

# Declaration of principle on respect for human rights

Implementation of due diligence in accordance with Section 6 (2) of the German Supply Chain Due Diligence Act (LkSG)



# 1. Commitment to respect for human rights

This policy statement describes our strategy for compliance with due diligence obligations along our supply chain. LEMKEN GmbH & Co KG (hereinafter referred to as LEMKEN) is committed to the rights of people, animals and the environment both in its own business operations and in our global supply chain.

We therefore base our own actions and cooperation with our business partners in particular on the following guidelines and laws

- the Supply Chain Due Diligence Act
- the principles of the UN Global Compact
- the Universal Declaration of Human Rights
- the conventions and recommendations of the International Labor Organization (ILO) on labor and social standards
- the UN Guiding Principles on Business and Human Rights
- the United Nations Sustainable Development Goals
- the OECD Guidelines for Multinational Enterprises
- the European Convention for the Protection of Human Rights and Fundamental Freedoms

Our activities in our own business area and in our supply chain can be associated with impacts that can have both direct and indirect negative consequences for people and the environment. We are therefore committed to the following environmental conventions, among others:

- Minamata Convention on Mercury (Minamata Convention)
- Stockholm Convention on Persistent Organic Pollutants (POP Convention)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal
- EU Timber Trade Regulation on the certification of timber and timber products from legal logging

## 2. System for implementation

As a global manufacturer of agricultural machinery, people are exposed to various risks along our supply chain. The implementation of our corresponding duty of care is integrated into a holistic management system.

### 2.1 Risk analysis

The risk analysis forms the first building block in our risk management process. The findings from the analysis of human rights and environmental risks and impacts are integrated into our corporate decision-making processes, particularly in the selection of suppliers, the management of business partners and in product responsibility and development. This analysis is carried out annually and also on an ad hoc basis. It forms the basis for identifying appropriate measures.

### 2.1.1 Abstract risk analysis

As a company, we are in constant communication with our subsidiaries in order to identify potential risks at an early stage and take appropriate measures to mitigate them.

The Prospeum software is used to carry out risk analyses of our business partners. This allows potential risks within the supply chain to be identified, evaluated and prioritized. The starting point for the analysis is all suppliers with whom a business relationship existed in the previous financial year. The economic code and the address of the company's registered office serve as a basis for identifying sectoral and geographical risks with the help of the software.

### 2.1.2 Concrete risk analysis

The results of the abstract analysis are viewed and filtered according to various criteria, such as a turnover threshold or approval of our Code of Conduct. Corresponding questionnaires are then sent to the remaining suppliers via Prospeum in order to gather detailed information on possible risks in relation to the risk categories. This approach ensures a thorough and targeted risk analysis that makes it possible to identify risky areas and initiate the necessary measures to minimize and eliminate risks in accordance with the requirements of the LkSG.

Based on the results of our risk analysis, we focus on social (child labor; diversity, equity and inclusion; collective bargaining and freedom of association; health and safety; forced labor) and political (responsibility in the supply chain) risks in the value chain.

In our own business operations, we give priority to improving accident prevention.

## 2.2 Measures

To fulfill our obligation to respect human rights and environmental concerns, we rely on a combination of different measures. Our aim is to protect the environment as well as affected or potentially affected persons and to prevent or at least minimize negative effects on them.

As part of our preventive measures, we have therefore formulated a code of conduct for all employees and business partners and established our own compliance department. We are also committed to providing regular training for this purpose.

In the event of reasonable suspicion or concrete indications of possible violations within our company or along our entire supply chain, we consistently investigate these and implement appropriate corrective measures. Our business partners are obliged to support us in clarifying the facts.

## 2.3 Effectiveness control

We review the effectiveness of our measures annually and on an ad hoc basis. We monitor all indications of potential human rights and environmental violations, conduct employee surveys and assess the effectiveness of our training and development measures by asking comprehension questions during training sessions.

In the supply chain, monitoring is carried out through additional supplier visits when necessary.

## 2.4 Complaints mechanism

We have set up a company complaints management system that is accessible both internally and externally via various channels.

The complaints officers are responsible for the operational implementation of the complaints procedure. They guarantee that they act impartially, work independently, are not bound by instructions and are obliged to maintain. They serve as the primary contacts for all incoming complaints, tips and reports from all reporting channels and act as the main point of contact in communication with the complainant and the LEMKEN Compliance Committee. The latter is responsible for monitoring and deciding on complaints procedures. As the committee must be independent in its activities and decision-making in accordance with Section 15 HinSchG, the committee has taken measures to prevent any manipulation or influence on the committee members in their activities and decision-making at all hierarchical levels.

The complaints procedure is subject to an annual effectiveness review. The "Rules of procedure for the complaints procedure in accordance with §8 of the Supply Chain Due Diligence Act (LkSG) of LEMKEN GmbH & Co. KG" are publicly accessible on our homepage.

## 3. Responsibilities

We have defined clear responsibilities in order to ensure that our human rights and environmental due diligence obligations are observed and complied with. Responsibility for the operational implementation of the due diligence obligations described in the LkSG lies with Strategic Purchasing. The Human Rights Officer and the Compliance Committee are responsible for monitoring the risk management system and other tasks. They report to the Executive Board at least once a year on identified risks, measures taken and progress made.

## 4. Outlook and further development

We view the implementation of human rights and environmental due diligence as a continuous development process. Our annually published sustainability declaration, in accordance with the CSRD, we provide information about our voluntary commitments, due diligence processes, and their effectiveness. We report on material risks and impacts identified through our business activities along the global supply and value chains and describe the preventive and corrective measures we have taken.



from left to right: Klaus Kuhl (CFO), Anthony van der Ley (CEO), Nicola Lemken, Dr. Thomas Lange-Stalinski (CTO)

Version 02.00 from January 2026

LEMKEN GmbH & Co.KG

**Nicola Lemken**

Shareholder

