

Declaration of Principles of Mabanaft GmbH & Co KG

Implementation of the duty of care according to § 6 para. 2 Supply Chain Due Diligence Act (LkSG)

Foreword by the Executive Committee

As Mabanaft, we proactively engage in the energy transition and are committed to conducting our business in an economically, environmentally and socially responsible way. As a leading independent and integrated energy company, the Mabanaft Group welcomes and supports the Supply Chain Due Diligence Act as an important step towards promoting human rights and environmental protection in global supply chains.

Commitment – to ourselves and others

As a responsible company, we set up and commit ourselves to the following principles and measures to protect human rights, prevent human rights violations and protect the environment.

1. Respect of human rights: *We respect and protect human rights in our global supply chains and are committed to respecting labour rights, working conditions and social justice, prohibition of child labour, discrimination and forced labour.*

2. Environmental protection and sustainability: *We strive to minimise the environmental impact of our supply chains and support sustainable practices to conserve resources and protect the climate.*

3. Transparency and risk assessment: *We systematically identify and assess risks in our supply chains to identify potential problems at an early stage and take measures to minimize risks.*

4. Supplier relationships and collaboration: *We maintain close relationships with our suppliers and work in partnership to develop and implement standards and practices in accordance with the law.*

5. Reporting and disclosure: *We are committed to regular reporting on our efforts to comply with the Supply Chain Due Diligence Act and promote transparency in our supply chains.*

6. Training and awareness-raising: *We train our employees and partners on the importance of the law and the need to work together on responsible supply chain management.*

7. Continuous improvement: *We strive for continuous improvement and adapt our processes to meet the requirements of the law and ensure the protection of human rights and the environment.*

The Mabanaft Group expects our principles to apply to the business activities of all Group companies, as well as those of our partners and especially our direct suppliers. The Mabanaft Group's actions are based on compliance with the following standards:

- the United Nations Universal Declaration of Human Rights;
- the International Covenant on Civil and Political Rights of the United Nations;

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- the International Covenant on Economic, Social and Cultural Rights of the United Nations;
- the Conventions and recommendations of the International Labour Organization (ILO) on labour and social standards;
- the Guidelines of the Organization for Economic Cooperation and Development (OECD) for multinational enterprises;
- the Principles of the United Nations Global Compact (UNGC), and
- the Charter of Fundamental Rights of the European Union.

Responsibility – How do we ensure compliance with our standards?

Mabanaft GmbH & Co. KG has established an additional risk management system from 2024 and integrated it into relevant business processes to ensure best possible compliance with its guidelines. As part of our risk management, additional analyses are continuously carried out to identify human rights and environmental risks in our own business area and at our direct suppliers. Identified risks are weighted and evaluated, and the results are communicated internally to the relevant decision-makers and responsible parties and measures are taken.

This risk analysis is reviewed at least once a year, adjusted if necessary and communicated to the relevant stakeholders.

In addition, the specially established reporting channel is available to all employees and third parties who are directly affected by the economic activities of the Mabanaft Group in its own business area or that of a direct supplier, as well as to those persons who are aware of a possible violation of a protected legal position or an environmental protection obligation. It is possible to report human rights and environmental protection risks or legal violations by contacting us anonymously. The Mabanaft Group's reporting channel, the CARE platform, can be accessed via the [Mabanaft website](#) or the [following link](#).

The issuing and implementation of this Declaration of Principles is the direct responsibility of the Group's Executive Committee, which is supported by the internal Legal/Compliance and HSSE & Sustainability departments. This clear assignment ensures that every department in the company is aware of its responsibility to respect human rights, provides ongoing training in this area and consistently implements compliance it in its daily processes.

In this context, we would also like to draw attention to our [Code of Conduct](#). The Mabanaft Group attaches great importance to respecting its Code of Conduct for both company employees and suppliers.

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