

# Policy Statement

on respecting human rights and environmental standards pursuant to the German Supply Chain Act (LkSG)

Bechtle AG

Version 1.1

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## 1. Introduction

Honesty, fairness and trustworthiness guide the actions and behaviour of every employee—both within our organisation and in our interactions with the wider world. We are committed to upholding the values that define our corporate culture: integrity, reliability, determination and inspiration. These values also form the basis of our Code of Conduct and our compliance standards.

The Bechtle Code of Conduct sets the guidelines for our actions: Bechtle is fully committed to complying with legal regulations and ethical principles and expects all employees to act accordingly at all times. It goes without saying that Bechtle's employees must adhere to the laws of the countries in which they operate, and respect widely accepted customs and practices that are consistent with those laws. This includes laws prohibiting bribery and corruption in business transactions, as well as internationally recognised human rights that underpin our social standards. The latest version of the Bechtle Code of Conduct is binding for all employees, regardless of their position. To support awareness, all employees are required to complete mandatory compliance training through an online learning programme. The Code of Conduct can be viewed at [bechtle.com/sustainability](https://bechtle.com/sustainability).

Our commitment to respecting human rights is guided by internationally recognised human rights and labour standards, which form the foundation of our business activities across the entire value chain.

### Human rights frameworks

- Universal Declaration of Human Rights
- Labour and social standards of the International Labour Organization (ILO)
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- The ten principles of the UN Global Compact

### Environmental standards

- Basel Convention
- Minamata Convention
- The Stockholm Convention ("POP Convention")
- KLIMAWIN

## 2. We have specific requirements for ourselves and our partners.

To uphold our commitment to respecting human rights and environmental standards, the Bechtle Group has implemented company-wide policies, in addition to its Code of Conduct, that define our requirements for ourselves and our business partners. These policies form the basis of our daily activities and are firmly embedded across the Bechtle Group. They apply to our employees, suppliers and service providers, as well as to workers across our supply chains, and also address our customers.

Under its strategic action area "Ethical business practices", the Bechtle Sustainability Strategy 2030 defines the following: "Ethical business practices are part of our corporate identity. We take responsibility for respecting human rights along our value chain."

Bechtle Logistik & Service GmbH (L&S), as the central purchasing and logistics hub of the Bechtle Group, plays a key role, with a strong focus on further strengthening sustainable supplier management and development. The Bechtle L&S Sustainable Sourcing Strategy 2030 sets out how sustainability is embedded across purchasing and logistics, translating Bechtle AG's overarching sustainability and climate strategies into concrete areas of action and targeted procurement measures. It builds on internal assessments, particularly supplier risk analyses, as well as external requirements such as increased due diligence obligations and rising customer expectations, and sets

out clear objectives and measures to address environmental and social responsibility along the supply chain while supporting the long-term resilience of the business model.

Our expectations of our direct business partners and suppliers are defined in our Supplier Code of Conduct, which forms part of all contractual agreements. It sets out binding standards for social and environmental requirements, as well as occupational health and safety, and applies to every business relationship. Employees in procurement, in particular, receive targeted training on these requirements. The Supplier Code of Conduct can be viewed at [bechtle.com/sustainability](https://www.bechtle.com/sustainability).

Respecting human rights and complying with environmental standards in global supply chains requires a long-term commitment and a step-by-step approach. By working closely with our partners, the Bechtle Group aims to continuously advance human rights and compliance with environmental standards.

### 3. Implementation of human rights and environmental due diligence

As part of its due diligence obligations, the Bechtle Group follows a two-stage assessment process to identify and evaluate risks relating to human rights and the environment.

The first stage involves identifying, assessing and weighting potential risks using a preliminary risk analysis, providing a high-level assessment of risks relating to human rights and the environment along the supply chain. This is based on the relevant scope or product category and the countries of origin of the sourced goods, using country and product-specific indicators to systematically categorise prioritise risks and inform the subsequent detailed risk analysis.

In the second stage, a more detailed, supplier-specific risk analysis is carried out using dedicated risk assessment tools such as EcoVadis IQ, which enables the systematic prioritisation of specific human rights and environmental risks by structuring and consolidating country and sector-specific risk indicators. To ensure data quality, results are additionally reviewed for plausibility using external sources (e.g. the [MVO Risk Check – CSR Risk Check | MVO Risico Checker](#)).

#### Own operations

As an internationally operating IT trading and services company, the key human rights and environmental risks in the Bechtle Group's own operations primarily arise from its supporting infrastructure and its role as a distribution and service entity.

Key focus areas include in particular:

- risks related to equal treatment and fair working conditions, particularly with regard to diversity and equal opportunities in a structurally male-dominated industry,
- work-related risks in connection with occupational health and safety and work organisation,
- as well as environmental impacts resulting from the operation of office buildings, logistics sites and IT infrastructure (in particular energy consumption).

Compared to manufacturing companies, direct environmental impacts are generally less significant; however, there is a substantial leverage effect through the product portfolio and the management of supply chains.

#### Supply chain and upstream value chain stages

The key human rights and environmental risks are structurally located in the upstream global supply chains of the IT products distributed by the Bechtle Group.

Direct suppliers predominantly operate in regulated markets (e.g. the EU), while the actual value creation – in particular raw material extraction, component manufacturing and final assembly – often takes place in international production networks outside Europe.

This results in particular in:

- human rights risks, such as child labour and forced labour as well as inadequate wages,

- occupational health and safety risks along labour-intensive manufacturing processes,
- restrictions on fundamental labour rights, in particular freedom of association,
- as well as environmental risks, for example in connection with raw material extraction and energy-intensive production.

These risks are typically concentrated in countries and regions with elevated structural risks in terms of governance as well as labour and environmental standards.

It should also be noted that, even in the case of business partners based in Europe, supply chains are often globally structured and risks may therefore arise in upstream production stages.

The Bechtle Group places particular emphasis on risks relating to labour and human rights, and, for its direct suppliers, has identified the following risks as high and therefore prioritised:

- Prohibition of the worst forms of child labour (§ 2 para. 2 no. 1 LkSG)
- Prohibition of forced labour (§ 2 para. 2 no. 2 LkSG)
- Prohibition of violations of occupational health and safety obligations (§ 2 para. 2 no. 5 LkSG)
- Prohibition of non-compliance with minimum wage requirements (§ 2 para. 2 no. 8 LkSG)

Key risk hotspots include raw material extraction as well as component manufacturing and final assembly in high-risk regions.

The results are then incorporated into sustainability and group risk management.

Ad hoc reports are submitted without delay to the responsible member of the Executive Board and integrated into the risk analysis, with a particular focus on deriving appropriate measures and assessing their effectiveness.

For suppliers with an elevated risk profile, more in-depth reviews are conducted. Where deficiencies are identified, corrective measures are developed together with the supplier and their implementation is closely monitored. If this does not lead to improvements, a structured escalation process may be initiated, up to and including termination of the business relationship. In this way, the Bechtle Group ensures that risks are identified, assessed and appropriately addressed at both a systemic and supplier level.

## 4. Preventive and remedial measures

The findings from these analyses inform the development of specific measures to prevent or mitigate any adverse impacts of our business activities. The implementation of such measures is an ongoing process at the Bechtle Group and enables the continuous development of our ESG risk management and our catalogue of preventive and remedial measures. It is the firm belief of the Bechtle Group that addressing human rights and environmental challenges in our global supply chains is an ongoing process that requires systematic changes as well as company-specific measures.

Within its own operations, the Bechtle Group relies on binding policies and regular training to prevent and mitigate human rights and environmental risks. The Bechtle Code of Conduct forms the central framework for ensuring integrity. In addition, sustainability requirements are systematically integrated into procurement processes, and employees—particularly in procurement—receive targeted training on ESG topics and sustainable supplier selection. Internal measures and their effectiveness are continuously reviewed and refined.

In addition, since 2026 the Bechtle Group has been a member of the Responsible Business Alliance (RBA), an internationally recognised industry initiative. This membership supports in particular the implementation of preventive measures within the supply chain through established standards, shared tools, and the exchange of best practices in the area of human rights and environmental due diligence.

Bechtle expects all direct suppliers to comply with internationally recognised human rights and environmental standards and to ensure these standards are upheld throughout the supply chain. These requirements are set out in the Supplier Code of Conduct, which forms the binding framework for collaboration and is considered both when establishing and throughout the course of the business relationship.

Where necessary, Bechtle engages in structured dialogue with the relevant suppliers to agree on improvement measures and support their implementation in order to promote continuous improvement and compliance with human rights and environmental standards.

Where potential violations are identified, Bechtle follows a structured process to review, assess and address each case. If a violation is confirmed, Bechtle works with the suppliers to agree appropriate remedial measures and supports their implementation to ensure lasting improvement.

In addition, the Bechtle Group continuously refines its internal processes to ensure a consistent and effective response in such situations, including further developing a clearly defined escalation mechanism for serious cases and strengthening its approach to reviewing the effectiveness of remedial measures, for example through regular progress reporting and structured follow-up.

By combining prevention, training, supplier development and remedial measures, the Bechtle Group ensures that risks are not only identified but actively reduced and managed.

## 5. Grievance mechanisms and remediation

Despite our commitment to human rights and environmental standards across our supply chains, violations may still occur. It is therefore essential to establish effective grievance mechanisms. These mechanisms serve to identify and document risks, as well as to uncover violations and initiate appropriate countermeasures. To this end, we have set up a central whistleblower hotline for the anonymous, confidential and secure reporting of concerns:

E-mail: [complianceboard@bechtle.com](mailto:complianceboard@bechtle.com)

Phone: +49 7132 981-4555

We investigate every report and ensure that whistleblowers do not face any reprisals or other disadvantages as a result of using the system. All reports are handled confidentially and assessed in a fair and impartial manner.

Reports submitted through the whistleblower system are incorporated into the risk analysis. The Compliance team conducts an initial review of all incoming reports and refers supply chain-related matters to the Human Rights Officer within Corporate Sustainability Management for further assessment and follow-up. Where appropriate, these are recorded in the internal sustainability risk register, ensuring that insights from day-to-day operations continuously inform and improve risk assessment and management along the supply chain.

Where negative impacts are identified that have been caused by the Bechtle Group or to which it has contributed, appropriate remedial measures are defined and implemented to prevent, end or, at a minimum, mitigate such impacts going forward. Further information is available at [bechtle.com/sustainability](https://bechtle.com/sustainability).

## 6. Responsibilities and accountability

The Bechtle Group Executive Board and Bechtle AG's Corporate Sustainability Management hold overall responsibility for human rights and environmental due diligence. Bechtle has defined clear responsibilities to ensure compliance with these obligations. Supplier risk management is carried out jointly by Corporate Sustainability Management at Bechtle AG and L&S and ensures that the human rights strategy is embedded across all key business processes.

In addition, Bechtle has established the role of Human Rights Officer. Sophie Mándoki (sophie.mandoki@bechtle.com) serves as the central point of contact, overseeing the implementation of human rights due diligence. She reports to the board member responsible for sustainability, Christian Jehle, on an ad hoc basis and to the full Executive Board at least once a year.

The Bechtle Group regularly reviews and updates its processes, measures and responsibilities. As conditions change, the risk assessment, the measures in place and this policy statement are updated accordingly.

## 7. Communication and reporting

Transparent communication is a core element of corporate due diligence. The Bechtle Group reports on its human rights and environmental due diligence processes at group level in its sustainability statement, published as part of the Annual Report, outlining the risk analysis, identified human rights and environmental risks, preventive and remedial measures, progress made and ongoing challenges.

The policy statement is intended for employees, suppliers, customers and the wider public and is published on the company website to ensure transparency. The ESG Fact Book also refers to the policy statement.

Employees are introduced to the due diligence requirements and policy statement as part of onboarding. Teams such as risk management and sustainability management receive targeted briefings to embed these principles into their day-to-day work.

Suppliers, business partners, investors and customers are also informed as needed, for example through meetings or presentations.

Neckarsulm, 10 June 2026



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The executive board