

# Human Rights Policy

## Our commitment to human rights and environmental standards

Nordzucker Group (hereinafter referred to as “Nordzucker”) is committed to developing an organizational culture and a general conduct of respect and support for internationally recognized human rights<sup>1</sup> as well as for the environment. Nordzucker seeks to avoid complicity in any human rights and environmental violations through its own activities and business relationships.

This Human Rights Policy (hereinafter referred to as “Policy”) sets out the expectations for our business to respect and promote human rights and environmental standards<sup>2</sup>.

We support and align with the principles contained within the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Nordzucker is also a signatory of the UN Global Compact and committed to its ten principles.

This Policy applies to all employees of Nordzucker. It also covers our upstream and downstream value chain through our business partners (e.g. growers, other suppliers and third-party contractors).

We expect all our business partners to respect the human rights of all stakeholders as well as environmental standards and to uphold the same standards we set for ourselves in this Policy. Stakeholders include our employees, value chain workers, affected communities, costumers and consumers with special attention to those groups particularly at of vulnerability. Furthermore, we expect our business partners to not only respect human rights and environmental standards but also strongly encourage them to adopt the same or similar standards and cascade these standards to their own suppliers - Nordzucker's sub suppliers.

## Salient human rights and environmental standards

Based on numerous impact assessments on human rights and environmental standards, we have identified the following salient human rights and environmental issues at Nordzucker and in our value chain:

- Occupational Safety and Health
- Modern slavery (including forced labour, compulsory labour, human trafficking and child labour)
- Working conditions
- Discrimination and harassment (including gender-based violence)
- Labour rights (including the rights to association and collective bargaining)
- Land rights (including indigenous peoples' rights)
- The right to health and life impacted by climate change, environmental contamination and water consumption.

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<sup>1</sup> Defined in the International Bill of Human Rights and the ILO's Declaration on the Fundamental Principles and Rights at Work as well as in legal requirements.

<sup>2</sup> Environmental standards specifically refer to environmental prohibitions of the German Supply Chain Due Diligence Act (LkSG).

## **Implementation of the Policy**

This Policy is implemented through human rights and selected environmental due diligence (hereinafter referred to as “Due Diligence”) processes that enable Nordzucker to identify, assess, prevent, mitigate and remedy adverse human rights and environmental impacts<sup>3</sup> caused by our activities, or to which we contributed to or that we are linked to through the activities of our business partners. This implementation of this Policy is informed by internal and external expertise.

The risk-based Due Diligence is performed continuously and embedded into our daily business processes. However, it can also be triggered by changes in contexts in which we operate, such as new business relationships or human rights or environmental challenges. Should any adverse human rights or environmental impacts arise, we prioritize them, ensuring that the salient issues are addressed promptly.

Furthermore, we engage with affected and relevant stakeholders, especially in identifying, preventing, mitigating and remedying adverse impacts. This includes engagement with our employees, business partners, affected communities, costumers and consumers.

Nordzucker has appointed a Human Rights Officer who monitors the implementation and fulfilment of the Due Diligence and carries out regular effectiveness reviews. The Human Rights Officer reports annually, and, if required, on an ad hoc basis to the Executive Board of Nordzucker AG.

In our efforts to be transparent, we also report externally on our handling of adverse human rights and environmental impacts.

The implementation of this Policy is supported by the Nordzucker Code of Conduct and the Nordzucker Supplier Code of Conduct<sup>4</sup> as well as other internal documents that further describe the process of the Due Diligence.

## **Reporting adverse impacts on human rights and environmental standards**

We are committed to enabling an effective grievance procedure with various ways of reporting adverse human rights and environmental impacts.

Adverse human rights and environmental impacts can be reported directly to Nordzucker’s Human Rights Officer ([humanrightsofficer@nordzucker.com](mailto:humanrightsofficer@nordzucker.com)), to the function Compliance Coordination ([compliance@nordzucker.com](mailto:compliance@nordzucker.com)) or via Nordzucker’s electronic whistleblower system “SpeakUp”. In addition, Nordzucker’s employees may also address adverse impacts with their superior or the Local Compliance Coordinator.

Reports can be submitted anonymously and will be processed confidentially and swiftly. If the reported adverse impact is confirmed, appropriate measures are taken by Nordzucker, if necessary, in consultation with the person submitting the report.

No employee of Nordzucker or third party submitting a report to the best of their knowledge and belief shall suffer any disadvantage from Nordzucker as a result of the report.

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<sup>3</sup> Adverse environmental impacts refer to environmental prohibitions of the German Supply Chain Due Diligence Act (LkSG).

<sup>4</sup> For Australian entities the MSL Code of Conduct and Supplier Code of Conduct supports the implementation of this policy.

### Providing access to remedy

When Nordzucker identifies that we have caused adverse human rights or environmental impacts in our own business area, we will engage in appropriate remediation processes by ourselves or in cooperation with relevant stakeholders.

When Nordzucker encounters actual adverse impacts at our business partners which we have contributed to or which we are directly linked to, we do not withdraw from the business relationship as the first reaction but rather use our leverage to work actively with the business partner to address these issues. We will:

- Inquire into the subject and evaluate the case,
- Set up demands and corrective actions,
- Follow up in an active engagement process with the business partners ensuring implementation of the mitigation plan, and
- Ensure effective remedy.

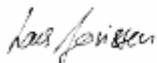
All severe negative impacts of human rights and environmental standards demand a response by the business partner and a follow-up by Nordzucker.

Nordzucker also expects its business partners to commit to remedy adverse impacts they either cause or contribute to and is committed to supporting them in doing so before Nordzucker terminates the business relationship as a means of last resort.

### Governance

Local management and Boards of directors (as applicable) together with the Top Management of Nordzucker is responsible for ensuring adherence to these commitments and the Executive Board has overall responsibility for overseeing the implementation and fulfilment of this Policy.

Braunschweig, December 2025



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