



Policy statement on respect for human rights and environmental obligations

Crown Gabelstapler GmbH & Co. KG is a subsidiary of Crown Equipment Corporation, headquartered in New Bremen, Ohio, USA. The Crown group of companies ("Crown") is an enterprise with a strong commitment to social, environmental, and economic sustainability. As a global manufacturer of high-quality forklift trucks and a leading provider of material handling solutions, Crown enjoys a special reputation in the material handling industry as a customer-oriented innovation leader that develops, manufactures, and sells forklift trucks and technological storage solutions of the highest quality.

As an internationally operating enterprise, we are dedicated to our responsibility to respect human rights and environmental obligations. Crown's sustainability program, Ecologic, is built upon the three pillars: social, environmental, and economic responsibility. These are key components of Crown's culture of integrity and the way we conduct our activities.

1. Commitment to respect human rights

While the responsibility for the implementation of this policy statement lies with Crown Gabelstapler GmbH & Co. KG's Managing Director, it is also supported by Crown's senior management.

Crown is committed to complying with legal obligations addressing human rights and environmental obligations under Germany's Act on Corporate Due Diligence Obligations in Supply Chains (German Supply Chain Due Diligence Act, LKSG). Crown sees it as part of our responsibility to ensure compliance toward both, our employees and in our supply and value chains. Crown complies with all legal obligations reflected in the following international standards:

- The International Bill of Human Rights (United Nations Universal Declaration of Human Rights, Civil Pact, Social Pact)
- The Declaration on Fundamental Principles and Rights at Work adopted by the International Labour Organisation (ILO).

The following values and principles guide our business activities. We expect our employees as well as our business partners and suppliers to comply with them:

Health and safety

Crown is committed to ensuring its work environments meet recognized standards in protecting the health and safety of Crown's employees, customers, suppliers, and guests. Accordingly, we expect the same level of commitment from our suppliers – to comply with all applicable health and safety laws, rules, and regulations.

Diversity and equal opportunities

Crown is committed to developing and maintaining a workforce that is open and accepting of all people and adheres to the principle of equal employment opportunities for all applicants and employees. Unlawful discrimination in the hiring, promotion, compensation, or retention of employees is strictly prohibited. Abusive, harassing, or offensive conduct is not permitted, whether verbal or physical. Suppliers are expected to align with Crown's standards

Fair working conditions

Crown offers our employees fair working conditions. Crown respects the right of employees to reasonable working hours and appropriate remuneration. In doing so, we comply with the respective local legal requirements for remuneration and working time regulations. Crown recognizes and respects the right of employees to form employee representative bodies and to engage in collective bargaining granted under applicable laws and regulations. Crown will ensure that employees who are active in employee representation are not subject to retaliation.

Prohibition of child and forced labour

All forms of child and forced labour are prohibited by Crown. Crown supports the United Nations Convention on the Rights of the Child (1989) and complies with applicable national and international laws to prevent child labour. We have a strict policy on the employment of young workers aged 15–17. This includes measures to avoid hazardous workplaces, night shifts and the guarantee of minimum wages. The upper limits for working hours and overtime are set with particular regard to the age of the employees. At the beginning of orientation of a new employee, a valid government-issued photo ID is required to be presented. We expect the same from our suppliers.

Responsibility for the environment

Crown is committed to providing an environmentally friendly and safe work environment. This includes saving resources wherever possible, minimizing waste generation, and continuously improving Crown's environmental performance. For these efforts to be effective, all employees must follow all laws, regulations, policies and procedures that apply at their respective facilities.

This commitment also includes compliance with environmental obligations under the international conventions relating to mercury (Minamata Convention), persistent organic substances (Stockholm Convention), and hazardous waste (Basel Convention), as specified in Section 2 of the German Supply Chain Due Diligence Act.

Deployment of security forces

Crown uses private guard and security services to protect its properties, facilities, assets, and employees from interference by third parties. Crown ensures that these security forces are instructed and controlled so that their deployment does not violate the prohibition of torture and cruel, inhumane, or degrading treatment, intentionally inflict actual bodily harm or fatal injury, or impair our employees' right to organize and freedom of association

If our suppliers hire or deploy security forces, whether private security contractors, public law enforcement, or military

personnel, we expect them to ensure that such security forces are committed to respecting human rights in the same manner and to the same extent. Crown will not tolerate any unlawful conduct by hired or deployed security forces that is in conflict with internationally recognized human rights.

Respect for natural foundations of human life

Crown rejects any form of unlawful eviction or deprivation of land, forests, or waters whose use secures a person's livelihood.

2. Implementation of due diligence obligations

We have established comprehensive due diligence processes within the company to appropriately fulfil our obligation to protect and respect human rights and environmental obligations in our own business as well as in our supply chains. These include defining responsibilities, regularly carrying out risk analyses to identify human-rights and environmental risks, deriving appropriate preventive and remedial measures, setting up a grievance mechanism, and continuously documenting our due diligence processes and transparent reporting on them to the Federal Office for Economic Affairs and Export Control (BAFA).

Risk management

Crown has defined specific responsibilities within the company in order to implement the human rights strategy appropriately and to monitor the due diligence processes.

Crown Gabelstapler GmbH & Co. KG's Human Rights Officer (HRO) has been appointed by the Managing Director and is the Director of Compliance for Europe, Middle East, and Africa. He monitors the management of human-rights and environmental risks, the fulfilment of due diligence obligations and reviews the effectiveness of the human-rights and environmental due-diligence process within the company. Periodically and as required, the Human Rights Officer informs Crown's Managing Director about the human-rights and environmental due-diligence processes. In addition, he ensures the annual update of this policy statement as well as the consolidation of information and annual reporting to BAFA.

The HRO works in close cooperation with the Procurement, the Environment, health and safety (EHS), the Human Resources (HR), and the Law Departments. The EHS and the HR Departments are responsible for overseeing program compliance, risk analyses, and appropriate preventative measures within Crown's business and for training and raising employees' awareness. In coordination with the HRO, Procurement is responsible for integrating human-rights and environmental topics into supplier management and the onboarding process. This includes conducting regular risk

analyses, evaluating and monitoring suppliers, and implementing and reviewing preventive and remedial measures for suppliers. The Law and Compliance Departments are responsible for providing and monitoring an effective grievance mechanism.

The Human Rights Officer also ensures that violations of the Code of Conduct and internal and external complaints relating to human rights and environmental obligations are processed and followed up.

Risk analysis

In accordance with the requirements of the German Supply Chain Due Diligence Act, Crown regularly conducts risk analyses to identify human-rights and environmental risks in its business and at its direct suppliers.

Using various publicly available quantitative indicators, supplemented by comprehensive qualitative indicators, Crown first determines an abstract risk at country level for the risk topics specified in the German Supply Chain Due Diligence Act. In the second step, the specific risk is determined considering the severity, probability of occurrence, and existing preventive measures. On this basis, Crown prioritizes the identified risks. In the event of substantiated knowledge, a risk analysis of indirect suppliers is carried out and appropriate measures implemented.

Our risk analysis did not identify any significant human rights or environmental-related risks in our own operations or at our direct suppliers. However, based on the results of our risk analysis, we recognize potential discriminatory behaviour and unequal treatment to be the most relevant of risks in our own operations. We recognize potential violations of fair working conditions (including anti-discrimination and equal treatment, occupational safety and health, and freedom of association) and environmental protection to be the most relevant of risks at our direct suppliers. Accordingly, we will prioritize these in our efforts on preventive measures.

Preventive and remedial measures

In order to adequately minimize human-rights and environmental risks, Crown is in the process of developing further measures both for its own business operations and for its direct suppliers. To raise awareness of human rights and environmental matters in our workforce, we have adopted various guidelines, and we conduct trainings on these topics (e.g., in the areas of occupational health and safety or discrimination). Our actions are based on our Code of Conduct, which explains Crown's corporate values. All managers, employees, and representatives at Crown must adhere to our Code of Conduct.

We communicate our expectations regarding human rights and environmental expectations to suppliers through our Supplier Code of Conduct, which was updated in 2024. An update of the Code of Conduct is planned, in which further human rights and environmental aspects will be integrated.

In addition, we are in the process of developing further preventive measures for our suppliers based on the results of the risk analysis. As part of the onboarding process, suppliers are asked to provide information on quality, environmental, and occupational safety management in the supplier self-assessment. The inclusion of further human rights and environmental aspects is currently being developed.

Subject to the results of the supplier self-assessment and following a risk-based approach, we will take further measures, such as assessment meetings with suppliers, on-site visits, or the creation of a corrective-action plan with a supplier. We are currently developing such a process and are evaluating the use of an IT tool for supply-chain risk management.

If violations concerning human rights or environmental obligations are identified in our business, we immediately initiate measures to put an end to them. We are expanding internal processes to determine how violations of the human

rights and environmental conventions defined in the LkSG are handled and how appropriate remedial measures are defined and implemented in our business and at our suppliers.

Whenever one of our suppliers identifies a breach of human rights or environmental requirements, the supplier must inform Crown immediately to ensure that appropriate action is taken to remedy the situation.

Grievance mechanism

Crown maintains an open-door policy for the employees, business partners, and third parties. If employees become aware of questionable or suspected inappropriate work-related activities, we encourage those employees to raise concerns with their manager, a supervisor, Human Resources, Compliance & Ethics, or via Crown's grievance mechanism:

[Connect with Crown ►](#).

We also encourage third parties to have open and honest conversations with their contacts at Crown and discuss any activities that they believe are inappropriate in relation to their business with Crown.

Reports of potential or actual violations of our Code of Conduct or unethical behaviour can be made by both employees and third parties via our grievance mechanism, Connect with Crown, which provides reporting channels that enable reporting in writing or orally, in an anonymous and secure way. Connect with Crown is managed by a third-party compliance provider and is always available.

Effectiveness control

Crown measures the effectiveness of the grievance mechanism and plans to examine the effectiveness of preventive and remedial measures in its business and with suppliers. The development and introduction of suitable KPIs is planned for this purpose. The effectiveness control is conducted periodically, at least once a year. If any deviations from our targets are identified, corrective measures are implemented.

Documentation and reporting

Decisions, results, and findings for business activities in connection with our due diligence processes are documented internally on an ongoing basis. In the annual report to BAFA, we provide information on our implemented due diligence obligations and progress. We publish the report on our website.

3. Human rights and environmental expectations toward employees and suppliers

Obeying the laws, both in letter and spirit, is the foundation on which Crown's ethical standards are built. All employees must comply with all applicable laws, rules, and regulations, and must consider the human rights and environmental expectations in this Policy Statement and Code of Conduct in their daily actions. In the event of a violation or suspected violation of the law, as well as violations or suspected violations of applicable internal policies employees are encouraged to promptly report this to their manager, a supervisor, Human Resources, Compliance & Ethics, or via Connect with Crown.

Kenneth Dufford
Vice President Europe
Managing Director, Crown Gabelstapler GmbH & Co. KG