

**Declaration of Principles
for the Respect of Human Rights**

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1. Preface

The Schörghuber Group is a family-owned company characterized over three generations by responsible entrepreneurship, careful cultivation of its traditions and values, and the pursuit of innovation. It connects Bavarian tradition to the future. The family business operates successfully both nationally and internationally in the fields of Development, Real Estate, Beverages, Hotels, and Seafood. The Schörghuber Group's corporate culture is based on the values of quality, innovation, and sustainability. These values form the foundation on which the five divisions operate independently. The more than 5,000 employees worldwide are united in striving for providing more service, greater comfort, better solutions, and thus a better quality of life for their customers. The corporate responsibility for respecting human rights and environmental standards is fundamental in all our activities.

The following declaration refers exclusively to our own business area and to the Development, Real Estate, and Seafood business areas. These are referred to below as the "Schörghuber Group". The Beverages and Hotel business areas are themselves obligated under the Supply Chain Due Diligence Act (LkSG) and have their own declaration of principles for the respect of human rights.

2. Our commitment to respecting human rights and environmental standards

We, the Schörghuber Group, commit to the corporate responsibility to respect human rights and the associated environmental standards. We are dedicated to establishing appropriate procedures and to responsible and sustainable corporate governance. Based on our values, we strive to conduct our business with the highest level of integrity and to comply with all applicable laws and regulations. The way we treat people, the decisions we take and the work we do every day is based on our corporate value system.

We align our business activities with applicable law and recognized international standards and guidelines. These currently include:

- United Nations Universal Declaration of Human Rights
- Human Rights Covenants of the United Nations
 - International Covenant on Civil and Political Rights of the United Nations (ICCPR)
 - International Covenant on Economic, Social and Cultural Rights (ICESCR)
- Core Labor Standards of the International Labor Organization (ILO)
- Tripartite Declaration of Principles of the International Labor Organization (ILO) on Multinational Enterprises and Social Policy
- European Convention for the Protection of Human Rights and Fundamental Freedoms
- Minamata Convention on Mercury of October 10, 2013
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal of March 22, 1989 (Basel Convention)
- Stockholm Convention on Persistent Organic Pollutants (POPs Convention)
- Forced Labor Priority Principles of the Consumer Goods Forum (CGF)
- OECD Guidelines for Multinational Enterprises (2011)
- IFC Performance Standards 2020
- UN Global Compact (2000)
- ISO 26000 (2011) Guidance on Social Responsibility

The Schörghuber Group expects all employees and business partners to comply with applicable laws, regulations, and internationally recognized human rights and associated environmental standards. Furthermore, suppliers are required to ensure that human rights and environmental standards are upheld within their supply chains.

3. Implementation of due diligence obligations at the Schörghuber Group

Business relationships along the direct supply chains are structured in accordance with environmental, social, and ethical standards. To this end, the divisions of the Schörghuber Group have defined sustainability parameters that are integrated into the order and supply chain management process. These are a fundamental part of the corporate philosophy.

The existing risk management system of the Schörghuber Group business divisions has been expanded to include the requirements of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG).

This law includes the following steps:

- regular risk analysis – at least annual and whenever they become necessary upon an incident - including assessment and prioritization of human rights and environmental risks
- implementation of appropriate and effective preventive measures
- implementation of appropriate and effective corrective measures in the event of violations
- regular – at least annual – effectiveness reviews
- regular – at least annual – internal reporting

The extended risk management of the Schörghuber Group business divisions ensures that the human rights strategy is firmly established in all relevant business processes.

3.1 Definition of responsibilities

The Executive Board of the Schörghuber Group has implemented the function of Human Rights Officer at the level of the holding. This Human Rights Officer is responsible for monitoring the establishment, implementation, and maintenance of the Schörghuber Group human rights and environmental risk management system.

The Human Rights Officer has designated contact persons in each business division who are responsible for the operational implementation of human rights and environmental due diligence obligations in their own division. They report to the Schörghuber Group's Human Rights Officer on a regularly and whenever necessary.

The Schörghuber Group Human Rights Officer reports to the Schörghuber Group Executive Board on a regular basis (at least once a year) and whenever necessary about the fulfillment of the assigned tasks, including the results of the monitoring.

3.2 Risk analysis

A key component of our due diligence obligations is to be aware of potential and actual adverse human rights risks and the impact of our business activities on people along the entire value chain.

Ensuring, complying with, and achieving the following aspects is mandatory for the Schörghuber Group in its own business area and in its direct supply chain:

- prohibition of child labor and forced labor
- freedom of association and the right to collective bargaining
- protection against discrimination and unequal treatment regarding the following dimensions:
age, gender, nationality and ethnicity, sexual orientation, mental and physical abilities, religious or philosophical, social background
- right to health and safety in the workplace

- right to an adequate remuneration and compliance with working time regulations
- security staff
- respecting the rights of local communities and indigenous peoples
- protection of personal data
- protection against the destruction of natural resources and environmental pollution
- correct handling of hazardous materials

To this end, the Schörghuber Group conducts risk analyses regarding violations of human and environmental rights. These analyses create the basis for identifying risks and developing adequate risk prevention and mitigation measures.

The risk analysis is carried out as part of a structured process that is updated regularly. Both the business activities of the Schörghuber Group itself and those of its direct suppliers are considered. The Schörghuber Group makes use of the expertise and experience of its employees, who are in close contact with suppliers and organizations of the civil society.

The risk analysis comprises—as a first step—an abstract consideration of industry-, raw material-, and country-specific risks in the supply chains. This analysis is based in particular on:

- supplier's origin
- products and services
- purchasing volume
- external and officially recommended risk sources (LkSG tool)

In a second step, if necessary, a specific risk analysis is carried out to identify those suppliers and companies that are subject to increased risk. This risk analysis draws on existing findings from integrity-related compliance checks carried out on third parties. However, these are supplemented by relevant external sources (via the LkSG tool) and information in order to obtain a comprehensive picture of the risk situation.

The following criteria are applied in accordance with Section 3 (2) of the German Supply Chain Due Diligence Act to assess and prioritize the specific risks:

- nature and scope of the company's business activities
- the company's ability to influence the direct cause of a human rights or environmental risk or the violation of a human rights or environmental obligation
- the typical severity of the violation, the reversibility of the violation, and the likelihood of violating a human rights-related or environmental obligation, as well as
- the nature of the company's contribution to the human rights or environmental risk or to the violation of a human rights or environmental obligation.

As part of the risk analyses carried out in the business divisions, direct suppliers were assessed on the basis of these adequacy criteria.

The analyses take all relevant legal positions protected by applicable conventions and laws into account. These include particularly sensitive areas. No risk-related aspects were identified in the course of the risk analyses carried out.

The results of the risk analyses form the basis for the business decision-making processes of the Schörghuber Group's business divisions with regard to the selection and management of suppliers.

They serve as a basis for identifying appropriate targets and for the (further) development of preventive and remedial measures. The results of the regular risk analyses are reported to the Executive Board.

If necessary (e.g., in the case of a supplier with increased risk), further relevant processes and measures are initiated. The risk management processes take complaints and criticism reported by third parties into account. If a need for adjustment is identified, measures are taken to prevent future violations. The risk management of the business divisions of the Schörghuber Group is subject to constant review and adjustment.

The risk analysis approach is continuously developed and the results reviewed to ensure an accurate representation of potential risks and, as a result, to further develop preventive measures.

3.3 Preventive measures

In order to fulfill our responsibility to respect human rights, we rely on the interaction of various preventive measures in our divisions and among our direct suppliers. With the Code of Conduct for Suppliers and Business Partners, the Sustainability Questionnaire, and the establishment of the Human Rights Officer, whom employees and managers can contact at any time, the business divisions of the Schörghuber Group have taken measures to effectively address potential risks.

Our primary goal is to protect potentially affected parties and to identify, prevent or at least minimize impacts on human rights or the environment.

The specific cooperation with external partners, contractors and suppliers is regulated by the Schörghuber Group business divisions by means of guidelines, manuals and process descriptions and the Code of Conduct for Suppliers and Business Partners.

As part of our regular assessment of our key suppliers and service providers using risk analysis tools, we also ensure compliance with the criteria set out in the Code of Conduct for Contractors, Suppliers, and Business Partners, which covers all essential requirements for human rights compliance.

3.4 Corrective measures

If the Schörghuber Group business divisions become aware that a violation of our human rights or environmental due diligence obligations has occurred or is about to occur in their own business division or at the suppliers, appropriate corrective measures will be taken immediately.

The corrective measures must lead to the prevention or termination of the infringement in during own business.

In addition, a concrete time schedule must be defined. In close consultation with other departments and the concerned supplier, binding corrective measures must be agreed upon and initiated. These corrective measures range from addressing the behavior that is causing the problem, conducting training and audits and providing support for an adequate processing so that the supplier continues to fulfill the requirements for the cooperation.

If the supplier does not sufficiently fulfill its obligation of investigation and cooperation, the Schörghuber Group may terminate the business relationship with the concerned supplier with immediate effect on the basis of our contractual or statutory rights. The same applies in case of repeated or serious violations. Further rights, in particular claims for damages, remain unaffected by this.

3.5 Complaints mechanism

An appropriate and effective complaints management system is an integral part of our due diligence processes in order to effectively prevent and remedy any violations within our company or in our value chain. Violations of our values not only damage the reputation of the Schörghuber Group as an employer and business partner, but they can also have serious legal and financial consequences for our company. In order to avoid or minimize possible unlawful acts, it is therefore crucial for us to identify, investigate and remedy any violations of human rights and applicable environmental standards at an early stage.

The Schörghuber Group takes violations of human and environmental rights seriously and therefore provides a publicly accessible and confidential reporting channel through which actual or suspected violations can be reported at any time.

Our secure, web-based whistleblower system (<https://schoerghubergroup.integrityline.app>) available to any person, whether or not they have any kind of contractual or business relationship with us, from everywhere and 24/7. The system gives affected parties the opportunity to submit information and complaints about the conduct of the Schörghuber Group or our direct and indirect contractors, suppliers or business partners under their name or anonymously. There are also access options in English, French, Spanish, Italian and Chinese. The whistleblower will receive confirmation of receipt of their report.

Reports can also be submitted by email to compliance@schoerghuber.group.

Reports and complaints will be processed by the Compliance Department in cooperation with the Human Rights Officer, who is impartial, independent and bound to secrecy.

Confidentiality and the protection of the whistleblower are our top priorities. As far as possible and within our control, we guarantee that whistleblowers are protected from any discrimination and punishment in connection with the information and complaints they submit. It is our corporate policy not to take any steps to establish the identity of an anonymous whistleblower.

All information on the whistleblower system is available on the Schörghuber Group website. If any violation has been identified, it will be checked whether it is an individual violation (which cannot always be avoided) or a systematic flaw in the risk management or compliance management system. Should the latter be the case, the systems will be reviewed and revised accordingly.

3.6 Effectiveness review

The Schörghuber Group reviews the effectiveness of the preventive and corrective measures and the complaints procedure on a regular basis - at least once a year - and whenever this becomes necessary upon an incident. The information from the various complaint channels will be considered. If necessary, the measures will be updated immediately. The findings from the effectiveness review are incorporated into the ongoing development of the risk management system.

4. Documentation

The implementation of human rights and environmental due diligence in our own business divisions and along our direct supply chains is an ongoing process that requires continuous development. Therefore the Human Rights Officer of the Schörghuber Group reports annually on the fulfillment of due diligence obligations to the Executive Board. The documentation of the implementation of due diligence obligations is the responsibility of the Human Rights Officer.

In addition, the Schörghuber Group reviews this declaration of principles once a year and whenever necessary in order to adapt it to any changed or expanded risk situation.

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Schörghuber Stiftung & Co. Holding KG


Florian Schörghuber
Alexandra Schörghuber
Dr. Jens Riedl
Stefan Fischbach