



# Human Rights Policy

**SEEDING  
THE FUTURE**  
SINCE 1856



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## Our Human Rights Commitment

### Foreword

KWS is a value-oriented global plant breeding company with a 167-year-old heritage. Our vision “Seeding the future for generations” comprises all of KWS’ key values – with foresight, we shape a sustainable future, staying close to generations of farmers and serving as a trusted, reliable partner to all our customers while staying independent as a company. Closeness, reliability, foresight, and independence form a stable set of values, which are also implemented in our business strategy and along the entire supply chain.

Our passion for plants sustains farming, food and the planet. We are convinced that our specialization in plant breeding and seed production makes a difference. We breed and research with passion – and thus make an important contribution across the entire agricultural production. For us, sustainability means creating value and following a responsible business practice within the scope of our activities. We think in terms of our planet: With focus on the reduction of inputs such as crop

protection products or water, innovations for alternative energies and, of course, the efficient use of available land represent a contribution to sustainable agriculture of the future. Through our daily work, we make an important contribution to the supply of food to our growing world population. And that is what we are proud of.

Respect for human rights is a fundamental component of our Corporate Governance. KWS maintains a strong commitment to upholding and respecting all internationally recognized human rights. We strive to ensure that human rights are respected by all members of the KWS Group as well as by our business partners. Our responsibility in human rights is focused on different fields of action where we are able to exercise our influence as a commercial enterprise. We always work in accordance with the duty of states and sovereign institutions to protect human rights.

The Executive Board



## Purpose and Scope

The purpose of this Human Rights Policy is to ensure the respect of human rights at the KWS Group and across our value chain.

To emphasize the profound integration of human rights and tackling of environmental issues both within our own operation as well as across our global supply chains, we align our corporate actions with the internationally recognized human rights standards. We are committed to respecting human rights in accordance with respective internationally recognized human rights standards.

The KWS Group's activities consider the following international standards:

- The UN Guiding Principles on Business and Human Rights (UNGP)
- The OECD Guidelines for Multinational Enterprises
- Conventions and Recommendations of the International Labour Organization (ILO) on labor and social standards
- The ten principles of the UN Global Compact (UNGC)
- UN Convention on the Rights of the Child
- UN Women's Empowerment Principles
- UN Declaration on the Rights of Indigenous Peoples
- International Covenant on Civil and Political Rights of December 16, 1966
- International Covenant on Economic, Social and Cultural Rights of December 16, 1966
- Minamata Convention on Mercury of October 10, 2013 (Minamata Convention)
- Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989 (Basel Convention)
- Stockholm Convention on Protecting Human Health and the Environment from Persistent Organic Pollutant (Stockholm POP Convention)

We comply with national law wherever we operate. Consistent with the UNGPs, where national law and international human rights standards differ, we will strive to meet the higher standard. Where national law and international human rights standards conflict, we will comply with national law, and strive to uphold the principles underpinning the international human rights standards where they are higher.

Where national legal requirements stand in conflict with individual aspects of this Human Rights Policy, we strive to uphold the highest possible principle of human rights within the legal setting of the country concerned.

This Human Rights Policy elaborates on the human rights commitment of the [KWS Code of Business Ethics](#), to “conduct our business in a manner that respects the rights and dignity of all people” and on the [Code of Business Ethics for Suppliers](#) that “internationally recognized human rights shall be respected by all our business partners and along the whole supply chain.”

Our human rights commitments are global and apply throughout KWS's value chain. We expect all our employees, business partners and suppliers to comply with applicable laws, to respect internationally accepted human rights and environmental standards and to follow the codes set out in this policy.



## Global Goals, Sustainable Development Goals

We strive to actively contribute to the achievement of the UN Sustainable Development Goals (SDGs) in the context of human rights and we are guided by the SDGs in the future development of our company. KWS feels particularly committed in this regard and contributes to the following SDGs through its business activities: fighting hunger (2), promoting economic growth (8), industry and innovation (9), sustainable production and consumption (12), climate protection (13) and protection of life on land (15).

We consider the SDGs when defining sustainability goals and promote their achievement by striving to participate in relevant initiatives. To strengthen our human rights commitments, KWS joined the United Nations Global Compact in 2023 and implements the UNGC ten principles in the areas of human rights, labor, anti-corruption, and environment within the scope of our operations.

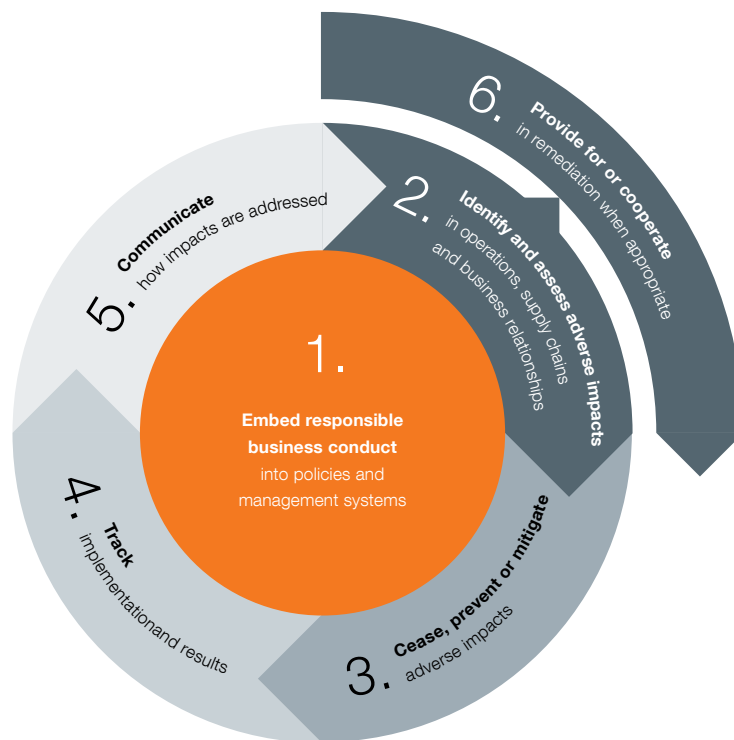


# Human Rights Due Diligence

## Due Diligence Strategy

We operate in an increasingly complex environment, where we shall continually assess the impact of our actions on human rights. In our human rights due diligence strategy, we respect the UN “Protect, Respect and Remedy” framework and committed to follow the below six steps of the OECD due diligence guidance:

### Human Rights Due Diligence<sup>1</sup>



<sup>1</sup> OECD, 2018 (22), [www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm](http://www.oecd.org/investment/due-diligence-guidance-for-responsible-business-conduct.htm)

Our human rights due diligence comprises an ongoing management process that a reasonable business needs to undertake to meet our responsibility to respect human rights.

### Identify and Assess Adverse Impacts

Based on its understanding of emerging issues, country specific conditions, common risks in the agricultural sector, and experience from other industries, we carry out an annual human rights assessment to identify and evaluate human rights risks and impacts.

In agriculture, child labor is the most relevant factor of human rights risks with a traditional prevalence in many countries. Seven out of ten cases of child labor happen in the agriculture industry<sup>2</sup>. KWS is especially focused on ending child- and forced labor within our value chains.

In line with the regulatory requirements, an ad hoc risk analysis is triggered by substantiated knowledge of a possible violation of a human rights or environmental obligation, or by the emergence of new risks along the entire supply chain due to a change in our business activities.

<sup>2</sup> [www.ilo.org/ipec/ChildlabourstatisticsSIMPOC/WCMS\\_817701/lang--en/index.htm](http://www.ilo.org/ipec/ChildlabourstatisticsSIMPOC/WCMS_817701/lang--en/index.htm)



### Prevention and Mitigation

When defining preventive measures, our focus is on the high-priority risk areas in both our supply chains and in our own operations.

We are committed to communicating with relevant stakeholders and involving our suppliers in due diligence processes to prevent human rights violations at an early stage or to mitigate and remedy risks when it is necessary.

### Reporting, Tracking and Communication

KWS reports annually on its relevant human rights and social performance through a variety of channels, e.g. on its website and annual reports. Further to this, we provide the Federal Office for Economic Affairs and Export Control (BAFA)<sup>1</sup> with human rights information in accordance with the German Supply Chain Act. The human rights report will be published annually starting in the first financial quarter of fiscal 2024/2025.<sup>2</sup>

### Remediation and Grievance Mechanism

“Access to remedy” is one important pillar of the due diligence framework provided by the UN Global Compact. Therein, KWS offers a [Compliance Reporting Platform](#) via which grievances of rightsholders can be detected early and remediated directly.

We are aware of our obligation to take remedial action as part of our human rights due diligence processes. We seek to act proactively, providing remedy in our own business area and with direct suppliers, while we also seek to take action with indirect suppliers if we have actual indications of a possible human rights violation.

As part of our human rights due diligence requirements, KWS recognizes the importance of making grievance channels available for anybody who could be, either directly or indirectly, negatively affected by our operations. KWS encourages all of its stakeholders and employees to come forward if there are concrete indications that the KWS Group is not fulfilling its human rights responsibility or that we are not living up to our human rights standards declared in this policy. A complaint may lead to remedy by triggering the obligation to take remedial action.

For more information, please see the KWS Group Compliance Website: [www.kws.com/corp/en/company/investor-relations/compliance.html](http://www.kws.com/corp/en/company/investor-relations/compliance.html)

<sup>1</sup> <https://bafa.de>

<sup>2</sup> The first report will be submitted according to the German Supply Chain Due Diligence Law by October 2024.





## Human Rights Priority Areas

### **No Child Labor and the Protection of Young Workers**

With respect to the Universal Declaration on Human Rights and Art. 24 of the UN International Covenant on Civil and Political Rights, the KWS Group is committed to respecting children's rights.

We acknowledge that the child's dignity must be respected, and their health and safety protected. In accordance with the ILO Conventions 138 and 182, we strictly prohibit child labor in our own operations and require our business partners to apply the same approach, in line with our expectations set out in the Code of Business Ethics and Code of Business Ethics for Suppliers. We comply with the different local laws and requirements on minimum age and do not employ child labor. Our hiring processes and governance mechanisms are designed to achieve these goals.

We expect our suppliers to take a similar approach with respect to their own operation. This expectation is outlined in the Code of Business Ethics for Suppliers.

### **No Forced Labor and Modern Slavery**

The KWS Group does not tolerate torture, cruel, inhuman, degrading treatment, slavery, or servitude.

In accordance with the ILO Conventions 29 and 105, we strictly prohibit forced labor, modern slavery or human trafficking in our own operations. We acknowledge that all work must be performed willingly and without threat of punishment, for instance as a result of trafficking in human beings.

We require our suppliers to apply the same requirements, in line with our expectation set out in the Code of Business Ethics for Suppliers.

### **Working Conditions, Working Times and Remuneration**

The KWS Group acknowledges the principle that working time and conditions must at least correspond to the respective national legal requirements. Consistent with applicable national laws, we acknowledge that safe



and healthy working conditions prevail, particularly with regard to the appropriate limitations of working hours, work breaks and regular paid vacation.

Furthermore, we acknowledge the relevance of all applicable international standards on working hours and working conditions, which also include the applicable ILO conventions, at the place of employment.

The working conditions, such as remuneration for KWS employees, are regulated in their contracts that comply with the applicable local labor, tax, and social security regulations. In accordance with ILO Convention Nr. 100, a KWS employee's total compensation package is put together considering the employee's individual expertise, professional experience, and local market conditions.

We expect our suppliers to apply the same approach consistent with our expectations as outlined in the Code of Business Ethics for Suppliers.

### **Freedom of Association and the Right to Collective Bargaining**

The KWS Group recognizes the right of its employees to form representative bodies and participate in collective bargaining on working conditions. In accordance with the ILO Conventions Nr. 87 (Freedom of Association and Protection of the Right to Organize Convention) and Nr. 98 (Right to Organize and Collective Bargaining Convention), we respect the rights of all employees to freely join organizations of their choice without fear of reprisal or discrimination and engage in collective bargaining, according to applicable law.

Employees of KWS are able to form worker committees or other organizations to represent them as permitted by local law. Collective representation bodies for employees exist in several countries such as Germany and France. The European Employee Committee (EEC) was established in 2015. This body is responsible for cross-border issues in EU member states and acts as an employee representation entity. If employees in other countries wish to establish a collective employee representation or if such representation is foreseen by the national laws, we provide support to our employees in the establishment of such associations.

### **Equal Treatment and Non-Discrimination**

Equal treatment of all employees is a fundamental principle of our business. We believe that all employees should have the right to be treated equally, regardless of any attributes other than their ability to do the job.

The KWS Group does not tolerate discrimination of any kind against our employees. In accordance with the ILO Conventions Nr. 100 and Nr. 111, we prohibit discrimination and harassment in the workplace and seek to create a diverse, equitable and inclusive environment that treats all employees with dignity and respect, ensuring the rights of vulnerable employees are protected. Employees must not be disadvantaged, favored, or harassed on the grounds of characteristics such as gender and gender identity, skin color, racial origin, religion, nationality, political or other beliefs, ethnic origin, disability, age, sexual orientation, or any other characteristics protected by local laws.

We expect our suppliers to apply the same approach consistent with our expectations as outlined in the Code of Business Ethics and Code of Business Ethics for Suppliers.

### **Diversity and Inclusion**

At the KWS Group people from more than 100 countries, different cultural background and age groups work together that enrich a diverse corporate culture. Based on our essence, we are committed to a culturally open work environment with equal opportunities and rights for all employees globally - regardless of gender, religion, ethnic origin, age, physical or mental ability, sexual orientation, social background, or any other dimension. We are opposed to all forms of discrimination and stand up for our position. This is our clear commitment, and we provide a work environment that values all employees and gives them the opportunity to develop their full potential.

### Right to Health and Occupational Safety

The protection and promotion of workers' health and safety is one of our highest priorities. The KWS Group strives to create a healthy, safe, and productive work environment, which means safeguarding our workers around the globe from immediate and long-term harm to their health. Global technical and operational safety standards are the basis for our work. The purpose is to prevent occupational accidents and work-related illnesses. At the KWS Group, we comply with safety regulations in the agricultural industry and use the required protective equipment. We ensure occupational, health and fire safety at the workplace at no cost for employees, at least in the context of the relevant national regulations and in harmony with the requirements of relevant international standards.

In accordance with ILO Conventions Nr. 155, Nr. 161 and Nr. 187, we create and promote a safe and healthy workplace throughout our operations and require our third parties to implement rigorous health and safety standards, in line with our expectations set out in the KWS Code of Business Ethics for Suppliers.

### Right of Local communities

KWS maintains a broad network of breeding stations and trial fields for plant breeding worldwide. Here, we test different genetic material for the respective areas of application. When using this genetic material, the rights of local population groups in all regions of origin from which the respective material comes must be considered.

KWS is aware of its obligations in this regard and supports the various international "access and benefit-sharing" frameworks for protecting the rights of indigenous population groups and the sustainable use of biological diversity. First and foremost, the Biodiversity Convention with the Nagoya Protocol and the food- and agriculture-specific "International Treaty on Plant Genetic Resources for Food and Agriculture" (ITPGRFA) should be mentioned here. To ensure compliance with these guidelines, we have implemented a due diligence process. In addition, training is provided for new employees and an annual seminar is held for all employees involved.







## Human Rights and Environment

Human rights and the environment are interdependent. Living in an unhealthy environment could result in violations of certain human rights; on the other hand, respect for human rights is vital for the protection of our environment.

The KWS Group acknowledges that environmental harm can negatively impact a number of internationally accepted human rights. We also acknowledge our corporate responsibility to protect the environment. To that end, we commit to minimize the environmental impact of our operations and products over their lifecycle, particularly where they can have an adverse impact on people. In addition to human rights due diligence, we respect our environmental due diligence duties and apply measures in both of our own premises as well as with regard to our suppliers and business partners.

In our Sustainability Ambition 2030 KWS has set ambitious, measurable targets for itself that address economic, environmental, and social components of sustainability. KWS has formulated six core targets in the areas of product impact and corporate responsibility.

Further to this, we are developing internal environmental policies and guidelines to ensure that we fulfill our environmental due diligence requirements, and through our Code of Business Ethics for Suppliers, we require our own suppliers to address issues such as emission, pollution, and waste and hazardous substances.

### Handling of Waste and Hazardous Materials

In accordance with the German Supply Chain Due Diligence Act (LkSG), in this policy we identify one specific area of environmental risk that is particularly relevant when the environment and human rights are intertwined.

In our premises, we comply with the applicable national laws implementing the prohibitions of the Basel Convention of March 22, 1989 on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal. In the updated Code of Business Ethics for Suppliers, we will request our suppliers to ensure that chemical and other materials posing a hazard, if released to the environment, are identified, and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.



## Responsible Supply Chain and Procurement Practices

Our responsibility to respect human rights extends beyond our own operation into our supply chains, where we seek to influence the broad adoption of internationally accepted human rights norms and to maintain an active assessment of the human rights performance of our suppliers.

We acknowledge that responsible procurement begins with respect for human rights. Consideration of the interaction between human rights and environmental risks is of crucial importance for us. At the KWS Group, we take a holistic approach to respecting human rights in our supply chains and apart from social requirements, we also consider environmental criteria in our procurement processes.

We expect our suppliers and business partners to respect the principles of responsible business conduct as foreseen in the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. We also encourage our business partners to comply with the Ten Principles of

the UN Global Compact and to respect and support human rights, particularly those rights that are listed in this document.

In our Code of Business Ethics for Suppliers, we require our suppliers to respect and uphold human and labor rights and to provide a safe and healthy work environment. Our suppliers should establish effective processes to actively protect human rights with the aim of identifying potential and actual negative impacts on human rights throughout their value chain and to prevent, minimize and end them.

Consistent with the German Supply Chain Act, our responsibility includes the understanding of the risks of human rights violations in our supply chains, validating our assessment through supplier engagement, and supporting suppliers to reduce risk, mitigate and remediate adverse human rights impacts.

Our aspiration is that all relevant suppliers will be assessed against social and environmental requirements.





## Human Rights and Technology

### Social Commitment in R&D

Being a national and international, innovation-driven company, we place great importance on the topics of education and science, especially the field of natural and agricultural sciences, and technologies. By supporting international R&D projects and initiatives as well as young researchers and scientists, our aspiration is to make a sustainable contribution to the life of people. The KWS Group continuously supports scholarship programs as well as initiatives in the field of development cooperation.

For more information on our development cooperations, please visit our [website](#).

### Privacy & Data Protection

We respect the right to privacy as articulated in Art. 12. of the Universal Declaration of Human Rights and in Art. 8. Of the European Convention of Human Rights.

The KWS Group is committed to the responsible use of personal data to protect the privacy of our business partners and customers. This commitment is outlined in our [privacy notices](#).

### Responsible use of Artificial Intelligence (AI)

KWS acknowledges AI's impact on responsible business conduct and that AI technology can have both adverse and positive impacts when it comes to advancing international human rights.

We acknowledge that AI technology can be impactful when it comes to certain human rights as declared in the UN Universal Declaration of Human Rights. In particular, we acknowledge the risk of AI related to Art. 2 of the UNHR on the right to non-discrimination, Art. 12 on the right to privacy, Art. 3 on the right to life and personal security and Art. 19 on freedom to opinion and expression.

KWS is seeking to deploying artificial intelligence systems in a transparent and responsible way and to ensure that the use of these systems has a clear purpose, in respect of internationally accepted human rights and in line with the principles and commitment of our Code of Business Ethics.

## Implementation of this policy

### Responsibility and Governance

This Human Rights Policy was approved by the KWS's Executive Board.

Overall responsibility for implementation of our human rights commitments sits with the Executive Board. The Executive Board monitors the operational implementation of the declared human rights principles. The informed decision making of the Board is ensured through annual and, in case it is necessary, ad hoc internal reporting on human rights-related issues and risks, information from the grievance mechanisms and information on the effectiveness of remedial and preventive measures.

The overall implementation of this policy and the human rights due diligence processes lies within the responsibility of the relevant teams, in particular Group Risk & Sustainability Management, Group Compliance, Global Human Resources and the Expert Hub Procurement.

The governance and coordination of the human rights issues, as listed in this policy, the position of human rights officer and the coordination of the external communication on human rights reporting are integrated into the Group Governance, Compliance & Risk function. The continuous monitoring of adverse human rights events and the preparation and conduction of human rights audits & trainings, furthermore the continuous

improvement of the due diligence processes, are integrated into several functions such as the Risk & Sustainability Management, Compliance, Procurement and Human Resources. These teams are supported and work closely with further functional experts and units across the whole KWS Group.

### Dialogue

This human rights commitment and policy was developed in consultation with relevant internal departments of the KWS Group such as Risk Management, HR, Health, Safety & Environment, Sustainability Management, Compliance and Procurement. In case a human rights risk analysis results in a conclusion that consulting external parties, such as potentially affected population groups or their representatives, is necessary, further dialogues are carried out locally.

### Outlook and Review

We are aware that the implementation of human rights due diligence is a continuous process of development. Nevertheless, it should be borne in mind that a human rights due diligence system, regardless of its design, does not provide absolute certainty that violations are avoided to full extent. KWS aims for continuous and stringent improvement in all its underlying actions. We review our human rights approaches and the respective due diligence measures regularly but at least biennially.





**Editor**

**KWS SAAT SE & Co. KGaA**

Grimsehlstrasse 31

P.O. Box 1463

37555 Einbeck/Germany

[www.kws.com](http://www.kws.com)

**Contact**

[sustainability@kws.com](mailto:sustainability@kws.com)

**Photo Credits**

Eberhard Franke ■ Karsten Koch ■ Julia Lormis ■ Dominik Obertreis ■

Alex Telfer ■ Sebastian Vollmert