

Human Rights Policy

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1. SCOPE

This policy 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 depending on regular basis, also with respect to future upcoming regulatory changes. If information is unavailable, it will be clearly stated, that it will be included in the next update.

2. 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. This might especially affect e.g., children, women, migrant workers, and indigenous peoples. 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 Right Due Diligence Framework lies with the Human Rights Officer (who simultaneously serves as Chief Sustainability Officer) and is overseen by the Chief Executive Officer (CEO), as well as GEA’s Supervisory Board.

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 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
- Principles of the United Nations (UN) Global Compact
- 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

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 all human rights and is aware of its responsibility towards its employees, business partners, affected communities and society at large. Considering GEA’s business activities, special focus lies on the human rights areas described in section 2.2 – 2.6.

2.1. 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.

2.2. 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. We do not tolerate forced labor, slavery or human trafficking in any form. GEA condemns all forms of violence, including gender-based violence.

2.3. Employment and working conditions

GEA undertakes to take 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.

GEA recognizes that all workers have the right to a living wage. Wages and other benefits must reflect the principle of fairness and at minimum comply with the respective national legal standards or industry tariffs.

2.4. Diversity and equal opportunities

We prohibit discrimination, harassment and abuse, and 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.

2.5. Freedom of association and the right to collective bargaining

GEA affirms the rights of workers to form or join free trade unions of their own choosing and to engage in collective bargaining without facing discrimination. We expect our suppliers to do the same. The relationship between employees and employers at GEA is characterized by many years of mutually respectful dialogue and interaction.

2.6. Health and safety

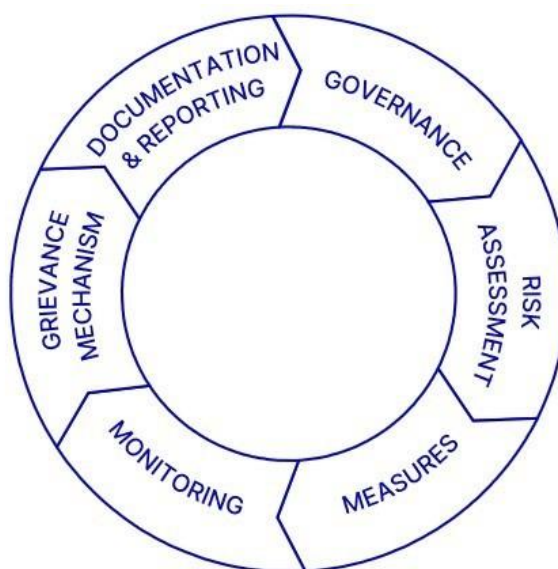
Occupational health and safety is a top priority at GEA and an integral part of our operational processes. We therefore ensure that consistent and high standards are maintained regarding occupational health and safety. The corresponding rules and requirements are communicated and implemented worldwide. 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.

2.7. 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.

3. 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. Those 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 regular human rights risk assessment to specifically target the most salient risks.

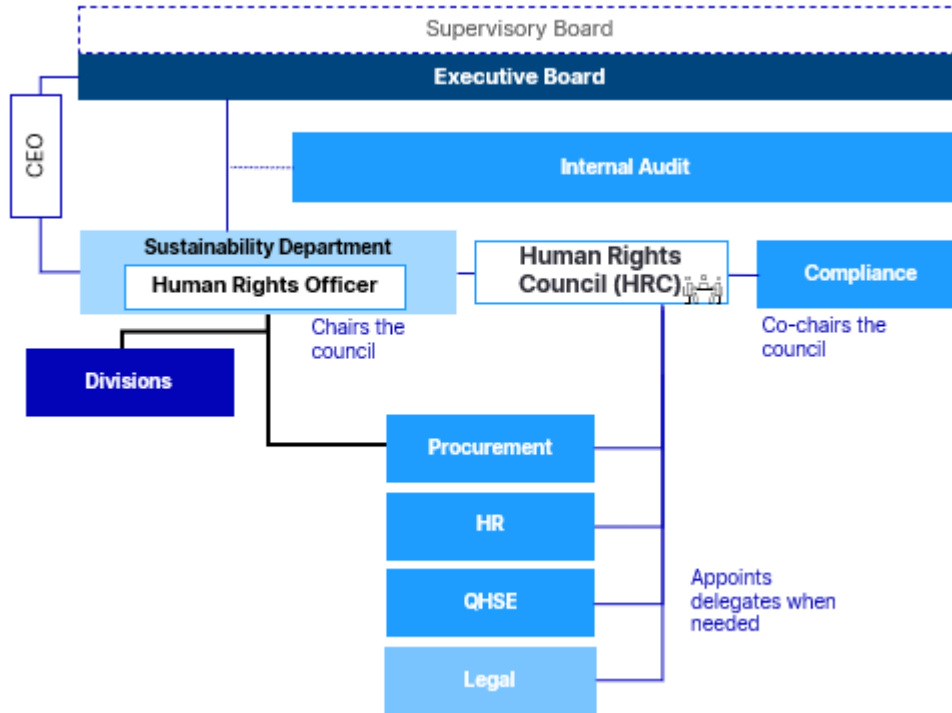


3.1 Governance

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 (GEA's Chief Sustainability Officer) and is anchored in GEA's Sustainability Department. 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, a Human Rights Council has been established to address human rights related issues (e.g., incidents, complaints, external reports) on a regular as well as an ad-hoc basis. The Council is headed by the Human Rights Officer and co-headed by the Vice President Compliance & Principle Legal Matters, and also comprises appointed delegates from Procurement, HR, QHSE, and Legal, whose representation on the Human Rights Council is subject to the individual matter at hand. Appropriate oversight over the entire due diligence

framework is ensured through the Executive Board as well as GEA's Supervisory Board.



3.2 Human Rights Risk Assessment

The risk assessment serves as the basis for an appropriate set-up and implementation of the Human Rights Due Diligence Framework. A yearly 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) based on activity types or goods and services sourced respectively. 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 the 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 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.

Results

GEA conducted an initial human rights risk analysis in 2022, 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- and purchasing clusters have been identified as priority areas based on the respective risk exposure.

GEA will conduct a full-scope human rights risk analysis following the methodology described in this policy in 2023 and update 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 3.3 below.

3.3 Measures

GEA will take appropriate action 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 2022) of this policy, the [Code of Conduct](#), the [Code of Conduct for Suppliers and Subcontractors](#) and the internal Human Rights Incident Management Policy provide the basis for implementing measures in GEA’s own operations and the supply chain.

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. Regular audits serve to review the human rights performance of GEA’s sites. 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. Online training on various topics related to human rights is 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, the 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.

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 Actions 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. Terminating a business relationship will be resorted to only if other measures have no prospect of success.

Further developments in GEA’s approach to implementing measures will be updated in this section.

3.4 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.

3.5 Complaints Mechanism

GEA has a complaints mechanism in place that offers employees and 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.

As of 2014, GEA offers its employees, workers in the supply chain and third parties a secure platform for reporting human rights violations: the independent, certified Integrity System BKMS that can be accessed via the [GEA webpage](#). The confidential Integrity System is available online around the clock and across the globe. It is managed by a restricted group of GEA employees from the team Compliance & Principle Legal Matters. Reports are treated confidentially in order to protect both complainants and accused parties. Reports can be submitted anonymously if allowed in the country in question.

Reports on compliance issues relating to GEA (as well as its subsidiaries) can be made via the “Whistleblowing-Hotline”: +49 30 235987050 (9am – 6pm CET). Whistleblower can report anonymously and confidentially to Orth Kluth Rechtsanwälte. The detailed process description and responsible persons can be found in [GEA Whistleblower Hotline](#) and the [GEA webpage](#).

After an initial plausibility check conducted by the respective complaints channel entity (BKMS, Whistleblower Hotline, GEA Compliance Officer of local entities), all plausible complaints related to alleged infringement on protected human rights and environmental duties as defined in the German Supply Chain Due Diligence Act will be forwarded to the Human Rights Officer who is responsible for its processing. Complainants must receive confirmation of receipt. Complaints will be handled with impartiality, independence, and confidentiality. All forms of retaliation against complainants are forbidden.

Complainants shall be processed in a timely manner in line with GEA’s internal Human Rights Incident Management 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.

At the end of 2023 the process will be reviewed and if necessary adjusted.

3.6 Documentation and Reporting

The Human Rights Officer is responsible for documentation and reporting. GEA has processes and structures in place that enable it 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. This report is published on the [GEA webpage](#) no later than four months after the end of the fiscal year and remains freely available to the public for seven years.

The first report will be published until the end of April 2024. Beginning in 2024, GEA’s subsidiaries with more than 1.000 employees will also report on their human rights due diligence in 2025.

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 (Lieferketten-Sorgfaltspflichtengesetz)”