

Policy statement Sandler Group

Our basic stance

We, the Sandler Group (Sandler AG, Sandler Technologie AG & Co. KG, and Sandler Nonwoven Corporation) are aware of our responsibility to respect human rights in our global supply and value chains.

It is our duty to ensure compliance, to prevent violations, and to make improvements violations are detected. Together with our employees, business partners, and stakeholders, we are committed to promoting human rights and contributing to healthy and lawful working conditions throughout our supply chains.

This policy statement supplements existing company principles and guidelines and applies to our operations at all locations.

The following internationally recognized frameworks form the basis of our commitment to upholding human rights:

- UN Convention on the Rights of the Child
- UN Human Rights Charter
- UN Guiding Principles on Business and Human Rights
- UN Women's Rights Convention
- ILO's (International Labour Organization) Core Labor Standards
- OECD's (Organisation for Economic Co-operation and Development)
- The ten principles of the Global Compact



Policy statement Sandler Group

Our responsibility

We respect the human rights of our employees and expect our business partners to do the same by complying with local laws and ILO's Core Labor Standards.

This includes:

- Compliance with the prohibition on child and forced labor and trafficking in human beings
- Equal treatment of all employees
- Health and safety in the workplace
- Remuneration at least equal to legally guaranteed minimum wages for working hours in accordance with applicable standards
- Personal data protection
- Recognition of the formation of employee representative bodies performing collective bargaining

These principles are anchored in our Code of Conduct and Code of Conduct for Suppliers.



Policy statement Sandler Group

Our implementation

We see the implementation of our human rights due diligence obligations as an ongoing process, during which reassessments and adjustments will be periodically necessary.

Risk analysis

Sandler regularly conducts risk analyses as part of its business activities. The risk classification is based on the analysis of recognized indices and studies (by country of origin and raw material), the evaluation of supplier questionnaires, concrete empirical values, and background checks.

The findings are used to identify specific measures to avoid or reduce the negative impact of our business activities.

Within Sandler	Violations against employees identified within
	the company must be remedied immediately.

 Direct 	suppliers	If a violation cannot be remedied immediately,
		specific plans must be formulated to minimize
		damages and prevent a future occurrence.

• Indirect suppliers

In the event of a violation, measures are taken on an ad hoc basis; however, the aim is always to eliminate or at least mitigate and prevent a

future occurrence.



Policy statement Sandler Group

Our implementation

Complaints procedure and access to redress

Effective complaint mechanisms play an important role for victims and observers of human rights violations. Sandler has set up an online reporting system for the confidential (and, if necessary, anonymous) reporting of human rights violations in various languages, which can be found at sandler-group.com under Compliance, along with all the contact details. In addition, the procedure can be accessed, which describes the process to be followed upon receipt of a notice or complaint.

Insight from a notice or complaint is used to further develop our mechanisms and identify risks. In the event of an identified violation, Sandler, to the extent permitted by its influence, seeks redress and remedy for those affected.

Reporting

Sandler will report annually on its activities to protect human rights in its supply chains beginning with the completed fiscal year 2024. The report will be available to interested parties on our website in May of each following year.



Policy statement Sandler Group

Our implementation

Responsibilities

The overall responsibility for human rights due diligence lies with the company management. Responsibility for the implementation of human rights due diligence lies with the managers of the individual departments and is guided and monitored by the human rights officer.

Contact

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Policy statement Sandler Group

Our commitment

We will critically review the implementation of human rights due diligence obligations at our suppliers and within our company on a regular basis, adjust measures where necessary, and continuously drive improvements within the scope of our influence to eliminate grievances and prevent violations.

Schwarzenbach/Saale, November 2023

Dr. Christian Heinrich Sandler

Chief Executive Officer

Dr. Ulrich/Hornfeck Management board

Sandler AG

Philipp Ebbinghaus Management board

Sandler AG

Kenny Haves

Managing Director

Sandler Nonwoven Corporation