



**CHAMPIGNON
HOFMEISTER**
FAMILY-OWNED SINCE 1908

Policy Statement on the respect for human rights and environmental rights

Version dated July 2025



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1. Foreword and announcement by the management

The fundamental principle guiding the actions of the Champignon-Hofmeister family business is sustainable, socially responsible and lawful entrepreneurial conduct that protects natural resources. The basis for this conduct is respect for human rights and environmental due diligence within the scope of our own activities and our business relationships. We undertake to uphold the rights defined in this Policy Statement. This Policy Statement is binding for all companies in the Champignon-Hofmeister family business. We recognise our responsibility for all our employees and are actively committed to complying with the respective laws, standards of conduct and human rights throughout our entire value chain. We require and promote compliance with these standards with respect to our employees and business partners and do not tolerate forced labour, child labour, discrimination or other human rights violations. We feel that we are under an obligation to act responsibly. Our Policy Statement is an expression of this commitment. It defines the values that guide us and governs our transactions with our stakeholders and their mutual cooperation. We are convinced that sustainable corporate management is not only ecologically and socially beneficial, but also economically successful. We therefore actively promote compliance with our Policy Statement and require the same standards from our business partners. The Policy Statement serves, on the one hand, to prevent legal violations and, on the other, to promote transparent communication of our values to our stakeholders for the purpose of complying with general human and environmental risks and those stipulated within the framework of risk analysis.

2. Commitment of the Champignon Hofmeister family business to the protection of human rights and the environment

We, the Champignon-Hofmeister family business, hereby declare our unconditional commitment to the protection of human rights and the environment and shall conduct our business activities and supply chains in accordance with the highest international standards and guidelines. In so doing, we are guided by the following international agreements and principles:

1. United Nations (UN) Universal Declaration of Human Rights
2. United Nations Guiding Principles on Business and Human Rights (UNGPs)
3. Conventions and recommendations of the International Labour Organisation (ILO) on labour and social standards
4. Principles of the United Nations Global Compact (UNGC)
5. UN Convention on the Rights of the Child
6. UN Convention on the Elimination of All Forms of Discrimination against Women
7. Guidelines of the Organisation for Economic Co-operation and Development (OECD) for Multinational Enterprises
8. Consumer Goods Forum (CGF) Priority Industry Principles on Forced Labour
9. UN Women's Empowerment Principles
10. International Covenant on Civil and Political Rights of 19 December 1966
11. International Covenant on Economic, Social and Cultural Rights of 19 December 1966
12. Minamata Convention on Mercury of 10 October 2013 (Minamata Convention)
13. Basel Convention on the Control of Transboundary Movements of Hazardous Waste and Their Disposal dated 22 March 1989



The Champignon-Hofmeister family business ensures that the principles and legal positions enshrined therein are also implemented and complied with as far as possible within the supply chain. This applies worldwide to all our companies and their supply chains and includes all the business sectors in which they operate. The companies belonging to the Champignon-Hofmeister family business recognise this Policy Statement as their own and have circulated it to all employees and have instructed companies in the supply chain to comply with it. This Policy Statement will be updated accordingly if further potential or actual general and industry-specific risks are identified. In this case, the companies in the Champignon-Hofmeister family business will be under an obligation to take the appropriate countermeasures. The companies in the Champignon-Hofmeister family business are therefore required to report potential and actual legal violations within the scope of this declaration.

Responsibility for content and changes this Policy Statement and the processes for protecting human rights are jointly supported by the human rights officer of the Champignon-Hofmeister family business (see contact details below), the sustainability officers of the respective companies and the executive board of the Champignon-Hofmeister family business. This Policy Statement was drafted in consultation with the person responsible for the Supply Chain Due Diligence Act (LkSG) at the Champignon-Hofmeister family business. This statement is regularly reviewed by our sustainability department and amended taking into account any relevant changes.

This declaration will also be reviewed at least once a year and as required by the person responsible for the Supply Chain Due Diligence Act (LkSG) to ensure that it is up to date, and will be amended if necessary.

3. Implementation of human rights and environmental due diligence obligations

The Champignon-Hofmeister family business has established a multi-stage process to systematically identify, assess and specifically minimise human rights and environmental risks in its own business and along its supply chains. This approach includes analysing potential risks, prioritising specific areas of action and implementing effective preventive measures in cooperation with the relevant stakeholders. The continuous review and further development of its measures enables the Champignon-Hofmeister family business to not only contribute to the protection of human rights and the environment, but to also strengthen the trust of its employees, business partners, suppliers and customers.

The Policy Statement is accompanied by several Rules of Procedure that set out the principles for the protection of human rights as specific actions and behaviours. This

“Code of Conduct” is published on the company website, and the rights and obligations contained therein form part of the contractual relationships of the Champignon-Hofmeister family business and must be acknowledged and observed by both contractual partners and employees.

The guidelines provided in the aforementioned documents form the basis of our working methods and are an integral part of our sustainable procurement policy.

3.1 Risk analysis in supply chains and in our own business sector

The Champignon-Hofmeister family business is exposed to various human rights and environmental risks in the course of its business activities. We use an integrated risk and opportunity management system to identify these risks at an early stage and we document them. In addition to financial risks, non-financial risks are also taken into account, including risks associated with the respect for human rights. The analyses take into account all the legal positions protected by the above-mentioned applicable conventions and laws to which the Supply Chain Due Diligence Act (LkSG) expressly refers.



The system is an integral part of the processes in the individual member companies and regions and is updated annually. In risk management, periodic inventories are used to systematically identify, assess, document and subsequently communicate the key risks along with the risk control measures. The executive board and supervisory bodies are regularly informed (at least once annually) about the risk situation at the association level. In addition, direct channels of information ensure that any significant risks that suddenly arise are reported immediately to the association management.

3.2 Significant industry-specific risks

The Champignon-Hofmeister family business is aware that its own business activities and those of its supply chain pose potential risks to human rights and the environment. As part of an abstract risk analysis, abstract risks were first identified in 2024 along the areas of risk under the Supply Chain Due Diligence Act (LkSG). Particularly sensitive areas were identified by taking into account statistical country and industry risks in their supply chains and in their own business sectors. This includes ensuring fair working conditions, the responsible consumption of water resources and sustainable waste management.

In addition, the procurement of certain product groups in our portfolio involves sector-specific risks to which we pay particular attention. Our risk commodity groups include dairy products, among others. We develop responsible procurement strategies for these high-risk commodity groups that promote the protection of the environment and the livelihoods of local populations and workers along the supply chain. We strive to counteract the risks of environmental damage through sustainable procurement strategies within the framework of ISO Guideline 20001. Moreover, we are committed to supporting employees of companies in the supply chain and have established a contact point for complaints regarding unsafe working conditions. We will strive to use our influence within this framework, particularly for vulnerable minorities.

In addition to these specific product groups, we have identified further significant social risks as part of our risk analysis and have assigned them the highest priority. This includes ensuring fair working conditions for our own employees, including

compliance with permissible working hours and applicable remuneration regulations, guaranteeing occupational safety, safeguarding freedom of assembly and promoting equal treatment without discrimination. We have implemented multi-layered measures within our own business sector and throughout the supply chain to minimise identified risks.

3.3 Preventive measures

The Champignon-Hofmeister family business has developed measures to ensure that it can adequately fulfil its requirements for compliance with human rights, labour and environmental protection in its own business activities and in its purchasing decisions. These measures are case-specific and based on the risk criteria identified in the risk assessment. To ensure compliance with human and environmental rights, the Champignon-Hofmeister family business has appointed two human rights officers who are responsible for developing, regularly updating and implementing the Policy Statement and the Supplier Code of Conduct. The Supplier Code of Conduct serves as a central guideline that sets binding standards for responsible conduct both within the company and along the entire supply chain.

Internal cooperation

Within the Champignon-Hofmeister family business, we promote close cooperation between departments to ensure that the requirements of the Code of Conduct are integrated into all the relevant business processes. Training and awareness-raising measures for employees create comprehensive awareness of the importance of human rights and environmental due diligence obligations.

Supply chain management

The Champignon-Hofmeister family business pursues an integrative supply chain management system that aims to systematically identify and minimise human rights and environmental risks. We ensure that our requirements for social and environmental standards are effectively implemented through the close cooperation with our suppliers and commitment at all levels of the production facilities and raw material production.

Our approach is based on a three-step process that includes defining clear requirements, regularly



monitoring suppliers and continuously developing stakeholders. When selecting suppliers, we take human rights and environmental aspects into account and give preference to purchasing certified products to address any risks at an early stage. A key objective of the Champignon-Hofmeister family business is to require all the relevant suppliers to comply with the Supplier Code of Conduct. Suppliers in the private label supply chains must disclose the production facilities where products for the Champignon-Hofmeister family business are manufactured. This ensures greater transparency and facilitates the monitoring of compliance with the relevant standards. To support our suppliers, we rely on targeted training programmes that help them implement the requirements of the Code of Conduct and continuously improve their social and environmental performance.

The Champignon-Hofmeister family business also works directly with suppliers on various projects to promote sustainable practices locally and to minimise risks throughout the procurement process. We ensure that the established standards are observed throughout the entire supply chain by integrating human rights and environmental criteria into supplier assessments and through control mechanisms such as audits, certifications and regular information right.

Stakeholder involvement

Sustainability in the supply chain requires long-term cooperation with all the relevant stakeholders. This includes participation in events and industry initiatives, the development of sustainability standards and the monitoring of political and regulatory developments. As part of the development of its human rights strategy, the Champignon-Hofmeister family business assesses how rights holders and potentially affected groups can be more closely involved in the process to strive for sustainable improvement in working conditions and the environmental impact along our value chain.

3.4 Complaints mechanism

The Champignon-Hofmeister family business has established a clearly structured complaints mechanism to systematically prevent or counteract violations of our standards of conduct. This enables employees, customers, business partners and stake-

holders along the supply chain to report improper conduct or to express concerns. The Champignon-Hofmeister family business has commissioned the independent compliance service provider DÜCHS Rechtsanwälte Partnerschaft mbB to establish a central reporting office. All reports in the reporting system are processed and initially reviewed in cooperation with DÜCHS Rechtsanwälte Partnerschaft mbB.

The latter then forwards the complaint to the responsible complaints department in the family business.

Employees have two main channels: They can either contact the compliance department directly or report violations via an online complaints system that enables anonymous reports. All employees receive regular training on the Code of Conduct, with a focus on ethical conduct, correct decision-making and compliance with relevant laws and regulations. In particular, the purchasing departments of our member companies receive specific training on the Code of Conduct and the relevant standards.

A complaint is systematically investigated once it has been received. This may include discussions with suppliers, on-site visits or interviews with the persons concerned. In some cases, cooperation with industry initiatives is also used to ensure a comprehensive and objective investigation. The aim is to thoroughly investigate potential violations and to initiate the appropriate preventive and corrective measures. The measures will be implemented in such a way that at no time can any conclusions be drawn about the identity of the complainant.

In addition to internal mechanisms, the Champignon-Hofmeister family business supports external complaint mechanisms that enable stakeholders to report violations to independent bodies. These external mechanisms offer an additional opportunity to promote compliance with human rights and ethical standards throughout the supply chain and to further strengthen the protection of the affected groups.

The Champignon-Hofmeister family business pursues a zero-tolerance policy with respect to the intimidation of potential complainants. The use of the complaints procedure must not be prevented



or restricted. Retaliatory measures against complainants are strictly rejected and sanctioned. The aim of the complaints procedure is to ensure compliance with the principles, rights and obligations set out in the Policy Statement, the Supplier Code of Conduct and the Code of Conduct.

The Champignon-Hofmeister family business regularly reviews and updates the Policy Statement with information from the complaints procedure to ensure that it reflects current developments and processes and meets the requirements for continuous improvement.

3.5 Handling of violations

In the event of actual or potential human rights violations being identified that are linked to the business activities of the Champignon-Hofmeister family business or its supply chain, the company is committed to taking appropriate remedial measures. The internal processes have therefore been developed that clearly define how to proceed when identifying irregularities and how to implement the necessary corrective measures within our own business sector and among our direct and indirect suppliers. If the Champignon-Hofmeister family business has reasonable suspicion or actual evidence of a human rights violation in its own business sector, measures are immediately taken to end the violation or risk. These measures include a thorough investigation of the incident and the initiation of the necessary corrective and preventive measures.

Should it transpire that a supplier has failed to comply with human rights or environmental standards, the Champignon-Hofmeister family business will enter into dialogue with the supplier to jointly agree on the appropriate remedial measures. The measures may range from the immediate cessation of the unacceptable behaviour to long-term preventive measures such as training and audits. The Champignon-Hofmeister family business requires its suppliers to implement the measures specified to continue the working relationship. At the same time, the Champignon-Hofmeister family business reserves the right to contractually oblige suppliers to cooperate fully in the investigation of incidents and to act within a reasonable time frame. Remedial measures may vary depending on the severity

of the human rights violation identified. These may range from requests for immediate rectification of the problem to legal action or termination of the supplier relationship if the cooperation or remedy is sufficient.

3.6 Effectiveness monitoring

The Champignon-Hofmeister family business annually reviews compliance with and the effectiveness of the above measures as part of an effectiveness monitoring process. This serves to ensure the effectiveness of the Policy Statement and to evaluate measures to prevent negative human rights and environmental impacts and modify them if necessary. The Champignon-Hofmeister family business uses supplier questionnaires and complaint options to gather the relevant information. Should there be any indications of violations, the Champignon-Hofmeister family business will carry out targeted monitoring on the rights stated in this Policy Statement and the Code of Conduct. Any indications of violations of the guidelines stated here will be consistently pursued, even after they have been brought to our attention. The Champignon-Hofmeister family business reviews all the information in this respect as part of the complaints procedure.

4. Reporting

As a German commercial enterprise in the food sector, we attach great importance to structured and transparent reporting. We implement regular and structured data collection to ensure that all the relevant information is recorded clearly and promptly and forwarded to the right departments within the company. This enables us to continuously monitor sustainability goals, identify risks at an early stage and to implement comprehensive corrective and remedial measures. Our reports serve both for internal control and planning purposes and for the continuous improvement of our processes and the promotion of an open corporate culture with our stakeholders. Reporting within the company is an essential part of our transparent and effective communication. We report on our approach and progress and on our commitments in terms of environmental and human rights, annu-



ally in our Sustainability Report and on the Sustainability page of our website.

5. Responsibilities for human rights and the implementation of environmental due diligence

The management of the Champignon-Hofmeister family business is responsible for implementing and complying with the Policy Statement on the respect for human rights. The management monitors the implementation of the corporate principles listed.

We are aware that the implementation of human rights and environmental due diligence is an ongoing process. We will therefore review the Policy Statement annually and as circumstances require. We will update the Policy Statement should any changes occur. The central responsibility for risk management and the continuous improvement of human rights and environmental due diligence lies with the human rights officer of the Champignon-Hofmeister family business. The officer will also ensure that external reporting is carried out correctly. The implementation of due diligence obligations is supported by the central Supply Chain Due Diligence Act (LkSG) implementation office and the relevant departments such as compliance, human resources and purchasing.

If you have any further questions or comments regarding this Policy Statement or the activities of the Champignon-Hofmeister family business, please contact us by email at:

compliance@champignon.de