk situation or category.

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10. REMEDIAL MEASURES

If there is a reasonable suspicion or an actual or imminent violation that our business activities are causing or contributing to human rights and/or environmental violations, we will investigate the concerns raised and take appropriate remedial action.

In our own business area, we take appropriate remedial action to prevent or end violations in the event of reasonable suspicion or concrete evidence of possible human rights and environmental violations.

We expect full cooperation from our suppliers in clarifying and ending possible human rights and environmental violations. In the event of very serious violations, if suitable remedial measures have not been implemented after an agreed implementation period has expired or if no other milder means are effective, we reserve the right to take legal action up to and including termination of the business relationship.


11. COMPLAINTS MECHANISM

An appropriate and effective grievance and reporting procedure is an important part of our due diligence processes. We encourage all stakeholders to raise concerns about suspected violations of our policies, including this statement.

With our online platform [<https://aryzta.navexone.eu>], we have set up a company complaints management system that is available to everyone inside and outside our company. The online platform acts as a confidential and anonymous reporting tool for any suspicion of illegal or unethical behavior. The protection of whistleblowers against discrimination or punishment based on information provided is an important part of our complaints procedure.

Cases or information reported to the online platform are first checked centrally by the Human Rights Office of the ARYZTA Group to determine whether the reported facts represent a human rights or environmental risk or a violation of human rights or environmental obligations. The ARYZTA company or supplier affected by the report is also checked. The report is then passed on to the responsible department within the ARYZTA Group. Where possible, it will be processed immediately. The matter raised will be clarified neutrally within a maximum period of three months, regardless of the person and their hierarchical position in the company, the persons involved will be heard and a solution will be found. If, in the course of clarifying the facts, it is determined that a violation of human rights and/or environmental obligations is imminent or is already taking place, the ARYZTA Group will immediately initiate remedial measures. Otherwise, a proposal for further action will be drawn up based on the findings of the fact-finding process.

More detailed information on this as well as on the respective regulations and procedures can be found in the Complaints Procedure Rules in accordance with the LkSG in addition to this policy statement.

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Revision	Bereich	Geltungsbereich	
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12. EFFECTIVENESS CONTROL

The effectiveness of our measures to prevent human rights and environmental violations is reviewed at least once a year and on an ad hoc basis. The Human Rights Office is responsible for monitoring effectiveness.

In the case of direct suppliers, we check the adequate implementation of human rights and environmental due diligence obligations in the form of supplier assessments, supplemented by in-depth supplier audits on a risk-oriented basis if necessary. Independently of this, audits are carried out on an ad hoc basis.

13. DOCUMENTATION AND REPORTING

We will document the fulfillment of our due diligence obligations internally on an ongoing basis and retain this documentation for at least seven years. Our annual reporting on this takes place no later than four months after the end of the respective financial year and is submitted to the Federal Office of Economics and Export Control (BAFA) as well as made available to the public on our website.

14. CONTINUOUS IMPROVEMENT

As part of our culture of continuous improvement, we regularly evaluate and review how we can best optimize and strengthen our approach to human rights within our sphere of influence.

The declaration of principles on human rights of ARYZTA Bakeries Deutschland GmbH was adopted by the management.

Valid from: January 2024