Engineering for a better world.

HUMAN RIGHTS POLICY

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Content

1. FOREWORD 3
2. SCOPE 3
3. COMMITMENT 3
   - 3.1. Our expectations 5
   - 3.2. Child labor and forced labor 5
   - 3.3. Employment and working conditions 5
   - 3.4. Diversity and equal opportunities 6
   - 3.5. Freedom of association and the right to collective bargaining 6
   - 3.6. Health and safety 6
   - 3.7. Protection of personal data 6
4. HUMAN RIGHTS DUE DILIGENCE FRAMEWORK 7
   - 4.1. Governance 7
   - 4.2. Human Rights Risk Assessment 8
   - 4.3. Measures 9
   - 4.4. Monitoring 11
   - 4.5. Complaints Mechanism 12
   - 4.6. Documentation and Reporting 12

RELATED DOCUMENTS 13

1. FOREWORD

GEA is one of the largest suppliers of systems and components to the food, beverage, and pharmaceutical industries. The international technology group specializes in machinery and plant, together with process technology and components. As such, GEA offers solutions for sophisticated production processes in various sales markets and a comprehensive service portfolio. With more than 18,000 employees, GEA generated revenues of about EUR 5,9 billion in more than 150 countries in the 2025 financial year. GEA plant, processes, components and services enhance the efficiency and sustainability of customer's production. They contribute significantly to the reduction of CO2 emissions, plastic usage and food waste. In doing so, GEA makes a key contribution towards a sustainable future, in line with the company's purpose: "Engineering for a better world". GEA is listed on the German MDAX, the European STOXX® Europe 600 Index and is among the companies comprising the DAX 50 ESG, MSCI Global Sustainability as well as Dow Jones Sustainability Europe and World.

GEA considers respect for human rights to be an integral element of the company's DNA. We can only make an effective contribution to our goal of "Engineering for a better world" if everyone who comes into contact with our company respects human rights. This applies equally to each of our employees as well as to all employees of subcontractors, all suppliers, and all customers. In specific terms, this means rejecting child and forced labor and human trafficking, complying with the applicable safeguards for young workers, combating all forms of violence and discrimination, recognizing the right to fair working conditions and a living wage, observing working hours and rest periods as well as providing a safe workplace for all employees. GEA also considers freedom of association, the protection of Indigenous people and local communities and a clean environment to be fundamental human right.

2. SCOPE

This policy describes GEA's strategy for protecting human rights and fulfilling its environmental obligations under the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz) and applies to all GEA Group companies, managers, employees, and business partners worldwide. This includes GEA Group Aktiengesellschaft, and all companies affiliated with it under company law (hereinafter referred to as **"GEA"**).

The Policy Statement shall be understood as a continuously evolving document. It will be updated on a regular basis, also with respect to future upcoming regulatory changes. If information is unavailable, it will be clearly indicated that it will be included in the next update.

3. COMMITMENT

GEA is uncompromisingly committed to respecting human rights and to implementing fair, sustainable and environmentally friendly business practices. In accordance with our values described in our GEA Code of Conduct, GEA respects the internationally enshrined rights of all people. We acknowledge that specific groups are potentially more vulnerable to having their human rights violated. Beyond respecting the minimum requirements of human rights laid out in the international human rights standards outlined below, GEA is aiming to actively promote human rights within its scope of influence.

This Policy Statement is adopted at the highest management level by the Executive Board. Accountability for the implementation of a comprehensive Human Rights Due Diligence Framework lies with the appointed Group Human Rights Officer in Personal Union of the function of GEA's Chief Sustainability Officer who is a member of GEA's extended management circle and investigates all reports of potential human rights risks or violations.

This policy is an integral part of GEA's corporate culture. The guidelines apply both to our own employees and to GEA's relations with suppliers and subcontractors in our value chain.

Our commitment to respecting human rights is based on the following international human rights standards:

- International Bill of Human Rights, comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights
- International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- ILO Fundamental Conventions
    - Freedom of Association and Protection of the Right to Organise Convention, 1948 (No.87)
    - Right to Organise and Collective Bargaining Convention, 1949 (No.98)
    - Forced Labour Convention, 1930 (No.29)
    - Abolition of Forced Labour Convention, 1957 (No.105)
    - Minimum Age Convention, 1973 (No.138)
    - Worst Forms of Child Labour Convention, 1999 (No.182)
    - Equal Remuneration Convention, 1999 (No.100)
    - Discrimination (Employment and Occupation) Convention, 1958 (No.111)
    - Occupational Safety and Health Convention, 1981 (No.155), and the Promotional Framework, 2006 (No.187)
- Principles of the United Nations (UN) Global Compact and its 17 Sustainable Development Goals (SDGs)
- United Nations Guiding Principles on Business and Human Rights
- Guidelines for Multinational Enterprises of the Organization for Economic Co-operation and Development (OECD)
- United Nations Woman Empowerment Principles and United Nations Convention on the Elimination of All Forms of Discrimination Against Women
- United Nations Convention on the Rights of the Child
- United Nations Global Compact

This list of standards is not exhaustive. Where GEA faces conflicts between the internationally recognized human rights and national laws, GEA will seek to act in accordance with the higher standard while ensuring legal compliance in our countries of operation.

GEA is committed to respect the human rights of workers. This applies to direct and indirect suppliers, as well as all workers including temporary, migrant, student, contract, direct employees, and any other type of worker and is aware of its responsibility towards local communities and society at large.

Considering GEA's business activities, special focus lies on the human rights areas described in section 3.2 – 3.6.

3.1. Our expectations

We expect our employees, our suppliers as well as our subcontractors along the entire value chain to collaborate in a spirit of mutual respect and in accordance with the values expressed in this policy.

Our values and expectations are laid down in our GEA Code of Conduct, which obliges managers and employees at every level to uphold, accept and promote the agreed values. GEA also expressly requires suppliers and subcontractors to comply with these values and rules as defined and expressed in these principles. In order to ensure compliance with human rights standards throughout the value chain, we have defined rules and requirements for our suppliers and subcontractors and for the suppliers' and subcontractors' Group companies in the Code of Conduct for Suppliers and Subcontractors. Every material business relationship with our suppliers and subcontractors should be subject to inclusion of the Code of Conduct for Suppliers and Subcontractors. The Code of Conduct for Suppliers and Subcontractors covers compliance with human rights standards, labor and social issues, environmental protection, and rules on business ethics, in particular measures to combat corruption and bribery, antitrust and competition law, data protection, and GEA's whistleblower system. The Code of Conduct for Suppliers and Subcontractors enables GEA to take legal action in the event of any violations, up to and including termination of the contractual relationship.

3.2. Child labor and forced labor

GEA respects the rights of children to development and education, and condemns all forms of child labor, both in its own operations and in the supply chain and is committed to respect the United Nations Convention on the Rights of Child.

In practice, GEA is not engaged in or does not support the employment of children under the age of 18. Some exceptions are accepted for children between the age of 15 and 18 when professional experience is part of their education path (e.g. trainees, apprentices). Under no circumstances does GEA support workers under the age of 18 for hazardous work that impacts their health and safety, including night shifts and overtime.

GEA is engaged to be proactive in combating child poverty and support for education through our community engagement programs.

GEA does not tolerate forced or compulsory labor, slavery, or human trafficking in any form. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services.

GEA is engaged to providing a secure work environment (i.e. company offices and off-site events), free from all forms of violence, this includes but is not limited to harsh or inhuman treatment, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers.

All threats or actual violence, both direct and indirect, should be reported immediately.

GEA's security arrangements are balanced to the need for safety while respecting human rights.

3.3. Employment and working conditions

GEA undertakes all reasonable measures to ensure appropriate and fair employment and working conditions both in its own operations and throughout its supply chain.

Working hours, including overtime, must comply with applicable laws and regulations, collective bargaining agreements and international conventions and a work week should not be more than 60 hours, including overtime, except in emergency or unusual situations.

GEA recognizes that all workers have the right to a living wage.

At GEA, all wages and other benefits must reflect the principle of fairness (equal pay for equal work and qualification) and at minimum comply with the respective national legal standards or industry tariffs. Deductions

from wages as a disciplinary measure are not permitted.

3.4. Diversity and equal opportunities

We prohibit discrimination, harassment and abuse based on race, color, age, gender, sexual orientation, gender identity or expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status. These can arise in a variety of work-related activities such as access to employment, particular occupations, training, vocational guidance, and social security, as well as recruitment, remuneration, hours of work and rest, paid holidays, maternity protection, security of tenure, job assignments, performance assessment and advancement, training opportunities, promotion prospects, occupational safety and health and termination of employment.

We are committed to maintaining a diverse, respectful, and inclusive workplace culture, which is viewed as a strategic success factor for GEA. GEA respects the principle of equal opportunity to the highest degree.

3.5. Freedom of association and the right to collective bargaining

GEA respects the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities without facing discrimination.

We expect our suppliers and subcontractors to do the same. The relationship between employees and employers at GEA is characterized by many years of mutually respectful dialogue and interaction.

3.6. Health and safety

Occupational health and safety are a top priority at GEA and an integral part of our operational processes. We therefore ensure that consistent and high standards are maintained regarding occupational health and safety.

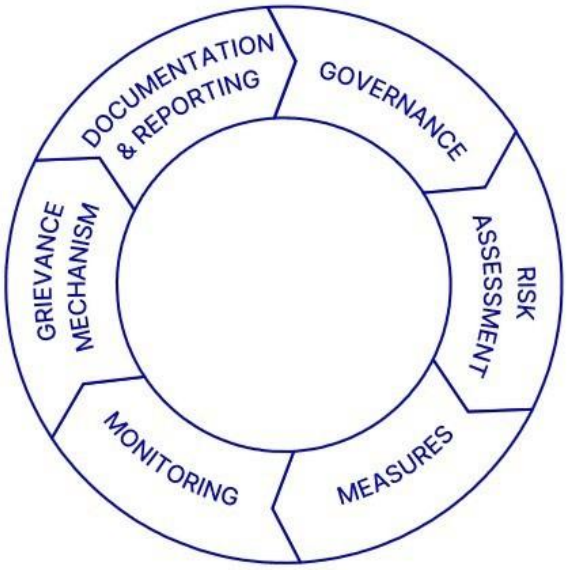
Potential exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards, etc.) are identified, assessed, and mitigated. The corresponding rules and requirements are communicated and implemented worldwide. Health and safety responsibilities are clearly defined at the sites, at country level and in the divisions. We also require our suppliers and subcontractors and their suppliers to conduct their operations in compliance with all applicable health and safety laws and best industry practice standards.

3.7. Protection of personal data

GEA protects individuals' right of publicity and upholds high data protection standards when processing personal data. This includes employees, customers, suppliers, other contractual partners, and job applicants, and applies to all GEA companies and departments that handle personal data.

4. HUMAN RIGHTS DUE DILIGENCE FRAMEWORK

To ensure the respect of human rights within GEA's own operations as well as its supply chain, GEA set up a comprehensive human rights due diligence framework containing the following six key elements: governance, risk assessment, measures, monitoring, grievance mechanism and documentation & reporting. These six due diligence elements are interconnected and designed to work in an iterative process, constantly developing to reflect changing circumstances and eliminate potential blind spots. The entire framework, especially in terms of implemented preventive as well as remedial measures, is based on GEA's individual human rights risk profile identified through the annual human rights risk assessment to specifically target the most salient risks.



4.1. Governance

GEA's organizational setup to design, steer, implement, and monitor a proper human rights due diligence framework is pictured in the organizational chart below. Overall responsibility for the design, steering and implementation of the framework lies with the appointed Human Rights Officer and is anchored in GEA's Sustainability Department. The department has personal resources designated on supporting GEA's Human Rights Officer on performing the human rights assessment and potential human rights investigations. The Human Rights Officer is mandated to coordinate, implement, communicate, and document appropriate measures throughout the entire GEA Group, and is responsible to keep track of upcoming human rights related issues, regulatory changes, and potentially necessary modifications/ improvements to the overall framework.

Additionally, GEA has established a Human Rights Investigation Policy to govern investigations related to risks or violations on human rights, including human rights related controls into the Internal Control System (ICS). Furthermore, Internal Audit is performing human right checks as part of the third line audits.

4.2. Human Rights Risk Assessment

The risk assessment follows the German Supply Chain Act and the Information on the Supply Chain Act provided by the Federal Office for Economic Affairs and Export Control (BAFA) and serves as the basis for an appropriate set-up and implementation of the Human Rights Due Diligence Framework. A yearly human rights risk assessment and analysis of the potential impacts resulting from GEA's business activities is to be conducted to identify risks and potential violations of human rights within GEA's own operations and across the supply chain.

Methodology

In order to cover the entirety of GEA's global activities including its supply chain, an abstract risk analysis is to be performed in a first step, assessing human rights related country- and industry-specific risks for predefined clusters (for GEA's own operations as well as the supply chain).

For assessing the risks on a country level, among others the following indices are used to perform the abstract risk analysis based on the indices matched to the risks of the German Supply Chain Act:

- Children's Rights in the Workplace Index (UNICEF: United Nations International Children´s Emergency Fund)
- Childhood Index (Save the Children)
- Global Slavery Index (Walk Free Foundation)
- Global Rights Index (IGB: Internationaler Gewerkschaftsbund)
- Global Gender Gap Report (WEF: World Economic Forum)
- Kaitz-Index (OECD: Organisation for Economic Co-Operation and Development)
- Living Wage & Living Income Dataset (GLWC: Global Living Wage Coalition LICoP: Living Income Community of Practice)
- Environmental Performance Index (Yale University)
- Water Risk Filter (WWF: World Wide Fund For Nature)
- Proportion of total adult population with secure tenure rights to land (FAO: Food and Agriculture Organization of the United Nations)
- Worldwide Governance Indicator - Government Effectiveness (World Bank)
- Fragile States Index (FFP: Fund for Peace)

Based on the abstract risk analysis, prioritized risk clusters are to be analyzed more detailed and on a more granular level (i.e., on site or supplier level). Following aspects, among others, shall be considered in the second step of the risk analysis: (1) the specific nature and scope of the business activities, (2) GEA's ability to influence the respective entity directly responsible for a risk or potential violation, (3) the expected severity and likelihood of a potential violation of this nature, and (4) the nature of GEA's contribution to the risk or the potential violation. Additionally, information based on past reports or incidents is to be considered to avoid potential blind spots resulting from insufficiencies in utilized external data.

In addition to the regular human rights risk analysis, an ad-hoc analysis is being triggered for all merger & acquisition activities[1] or in case GEA gains substantiated knowledge of human rights issues currently not being covered by the regular risk analysis or due to a significant change in the business model and activities, resulting in a changed risk exposure.

The methodology is annually reviewed.

[1] An ad-hoc human rights risk analysis is performed as part of the M&A due diligence process.

Results

GEA conducted an initial human rights risk analysis in 2023, 2024 and 2025 covering the abstract analysis described above as well as considering certain aspects and risk factors of the concrete analysis. As a result of the initial assessment, specific activity clusters have been identified as priority areas based on the respective risk exposure.

GEA conducted a full-scope human rights risk analysis following the methodology described in this policy in 2023, 2024 and 2025 and updated the "Results" section of this policy accordingly. Based on the identified risks, appropriate risk mitigating measures are to be taken as described in more detail in section 4.3 below.

4.3. Measures

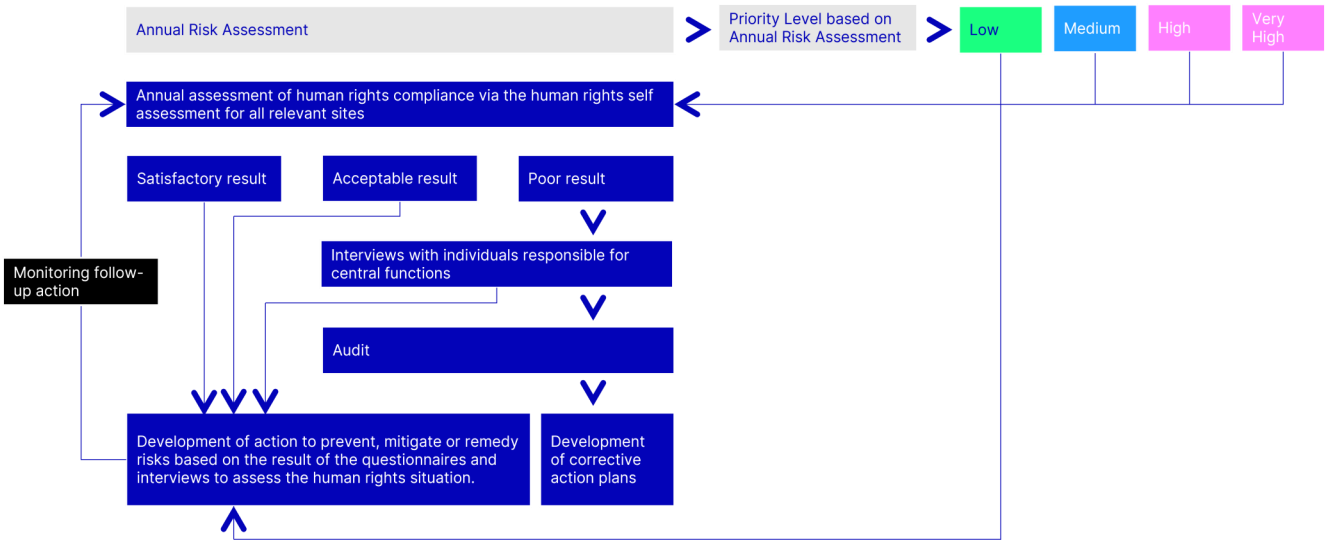
GEA takes appropriate actions on its human rights- and environment-related risks by implementing preventive, mitigating and remedial measures. The overarching purpose of all measures is to prevent or minimize adverse effects on individuals and groups of people, and to provide remedy for individuals or groups already affected. The design and timeline of measures will closely correspond to the identified risks, ensuring appropriate yet timely action.

The updated version (status 2026) of this policy, the Code of Conduct, the Code of Conduct for Suppliers and Subcontractors and the Human Rights Investigation Policy provide the basis for implementing measures in GEA's own operations and the supply chain.

We assigned our business activities in all our countries to four categories and performed a risk assessment which combines the probability of a human rights violation occurring with its consequences. The probability rating results from the industry and country in which an activity is being conducted. The impact assessment considers the severity and extent of a potential incident and whether it is reversible.

109 GEA sites and approximately 100 suppliers were requested to provide a self-assessment in 2025. Remaining medium risks or higher are mitigated through interviews and/or audits as shown in the graphics below.

Own Operations



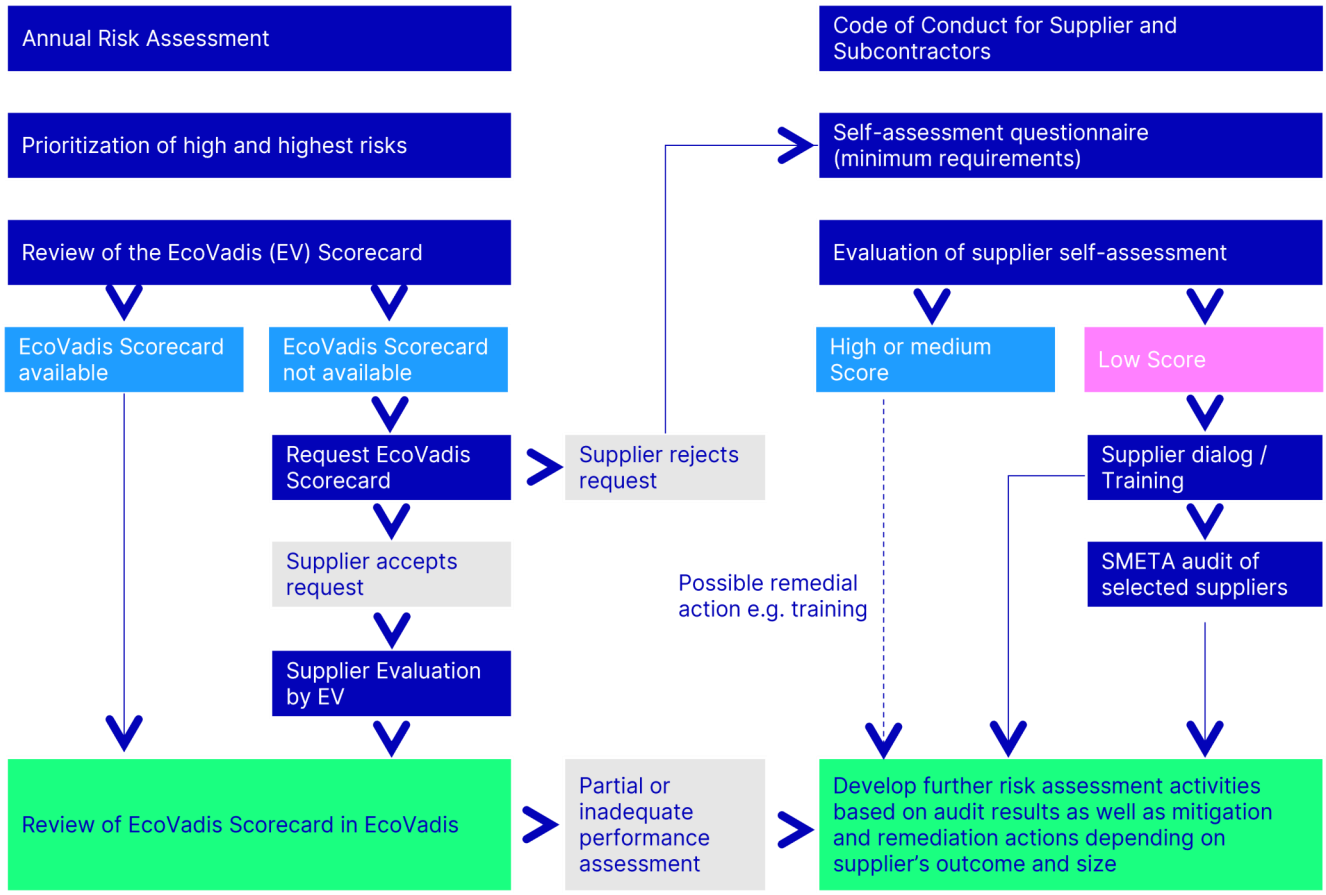
Preventive measures include an annual assessment of GEA's sites through a human rights self-assessment questionnaire, followed up by corrective actions where applicable.

GEA is a member of relevant industry initiatives such as the United Nations Global Compact to leverage synergies and develop best practices. GEA strives to improve the awareness and capacities of its employees

for respecting human rights. Therefore, human rights trainings are mandatory for all active employees, including part-time employees. Online trainings on various topics are available to all employees worldwide via the GEA Learning Center. Employees of the procurement organization also receive training on the contents of the Code of Conduct for Suppliers and Subcontractors. In addition, GEA keeps its employees informed on human rights issues on both an ongoing and incident-related basis.

GEA has an internal process in place for handling incidents that amount to human rights violations or the imminent risk thereof. The process shall ensure that appropriate mitigating and remedial measures are taken. GEA will ensure engagement of potentially affected individuals or groups in the development and implementation of such measures.
No human rights violations were identified in 2023, 2024 and 2025 within GEA's own operations; therefore, no mitigation plans were established, or remediation actions taken. There were no negative effects on local communities identified that have been caused by GEA's own operations in 2023, 2024 and 2025.

Supply chain



Management of GEA's supplier relationships is the overarching action to prevent and mitigate human rights- and environmental-related risks along GEA's supply chain. GEA is working with third party solutions to expand its supply chain transparency and continuously engages with its tier 1-suppliers to monitor their sustainability performance. GEA seeks to support its suppliers in complying with GEA's human rights requirements as laid out in this policy as well as the Code of Conduct for Supplier and Subcontractors. Suppliers are to be regularly assessed and audited if deemed necessary. Furthermore, GEA ensures that corresponding Corrective Action Plans are implemented within the agreed timeline. Additional prevention measures include supplier trainings. Mitigating and remedial action will be taken on a case-by-case basis.

GEA seeks to engage in dialogue and partnership with its suppliers to support their efforts in preventing and ending any practices that violate human rights. However, if a supplier refuses to act on identified human rights risks or violations, GEA reserves the right to take appropriate legal action, including measures to terminate the business relationship entirely. A business relationship will only be terminated if other measures have no prospect of success. No human rights violations were identified in 2023, 2024 and 2025 within GEA's Supply Chain. There were no negative effects on local communities identified within GEA's supply chain.

4.4. Monitoring

GEA's Human Rights Officer is responsible for monitoring and reviewing the effectiveness of GEA's human rights due diligence. The effectiveness review will be conducted annually, with a focus on the following core elements of GEA's human rights duties: preventive measures, remedial measures, and the complaints mechanism.

The effectiveness review shall be based on key objectives and corresponding indicators to be determined for these core elements. GEA's monitoring and effectiveness review shall be improved continuously, and corresponding changes included in the next update of this policy.

4.5. Complaints Mechanism

GEA has a complaints mechanism system in place that offers employees, customers, consumers, suppliers and subcontractors, service provider, local communities, affected persons and all other third parties a safe and anonymous way to report human rights and environment-related risks or violations. The complaints mechanism comprises several channels through which complaints can be submitted to GEA.

The GEA Whistleblower Tool is available in nine languages and accessible 24/7 from any internet capable device. The IT system is provided by an external provider and guarantees security for the informant.

Complaints can be also raised via a voice intake service in 19 languages and 55 national telephone numbers. All filled human rights and environmental related reports are directly forwarded to GEA's Human Rights Officer and a designated human rights investigator. Reports are treated confidentially to protect both complainants and accused parties. Reports can be submitted anonymously if allowed in the country in question.

The external GEA Whistleblower Hotline is available from Monday to Friday from 9 a.m. to 6 p.m. (CET) via phone: +49 30 235 987 050

The Hotline is operated by Orth Kluth, an independent law firm based in Germany. A report can be submitted in English or German language.

More details on GEA's complaint mechanism can be found on the GEA website.

All complainants will receive confirmation of receipt. Complaints will be handled with impartiality, independence, and confidentiality. All forms of retaliation against complainants are forbidden.

Complaints shall be processed in a timely manner in line with GEA's internal Human Rights Investigation Policy. The processing of human rights-related complaints includes a preliminary assessment to determine if complaints require further processing. If so, an investigation and assessment of the facts, case decision and resolution follow. The duration of the investigation depends on the complexity of the case. The investigation includes, where possible, the discussion of facts with the complainant.

4.6. Documentation and Reporting

The Human Rights Officer is responsible for documentation and reporting. GEA has processes and structures in place that enable us to continuously document all elements of its Human Rights Due Diligence Framework.

Based on this documentation, GEA submits an annual report on the fulfillment of its human rights' due diligence to BAFA.

RELATED DOCUMENTS

- GEA Code of Conduct
- GEA Code of Conduct for Suppliers and Subcontractors
- GEA Environmental Responsibility Policy
- GEA Occupational Health and Safety Policy
- GEA Conflict Minerals Policy
- GEA Community Engagement Policy
- GEA Whistleblower Protection Policy

Date	Review and Revision
01.01.2021	Review without revision.
01.01.2022	Review without revision.
25.01.2023	Complete new version of policy according to German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz)”
21.06.2024	Additional section Foreword was added. Additional conventions and standards followed were added. Commitments were more comprehensively described and further detailed. Update of the section Human Rights Due Diligence Framework, particular the results of the Human Rights Risk Assessment 2023 as well as the related measures. Complaint Mechanisms updated. Section Related Documents was added.
05.06.2025	Review and update regarding 2024 actions.
11.05.2026	Review and update regarding 2025 actions.