

Statement of principles on respect for human rights and the environment

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FOREWORD

Dethleffs GmbH & Co KG is one of the leading manufacturers of leisure vehicles and a wholly owned subsidiary of Erwin Hymer Group SE. Erwin Hymer Group SE unites numerous caravan and motorhome manufacturers, accessories specialists and rental and financing services under one roof and is a wholly owned subsidiary of THOR Industries, one of the world's leading manufacturers of leisure vehicles with over 32,000 employees. As the inventors of the caravan, we also see ourselves as drivers of innovation in our industry – committed to making the future of caravanning more sustainable and forward-looking. We strive to continuously optimise our business activities and our products in terms of sustainability. Dethleffs GmbH & Co. KG is therefore committed to ecologically, socially and ethically responsible corporate governance and, in particular, to respecting human rights and protecting the environment.

We endeavour to comply with human rights and environmental concerns both in our own business operations and in our supply chains, and to promote these issues together with our business partners. We take appropriate measures to prevent human rights violations and environmental harm in connection with our business activities and ensure that affected individuals have access to reporting channels and suitable remedies.

COMMITMENT TO INTERNATIONAL STANDARDS

In accordance with the United Nations Guiding Principles on Business and Human Rights, we are committed to upholding the standards set out in the following internationally recognised human rights and environmental frameworks:

- United Nations Universal Declaration of Human Rights
- European Convention on Human Rights and Fundamental Freedoms
- United Nations Global Compact
- OECD Guidelines for Multinational Enterprises
- Core labour standards of the International Labour Organization (ILO)
- Paris Agreement on Climate Change
- Minamata Convention on the production, use and/or disposal of mercury
- Basel Convention on the control of transboundary movements of hazardous wastes and their disposal
- Stockholm Convention on the production and/or use of persistent organic pollutants (POPs) and the environmentally sound disposal of POP-containing waste

In addition to these standards, our internal guidelines, such as our Code of Conduct, form the foundation of our actions and underpin successful and fair business practices.

RELEVANT HUMAN RIGHTS ISSUES

Our human rights due diligence focuses primarily on the following key issues, which we have identified as material to our business through risk analysis. These areas represent the greatest potential risks of adverse impacts on individuals associated with our business activities – whether at our own sites or within our supply and value chains:

Prohibition of forced labour

No form of forced labour, slave labour or comparable practices may be used. All work must be undertaken voluntarily and without the threat of punishment.

Prohibition of child labour

Child labour must not be used at any stage of production. We adhere to the minimum age requirements for employment as set out in the relevant ILO conventions.

Occupational health and safety

We are committed to providing a safe and healthy working environment. Our employees receive regular training and guidance on relevant health and safety regulations, and we take appropriate precautions to minimise the risk of accidents and work-related illnesses.

Freedom of association

We respect the right of employees to form and join organisations of their choosing, to engage in collective bargaining and to take industrial action. No employee should face discrimination for exercising these rights.

Prohibition of discrimination

We do not tolerate any form of discrimination in the workplace unless objectively justified by job requirements. This includes unfair treatment based on gender, age, sexual orientation, race, ethnic or social origin, skin colour, disability, political views, religion or belief.

Fair pay and working hours

Remuneration for regular and overtime work, as well as working hours, must comply with applicable national legislation. Our employees are entitled to all statutory benefits.

Lawful deployment of private and public security services

Security personnel must not be deployed in any way that results in inhumane or degrading treatment, physical harm, or the restriction of our employees' right to freedom of association.

Respect for land rights

We oppose all forms of unlawful eviction or land seizure. This includes the improper appropriation of land, forests or water sources, particularly where such resources are essential to the livelihoods of local individuals or communities.

Environmental rights

We reaffirm the rights of all employees to a healthy and safe working environment, and to the protection and conservation of our natural resources. We respect and promote environmental rights by integrating sustainable practices into our operations and business processes. This includes the reduction of emissions, the efficient use of resources and the protection of ecosystems.

OUR APPROACH AND IMPLEMENTATION

A risk management system is the cornerstone for identifying, preventing, minimising and addressing risks and violations of human rights and environmental standards.

To meet the requirements of the German Supply Chain Due Diligence Act (LkSG), we have embedded human rights due diligence processes as integral elements of our organisation and our relationships with business partners. These processes are adapted to reflect evolving circumstances, the nature of our business activities, and the size and structure of our company. We therefore review and update our due diligence processes on an ongoing basis.

STRUCTURE AND RESPONSIBILITIES

We have defined clear responsibilities to ensure awareness of and compliance with our human rights due diligence obligations among our workforce.

The Human Rights Officer of Erwin Hymer Group SE, who is responsible for our organisation, oversees the risk management process. Regular and ad hoc internal reports are submitted to the Management Board of Erwin Hymer Group SE. These reports present findings from ongoing risk analyses, information received via grievance mechanisms, and assessments of the effectiveness of preventive and remedial measures. This approach ensures that informed decisions can be made at all times.

Given the complexity of the requirements under the German Supply Chain Due Diligence Act, we have appointed dedicated staff in the departments of Human Resources, Strategic Procurement, and HSE Management to oversee operational implementation. In this way, we ensure a holistic and interdisciplinary approach.

RISK ANALYSIS

In order to implement the requirements of the German Supply Chain Due Diligence Act, it is crucial to identify and prioritise potential or actual risks to our business activities and products, as well as their impact. We therefore use an established management process to identify and assess relevant human rights and environmental issues, as well as potentially affected stakeholders across the entire value chain. A comprehensive risk analysis is conducted on an annual basis. In addition, we carry out event-driven risk assessments whenever significant changes or developments in our supply chain risk profile are anticipated – for example, when launching new products, projects or business areas, or in response to specific alerts.

The results of these human rights risk and impact assessments are incorporated into our corporate decision-making processes.

This information also serves as the basis for developing – and, where necessary, adapting – internal policies, procedures and training programmes to reflect evolving due diligence requirements.

PREVENTIVE MEASURES

To fulfil our responsibility to uphold human rights, we rely on a combination of different measures. The aim is to protect (potentially) affected persons and to prevent or at least minimise adverse human rights impacts.

The effectiveness of our internal processes is regularly confirmed through external audits, including certifications such as ISO 9001 (quality management) and ISO 14001 (environmental management). Employees of Dethleffs GmbH & Co. KG receive targeted training that reflects both the general expectations set out in our Code of Conduct and the specific requirements relating to human rights and environmental standards along the supply chain. These training sessions are designed to be easy to understand and accessible at all times. We view raising awareness of human rights and providing the necessary expertise for effective implementation of due diligence processes as an essential aspect of our corporate responsibility. We are therefore committed to continuously updating our existing training courses and expanding them as required for specific departments.

Concerns can be submitted anonymously via the “BKMS” whistleblowing system (<https://www.bkms-system.com/ehg-compliance-sprich>), enabling the Group Compliance Office to investigate potential violations and take appropriate action. Additional reporting channels are available to employees of our company.

Through our association work, we actively promote sustainability in the leisure vehicle industry. This engagement allows us to contribute ideas, promote holistic strategies and benefit from a broad-based exchange of knowledge.

We are aware that our corporate success is closely linked to our social and ecological responsibilities. As such, we have already launched several internal projects involving renewable energy.

REMEDIATION

Preventing human rights and environmental violations remains a high priority for us at all times. However, if an infringement is only identified after the fact, our efforts focus on minimising the impact and resolving the issue as quickly as possible. Every report we receive about potential human rights violations is followed up consistently and with due care.

In cases where human rights or environmental obligations are breached within our own operations, we take prompt and appropriate remedial action to bring the violation to an end.

In the event of violations within our supply chain, we expect our business partners to fully cooperate in clarifying the circumstances and to support the investigation within a reasonable timeframe.

Depending on the severity of the violation, we reserve the right to take proportionate action with regard to the business partner concerned – up to and including termination of the business relationship.

EFFECTIVENESS REVIEW

We review the effectiveness of all measures relevant to the German Supply Chain Due Diligence Act at least once a year, as well as on an ad hoc basis. This ensures that adverse human rights or environmental impacts continue to be identified, prevented, remedied or mitigated. Within our own operations, this may involve methods such as comprehension checks and final tests as part of training programmes, or employee surveys.

GRIEVANCE MECHANISM

We operate a whistleblowing system that provides internal and external stakeholders – as well as any potentially affected individuals worldwide – with a confidential channel to report potential violations of human rights and international treaties. Reports can also be submitted anonymously and in a variety of languages (<https://www.bkms-system.com/ehg-compliance-sprich>). Additional reporting channels are available to employees of our company. All reports and substantiated suspicions of potential human rights violations are handled via a transparent process. The anonymity of whistleblowers and the confidentiality of reports are respected.

We also ensure, to the extent possible and within our sphere of influence, that whistleblowers do not suffer any disadvantage as a result of submitting a report.

DOCUMENTATION AND REPORTING

Dethleffs GmbH & Co. KG publishes an annual report on the fulfilment of its due diligence obligations for the previous financial year. This report is updated regularly, published on our website, and made publicly available for a period of seven years. The report outlines the effectiveness and continued development of our due diligence measures. It details the steps taken to identify human rights and environmental risks and to meet our due diligence obligations, provides an evaluation of these measures and sets out conclusions for future action. By publishing this report, we enable a transparent evaluation of Dethleffs GmbH & Co. KG's efforts in the areas of human rights and environmental protection – both by the relevant authorities and the wider public.



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