

Human rights policy statement SWG Schraubenwerk Gaisbach GmbH

1. Scope and responsibilities

SWG Schraubenwerk Gaisbach GmbH (hereinafter SWG) is committed to complying with and implementing the policy statement of the Würth Group in all facilities within Germany, in pick-up shops and in the premises of companies with whom SWG has a business relationship. It is the responsibility of each SWG employee to implement the SWG human rights policy in their own daily work and sphere of influence. The overall responsibility for ensuring that human rights are upheld lies with the SWG management team. The sustainability management team, under the direction of human rights officer Jessica Heintz, is tasked with implementing measures to ensure that human rights are upheld.

2. Human rights: Due diligence

As a result of the sense of responsibility for sustainability and human rights, SWG has joined the United Nations Global Compact, the largest and most important global initiative for responsible corporate management. In addition, SWG follows the guidelines and standards of the Universal Declaration of Human Rights, the principles of internationally recognised standards for responsible corporate management and the Rio Declaration on Environment and Development. With this commitment, we want to incorporate our values into the supply chain and contribute to a more sustainable economy.

Risk management

SWG carries out systematic risk assessments of the materials, products and processes used in order to meet the requirements for human rights due diligence. The risk assessment regarding human rights in our supply chain includes the risks present in the countries in which we have procurement operations, branches and products. The risk assessment also takes into account any influence that the business model and purchasing practices of SWG has on suppliers. To classify the risks, information from external sources and experience from related internal business areas such as auditing and procurement are used. Our risks primarily relate to the upstream stages of the value chain. The findings of the risk assessment will be used as a basis for selecting and assessing suppliers in the future. In the last risk assessment, issues such as equal opportunities/anti-discrimination, occupational safety and the prevention of environmental impact and hazardous materials were identified as being particularly relevant for SWG.

Implementation in the business units

At SWG, all employees are trained on compliance issues. The training also covers the observance of human rights. In addition, there are training courses available that provide information to specific target groups about the anti-discrimination policy and Supplier Code of Conduct of SWG, as well as the principles of a sustainable supply chain. In the Sustainability Management qualification programme of the Würth Academy, we focus on the widely used strategies for implementing sustainable practices in the company and in our supply chains.

Implementation in the value chain

All business partners and suppliers of SWG, along with their direct and indirect partners, undertake to respect, observe and support human rights and to act in accordance with the established principles. If a company qualifies as a supplier for SWG, the company is obliged to comply with the Code of Compliance and the Supplier Code of Conduct of SWG within the framework of the supplier agreements. As a result, suppliers must also comply with ethical business practices, human rights and environmental standards. In terms of content, the requirements of the Supplier Code of Conduct are based on the ten principles of the UN Global Compact, which in turn are derived from the Universal Declaration of Human Rights, the core labour standards of the International Labour Organization (ILO), and the Rio Declaration on Environment and Development. There are defined human rights knock-out criteria for ecological and social issues, which are summarised below:



- Child labour, forced labour and non-compliance with working time regulations
- Industrial pollution (e.g. waste water disposal)
- Product-related environmental damage (e.g. ingredients that are hazardous substances)
- Lack of a quality management system
- Serious violations of occupational health and safety regulations.

If any of these knock-out criteria occur at a supplier, depending on the severity of the violation, improvement measures with a specific deadline must be drawn up and checks must be undertaken to ensure that the measures have been implemented. If no improvements are made, the supplier relationship may be terminated. However, the preferred solution is to improve the general conditions in our suppliers' factories and not simply change suppliers. SWG offers internal and external personnel the possibility to submit complaints and information about human rights violations via the email address given below.

Email: nachhaltigkeitsmanagement@swg.de

3. Further development

SWG will regularly scrutinise its position and the implementation of its policies and continue to develop these further. This policy statement is reviewed annually and on an event-related basis (together with the Supplier Code of Conduct) and revised if necessary in accordance with the findings of risk assessments.