

# Vibracoustic Policy Statement on Human Rights and the Environment



## 1. Introduction

Respect for human rights and the environment are central to our corporate culture, policies, and behaviors.

We are committed to protecting the environment and safeguarding the health and well-being of all our stakeholders around the world. We understand the potential to make a significant and lasting impact – today and for generations to come.

We are focused on operating in a responsible way, and demonstrating respect, trust, tolerance, and fairness. Furthermore, we actively prohibit and reject all forms of child labor, forced labor, human trafficking, and discrimination – both within our own business and within the many organizations we work with.

To guide our commitments, we conduct our business in accordance with the following important treaties, laws, regulations, and other policies:

- ▶ the Conventions [numbers 1. to 14.] mentioned in the official English translation of the Annex to the German Supply Chain Due Diligence Act
- ▶ the UN Guiding Principles on Business and Human Rights
- ▶ the Ten Principles of the UN Global Compact
- ▶ Vibracoustic's Code of Conduct, available here:
  - <https://www.vibracoustic.com/en/downloads/>
- ▶ Vibracoustic's Supplier Code of Conduct, available here:
  - <https://www.vibracoustic.com/en/downloads/>
- ▶ Vibracoustic's Conflict Minerals Global Policy, available here:
  - <https://www.vibracoustic.com/en/downloads/>

## 2. Overview of the due diligence procedure

To safeguard and maintain respect for human rights and the environment, we have developed a risk management system that can be applied to relevant Vibracoustic business processes and activities.

During Q3 2022, we implemented software that detects and predicts risks in our supply chains and issued *Supplier Self-Assessment Questionnaires* covering ESG topics to our portfolio of suppliers.

Additionally, we have developed a new Sustainability Score to be used for supplier evaluations, which helps ensure that our sourcing decisions are influenced by ESG criteria.

We currently conduct risk assessments on a planned and ad hoc basis – both internally and for our suppliers – allowing us to identify a range of ‘live’ and potential risk factors. Quantitative and qualitative criteria are applied to help us elaborate definitive overall assessments.

Depending on the result of the risk assessment, we may conduct enhanced risk evaluations. If we identify risks for humans or for the environment, we plan and execute preventive measures. Such measures might include:

- ▶ training for our employees or for supplier personnel,
- ▶ implementation of our strategy for safeguarding human rights and the environment within our business procedures,
- ▶ requesting that relevant suppliers [and their network of suppliers] comply with specific Vibracoustic ESG requirements and expectations, and
- ▶ conducting ongoing checks to verify compliance by our employees and by our suppliers

If we identify an imminent risk of a violation, we take actions for prevention. Where we have discovered a violation of an obligation, we take appropriate measures to stop it or to minimize its impact.

To identify human rights-related and environment-related risks, and to provide support and remedy in a timely manner, we have established a compliance procedure. Further information is available here: <https://www.vibracoustic.com/en/human-rights-officer/>

We review the effectiveness of the aforementioned measures and repeat or adjust them if necessary. We track our actions taken in relation to human rights-related and environment-related due diligence, and report on these actions on an annual basis. Our reports are available here: <https://www.vibracoustic.com/de/downloads/>.

### 3. Priority risks identified via the risk analysis

Based on analysis of risk within our main operational spheres, we have identified worker safety as our priority for risks relating to human rights, and pollution as our priority for risks relating to the environment.

### 4. Expectations from employees and suppliers

We expect our employees and suppliers to comply with the standards listed above in item 1. In addition, we expect our suppliers to ensure compliance with those same standards by their own suppliers and sub-suppliers.

This document serves as a policy statement by Vibracoustic Group under the German Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz*). It supplements our Code of Conduct, Supplier Code of Conduct and Conflict Minerals Global Policy. It applies to all employees and suppliers of Vibracoustic Group.

Updated 23.12.2024

Frank Mueller  
CEO

Marina Cacciutti  
CFO

Dr. Joerg Boecking  
CTO

Axel Wersel  
COO