



# Human Rights Policy Südzucker Group

Together as Südzucker Group, we are contributing to a sustainable world.



# Our Responsibility for Human Rights

*growing in  
balance* 



Respect for human rights is fundamental to the Südzucker Group and an integral part of our Sustainability Strategy “Growing in Balance”.

We are convinced that a safe and fair working environment is crucial to our success.

That is why we at Südzucker Group pursue binding goals for health and safety as well as fair remuneration. Together with our employees, partners, and suppliers, we are committed to ensuring that human rights are respected and protected in our company and along our value chain.

## **Dr. Theresa von Fugler**

Chief Commercial Officer and Board Member  
responsible for Sustainability & Human Rights

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The Südzucker Group's Human Rights Policy sets out our approach, measures, and objectives for protecting human rights within our own business operations as well as across our upstream and downstream value chain. Respect for human rights is a core element of our Group Sustainability Strategy „Growing in Balance“ and is reflected in our corporate values – responsibility, creativity, appreciation, and collaboration.

As a globally operating company, we consciously assume responsibility and are committed to respecting human rights both within our own operations and throughout our global value chain. We treat employees and external partners with respect, communicate openly and constructively, and work cooperatively toward shared goals.

Compliance with applicable human rights laws and regulations forms the foundation of our responsibility. We align our business conduct and human rights due diligence with internationally recognized standards and comply with all applicable national and international laws and regulations.

In particular, our approach is based on the following frameworks and guidelines:

- I. **Universal Declaration of Human Rights of the United Nations**
- II. **UN Guiding Principles on Business and Human Rights**
- III. **International Labour Organization (ILO) Core Labour Standards**
- IV. **OECD Guidelines for Multinational Enterprises**
- V. **Ten Principles of the United Nations Global Compact (UNGC)**
- VI. **Regulations of the Supplier Ethical Data Exchange (SEDEX)**

In addition, we actively engage in exchange formats, initiatives, and industry dialogues in order to develop, help shape, and further advance industry-wide standards. As a member of the United Nations Global Compact (UNGC), for example, we contribute to the improvement of sector-specific solutions. Our general commitment to respecting human rights can be viewed here:

[\*Declaration of Principles on Respect for Human Rights\*](#)

The “Südzucker Group” refers to Südzucker AG and all companies in which Südzucker AG directly or indirectly holds a majority interest. The Human Rights Policy is adopted by Südzucker AG as the parent company for its controlled companies. The exception is AGRANA Beteiligungs-AG and its subsidiaries in which it holds a direct or indirect majority shareholding (AGRANA Group). AGRANA Group has published its own declaration of principles, which can be viewed at the website of AGRANA Group.

# Business Model and Governance

# Business Model and Governance



**Our business model involves the use of plants and other raw materials of agricultural origin with the aim of developing, producing, and marketing high-quality food products, food ingredients, animal feed, ethanol, and other products. This is associated with a dependence on suitably qualified workers, particularly in the production area.**

The Südzucker Group's organizational structure is designed to ensure a holistic and consistent, group-wide approach to sustainability. Overall responsibility for sustainability, including human rights, as well as the associated material impacts, risks, and opportunities, lies with the Executive Board. The Group function for Sustainability and Environment is assigned to the Executive Board department of the Chief Commercial Officer (CCO). The CCO ensures that sustainability, including human rights-related issues, is appropriately considered in strategic corporate decisions.

As part of this Group function, the Corporate Human Rights Team is responsible for implementing human rights due diligence across the entire Südzucker Group<sup>1</sup>, including the establishment of a human rights risk management system that covers the development and implementation of measures to minimize human rights risks within our own operations as well as throughout the value chain. Oversight of the human rights risk management system lies with the Südzucker Group's Group Human Rights Committee, which also fulfills the role of the independent Human Rights Officer as required under the German Supply Chain Due Diligence Act (LkSG). Overall oversight of sustainability matters lies with the Supervisory Board, which has established a dedicated Strategy & Sustainability Committee. This includes all matters relevant to the strategic direction of the company and corporate governance aligned with the principles of sustainability.

<sup>1</sup> With the exception of AGRANA.

# Human Rights Risk Management

# Human Rights Risk Management



We pursue a systematic, integrated, and risk-based approach to fulfill our responsibility to respect human rights. To identify potential risks or violations and to address them appropriately, we detect and assess these using our management system. This system includes processes for risk identification, the derivation of preventive and remedial measures, as well as remediation in the event of identified human rights-related cases within our own business operations and supply chains. The processes are carried out in a structured manner following the identification of potential risks. Human rights risks can be identified through the annual risk analysis, ad hoc risk analyses, or internal and external reports. The assessment is carried out through an internal and external review of defined human rights criteria (human rights due diligence check). Depending on the risk assessment, measures are developed and implemented to minimize the risk through preventive measures, or, in the event of a violation, to provide remedial measures and compensation and rehabilitation. The effectiveness of these measures is regularly monitored and adjusted as necessary.

We rely on insights from diverse external scientific, civil-society and industry-specific sources and exchange formats. Furthermore, we consider, among other things, sector-specific human rights and environmental risks to ensure the respect and promotion of human rights across all areas of our business operations.



# Human Rights Risk Management



Targets, KPIs, and Effectiveness Review

## Information Channels

## Risk Analysis

## Measures

Abstract Risk Analysis

Human Rights Due Diligence Check

Final Risk Assessment

Decision

Development

Implementation

Prevention

Remedy

Compensation and Rehabilitation

Ad-Hoc Risk Check

Processing of Human Rights Complaints and Cases

Human Rights Mailbox  
Human Rights Media Screening  
Internal Information  
...

Whistleblowing System

Governance Elements

# Human Rights Risk Management



To ensure that reports of human rights violations are addressed as quickly and effectively as possible, they can be submitted directly to the relevant contacts within the company. The Südzucker Group's whistleblowing system and its reporting channels are open to all employees as well as external individuals and organizations. The Group's grievance mechanism, along with a detailed description of how reports are handled, is publicly accessible on our corporate website.

Our Code of Conduct and our Declaration of Principles on Respect for Human Rights also refer to the various reporting channels. These so-called Compliance Lines of the Südzucker Group are available to whistleblowers in multiple languages. Communication takes place via the provided contact option or, in the case of anonymous reports, through the secure mailbox of the reporting channel. For human rights-related reports, information on the outcome of the investigation and any remedial or preventive measures taken is provided within the legally prescribed timeframes.



# Human Rights Focus Areas

# Human Rights Focus Areas



As a globally operating company, we source our raw materials primarily from Europe, but also from various regions around the world. For successful production and a trusting collaboration with our suppliers, we rely on a cooperative, inclusive, and open approach.

The well-being of our employees within our own operations, as well as of the people along our value chains, is a priority for us. Accordingly, we have defined Group-wide objectives to protect human rights and continuously improve working conditions. Our measures to promote the holistic well-being of people focus on two key areas.

## Our focus areas:

 Health and Safety

 Fair remuneration

The health and safety of our employees are a central concern for us and are firmly anchored as a focus area in our Group Sustainability Strategy „Growing in Balance“. Occupational safety is not only a legal requirement but also an essential part of our corporate responsibility, and it is formally established through our Health and Safety Policy. Our goal within our own operations:

**By the end of the 2026/27 fiscal year, we will implement measures to reduce the accident rate across the entire Südzucker Group to 5.0<sup>2</sup>.**

Under the guiding principle “SAFETY FIRST – Because You matter”, we have taken numerous measures in recent years to promote health and occupational safety.

## Our measures within our own operations:

- ✓ **Workshops and seminars**  
Establishing a unified understanding of occupational safety and providing continuous training on risks and protective measures.
- ✓ **“Lessons Learned“**  
Communicating workplace accidents and near-misses, and issuing a “Safety Flash” in the event of serious accidents or high-risk situations.
- ✓ **“Best in Safety“-Award**  
Recognizing accident-free sites within the Südzucker Group.
- ✓ **“Health and Safety Booklet“**  
Methods, tools, and best-practice examples for occupational safety and health protection, continuously updated and developed.
- ✓ **Communication campaign**  
Strengthening safety awareness and personal responsibility through annually defined focus topics to promote safe behavior.

<sup>2</sup> (Base year 2021: 11.0) The accident rate and the rate of accident-related lost workdays each refer to one million working hours. Work-related accidents are recorded if they result in one or more lost workdays.

# Health and Safety



Together with our suppliers, we aim to contribute to a safe and healthy future for employees in our supply chains, leveraging our own experience in the process. Accordingly, we have set the following objective for our supply chain:

**By 2030, together with our strategic suppliers<sup>3</sup>, we will develop and implement specific protection concepts in industries with elevated occupational safety requirements.**



## Our measures in the supply chain:

- ✓ **Needs analyses with strategic suppliers**  
Identifying gaps and risks in occupational safety in industries with higher hazard potential.
- ✓ **Individual action plans**  
Joint development of concrete measures to improve occupational safety standards at suppliers with identified needs.
- ✓ **Implementation of occupational safety concepts**  
Supporting suppliers in implementing their action plans and documenting progress to ensure transparency and traceability.
- ✓ **Regular exchange**  
Promoting cross-industry learning by sharing best practices, challenges, and success factors with suppliers.
- ✓ **Monitoring and effectiveness evaluation**  
Establishing mechanisms to track the success of measures and drive continuous improvement.

<sup>3</sup>Strategic suppliers that make a decisive contribution to the value creation and competitiveness of the Südzucker Group.



## Fair Remuneration



The working conditions of the majority of employees in the Südzucker Group, both in production and administrative areas, are secured through collective agreements. Depending on the country, these agreements cover topics such as job security, working hours, fair wages, and social dialogue, in order to provide our employees with good working conditions. In combination with our collective agreements, we ensure that our remuneration is in line with market conditions and that our employees' performance is appropriately rewarded. Currently, 74.5% of our employees work at locations that are bound by collective agreements.

To systematically strengthen fair remuneration within our own operations and identify potential gaps, we have set the following goal:

**By 2030, the Südzucker Group will have a centrally integrated system that enables a structured, Group-wide analysis of remuneration data. In this way, compensation imbalances can be identified and, where required, corresponding development measures can be initiated.**

### Our measures within our own operations:

- ✓ **System for systematic pay comparison**  
Systematic recording of all salaries by position, length of service, gender, and other comparison variables.
- ✓ **Internal working group**  
Development and implementation of measures to reduce pay disparities, in particular the gender pay gap.
- ✓ **Monitoring and effectiveness evaluation**  
Continuous monitoring of progress and obstacles to identify opportunities and risks.



## Fair Remuneration



Especially in global agricultural supply chains, people are affected by poverty and require sustainable support to secure their livelihoods. A fair level of wages reduces the risk of child and forced labor<sup>4</sup>. For this reason, we have set the following objective for our supply chain:

**By 2030, we will actively promote initiatives and projects that strengthen fair incomes and wages in lower-tier agricultural supply chains.**



### Our measures in the supply chain:

- ✓ **Annual human rights risk analysis**  
Systematic recording and assessment of supply chains with an elevated risk of underpayment.
- ✓ **Identification of high-risk agricultural supply chains**  
Focusing on regions and sectors with pronounced structural wage inequalities.
- ✓ **Participation in multi-stakeholder initiatives**  
Active involvement in sector-specific and cross-sector initiatives to promote living wages and incomes, for example through knowledge transfer, standards, and joint pilot projects.
- ✓ **Promotion of joint projects with partners**  
Supporting projects with suppliers, NGOs, and other stakeholders to improve local income levels.
- ✓ **Monitoring and effectiveness evaluation**  
Establishing mechanisms to track the success of measures and ensure continuous improvement.

<sup>4</sup> Source: Federal Ministry for Economic Cooperation and Development (BMZ), Sustainable Agricultural Supply Chains.

# Outlook and Further Documents

As the Südzucker Group, we believe in achieving progress together with our partners and take responsibility for the human rights impacts of our actions. We continuously review our business activities and their long-term effects on our value chain.

We conduct regular and ad hoc human rights risk analyses to identify risks and potential human rights violations early and respond appropriately. This also includes carrying out the double materiality analysis as part of reporting in accordance with the Corporate Sustainability Reporting Directive (CSRD). The results are published in our Sustainability Statement, as part of the Annual Report:

*Annual Report*

Our focus areas are regularly reviewed and adjusted or expanded as needed. In line with our human rights management approach, we report regularly on our progress and challenges.

Another pillar is the ongoing exchange with internal and external stakeholders, including works councils, trade unions, and industry initiatives. This dialogue enables us to reflect on our actions from different perspectives and to work together with other companies and organisations on sustainable solutions.

**In the future, we will report regularly on the status of our efforts and continuously further develop our approaches – with the goal of effectively protecting human rights within our own operations and along our value chain, and sustainably improving the living and working conditions of our employees.**

## Further Documents



Declaration of Principles on Respect for Human Rights



Südzucker Group Code of Conduct



Supplier Code of Conduct



Annual Report (Sustainability Statement)



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Let's boost

# growing in balance

together across the  
Südzucker Group!

