



VISSMANN
GENERATIONS
GROUP

POLICY ON HUMAN RIGHTS AND ENVIRONMENT

At the Viessmann Generations Group, our purpose is to co-create living spheres for generations to come. It directs us to take a long-term view, rooted in respect for people and the planet. Defending human rights and protecting the environment are not only moral imperatives, they are essential for building a just, resilient, and future-proof economy. Through this policy, we reaffirm our commitment to acting with integrity across our value chains and doing everything we can to leave a better footprint behind us than what we inherited.

Maximilian Viessmann
CEO, Viessmann Generations Group

Upholding human rights and protecting the environment is a long-term responsibility—one we approach with humility, determination, and a willingness to learn. We know that lasting change can only be achieved through collaboration. Together with our portfolio companies, we invite all our partners to join us in this shared journey: to act responsibly, keep an open mind, and continuously improve together.

Alix Chambris
Vice President Sustainability and Human Rights Officer



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Commitment to Upholding Human Rights and Protecting the Environment 1/2

The Viessmann Generations Group is an independent, global family business led by the fourth generation of the Viessmann family. Founded in 1917, it builds on over 100 years of heritage. Our purpose, *co-creating living spheres for generations to come*, drives our long term commitment to social and environmental responsibility across our value chains. We aim to build transparent and resilient value chains that avoid harm to people and the planet. To achieve this, we are dedicated to identifying and managing human rights and environmental risks effectively and in a timely manner.

This Policy outlines the core elements of our due diligence responsibilities. It is a key part of our sustainability governance and human rights strategy and applies to all majority-owned portfolio companies within the Viessmann Generations Group. It complements and reinforces our own Code of Conduct and our Supplier Code of Conduct.

As a purpose-driven company, the Viessmann Generations Group strives to fulfill its human rights due diligence responsibilities regardless of legal obligations - because it is the right thing to do. We view legislation, such as the German Lieferkettensorgfaltspflichtengesetz (**LkSG**) or the EU Corporate Sustainability Due Diligence Directive (**CS3D**), next to international standards, as important steps toward greater accountability in global supply chains and welcome it as a reaffirmation of the values we already embody in our daily operations.



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Commitment to Upholding Human Rights and Protecting the Environment 2/2

The Viessmann Group aligns its business activities with internationally recognized human rights and environmental norms, standards and treaties, including but not limited to:

International human rights and labour law

International Covenant on Civil and Political Rights, International Covenant on Economic, Social and Cultural Rights, Convention on the Rights of the Child, UN Convention on the Elimination of All Forms of Discrimination Against Women, International Convention on the Elimination of All Forms of Racial Discrimination, ILO Core Labour Conventions

Treaties on the environment and climate change

Paris Agreement on Climate Change, Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, Minamata Convention on Mercury, Stockholm Convention on Persistent Organic Pollutants

Soft law and voluntary standards

Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, UN Global Compact

Human Rights and Environmental Protection Due Diligence 1/3

The following key elements of our human rights and environmental due diligence apply to the Viessmann Generations Group and all its majority-owned portfolio companies. Our minority-owned portfolio companies are also encouraged to implement the same policy.

Risk Management

We manage human rights and environmental risks across our operations and direct suppliers and, where feasible, extend these efforts beyond tier-1 suppliers to increase transparency and prevent potential harm. Based on risk analysis, we define preventive and corrective actions to mitigate potential impacts. Clear responsibilities are in place for monitoring risks. Designated risk managers report findings to the Board of Directors and relevant stakeholders annually or when incidents occur. Our risk analysis follows a two-step process: first, a broad screening (risk mapping) identifies high-risk business areas and suppliers; second, these are evaluated and prioritized. We also conduct event-based risk reviews in two cases: when there are major changes in the supply chain and when specific risks or violations are reported, especially via our integrity line. To support supply chain risk analysis, the Viessmann Generations Group uses an AI-powered monitoring tool. It continuously scans public data to detect human rights or environmental risks early, helping us work with suppliers to take preventive action before issues arise.

Integrity Line

The Viessmann Generations Group has set up a complaint mechanism, an "Integrity Line", to enable employees, suppliers and other stakeholders to share a concern or to hint at any human rights or environmental risk or actual violation – anonymously, if preferred. This helps us become more aware of potential risks or violations so that they can be addressed through appropriate measures. And it further enhances the information base for the regular risk analysis.

Human Rights and Environmental Protection Due Diligence 2/3

Preventive and Remedial Measures

Based on the risk analysis, the Viessmann Generations Group designs preventive measures for potential risks and remedial measures for actual violations.

To promote the protection of human rights and to reduce the risk of human rights violations, the Viessmann Generations Group has implemented a number of preventive measures. These include, inter alia, the integration of sustainability into our corporate strategy and Codes of Conduct, dialogue with employees and suppliers so that effective solutions, such as targeted training, can be developed where relevant. Furthermore, the selection process of suppliers has been aligned with our human rights and environmental protection expectations. We firmly believe that both the Viessmann Generations Group and suppliers can more effectively address risks in the supply chain by working together.

The effectiveness of measures is frequently evaluated in accordance with applicable standards and regulations. Risk assessments are guided by appropriateness criteria, including the nature and scope of business activity, the company's sphere of influence, the severity of potential violations, the likelihood of occurrence, and the degree of contribution to the risk. Insights from both types of risk assessments – covering Viessmann's own operations and its direct suppliers – are continuously incorporated into the ongoing development of the risk management system.



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Human Rights and Environmental Protection Due Diligence 3/3

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| Summary of Risk Analysis Results | <p>Our own operations have two main risk areas: workplace health and safety—especially in production involving machinery or hazardous materials—and potential environmental impacts from industrial activities and operations near water sources or residential areas. Greenhouse gas emissions in particular remain a priority area for environmental policy and oversight. While these risks are inherent to the nature of our industrial operations, robust safety and environmental management measures are implemented to mitigate them effectively and ensure compliance with all applicable local and national regulations.</p> <p>Our direct suppliers, including the ones of our majority-owned portfolio companies, are predominantly based in the European Union and North America. A smaller portion of our supplier base is associated with countries and industry sectors that carry elevated human rights and environmental risks. These include specific business areas such as the sourcing of raw materials, as well as sectors like construction, transportation, and machinery and equipment. Based on our current assessments, only a very small number of suppliers have been classified as high risk. Nevertheless, we apply enhanced due diligence and continuous monitoring where elevated risk factors are present.</p> |
| Documentation and Reporting | <p>Transparent communication on human and environmental risks is a core element of our human rights due diligence. To enable an efficient communication process, we place great emphasis on continuous documentation. With regards to the risk assessment, we document our risk analysis and track the effectiveness of mitigating measures.</p> <p>In the coming years, we intend to communicate our broader sustainability efforts - for example, through our United Nations Global Compact Communication on Progress as well as an integrated annual report.</p> |
| Review and Communication | <p>The Policy on Human Rights and the Environment is reviewed on a regular basis and communicated to employees and tier-1 suppliers where a human rights or environmental risk was identified. The updated Policy is also published on our website to ensure it is accessible to all interested parties.</p> |

Overview of Relevant Human Rights and Environmental Issues

The following human rights and environmental risks are relevant for the supply chain, in line with global standards and best practices:

HUMAN RIGHTS RISKS:

- › Child labor
- › Forced labor & modern slavery
- › Inadequate occupational health and safety
- › Lack of freedom of association
- › Inadequate wages
- › Discrimination
- › Substantial impacts of environmental degradation on livelihoods and ecosystems
- › Forced eviction and land expropriation
- › Misuse of security forces
- › Lack of freedom of thought, conscience and religion
- › inadequate housing

ENVIRONMENTAL RISKS:

- › Greenhouse gas emissions
- › Manufacture, use, import and export of products containing mercury
- › Production, use non-environmentally sound handling, import and export of hazardous chemicals
- › Import and export of hazardous waste
- › Adverse impacts on biological diversity, natural heritage properties and wetlands
- › Pollution of the marine environment

We expect all of our employees and suppliers to refrain from contributing in any way to the aforementioned risks, so that we can jointly respect and promote fundamental human rights. A summary of the identified main risks for the Viessmann Generations Group is provided in the previous section.

Further detailed expectations for employees and suppliers are set out in our own Code of Conduct and our Supplier Code of Conduct.



The Viessmann Generations Group fully recognizes its responsibility within global supply chains and is committed to meaningful, transparent action. We understand that implementing human rights and environmental due diligence is not a one-time obligation but a continuous effort. That is why we regularly assess the social and environmental impacts of our operations and supply chains—with the goal of learning, improving, and preventing harm. In a world of evolving risks and expectations, we will continue to act with foresight, accountability, and collaboration, reaffirming our purpose to co-create living spheres for generations to come.

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