

Declaration of Principles on Human Rights

Pelikan Vertriebsgesellschaft mbH & Co. KG

Pelikan Vertriebsgesellschaft is committed to social responsibility as part of its global business activities. In particular, Pelikan Vertriebsgesellschaft bears responsibility within the scope of its entrepreneurial activities towards its own companies and employees, towards customers and suppliers in the value chain as well as towards the environment and society. We at Pelikan Vertriebsgesellschaft implement applicable law, respect internationally recognized human rights and take care to prevent human rights violations in the course of our business activities. This policy statement applies to all employees of Pelikan Vertriebsgesellschaft.

Standards and Guidelines

Pelikan Vertriebsgesellschaft is committed to respecting all internationally recognized human rights. Our approach to implementing and managing human rights issues is guided by the Guiding Principles on Business and Human Rights (UNGP). In accordance with these Guiding Principles, we are committed to the following internationally recognized human rights frameworks and standards:

- United Nations Universal Declaration of Human Rights (UN UDHR)
- Conventions and recommendations of the International Labor Organization (ILO) on Labor and social standards
- United Nations Convention on the Rights of the Child (UN-CNC)
- United Nations Convention on the Elimination of All Forms of Discrimination against Women (UN-CEDAW)
- Guiding Principles for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD)
- Gender dimension of the UN Guiding Principles on Business and Human Rights
- Sector-specific OECD guidelines *

Implementation of the Requirements

We encourage and support our employees, business partners and suppliers to exercise due diligence and avoid negative impacts. We encourage our suppliers to share our human rights requirements with their subcontractors.

Our internal risk management system has been enhanced to analyze potential human rights risks and to prioritize where we have identified particular risks. The risk assessment is based on the amfori Country Risk Classification and the purchasing volume. On this basis, we aim to derive measures to avert potential risks, align our management processes accordingly and raise awareness of these issues among employees, business partners and suppliers.

* Sector-specific guides for the mineral and extractive sectors, the apparel and footwear industry, the agricultural sector and the financial sector.

Compliance policies reflecting the above standards and values have been implemented throughout the Group. As the basis for our daily actions, they provide a binding framework for our employees, business partners and suppliers. The guidelines are as follows:

- The Code of Conduct of Pelikan International Corporation Berhad commits the management and employees of the Group to create a corporate culture based on conducting the Group's business in an ethical manner and meeting the highest standards of professionalism and exemplary corporate conduct.
- The supplemental local compliance policies implement the requirements of the Group policy while taking into account the specific circumstances in each country.
- The Code of Conduct of the Pelikan Group forms the basis of all business relations with regard to all national and international production processes and locations with regard to the final processing of the commercial and non-commercial goods purchased by the Pelikan Vertriebsgesellschaft. It applies worldwide to the Pelikan Vertriebsgesellschaft itself as well as to the direct business partners of the Pelikan Vertriebsgesellschaft and to the other agents used by the direct business partners who are involved in the production of goods of the Pelikan Vertriebsgesellschaft. The business partners warrant and represent that they will comply with and/or grant the principles set forth in this Code of Conduct at.

The principles to be observed and granted are essentially based on the binding requirements of the amfori BSCI Code of Conduct; these are:

- Social management system and cascade effect
- Employee participation and protection
- Freedom of association and right to collective bargaining
- No discrimination, violence or harassment
- Appropriate compensation
- Reasonable working hours
- Occupational safety and health
- No child labor
- Special protection for young employees
- No precarious employment
- No bonded labor, forced labor or human trafficking
- Environmental protection
- Ethical business conduct

Complaint Mechanisms

We recognize that our ability to influence complex value chains is sometimes limited. That is why it is important for us to keep an avenue open for complaints and confidential information about violations. This enables us to identify risks and violations where they occur and to take action. Complaints or tips (also in anonymous form) can be sent to Pelikan Vertriebsgesellschaft at any time at the following e-mail address: social-compliance@pelikan.com.

Reporting and Progress

We view human rights management and risk analysis as an ongoing process that needs to be adapted and developed on a regular basis. We document our progress in implementation and development on an ongoing basis through reporting by the internal representative to

management. Reporting takes place annually as part of DIN-EN-ISO certification on the basis of a corresponding procedural instruction.

Structure and Responsibilities

The management of the Pelikan sales company is responsible for monitoring compliance with and implementation of our human right's due diligence obligations. In accordance with our internal risk management system, the human rights risk analysis is carried out across departments in a controlled process. Individual responsibilities for the implementation of measures resulting from the analysis are defined on a case-by-case basis.

In the area of corporate responsibility, the management of the Pelikan sales company is supported by Pelikan International Corporation Berhad. The Group Compliance Team at the parent company liaises with other group companies.

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Pelikan Vertriebsgesellschaft mbH & Co. KG



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