

FUCHS GROUP HUMAN RIGHTS PRINCIPLES

MOVING YOUR WORLD



Human Rights Principles

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1 FUCHS Values & Human Rights

The following principles serve as a guiding framework for our operations, emphasizing the importance of upholding fundamental human rights across our global footprint. FUCHS is very much aware of its social responsibility and carries out its activities with this responsibility. Upholding human rights and ensuring fair working conditions are fundamental aspects ingrained in our corporate values.

The FUCHS Human Rights Principles are developed in alignment with crucial international standards regarding human rights and working conditions, drawing inspiration from frameworks such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

The FUCHS Human Rights Principles complement our [FUCHS mission statement](#), developed in 2012, with the objective of providing employees throughout the world with orientation for their daily actions. The model rests on three pillars, which continue to characterize the success of FUCHS to this day:

- **Lubricants:** Focus on lubricants and related specialties
- **Technology:** Technological orientation
- **People:** Highly qualified, specialized, and motivated people

Furthermore, the mission statement builds on the five values:

- **Trust:** Trust is the basis of our self-understanding.
- **Creating Value:** We deliver leading technology and first-class service to our customers. We identify and create FUCHS Value Added. Not only do we provide space for innovation to explore new paths, but also for entrepreneurial action. We empower employees with responsibility and accountability.
- **Respect:** We acknowledge our responsibility towards our stakeholders, society, and environment. We show appreciation and recognition and act with fairness towards our partners and employees. We foster an open-minded discussion culture.
- **Reliability:** We walk the talk. We are committed to technical leadership, maintaining a consistent track record of performance, and acting in a responsive and transparent way.
- **Integrity:** We believe in a high level of ethics and adhere to our Code of Conduct.

The principles provide a detailed overview on how our group actively promotes human rights.

Essential topics, including the fair treatment of all our employees, the assurance of health and safety in the workplace, and our environmental responsibility, are thoroughly addressed. Our human rights principles aim to create a workplace and business environment that fosters dignity, equality, personal welfare and respect for all.

By integrating these human rights principles into our corporate culture and daily operations, we aim to create a positive impact on the well-being of our employees, partners, and communities. Through continuous evaluation and enhancements, we strive to be a role model for our industry, setting a standard for responsible corporate citizenship within our business sector.

Mannheim, February 2024

FUCHS SE

A handwritten signature in blue ink, appearing to read "Stefan Fuchs". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Stefan Fuchs

A handwritten signature in blue ink, appearing to read "Heiner". The signature is cursive and somewhat stylized.

Dr. Sebastian Heiner

2 Our Commitment

We, FUCHS SE and its subsidiaries (hereinafter referred to as "FUCHS"), are an internationally operating corporation that meets the challenges of global competition head-on and assumes entrepreneurial as well as social responsibility. This responsibility covers legal, social, environmental, and ethical aspects that we as a company need to consider in order to be successful. We are committed to conducting our business in a fair, responsible, and transparent manner and ensuring that our activities in all the countries that we work in are founded on the respect for law, order, ethical and social standards.

FUCHS respects and considers human rights and supports the United Nations Universal Declaration of Human Rights (UDHR), the International Labor Organization's (ILO) Declaration of Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, as well as the principles of the United Nations Global Compact (UNGC).

This policy applies to all FUCHS Group locations worldwide and focuses on topics that are of particular relevance to the company and its employees.

3 Social Responsibility

FUCHS is aware of the responsibility towards society and carries out all business activities without exception based on this responsibility. We are committed to respecting human rights in everything we do. It is a central part of our mission to contribute towards building a better world and future in which everyone can develop freely.

In addition, FUCHS has drawn up policies and rules that concretize the standards governing our cooperation with business partners and authorities. FUCHS expects endeavors to ensure that these rules and principles are also adhered to by our business partners that include, for example, suppliers, service providers, distributors, advisors, agents as well as other third parties.

We treat all employees, regardless of whether they are permanent employees, part-time employees, temporary workers, trainees or working students, with fairness, humanity, respect, and dignity.

3.1 Child Labor

FUCHS does not tolerate any form of child labor at any stage of production or processing. We prohibit the employment of persons under the age of 15, regardless of whether this is permitted by local law, as defined in the ILO Conventions No. 138 (Minimum Age Convention). The only exceptions to this requirement are government approved vocational training programs that clearly benefit participants.

Children must not be inhibited in their development and their safety and health must not be impaired. We prevent workers under the age of 18 from performing work that could endanger their health or safety, including night shifts, overtime, or hazardous work in accordance with the ILO Conventions No. 182 (Worst Forms of Child Labor Convention). We ensure that appropriate measures are implemented to safeguard their health and safety at any time.

3.2 Forced Labor and Slavery

FUCHS does not tolerate any form of forced labor, modern slavery, or trafficking practices. In alignment with our dedication to the ILO Conventions No. 29 (Forced Labor Convention) and No. 105 (Abolition of Forced Labor Convention), as well as the Protocol of 2014 to Convention No. 29, we pledge to identify and address any instances of modern slavery within our operations and throughout our supply chains. We are fully committed to operating responsibly and maintaining high ethical standards.

3.3 Equal opportunities and Non-Discrimination

Employees must not be discriminated against, for example, based on origin, nationality, skin color, religion, ideology, political and trade union activity, gender, sexual orientation, age, disability, illness, status of health, payment of unequal salary for equal work, pregnancy, or any other characteristics protected by law.

Furthermore, we do not tolerate any form of harassment, sexual or moral, as defined by ILO Convention No. 190 (Violence and Harassment Convention) and applicable national laws. This applies to violence and harassment in the work environment that occurs during, in connection with or as a result of work.

We support diversity and women's rights, and that employment relationships are built on equal opportunity principles.

3.4 Freedom of Association and Right to Collective Bargaining

We respect the fundamental right to freedom of association and the right to collective bargaining within the framework of national laws and ensure that this is not impaired. The management of FUCHS ensures an ongoing and constructive dialogue with our employees and their representatives according to local laws and regulations. There is a commitment to ensuring that members of employee organizations or trade unions are neither disadvantaged nor given preferential treatment.

3.5 Wages, Working Hours and Social Benefits

Employees shall be compensated, at a minimum, in compliance with applicable wage laws, including those related to minimum wages, working hours, and legally required social benefits.

Hours of work and overtime must be performed in accordance with all applicable laws, including maximum hours and minimum rest laws. Overtime work must be agreed upon in advance, possibly compensated at a higher than regular hourly rate – or, to the extent legally permissible, agreed upon in advance with time off in lieu of the higher hourly rate. We, as an employer, ensure to facilitate a proper work-life balance.

3.6 Right to occupational Health and Safety at the Workplace

FUCHS is deeply committed to mitigating workplace accidents and preventing work-related illnesses. It is our core belief that occupational health and safety, environmental protection, product and process quality and commercial efficiency are factors of equal importance.

Therefore, we create a work environment that meets or exceeds industry standards and local, regional, and national safety, occupational health and fire regulations. Employee exposure to hazards must be limited, and continuous improvement of working conditions and occupational health and safety must be promoted. Based on this business perception, FUCHS has decided

to set up unified documented [Occupational Health and Safety \(OHS\) rules](#) to pro-actively secure all FUCHS employees from negative impacts.

Referring to ILO No. 1 and ILO No. 14, we define working hours (including overtime, maximum working hours, rest periods, working time schedules, parental leave, sick leave, leave for family reason, paid overtime) in such a way that occupational accidents due to physical and mental exhaustion are prevented and the health of employees is maintained.

Whenever an injury or illness or near misses and unsafe situations occur, we commit to investigating, and taking corrective and preventive action. All affected employees should have knowledge of every incident and near misses, understand the importance of prevention, and corrective actions and practice it in their daily work.

Employees are encouraged to openly address health and safety concerns, and precautions must be taken against retaliation.

3.7 Environmental Responsibility

Every FUCHS affiliate is responsible to ensure that no harmful soil alteration, water pollution, air pollution, harmful noise emissions, or excessive water consumption resulting directly from our operations interferes with natural resources for the preservation and production of food, denies, obstructs, or destroys access to drinking water and sanitary facilities, or harms human health. The FUCHS Sustainability Guideline published in 2012 contains standards for responsible business practices and is considered as binding sustainability framework for the Group's global business operations.

3.8 Supplier Responsibility

FUCHS expects its suppliers, service providers, subcontractors, and business partners with intermediary function, to monitor and ensure compliance with the principles outlined herein. Therefore, the [FUCHS Supplier Code of Conduct](#) has been developed, based on our jointly developed values. Key elements are adherence to labor standards, business ethics and compliance, as well as environmental protection and safety. The goal of FUCHS is to create a resilient, stronger, and more sustainable supply base. The FUCHS Supplier Code of Conduct applies to all FUCHS Suppliers worldwide. We expect our Suppliers to make reasonable efforts to implement high standards in their upstream supply chains as well, meaning their suppliers and subcontractors.

4 Grievance & Remedy

Management and employees are, without exception, called upon to observe, as part of their work-related activities, the respective applicable laws, guidelines, and social standards, irrespective of whether these are supranational or local rules. Same applies to our FUCHS Human Rights Principles.

In 2004, FUCHS launched a [Code of Conduct](#) that sets forth, among other standards, the principles of fair competition, transparency and integrity. The Code of Conduct was last updated by the Executive Board in the financial year 2022. The Code of Conduct is publicly available on the FUCHS website and has been assigned worldwide to all employees with computer access through the e-learning tool for the purposes of self-study.

Corporate Governance and Compliance are directly assigned to FUCHS SE's Executive Board. The Compliance Management System of FUCHS includes a Chief Compliance Officer and a compliance organization that supports and advises our employees worldwide. Each local unit is assigned one local compliance officer.

Effective September 15th 2014, FUCHS has launched an internet-based reporting system called [FUCHS Compliance Communication](#). The system is based on the standardized solution of the service provider Business Keeper AG fulfilling highest IT security standards. It enables the user to describe her/his observations in detail and to enter into dialogue with the responsible person investigating his/her case. If desired, the user can remain completely anonymous throughout the whole process. If reported violations are confirmed, we will take the necessary corrective actions. We invite users to learn more about the principles and processes governing the reporting mechanism by reading our [FUCHS Rules of Procedure](#).

5 Governance & Accountability

Our Managers at FUCHS are responsible for the implementation of the FUCHS Human Rights Principles in their area of responsibility. Our managers are obligated to inform their employees about the content of our principles and support them in applying these principles in their daily work. The manager must promptly and judiciously address any signs of potential human rights violations.

The FUCHS Human Rights Principles complement the FUCHS Code of Conduct and are applicable to all employees and subsidiaries worldwide. It is the task of each individual employee to behave in accordance with these Principles. It is our expectation that each employee upholds and respects human rights without any compromise. In the event of indications of possible human rights violations, employees can inform their responsible manager, the human rights officer (hre-supplychain@fuchs.com) or contact the global FUCHS compliance reporting system FUCHS Compliance Communication.

In order to identify, assess and avoid human rights and environmental risks and violations within our supply chains, as a first step we have developed a risk analysis. We are aware that risks and violations can occur at different levels, such as the country, industry, or commodity level. The complexity of the supply chains, the potential risks and the monitoring obligation led us to decide to draw on external expertise by using a cloud-based INTEGRITY NEXT platform.

In addition to the digital solution, we also see huge potential in sharing and collaborating with other companies. This is why we are actively involved in the Automotive Industry Dialogue, a multi-stakeholder initiative of which we are a member.

6 Appendix

Supporting guidelines and principles:

[FUCHS Group – Code of Conduct](#)

[FUCHS Group – Compliance Communication](#)

[FUCHS Group – Compliance Roles of Procedure](#)

[FUCHS Group – Health and Safety Guideline](#)

[FUCHS Group – Mission Statement](#)

[FUCHS Group – Supplier Code of Conduct](#)

[FUCHS Group – Sustainability Guideline](#)

Imprint

Publisher

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