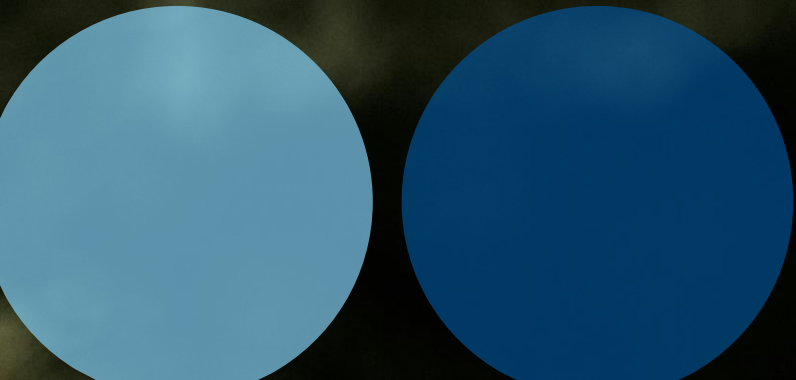


Accepting responsibility.

HUMAN RIGHTS POLICY





HUMAN RIGHTS POLICY

The BRITA Human Rights Policy underlines our commitment to respect internationally accepted human rights and our responsibility for the planet. It explains how we manage potential human rights and environmental risks at our own sites and at our suppliers.



Committed to protecting human rights and the environment

BRITA is a leading expert for drinking water optimisation. Our long-established brand is synonymous with the water filter jug in many countries but our product portfolio extends to, among others, filter applications in a professional environment and mains-fed water dispensers. As a family-owned and values-driven company, an essential and fundamental part of the BRITA business culture and self-image involves acting with integrity and responsibility. The basis of our social responsibility is acting within the law. We comply with all applicable laws related to human rights and environmental issues. In instances where local law and the principles of the standards above do not match, the stricter standard applies.

Beyond our legal obligations we also condemn any breach and disregard for internationally accepted human and environmental rights. We are committed to setting up systems to prevent human rights and environmental violations and to ensure that, where necessary, remedial action is taken to end them - in our own operations but also in our suppliers' and business partners' operations. We want to continuously enhance our business practices and products to maximise positive impact while minimising any potential adverse effects on human rights or on the environment.

Together with our BRITA Employee Code of Conduct as well as the BRITA Supplier Code of Conduct and the BRITA Sustainability Policy, the Human Rights Policy forms the guiding framework on which we base our responsible business conduct. Our commitment is guided by internationally recognised norms, guidelines, and standards that serve as essential frameworks for this policy. The most relevant ones are:

- **Universal Declaration of Human Rights (UDHR)**
- **International Bill of Human Rights**
- **Charter of Fundamental Rights of the European Union**
- **UN Global Compact**
- **ILO Declaration on Fundamental Principles and Rights at Work (and its Follow-Up)**
- **UN Guiding Principles on Business and Human Rights**
- **OECD Guidelines for Multinational Enterprises**
- **2030 United Nations Agenda for Sustainable Development (Sustainable Development Goals)**

Out of the 17 SDGs we have identified four direct and four indirect Goals that are of particular relevance to our business.

Vision and Purpose



Products and Business



Indirect Impact



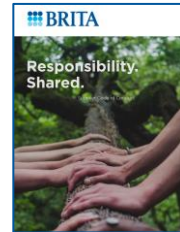
Other documents guiding our responsible business conduct:



Sustainability Policy



Employee Code of Conduct



Supplier Code of Conduct

Our principles

The following human rights and environmental principles build the foundation of our social responsibility framework. We comply with the ILO Conventions as referenced below.

Ban on child labour

We fundamentally oppose any form of child labour and do not accept the employment of children below the minimum legal working age as stipulated by national laws¹. We also reject the worst forms of child labour and want employees younger than 18 to be treated with special care regarding their health, safety and development².

Ban on forced labour

We univocally reject any form of forced or compulsory labour and slavery. We demand all labour is voluntary and free from any threat of punishment³. Forced labour includes the recruiting, transport or housing of people using violence, deception or fraud with the goal of exploiting their labour.

Right to safe working conditions

We believe everyone has the right to a safe working environment that adheres to local laws, prevents accidents and promotes the health of all employees. BRITA employees will and employees of suppliers should receive relevant safety and health trainings. Ideally, international standards like ISO 45001 are used to implement an occupational health and safety management system at our own as well as at our suppliers' sites.

Right to freedom from discrimination

We live and embrace diversity. This means we want everyone to be able to work in an environment that is free of discrimination - whether based on race, ethnic background, gender, age, nationality, social background, disability or state of health, sexual orientation, religion, worldview, political opinion, or trade union activity. We aim to create such an environment.

¹ ILO Convention No. 138

² ILO Convention No. 182

³ ILO Conventions No. 29, No. 105 and its indicators on forced labour



Right to fair compensation and working hours

We want people contributing to our business to be fairly compensated and able to live a decent life. Therefore, remuneration for regular working hours and overtime should be aligned with the local legal minimum wage and legal requirements on working hours, breaks and holidays are to be observed. We also support the principle of equal pay for equal work⁴.

Right to freedom of association

We affirm the right of all people to freely form and join trade unions and engage in collective bargaining without fear of unjust or unequal treatment⁵. The right to collective bargaining for the regulation and improvement of working conditions is to be granted within the framework of the local legal regulations.

Using private or public security forces

We do not support the use of security forces if there is a risk of torture, cruel, inhumane or degrading treatment, injury to life or limb or impairment of the freedom of association and union. Special precautions must be taken when private or public security forces are to be used to ensure employees are not restricted in their rights.

Protection against improper land use

We respect the rights of indigenous people and local communities that may be affected by our or the business activities of our suppliers or their suppliers. We also accept a responsibility to help safeguard the planet and its resources for future generations. Therefore, we reject illegal eviction practices and the wrongful deprivation of land, forests or water resources that are crucial for the livelihoods of local communities.

Environmental stewardship

Preventing environmental damage helps to ensure that people have access to clean air, soil and water. Therefore, we support the responsible use of resources, the avoidance of waste, the protection of natural habitats, the limitation of carbon emissions and upholding of environmental laws and standards such as ISO 14001 as a critical part of socially responsible business conduct. This includes but is not limited to the environmental conventions⁶ specified in the German Supply Chain Due Diligence Act (LkSG).

⁴ILO Convention No. 100

⁵ILO Conventions. No. 87 and No. 98

⁶ILO Basel Convention, Minamata Convention on Mercury, Stockholm Convention on Persistent Organic Pollutants



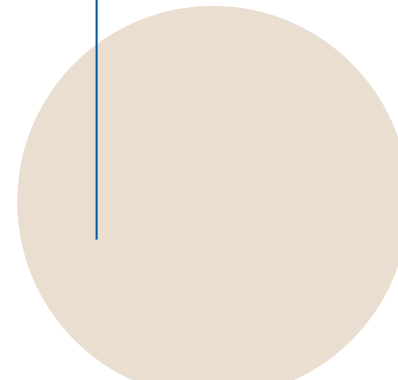
Safeguarding people and planet: a shared responsibility

The overall responsibility for human rights and environmental due diligence both within BRITA and in our supply chain rests with the BRITA Executive Board. Operational implementation is spread across several departments, all of which contribute needed resources to implement, upkeep, report on and analyse the human rights and environmental due diligence systems. Group Human Resources is responsible for coordinating mechanisms to ensure human rights are respected and fair working conditions exist at all BRITA locations worldwide. Group Supply Chain Management develops and manages due diligence processes related to our direct suppliers and critical supply chains. Both are supported by Group Legal and Compliance, Group Auditing and Continuous Improvement, Group Sustainability and others in addressing and coordinating human rights and environmental concerns.

We expect our international entities to implement adequate due diligence processes as directed and ensure compliance with the relevant regulations, such as the German Supply Chain Due Diligence Act (LkSG) or the UK Modern Slavery Act.

To oversee the risk management and due diligence processes related to human rights and environmental issues, BRITA has established the role of Social Responsibility Manager as part of the Sustainability function. The Social Responsibility Manager acts as a designated human rights officer and supports, reviews and consults on the continuous development of the human rights and environmental due diligence management system. The Social Responsibility Manager also regularly informs the BRITA Executive Board about current human rights topics and incidents. In addition, the Social Responsibility Committee, chaired by the Social Responsibility Manager, acts as an internal oversight committee. Its team of experts also defines corrective actions and mitigation measures in case we gain knowledge of incidents or violations.

We expect all our employees around the world and at all BRITA sites to uphold the principles outlined in this Human Rights Policy and in the BRITA Employee Code of Conduct and to treat their peers, customers and all other stakeholders with respect. We see suppliers and distributors as our partners and we work with them at eye-level. This also means we expect them to set up systems and processes to safeguard human and environmental rights and to mitigate effects of violations. The BRITA Supplier Code of Conduct further specifies our expectations related to human rights and environmental issues. It is binding for all our suppliers and partners worldwide.



Corporate responsibility due diligence

Identifying potential risks

We recognise that there may be potential risks for human rights and to the environment associated with our global business activities. To identify these, we perform annual risk assessments to identify actual and potential adverse effects both in our own operations as well as at our direct suppliers and in our most critical supply chains.

Our risk analysis specifically focuses on stakeholder groups that may most be at risk to be adversely affected. These include BRITA employees worldwide (including apprentices, working students, trainees and temporary workers), as well as employees of our direct suppliers and service providers working on or off BRITA sites. We also consider suppliers of our suppliers in the risk analysis, but for now primarily focus on direct suppliers when setting up prevention and mitigation measures.

For both own sites and suppliers, we take a two-step approach:

In a first step, we evaluate abstract risks based on location and material category or activities using publicly available information of potential human rights and environmental risks in the countries we operate in.

This analysis helps us to identify potentially high-risk BRITA sites and suppliers as well as high-risk supply chains.

In a second step, we verify the actual risk of critical BRITA sites and suppliers by evaluating their social responsibility performance using, in a first step, self-assessment questionnaires or audits. We also identified two high-risk supply chains for which we will perform a more in-depth analysis going beyond our direct suppliers.

Based on our risk analysis concluded in November 2023, we will focus specifically on monitoring and mitigating the following human rights and environmental risks: safe working conditions, forced labour, fair compensation and working hours, discrimination and unequal treatment, freedom of association as well as environmental (air) pollution and waste handling.

Prevention and mitigation of risks

BRITA wants to avoid negative effects on people and the environment that may be caused by its business operations. Therefore, we aim to protect potentially affected people, identify negative effects early on and prevent them or, if prevention is not

possible, at least mitigate their impacts. To achieve this, we have set up various preventive measures – both for our own sites and for direct suppliers.

For own sites, we use standards and certifications like ISO 45001 and ISO 14001 to ensure our processes are set up to fulfil our social responsibility expectations. We offer trainings for employees covering compliance, work safety and environmental topics. Going forward, we want to set up more regular, uniform trainings on key topics, including human rights as well as further compliance and sustainability topics for existing employees, but also as part of the onboarding process. Our purchasing teams receive additional training in supply chain-related human rights and environmental due diligence.

When selecting suppliers and materials, we consider potential risk factors and evaluate the social responsibility performance of new suppliers before entering into a contract with them. All suppliers are required to adhere and commit to our social responsibility principles laid out in the Supplier Code of Conduct, which is part of our contractual agreement with suppliers. We have defined minimum criteria that our suppliers have to meet and regularly review their human

rights, environmental and sustainability performance. Where we identify gaps or issues, we work with suppliers to mitigate the risks and effects of these gaps by agreeing on corrective measures with specific timelines. If, despite all efforts, the measures do not lead to an improvement, we reserve the right to terminate the contractual relationship.

Reporting and handling of incidents and violations

Prompt and appropriate action to address human rights and environmental incidents is key to a functioning due diligence system. Only if we are aware of violations of our principles, can we act with determination to mitigate and prevent further incidents at our own sites and in our supply chains. To ensure barriers to report suspected or actual incidents are low, BRITA has set up a comprehensive [whistleblowing system](#).

Reports of suspected or actual violations at BRITA, our suppliers or business partners are received by an external, neutral ombudsperson, ensuring a confidential and swift response. The system is available in 26 languages and reports can be submitted anonymously.

We encourage BRITA employees, business partners and other third parties to report suspected violations and irregularities at any time. We take all reported incidents very seriously and will define specific measures to mitigate the situation. We ensure that the reporting parties will not be subject to unequal treatment or punishment.

Contact for further compliance questions:

✉ compliance@brita.net

Documenting and reporting our progress

We will analyse the effectiveness of our due diligence system, both for own sites and our supply chain, at least once per year. The primary goal is continuous improvement, taking developments in our business and our supply chains as well as in regulation and stakeholder requirements into account. In addition, if we obtain knowledge of human rights or environmental violations at our own sites or suppliers, we will conduct an ad hoc analysis to identify areas of improvement.

We document our processes and will regularly report to the Executive Board and other relevant internal stakeholders. We also make our efforts transparent to external stakeholders, especially in our annual and sustainability reports. In the future, we will also prepare an annual due diligence report in line with requirements of the German Supply Chain Due Diligence Act (LkSG) and other relevant regulations. The report will be available on the BRITA website.

Further questions?

For questions regarding our human rights and environmental due diligence, risk analysis or mitigation efforts, please contact the BRITA Social Responsibility Manager

✉ socialresponsibility@brita.net

This Human Rights Policy was approved by the BRITA Executive Board in June 2024. It will be reviewed and updated regularly as we continue to develop our approach and management system.

Markus Hankammer
CEO BRITA Group

Stefan Jonitz
CFO BRITA Group

Dr. Rüdiger Kraege
CCO Professional Filter /
Dispenser BRITA Group





CONTACT AND FEEDBACK:

BRITA SE
Heinz-Hankammer-Straße 1
65232 Taunusstein
Germany
socialresponsibility@brita.net

