FUCHS GROUP

Policy Statement on Human Rights Strategy

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LUBRICANTS. TECHNOLOGY. PEOPLE. FUCHS

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About FUCHS

Founded in Mannheim in 1931 as a family business, FUCHS SE (FUCHS) is now the world's largest independent supplier of innovative lubricant solutions for almost all industries and applications. FUCHS SE has been listed on the MDAX since 1985 and is one of its most successful stocks. To this day, the Group's headquarters are located in Mannheim's port on Friesenheimer Insel. The more than 6,500 employees in over 50 countries continue to pursue the same goal: keeping the world moving sustainably and efficiently. Unconditionally reliable.

Sustainability has always played an essential role for FUCHS. All aspects of sustainability are therefore firmly rooted in its daily business activities. For FUCHS, sustainability goes far beyond purely ecological aspects; it also includes social, human rights, and economic elements.

This document represents the policy statement in accordance with Section 6 (2) of the Supply Chain Due Diligence Act (LkSG).

Commitment to respecting human and environmental rights

As an internationally active company, FUCHS faces the challenges of global competition. In doing so, we naturally assume our full corporate, ethical, ecological, societal, and social responsibility, not only for our own business area, but also for our supply chain. We are committed to acting not only on the basis of law and legislation in all countries in which we operate, but also far beyond this.

Back in 2012, FUCHS developed a mission statement as the basis for a uniform corporate culture. The FUCHS mission statement consists of three cornerstones and is based on five fundamental values. It serves as a foundation and guide for daily activities. This mission statement strengthens the corporate identity of the group. Employees know what their company stands for. The three cornerstones are:

LUBRICANTS: FUCHS focuses on lubricants and has solutions for all questions and areas of application in the world of lubricants.

TECHNOLOGY: FUCHS claims technological leadership in strategically important areas of application and is known as a technology partner to its customers. FUCHS focuses not only on its own lubricants, but also on a holistic process approach for its customers.

PEOPLE: The strategic component of FUCHS' success is its own corporate culture and a loyal and motivated team. Our employees are the basis of our success.

The five fundamental values of the FUCHS mission statement are:

Trust:

- Trust is the basis of our self-conception.

Creating value:

- We provide our customers with leading technology and the best service.
- We identify and create added value (FUCHS Value Added).
- We create space for innovation and new approaches.
- We act as entrepreneurs within the company.
- We give our employees responsibility and take them at their word.

Respect:

- We stand by our responsibility to various stakeholders, society, and the environment.
- We show appreciation and recognition.
- We are fair to our partners and employees.
- We promote a culture of open discussion.

Reliability:

- We stand by our word.
- We are committed to technological leadership.
- We want to continue our success story.
- We act decisively and transparently.

Integrity:

- We believe in moral values and adhere to our code of conduct.

The FUCHS corporate culture and mission statement are in line with internationally recognized human rights. In addition, we have drawn up and published our “Human Rights Principles”. We expressly support compliance with international conventions for the protection of civil liberties and political, economic, and social rights, as well as environmental protection. This

includes, among other things, the United Nations Universal Declaration of Human Rights, the United Nations Global Compact, and the International Labor Organization (ILO) Declaration.

As a globally active company, we are aware of our responsibility and will do everything necessary within the framework of our corporate guidelines to ensure compliance with internationally recognized standards for human rights and the environment, both for our own business activities and to actively promote them among our business partners.

In addition, we will continue to expand and develop our group-wide risk management system for human rights and environmental issues and review it regularly. This will enable us to manage and ensure the continuous improvement of our existing risk management system for human rights and environmental issues.

By deeply embedding human rights in our culture and our dealings with all employees, business partners, and stakeholders, we ensure our contribution to humane coexistence.

Mannheim, November 2025

FUCHS SE

Stefan Fuchs
Chairman of the Board of Management, CEO

Dr. Timo Reister
Deputy Chairman of the Board of Directors

Mathieu Boulandet
Member of the Executive Board, CTO

Dr. Ralph Rheinboldt
Member of the Executive Board

Esma Saglik
Member of the Executive Board, CFO

1. Basic human rights and environmental expectations of FUCHS employees and business partners

We have clearly set out our fundamental human rights and environmental expectations of our employees and business partners in a set of rules and regulations. These rules and regulations apply to everyone and are communicated transparently. They can be viewed at any time on our website.

Our expectations of our employees regarding human and environmental rights are set out in our comprehensive Human Rights Principles, the Code of Conduct (CoC), and the Principles on Health, Safety, Environment, Energy, Quality, and Sustainability Management, which have been approved by the Executive Board. These documents describe and explain our commitment to social responsibility and human rights principles. In addition, the CoC contains further points based on internationally recognized agreements.

We have summarized our expectations of our business partners in our FUCHS Supplier Code of Conduct (SCoC). This framework of expectations is closely related to our CoC, which applies to our own business activities. In Chapter 14 of our General Terms and Conditions of Purchase, which form the contractual basis for our transactions with suppliers, we also set out our general expectations of our suppliers with regard to social, environmental, and compliance standards. The General Terms and Conditions of Purchase contain a clear reference to our SCoC.

2. Scope

Pursuant to Section 1 (1) LkSG, FUCHS SE has fallen within the scope of the LkSG since January 1, 2024. Due to its controlling influence, FUCHS SE's own business area also includes its majority-owned subsidiaries in Germany and abroad. FUCHS SE and its majority-owned subsidiaries are hereinafter referred to as FUCHS. This policy statement applies to FUCHS as a whole.

FUCHS LUBRICANTS GERMANY GmbH (FLG), a German subsidiary of FUCHS SE, occupies a special position within FUCHS. Due to its number of employees in Germany, FLG has been independently subject to the LkSG since January 1, 2024. FLG has decided to publish a separate policy statement in accordance with Section 6 (2) LkSG in order to better reflect the specific characteristics of FLG. This policy statement by FUCHS takes appropriate account of the policy statement by FLG. However, not all statements made in the FLG policy statement apply without restriction to FUCHS as a whole.

3. Risk management and responsibility, Section 4 LkSG

Within FUCHS, we have appointed a human rights officer who monitors risk management and thus compliance with due diligence obligations worldwide. The human rights officer of FUCHS is also the human rights officer of FLG by appointment of the management.

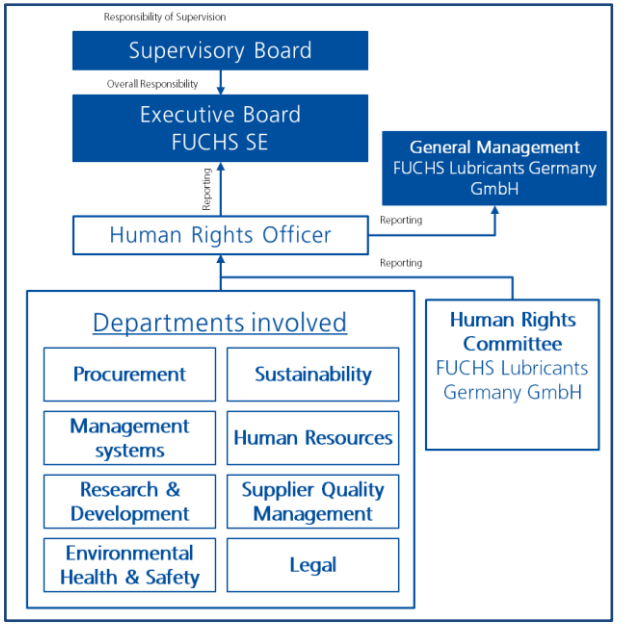

Figure 1: Organizational structure within FUCHS

The Human Rights Officer acts as a link between the Executive Board and all global functions to be involved, such as Procurement, Sustainability, Supplier Quality Management, Environmental, Health & Safety, Management Systems (EHSE), Human Resources, Research & Development, and Legal. As the largest subsidiary, FLG has a human rights committee that meets regularly and consists of representatives from EHSE, Supplier Quality Management, Legal, and Human Resources. This committee reports to the Human Rights Officer (see Figure 1).

Risk management is a continuous, repetitive process that is integrated into all relevant FUCHS business processes and is a central component of FUCHS' activities to fulfill its due diligence obligations with regard to human rights and the environment and to proactively manage risks. Risk management applies to both the internal business area and to direct suppliers and, in cases of substantiated knowledge, also to indirect suppliers (Section 11 LkSG).

Risk management involves the following steps, which are visualized in Figure 2.

- Risk identification and assessment in accordance with Section 5 LkSG
- Risk control in accordance with Sections 6 f. LkSG
- Risk monitoring and reporting in accordance with Section 10 LkSG

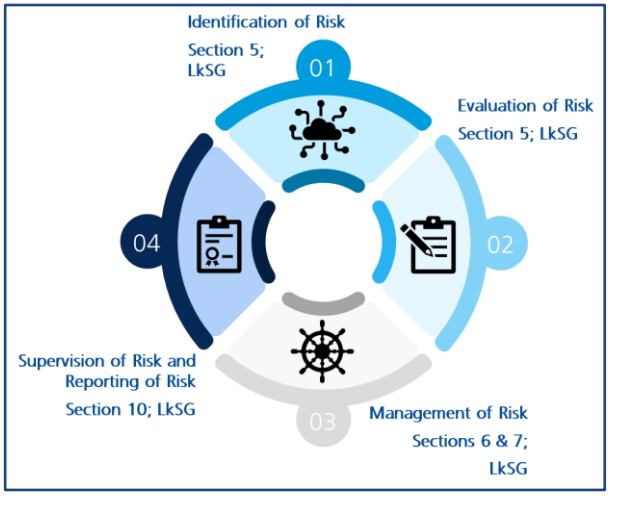

Figure 2: Risk management cycle

4. Risk analysis, Section 5 LkSG

The basis for appropriate and effective risk management is risk analysis, in which potential risks are identified, assessed, weighted, and prioritized. Risk analysis is carried out as a continuous process. It is reviewed and updated annually and as needed in order to be able to respond appropriately to changing conditions and new potential risks.

At FUCHS, risk analysis is carried out in line with risk management in accordance with Section 5 LkSG for our own business area and the supply chain.

FUCHS has also prepared a comprehensive materiality analysis in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS) of the European Financial Reporting Advisory Group (EFRAG), in which environmental and human rights-related risks were identified and assessed.

Risk identification and assessment, Section 5 LkSG

Risk identification takes place both for the national subsidiaries within FUCHS and for suppliers. The following risks are relevant for both internal companies and the supply chain, which are determined on the basis of four levels (see Figure 3):

1. Level: Initial analysis using Integrity Next:
   - Abstract country-specific & industry-specific risk
   - Risk based on the results of the self-assessment as an intermediate step
2. Level: Concrete analysis taking into account influence and severity
3. Level: Addition of further risk factors and data
4. Level: Number of risky suppliers and companies requiring specific measures and action (= specific risk)

This measure is repeated regularly, at least once a year or when there is a specific reason to do so.

Own business area

Risk analysis in our own business area is particularly important, as FUCHS has a significant responsibility due to its decisive influence. As in the supply chain, each

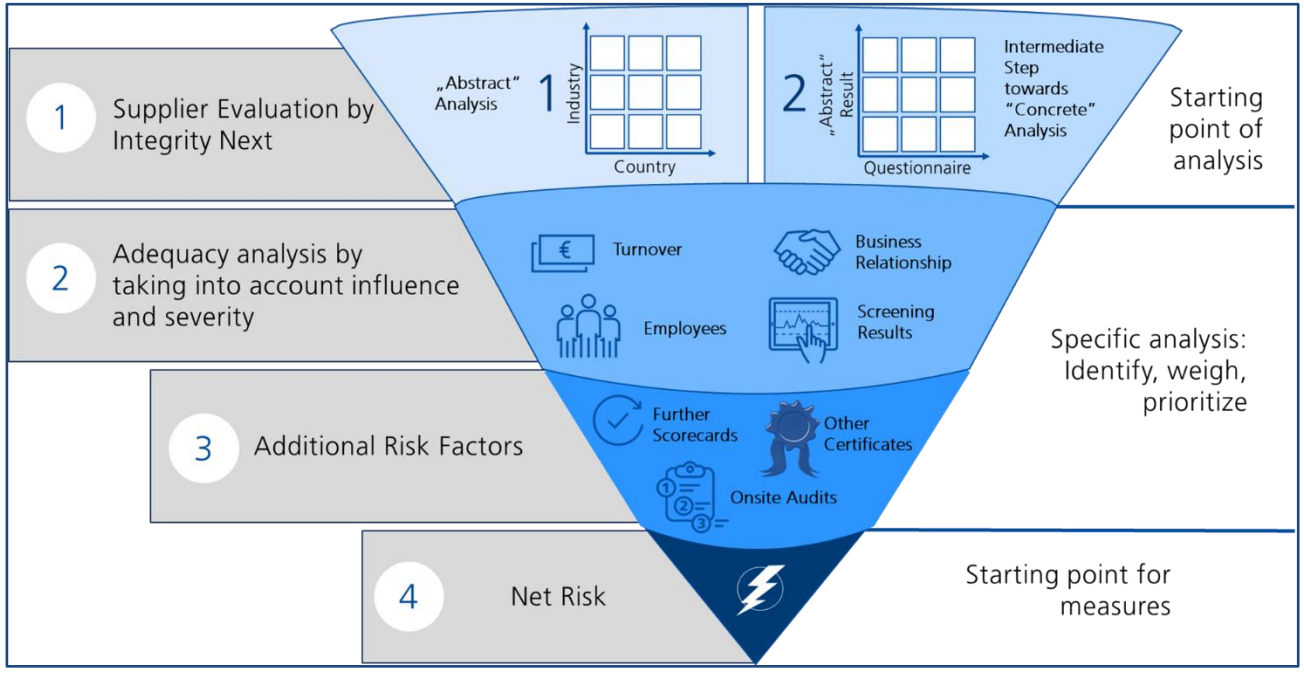

Figure 3: Step-by-step process of risk analysis in the supply chain

subsidiary must carry out an Integrity Next assessment as the basis for risk analysis. In addition, existing valid certificates and (ISO) standards are considered, which represent certain production standards and thus safeguards with regard to environmental, accident, and health risks, and can therefore reduce the risk of violations. The risk analysis is then weighted according to the type of business activity. If, for example, it is a pure sales company with low turnover, the probability of occurrence of production-related risks is excluded, and due to the scope of business, the potential severity is also assumed to be lower than for large production companies, where a significantly higher risk is assumed (risk of probability of occurrence and severity of an incident).

If available, internal audit results or reports from the complaint procedure are also taken into account in the risk assessment.

Supply chain

The results of the supplier assessment by Integrity Next as the first part of the risk analysis are offset against an LkSG-ESG risk for all suppliers identified as having an increased risk. In addition to the LkSG ESG risk result, the various risk areas are weighted and a risk score is calculated for the supplier. This risk score serves both to provide a better understanding of the extent and probability of occurrence and to prioritize the initiation of corrective measures by the purchasing organization.

For high-risk suppliers, additional internally available data, such as the results of supplier audits or supplier visits, is used to further specify the risk, and suppliers are classified according to the adequacy criteria of influence and causation.

In addition, raw material risks are also gradually being considered, as leading NGOs and initiatives have identified significantly higher environmental and human rights risks in the supply chains of certain raw materials than in other raw materials and ingredients.

5.Priority risks identified, Section 6 LkSG

At FUCHS, we are committed to conducting our business activities responsibly and in compliance with all applicable regulations in order to make an economic, ecological, and social contribution. We are aware that, despite this, our own business activities and our supply chain may still have negative impacts on human rights and the environment. We therefore strive to continuously improve our processes. Our fundamental values and requirements for successful work are reflected in our regulations. They apply equally and without exception to all employees in the supply chain and can be accessed at any time on our website.

Risks in our own business area

The following risks have been classified as priorities in our own business area:

- Protection of habitats
- Rights to co-determination and equal treatment
- Rights to decent working conditions

Risks in the supply chain

The following risks were classified as priorities in the global supply chain:

- Protection against child and forced labor
- Rights to decent working conditions
- Rights to co-determination and equal treatment
- Protection of habitats
- Environmental protection

6. Preventive and remedial measures, Sections 6 f. LkSG (risk management)

For the risks identified in the annual and ad hoc analyses described above, measures must be defined and implemented immediately by the departments in charge. The human rights officer is involved as necessary. The human rights officer shall review the effectiveness of these measures either on an ad hoc basis or, at the latest, as part of the annual risk analysis, which highlights changes in risk positions, including the improvements expected because of the measures taken.

Measures in our own business area

As a key preventive measure, an internal training course covering the content of the LkSG was developed and rolled out to the workforce.

In addition, the "FUCHS Compliance Communication" complaint procedure described in more detail in section 7 was also opened up to LkSG issues. The complaint procedure was communicated internally at FUCHS. Furthermore, FUCHS took World Whistleblower Day 2024 as an opportunity to publish a specially produced short video on the intranet. This video highlights the value of whistleblowers for companies such as FUCHS in a modern and entertaining way. It also reminds all employees of the reporting channels that FUCHS provides them with.

Internal events (town halls) are held with the human rights officer to further raise awareness of the issue among the workforces.

A remedial concept is currently being developed that describes how to deal with and handle potential cases. The plan is to validate this concept on an ongoing basis and have it reviewed regularly by the Human Rights Officer.

Measures in the supply chain

Sustainability considerations play an important role at FUCHS in our relationships with our partners along with the supply chain. The most important suppliers are evaluated using the Supplier Performance Evaluation (SPE) approach. The performance evaluation consists of five areas: delivery reliability, technical aspects, quality, service, and sustainability. Each area has its own requirements, and the overall rating is calculated using a special set of rules. All five topics have the same importance and weighting for the overall evaluation of the supplier.

The overall rating is regularly discussed with suppliers to provide feedback and give them the opportunity to improve if the result is unsatisfactory. Suppliers have designated contact people within FUCHS to ensure a supportive and constructive dialogue.

If the results are unsatisfactory, remedial measures must be worked out together immediately. In the event that the sustainability results achieved are permanently unsatisfactory or there is a lack of willingness to cooperate, the business relationship may be terminated as a last resort.

Preventive measures to avoid human rights and environmental violations are already incorporated into the contracts we draw up with our suppliers at FUCHS in a variety of ways. An essential part of this are the General Terms and Conditions of Purchase, which are related to the FUCHS SCoC. The SCoC is therefore a central document setting out requirements for partners in the supply chain, which also serves as a preventive measure. Its contents include, for example, compliance with relevant social standards taking into account ILO norms, fulfillment of environmental standards taking into account relevant ISO certificates and ethical principles, as well as requirements for our own supply chain, i.e., for FUCHS' indirect suppliers.

In addition, the annual ESG assessment of suppliers using the Integrity Next platform is a preventive measure. Through the ongoing assessment of suppliers, ESG risks in the supply chain are considered in a timely manner. If there is deterioration in the assessments, remedial measures are initiated.

The corrective measures are implemented both for suppliers identified as risky in accordance with the risk cycle and for suppliers identified as risky due to reported cases or evidence. The measures are selected individually on a case-by-case basis and summarized in an action plan.

The first step is to obtain documents and self-disclosures, such as confirmation of our Supplier Code of Conduct, if this has not already been done. In addition, suppliers must complete risk-related training courses and obtain common certifications and submit them to FUCHS (e.g., ISO 14001, 45001, etc.), if this

has not already been done. The measures are reviewed by the responsible purchasers, the sustainability officer responsible for procurement in the region, and, if necessary, the human rights officer, depending on the case and the degree of risk. The implementation of the measures at the suppliers will be reviewed either directly by us or by certified partners according to a pre-communicated and defined time frame. Communication with the purchasing department and, if necessary, other relevant departments will take place both in parallel and downstream.

7. Complaints procedure, Section 8 LkSG

The complaints procedure implemented at FUCHS comprises various channels that are available at all times to all FUCHS employees and external stakeholders, namely suppliers and their employees. FUCHS employees are familiar with and informed about the respective channels in regular training sessions and through notices. The complaint channels are available in all regions and national subsidiaries of FUCHS and are also accessible on the Internet to all relevant external stakeholders.

Any suspected violations can be reported by employees directly to the Human Rights Officer and/or the Group Compliance Office or the Local Compliance Officer responsible in the national subsidiary by email or phone. In addition, there is a central whistleblower system that is publicly available to everyone free of charge and can be accessed via the FUCHS website. This system is available around the clock in various languages via an internet-based platform. The system allows reports to be submitted completely anonymously while remaining in contact with the people processing the report via an anonymous mailbox procedure. All people entrusted with investigating matters are obliged to act impartially and maintain confidentiality. The responsibilities and procedures following receipt of a report comply with the provisions of Section 8 LkSG; details are described in the publicly accessible rules of procedure.

8. Documentation and reporting obligations, Section 10 LkSG

FUCHS meets the requirements of the LkSG for internal documentation. FUCHS is monitoring current developments with regard to the report pursuant to Section 10 (2) LkSG. FUCHS currently assumes that the statutory reporting obligation will be abolished by the end of 2025. FUCHS will not prepare a report and publish it on its website until further notice.

Imprint

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