

FUCHS GROUP

Principal Declaration of Human Rights

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Principal Declaration of Human Rights

1 About FUCHS

Founded in 1931 as a family business in Mannheim, FUCHS SE (FUCHS) is today the world's largest independent supplier of innovative lubricant solutions for almost all industries and areas of application. FUCHS SE has been listed on the MDAX since 1985, where it is one of the most successful stocks. The Group's headquarters are still located in the port of Mannheim on Friesenheim Island. The meanwhile over 6,000 employees in more than 50 countries still pursue the same goal today: to keep 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 our daily business activities. For FUCHS, sustainability goes far beyond purely ecological aspects; it also includes social, human rights and economic elements.

This document constitutes the declaration of principle pursuant to Section 6 (2) of the German Supply Chain Due Diligence Act (LkSG).

2 Our commitment to respecting human and environmental rights

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

FUCHS developed a mission statement back in 2012 as the basis for a uniform corporate culture. The FUCHS mission statement consists of three cornerstones and is based on five elementary values. It serves as a foundation and guide for day-to-day activities. This mission statement strengthens the corporate identity of the Group. Employees know what their company stands for. The 3 cornerstones are:

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

TECHNOLOGY: FUCHS claims to be the technology leader in strategically important application areas and is known as the technology partner for its customers. FUCHS

focuses not only on its own lubricants, but also on the customer's holistic process approach.

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

The five elementary values of the FUCHS mission statement are:

Trust: Trust is the basis of our self-image.

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 towards the various interest groups, 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 follow our Code of Conduct.

This Code of Conduct is in line with internationally recognized human rights. We have also drawn up and published a "Human Rights Policy". We expressly support compliance with international conventions for the protection of civil liberties and political, economic and social rights as well as the protection of the environment. This includes the United Nations Universal Declaration of Human Rights, the United Nations Global Compact and the Manifesto of the International Labor Organization (ILO).

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 this among our business partners.

In addition, we will expand and continuously 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 on human rights and environmental issues.

By deeply embedding human rights in our culture and our dealings with all employees, business


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partners and stakeholders, we ensure our contribution to human coexistence.

Mannheim, December 2024

FUCHS SE




Stefan Fuchs




Dr. Sebastian Heiner



Isabelle Adelt



Dr. Timo Reister



Dr. Ralph Rheinboldt

3 Basic human rights and environmental expectations of FUCHS employees and business partners

We have set out our fundamental human rights and environmental expectations of our employees and business partners clearly and unambiguously in rules and regulations. The rules 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 Policy**, the **Code of Conduct (CoC)** and the **Principles on Health, Safety, Environment, Energy, Quality and Sustainability Management**, which have been adopted by the Executive Board. These 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 towards our business partners in our **FUCHS Supplier Code of Conduct (SCoC)**. This framework of expectations is closely related to our CoC, which applies primarily to our own business activities. We also set out our general expectations with regard to social, environmental and compliance standards for our suppliers in Chapter 14 of our **General Terms and Conditions of Purchase**, which form the contractual basis for our business with suppliers. The general terms and conditions of purchase contain a clear reference to our SCoC.

4 Scope of application

FUCHS SE has been subject to the LkSG since January 1, 2024 in accordance with Section 1 (1) LkSG. Due to its decisive 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 declaration of principles 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 covered by the LkSG since January 1, 2024. FLG has decided to publish a separate declaration of principles in accordance with Section 6 (2) LkSG in order to better reflect the special features of FLG. This FUCHS declaration of principles takes appropriate account of FLG's

declaration of principles. However, not all statements made in FLG's declaration of principles apply to FUCHS as a whole without restriction.

5 Risk management and responsibility, § 4 LkSG

Within FUCHS, we have appointed a Human Rights Officer to ensure the monitoring of risk management and thus compliance with due diligence obligations worldwide. The FUCHS Human Rights Officer is also the Human Rights Officer of FLG by appointment of the management.

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).

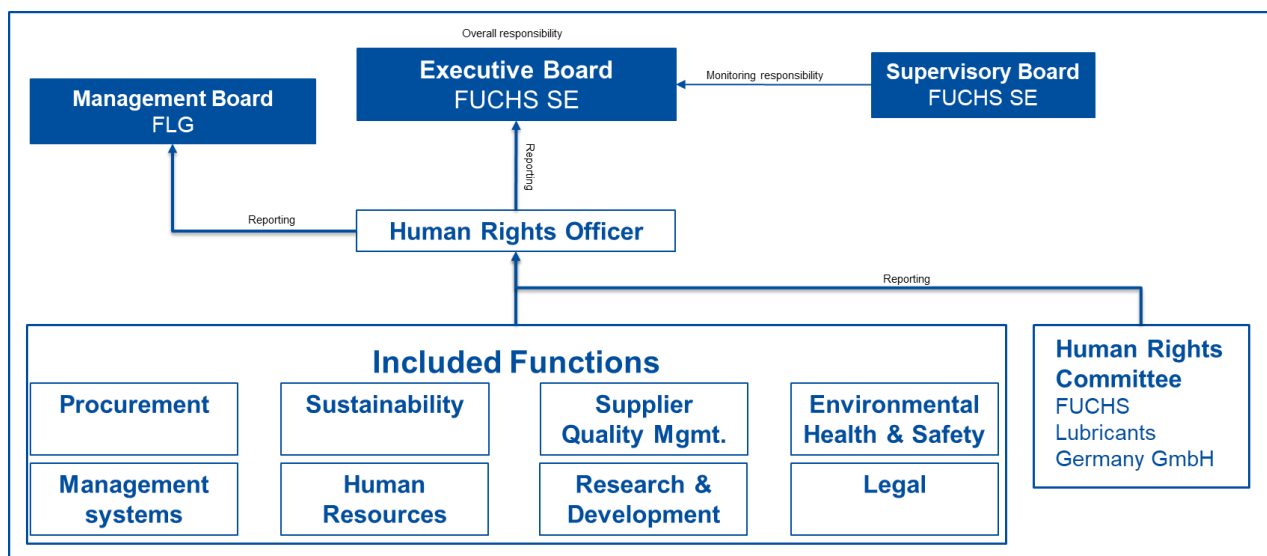


Illustration 1: Organizational set-up at FUCHS

Risk management is a continuous, iterative process that is integrated into all relevant FUCHS business processes and is a central component of FUCHS' activities in order to fulfill due diligence obligations with regard to human rights and the environment and to proactively manage risks. Risk management relates both to the internal business area and to direct suppliers and, if substantiated, 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 § 5 LkSG
- Risk management in accordance with § 6 f. LkSG
- Risk monitoring and reporting in accordance with § 10 LkSG

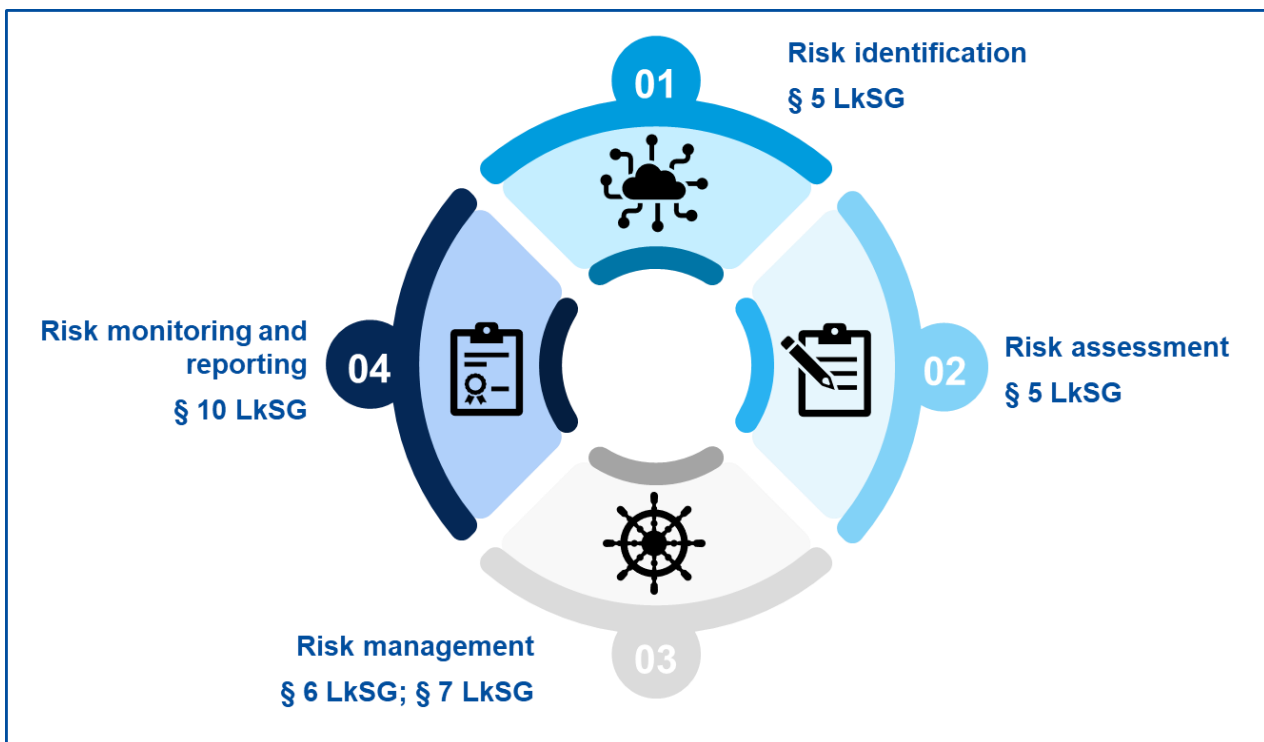


Illustration 2: Risk management cycle

6 Risk analysis, § 5 LkSG

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

The risk analysis at FUCHS is prepared for the company's own business area and the supply chain in the same way as risk management in accordance with Section 5 LkSG.

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, § 5 LkSG

Risks are identified both for the national companies within FUCHS and for the suppliers. The following risks are relevant for the internal companies and the supply chain, which are determined on the basis of 4 levels:

1. Input analysis using Integrity Next:
 - Abstract country-specific & sector-specific risk
 - Risk based on the results of the self-disclosure as an intermediate step
2. Concrete analysis taking into account influence and severity
3. Addition of further risk factors and data
4. Risk suppliers and companies for specific measures and need for action

This measure is repeated regularly, but at least once a year or on a specific occasion.

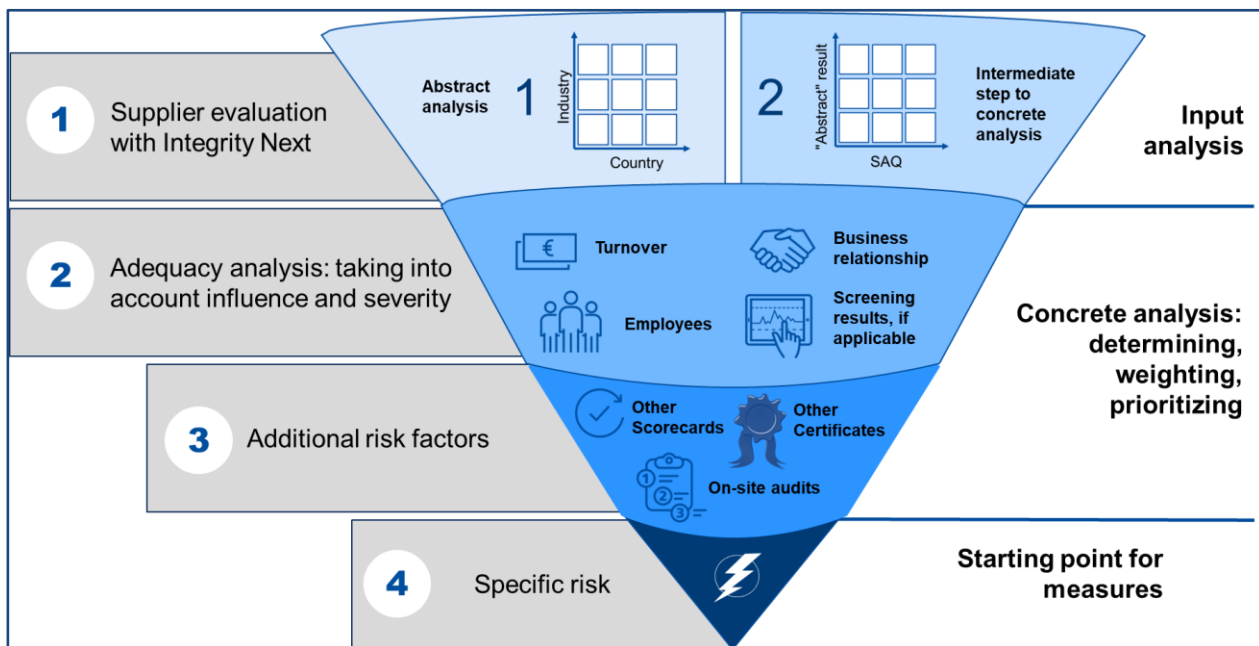


Illustration 3: Step-by-step process of risk analysis for the supply chain

Own business division

The risk analysis in its own business area is of particular importance, as FUCHS has an outstanding responsibility due to its decisive influence. As in the supply chain, each subsidiary must carry out an Integrity Next assessment as the basis for the risk analysis. In addition, existing valid certificates and (ISO) standards are considered, each of which represent certain production standards and thus safeguards with regard to environmental, accident and health risks and can thus reduce

the risk of violations. The risk analysis is then weighted according to the type of business activity. If, for example, the company is purely a sales company with a low turnover, the probability of occurrence for production-related risks is very low, and the potential severity is also assumed to be lower than for large production companies, where a significantly higher risk can be assumed (risk of probability of occurrence and severity of an incident) due to the scope of business. If available, internal audit results or reports from the complaints 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 with an increased risk. In addition to the result of the LkSG-ESG risk, the various risk areas are weighted and a risk figure is calculated for the supplier. This risk figure is used both to better understand the extent and probability of occurrence and to prioritize the initiation of corrective measures by the purchasing organization.

In the case of risk suppliers, other internally available data, such as the results of supplier audits or supplier visits, are used to further specify the risk and the suppliers are classified according to the appropriateness criteria of influence and contribution to cause.

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

7 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 negative impacts on human rights and the environment can nevertheless occur both in our own business activities and in the supply chain. We therefore strive to continuously improve our processes. Our fundamental values and requirements for successful work are reflected in our rules and regulations. They apply equally and without exception to all employees in the supply chain and can be accessed at any time via our website.

Own business area risks:

According to the procedure described above and after evaluating the questionnaires, the greatest risks currently exist within the following subject areas:

In the area of human rights:

- Health and safety in the workplace
- Freedom of assembly and the right to collective bargaining
- Diversity, equality and inclusion

In the area of environmental protection:

- Risk of soil, water and air pollution in general
- Causing harmful soil change, water pollution, air pollution, harmful noise emissions or excessive water consumption
- Production and use of hazardous substances and chemicals (risks in accordance with the Minamata, Basel and Stockholm Conventions)

Risks in the supply chain:

Our suppliers with a high risk of human rights and environmental violations are currently located in the following countries: India, Mexico, China, South Africa, Singapore, Thailand and Malaysia. The following priority risks are assigned to these countries:

In the area of human rights:

- Discrimination
- Forced labor or other forms of domination or oppression in the workplace environment
- Working conditions and appropriate remuneration

- Freedom of assembly and the right to collective bargaining

In the area of environmental protection:

- Risk of soil, water and air pollution in general
- Causing harmful soil change, water pollution, air pollution, harmful noise emissions or excessive water consumption
- Production and use of hazardous substances and chemicals (risks in accordance with the Minamata, Basel and Stockholm Conventions)

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

The responsible specialist departments must define and immediately implement measures for the risks identified in the annual and ad hoc analysis described above. The Human Rights Officer is involved in this process as required. The effectiveness review by the Human Rights Officer takes place either on an ad hoc basis or, at the latest, as part of the annual risk analysis, in which the changes in the risk positions, including the improvements expected as a result of the measures, become visible.

Measures in our own business area:

As a key prevention measure, an internal training course with content from the LkSG was developed and rolled out to the workforce.

In addition, the "FUCHS Compliance Communication" complaints procedure described in more detail in section 9 was also opened up to LkSG matters. The complaints procedure was communicated internally at FUCHS. In addition, FUCHS took World Whistleblower Day as an opportunity to publish a specially produced short video on the intranet. This video emphasizes the value of whistleblowers for companies like FUCHS in a modern and entertaining way. In addition, all employees are reminded of the reporting channels that FUCHS makes available to them.

Internal events (town halls) are held with the Human Rights Officer to raise awareness of the issue within the workforce.

At the time of publication of this document, there are no proven incidents of human rights violations within the company's own business area. A remediation concept is being developed that describes how to deal with potential cases. It is planned to validate this concept on an ongoing basis and to have it regularly reviewed by the Human Rights Officer.

Measures in the supply chain:

Sustainability aspects play a key role at FUCHS in the relationship with our partners along the supply chain. The evaluation of the most important suppliers is carried out using the "SPE" - "Supplier Performance Evaluation" approach. The performance evaluation is made up of 5 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 5 topics have the same importance and weighting for the overall evaluation of the supplier.

The overall assessment is regularly discussed with the suppliers in order to provide feedback and give them the opportunity to improve if the result is not satisfactory. The suppliers have fixed contact persons within FUCHS to ensure a supportive and constructive dialog.

If the results are not satisfactory, remedial measures must be worked on together immediately. In the event that the sustainability results achieved are permanently unsatisfactory or there is a lack of willingness to cooperate, the last resort may be to end and terminate the business relationship. At FUCHS, preventive measures to avoid human rights and environmental violations are already incorporated in a variety of ways when drafting contracts with our suppliers. The General Terms and Conditions of Purchase, which are linked to the FUCHS SCoC, are an elementary part of this. The SCoC thus forms a central document with requirements for partners in the supply chain, which also serves the purpose of prevention. The contents include, for example, compliance with relevant social standards, taking into account ILO standards, the 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. The ongoing assessment of suppliers means that ESG risks in the supply chain are considered in a timely manner. If there are any deteriorations in the assessments, remedial measures are initiated.

The corrective measures are implemented both for the suppliers identified according to the risk cycle and for the suppliers identified by reported cases. 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, e.g. confirmation of our Supplier Code of Conduct, if this has not already been done. In addition, risk-related training courses must be completed by the supplier and current certifications must be obtained and submitted 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, also by the human rights officer, depending on the case and degree of risk. The implementation of the measures by the suppliers is checked either directly by us or by certified partners according to a previously communicated and defined time frame. Communication with Purchasing and, if necessary, other relevant departments takes place both in parallel and downstream.

9 Grievance Mechanism, § 8 LkSG

The complaints procedure implemented at FUCHS comprises various channels that are available to all employees and all external stakeholders of FUCHS, namely suppliers and their employees, at all times. FUCHS employees are familiarized and informed about the respective channels in regular training sessions and through notices. External parties are informed via the FUCHS homepage and the SCoC. The complaints channels are available in all regions and national companies at FUCHS and are also accessible on the Internet for all relevant external stakeholders.

Any suspicion of a violation 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 company by email or phone call. In addition, there is the central whistleblower system, which is publicly available to all persons free of charge and can be accessed via the FUCHS homepage. This system is available around the clock in various languages via an internet-based platform. The system makes it possible to submit reports completely anonymously and to remain in contact with the persons processing them via an anonymized mailbox procedure. All persons involved in investigating the matter are obliged to act impartially and maintain confidentiality. The responsibilities and the procedure following receipt of a report comply with the provisions of Section 8 LkSG. Details are described in the publicly accessible rules of procedure.

10 Documentation and reporting obligation, § 10 LkSG

FUCHS fulfills the requirements that the LkSG places on internal documentation. With regard to the external report in accordance with § 10, para. 2 LkSG, FUCHS observes the developments with regard to the CSRD Implementation Act and the relevant BAFA announcements. FUCHS reserves the right to completely dispense with a separate LkSG report or to submit it later after the

statutory deadline has expired, if permitted by the relevant BAFA announcements.

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