



SIEGWERK

Business Partner Code of Conduct



1. Introduction



Siegwerk is a family-owned business with a history spanning two centuries. As such we recognize our responsibility to uphold human rights and safeguard the environment. For Siegwerk’s owners and employees, this responsibility is not only a legal obligation but a moral imperative, and of high relevance to build resilient operations and supply chains. This Business Partner Code of Conduct (referred to as “Code” in the following) describes our expectations towards our suppliers and business partners. This is a journey and we cannot take it alone.

The Business Partner Code of Conduct is rooted in our Human Rights Guiding Principles from our [Human Rights Policy](#). The Principles include (complete list of principles can be found in our Human Rights Policy):

Principle 2 - Risk Acknowledgement and Principle 3 - Knowledge Seeking:

Siegwerk acknowledges human rights and environmental risks in our operations and upstream supply chain. We foster transparency and encourage business partners to review their operations and share issues with us using our Code.

Principle 4 - Collaboration is Key: We collaborate openly to improve conditions for employees and communities. We

provide guidance and support to address issues, and we value your input on prioritization and actions.

Principle 5 - Stakeholder Focus: The prioritization of actions needs to be based on the situation of the involved people, the severity of violation, and the number of people involved.

Principle 8 - Continuous Improvement: Siegwerk expects immediate action on severe breaches while recognizing that other issues may take longer to address. In these cases, an improvement roadmap with actions and timelines needs to be created. We will go into further detail in chapter 3.

Principle 6 - Last Resort Measure: Where suppliers show a consistent or significant lack of commitment to comply with this Code, we reserve the right to end the relationship and terminate relevant agreements. This shall be the last resort measure after efforts to rectify the violation collaboratively were unsuccessful.

Our focus is on continuous improvement. Transparency guides us toward sustainable operations and supply chains. Let’s collaborate to leave a legacy of respect, responsibility, and a preserved planet for future generations.

2. Scope

All workers **at your site and in your operational control** are in scope of our Code. These are not only your permanent employees but also – and not limited to – all temporary and contract workers, workers which are working at your site



through service providers e.g. cleaning, canteen, security and construction. All your processes and policies protecting workers need to apply to all workers described.

When implementing these criteria, particular attention should be paid to the rights of at-risk individuals, including but not limited to women, migrants and, as mentioned, sub-contracted workers. We

expect you to discuss the principles of this Code also with your suppliers and work with them to improve on issues in your upstream supply chain.

3. Breaches of code and reporting incidents

Siegwerk has developed its “**Siegwerk Sustainability Checklist**” (attached as appendix) in which some questions or topics are marked as high priority. These represent severe non-compliance which have significant impact on human rights or the environment, affecting many people or a large area, being irreversible or posing a high risk of violations. If any of these topics arise in your operation or your upstream supply chain, Siegwerk expects **transparency**. You can disclose these issues either through the respective Siegwerk purchasing responsible or directly to the Human Rights Officer and Supplier Sustainability Hub (humanrights@siegwerk.com). Alternatively, the mentioned grievance channels can be used.

We expect you to generate an **action plan including timeline** to address the topics and follow-through with the planned improvements.

If there are imminent severe violations of human rights or environmental impacts (incidents) in your own operation or supply

chain, these need to be **stopped without delay** and we expect you to **inform** Siegwerk. If **remediation** is required, it needs to be proven by documentation e.g. payment slips to affected stakeholders. You should keep Siegwerk informed during investigations and consult on remediation steps. In cases where we have contributed to the issue, we may participate in remediation.



Legal compliance violations are a severe breach of code. Should the expectation outlined in this Code contradict local laws or regulations, Siegwerk needs to be informed and alternative ways to respect the spirit of the criteria need to be found. In other instances, where we must submit reports to legal entities, your cooperation in supplying the required details to facilitate our timely disclosure is expected.

In case, you actively hide severe issues or avoid getting knowledge about them and do not make any efforts to rectify the situation, we will reserve the right to terminate the business relations.

4. Grievance channels



In order to foster transparency and strengthen workers voice, the following Grievance mechanisms are available and need to be made accessible to

workers. This includes workers of sub-suppliers of our suppliers e.g. contract agencies. It can also be used by negatively affected communities and stakeholders.

- humanrights@siegwerk.com
- [Compliance - Siegwerk](#)

These grievance channels ensure confidentiality through anonymity and proper channels of discretion as these are of utmost importance to Siegwerk. There are local languages available for best accessibility. We will investigate concerns,

discuss findings, and expect your assistance with any such investigation and provision of access to any information reasonable requested.

You will find a QR code as appendix to this code, which can be translated and distributed to the workers for easy access to the grievance channel.

5. Due diligence and compliance monitoring

To ensure compliance with our Code, we employ a comprehensive approach that fosters transparency, collaboration, and continuous improvement. Here are the key measures we take.

We engage in **open dialogues** with you,, fostering mutual understanding and trust. Regular communication allows both of us to address concerns, share best practices, and align on shared goals.

Our leadership team actively participates in **senior management meetings**. These sessions provide a platform for strategic discussions, alignment, and commitment to our Code.

We regularly **assess and audit** you to evaluate compliance. Audits can be done



as desktop audits or on-site audits. Assessments can include methods to capture workers voice such as Human Rights Impact Assessments. We employ announced, semi- and non-announced audits depending on the risk level involved. Third parties may be used to conduct these activities.

Should any non-adherence to the Code be discovered, we will follow the procedures outlined in chapter 3 - Breaches of code and reporting incidents. In case you have questions or suggestions for improvement for this Business Partner Code of Conduct, we are happy and open to engage with you to improve.

6. Confidentiality



At Siegwerk, we understand that a successful partnership is built on a foundation of cooperation, trust, and respect.

We take the confidentiality of findings and documents seriously, ensuring they are not disclosed to third parties without proper authorization, unless they are already part of the public domain.

It is important to note that the use of our logo and/or our name in the public domain, including websites and all forms of social media, is not permitted without prior approval. Our logo is a protected trademark and subject to image rights. You have to reach out in case you are interested in using our logo and/or our name

7. Reference to international standards

The criteria contained within this Code are based on internationally recognized standards and principles. Siegwerk is committed to guidelines such as:

- Guiding Principles on Business and Human Rights (United Nations)
- International Bill of Human Rights
- International Labor Organization's Declaration on Fundamental Principles and Rights at Work (ILO)

By signing this code, you also commit to the principles of the [United Nations Global Compact \(UNGC\)](#).



We expect that our business partners share and practice values and principles that mirror our own, as outlined in this Code as well as in our [Human Rights](#) and [Sustainability Policies](#).

8. Documentation

This Code is regularly reviewed to secure that it remains valid. Any updates will be communicated in a timely manner and shared on the Siegwerk [Website](#).

9. Processes and documents

You have documents and processes in place that ensure compliance with this Business Partner Code of Conduct. These are regularly **monitored and trained**. You also have a system in place to stay up-to-date with relevant new or changed regulations to secure continued compliance.

We encourage you to be member of sustainability programs or initiatives such as UN Global Compact, Carbon Disclosure project, SEDEX, EcoVadis and engage in other sustainability activities to support local communities.



You have a **supplier management** in place that does not only focus on commercial aspects of the purchased products but also evaluates human rights, environmental and

equivalent standards. The supplier management ensures that these topics are cascaded down the supply chain to increase the positive impact. Undergoing a supplier evaluation to avoid risks upfront is prerequisite before you onboard a new supplier. You need to be able to disclose **information of origin** of your raw materials and support Siegwerk in identifying its involvement in case there are severe breaches by disclosing your supply chain.

In the following, overarching topics to which compliance is mandatory are described. As mentioned before, this applies to all workers at your site or under your operational control. For further details, please also check the "Siegwerk Sustainability Checklist" in the appendix.

10. Human Rights

Under no circumstances will you use **child labor**. That means you do not employ children under the age of 15, unless exceptions recognized by the ILO apply. You do not permit those under the age of 18 to do work that can jeopardize their physical or psychological health or development, or interfere with school. You take reasonable precautionary measures to verify the age and identity of workers.

We recognize that not all work performed by children is child labor and in certain situations, the provision of decent work for 15–17-year-olds can be an effective way of addressing child labor, where national laws allow.

Under no circumstances will you use **forced or involuntary labor**, including compulsory or trafficked labor, indentured

labor, bonded labor, prison labor, or other forms of mental or physical coercion. You, or any labor intermediary used by you, do not retain workers' passports or other identification documents, require workers to pay fees or deposits in exchange for work, withhold pay, or otherwise constrain a worker's freedom of movement.

The **land rights** and "free, prior and informed consent" of local communities and indigenous peoples are respected.

In some contexts, there are significant risks to **environmental and human rights defenders**, including trade unionists, indigenous peoples and community leaders. Threats, violence or intimidation towards human rights and environmental defenders is not permitted.



11. Labor Practices and Standards

You will employ **reasonable working hours** and do not require workers to work more than the regular and



overtime hours allowed by local laws and regulations (max. 60 hours per week).

Workers will not be forced to work overtime. Furthermore, you ensure that workers are provided with at least 24 hour of rest after 6 consecutive days of work or alternative 48 hours after 14 consecutive days of work where applicable by local law.

You ensure **fair and timely compensation** and compensate all workers with wages, overtime premiums and benefits that meet or exceed legal requirements or collective

agreements, whichever are higher. You pay salaries on time and in full, with only legal deductions.

You respect the **freedom of associations** and the right of workers to form, join, or not join labor unions. You are committed to bargaining in good faith and establishing a constructive dialogue with legally recognized workers' representatives. You provide other means of dialogue in locations where freedom of association is restricted.

You do not tolerate **harassment and abuse** and treat all workers with respect and dignity. You prevent and eliminate any form of physical, sexual, or verbal

harassment, actual or threatened violence, bullying, intimidation, or other inappropriate behavior.

You are committed to providing equal opportunities and do not tolerate **discrimination** in any form. An individual's or group's access to opportunities are not limited by characteristics such as race, color, caste, national origin, religion, age, disability, gender, veteran status, marital or domestic partner status, family relationship, sexual orientation, citizenship, union membership, political affiliation or other similar characteristics. Furthermore, you apply this to all aspects of employment decisions.

We expect you to have a clear set of principles and processes for **training and development** that address recruitment, evaluation, training, and management of layoffs. Your recruitment process is fair and transparent with equal opportunities to all candidates. There are no recruitment fees (obvious or hidden) being charged. You regularly evaluate your employees' performance and provide constructive feedback. This process is fair, transparent, and linked to the employees' development. You provide your employees with necessary skills training and personal development opportunities.

12. Operational Health and Safety



You prioritize the safety and well-being of workers by ensuring **compliance** with legal requirements.

You proactively prevent workplace hazards through effective **systems and procedures**.

Additionally, you provide **training, personal protective equipment (PPE), and medical care for injuries**. PPE is defined after a thorough risk analysis of the respective work and is appropriate for injury prevention. It is provided free of charge.

You are prepared for **emergencies** in providing first-aid and firefighting

equipment and have regular emergency drills.

Furthermore, you maintain **sanitary and safe conditions** for employer-provided housing, transportation and food. This is also being checked and ensured for all non-permanent employees working on site or under operational control as specified in chapter 2 – Scope.

Material storage conditions comply with applicable law. Hazardous materials (e.g. flammables and combustibles) are stored in HSE controlled risk zones.

13. Environmental Standards

You ensures that each manufacturing facility is in compliance with applicable laws and adheres to relevant environmental laws and regulations, with a specific focus

on **emissions, water usage, discharge, and waste disposal**. Additionally, you obtain and comply with all necessary legal permits for your operations.

You put efforts in addressing the impacts and reducing and mitigating hazardous and non-hazardous **air emissions** throughout your operations and supply chain, such as - but not limited to - greenhouse gasses, sulfur and nitrogen oxides, volatile organic compounds (VOC), particulate matter (PM), dust, odor, noise and light polluting the local environment. You report accurate **carbon emission data** and actively participate in reduction initiatives, recognizing the critical link between climate change and escalating human rights risks.

Your organization actively minimizes impacts and its environmental footprint and protects vital natural resources and **biodiversity**. This involves addressing areas like **raw material usage, energy and water efficiency, pollution prevention, and waste management**.

Importantly, you are not sourcing materials that could lead to **deforestation**¹ in ecologically significant regions or harm endangered species' habitats.

You take care of your **customers and potential consumers health and safety** by mitigating negative impacts of your products and services where it is applicable. You have a formalized process and information sharing to proactively interact with customers regarding the potential health and safety risks from **product use**, such as contamination.



You are striving to make your products sustainable or ensure they are used in a sustainable manner. Ideally, you already offer **environmental services and advocacy**, or you are working towards promoting sustainable consumption of your products or services among your customers. This includes efforts such as reducing greenhouse gas emissions or minimizing waste throughout the product life cycle.

14. Business Integrity, Legal Compliance and Ethics

You **comply** with all laws and regulations applicable to you.

You do not engage in any type of **corruption** such as offering, promising or accepting bribery, kickbacks or facilitation payments. You also do not offer gifts, business hospitality or any other benefits which may inappropriately influence decision-making.

You **avoid conflicts of interest** in all forms. You will declare to Siegwirk any potential

or existing conflicts of interest regarding your relationship with Siegwirk.

You **compete fairly**, and comply with applicable anti-trust and competition laws and regulations.

You comply with applicable **trade sanction regulations**, such as trade embargoes, sanctions on parties and geographical areas, and import and export regulations. You do not participate in **money laundering**, tax evasion, or financing of



¹ For producers and retailers of bio-based materials, these do not originate from areas where there has been deforestation after 31 December 2020. Deforestation is the intentional

clearing or removal of forests to make way for e.g. agriculture, livestock grazing, or urban development.

terrorist, or criminal activities. You keep accurate and transparent records of business transactions.

You ensure the **confidentiality** and security of non-public information of Siegwirk. You respect the **intellectual property** of others. You **respect privacy**, and collect and process personal data only in compliance with applicable laws and regulations.

You meet all **product quality requirements** and service specifications, and quality and safety requirements as required by law. You use **material of known origin** and ensure traceability of raw materials and finished goods. Where applicable, actions are in place to identify and assess **conflict minerals**². In the manufacture of all products supplied to Siegwirk, these substances or raw materials containing these are not used as intentionally added ingredients.

15. Appendixes

Appendix 1: QR code with access to Siegwirk Grievance Mechanism

Appendix 2: "Siegwerk Sustainability Checklist"



² Substances in the scope of: - SEC. 1502. "CONFLICT MINERALS" of the Dodd-Frank Wall Street Reform Act and Regulation (EU) 2017/821

16. Commitment



We, the undersigned, hereby confirm that we have read and will fulfill the requirements of the Siegwirk Business Partner Code of Conduct and have taken note of the Siegwirk Sustainability Checklist in the appendix. This is also confirmed for any entity which owns or controls, is owned or controlled by, or is under common ownership or control with, the signing business partner.

We will report to Siegwirk any case of non-compliance to this Code and will take necessary action to comply with the requirements and provisions herein.

Company Name:	
First and Last Name:	
Job Title:	
Date & Place	
Authorized signature	

This document must be signed by an authorized representative of the business partner.

Siegwerk reserves the right to update this Code if necessary. The validity and binding nature of previous versions already signed always remain in force.

Siegwerk Sustainability Checklist

Sustainability is a complex topic, encompassing Human Rights, Environmental Impacts, Compliance and many other issues. To detail our expectations of our Business Partners and give guidance, Siegwerk has developed its Siegwerk Sustainability Checklist as part of the Business Partner Code of Conduct.

In this checklist, some questions or topics are marked as "high priority". These represent severe non-compliance which have significant impact on human rights or the environment, affecting many people or a large area, being irreversible or posing a high risk of violations.

If any of these topics arise in your operation or your upstream supply chain, Siegwerk expects transparency. You can disclose these issues either through the respective Siegwerk purchasing responsible or directly to the Human Rights Officer and Supplier Sustainability Hub (humanrights@siegwerk.com). Alternatively, the grievance channels mentioned in the Code can be used.

We expect you to generate an action plan including timeline to address the topics marked with "high priority" and follow-through with the planned improvements.

(In case needed, the Siegwerk Sustainability Checklist can also be provided in MS Excel. Please contact your respective purchasing responsible.)

Human Rights		Priority
1.1.	Child labor	
1.1.1	No worker at sites serving Siegwerk (including contract workers & service providers) is below the minimum legal working age or minimum 15 years old; whatever is higher. In case exceptions recognized by the International Labour Organization (ILO) apply, please specify in the next column.	High
1.1.2	No under 18s work at night.	High
1.1.3	No under 18s are working in hazardous conditions.	High
1.1.4	No under 18s are working overtime unless specified by law.	High
1.1.5	In case below 18s are employed e.g. as apprentices or interns, this does not interfere with schooling and is in accordance to local law and international standards.	High
1.1.6	A remediation plan is in place if child labor is found.	High
1.1.7	Identification papers are verified prior to hiring.	High
1.1.8	A copy of the identity documents that verify each worker's date of birth is kept on file.	
1.1.9	A register of workers under 18 years is kept on file.	
1.1.10	All above mentioned points with high priority are being checked and ensured for all non-permanent employees working on site or under operational control as specified in BPCoC/Chapter 2.	High

Human Rights		Priority
1.2.	Freely chosen employment / safeguards against forced labor and modern slavery	
1.2.1	You have a policy in place on modern slavery, including forced labor and involuntary prison labor, that is communicated to all workers.	
1.2.2	It is possible for a worker to leave your employment when their contract expires, or if they give notice within a period of time detailed in their contract.	High
1.2.3	Fees and costs related to recruitment, employment or termination processes as per the ILO definition are not charged to workers.	High
1.2.4	Where workers have paid recruitment fees or costs, workers are repaid.	High
1.2.5	Employers do not charge deposits, withhold or delay payments or implement any financial scheme that limits the worker's ability to leave employment freely. This includes withholding or charging money for uniforms, personal protective equipment (PPE) or other things required for the work.	High
1.2.6	Workers have written contracts in a language they can read and understand. These are provided prior to signing. Significant changes in employment terms are agreed upon by the worker in writing.	High
1.2.7	Workers do not give up identity papers, passports, or work permits as a condition of employment.	High
1.2.8	Surveillance is not used for the purpose of intimidation or control of workers.	
1.2.9	Workers have freedom of movement and are not confined to the premises, including dormitories, or provided housings.	High
1.2.10	Wages are paid, on time, regularly and in full without any delay.	High
1.2.11	A fair disciplinary policy or process is in place, and procedures are implemented, adopted and communicated to all workers. It is ensured that these are adequate, fair and non-discriminating and that workers do not suffer from individual actions of supervisors or colleagues.	High
1.2.12	In case accommodation or transport to the working site is provided, it is voluntary.	High
1.2.13	All workers are living off-site.	
1.2.14	In case accommodation is provided, these are adequate and meeting basic standards e.g. limiting the number of people to a room, ensure proper water, sanitation, well-ventilated, where needed heated or air-conditioned and with cooking facilities which should be separated from sleeping rooms.	High
1.2.15	Your company employs migrant workers or other vulnerable groups e.g. from different regions or countries.	
1.2.16	All standards and human rights outlined in the BPCoC and the Sustainability Checklist equally apply to migrant workers and other vulnerable groups.	High
1.2.17	All above mentioned points with high priority are being checked and ensured for all non-permanent employees working on site or under operational control as specified in BPCoC/Chapter 2.	High
1.3.	Land rights	
1.3.1	The land rights and "free, prior and informed consent" of local communities and indigenous peoples are respected.	High

Human Rights		Priority
1.4.	Environmental and human rights defenders	
1.4.1	Threats, violence or intimidation towards human rights and environmental defenders as well as union workers and supporters is not permitted.	High

Labor Practices and Standards		Priority
2.1.	Reasonable working hours	
2.1.1	The standard working hours do not exceed the legally permitted quantity per week.	High
2.1.2	Local legal overtime limitations are complied with.	
2.1.3	Including overtime, the maximum working hours per week do not exceed 60 hours in a 7 day period unless permitted by local law and agreed freely by a workers organization or representation and appropriate safeguards are taken to protect the workers' health and safety.	
2.1.4	All overtime is on a voluntary basis. If the employment contract allows for contractual overtime, then workers expressly agree to it.	High
2.1.5	Overtime is paid at the appropriate premium rate according to legal requirements and/or collective bargaining agreements.	High
2.1.6	Working hours by employee are monitored and recorded.	
2.1.7	To maintain health of the workers and ensure appropriate time for recovery and social life, workers are entitled to a minimum of 24 hours of consecutive rest within a 7 day period or two 24 hour periods in every 14 days where applicable with national law.	High
2.1.8	Workers receive all legally required leave.	High
2.1.9	Rest times are being paid and cannot be exchanged with additional pay in case the worker decides to work to maximize pay. This is to ensure that there are no adverse effects on health and safety.	
2.1.11	Workers receive all legally required meals and rest breaks.	High
2.1.12	Workers have transparency on their salary, standard working hours, maximum overtime & premiums, entitlement to leave and breaks and other relevant topics e.g. through their contracts.	High
2.1.13	All above mentioned points with high priority are being checked and ensured for all non-permanent employees working on site or under operational control as specified in BPCoC/Chapter 2.	High
2.2.	Fair and timely compensation	
2.2.1	Wages and benefits paid for a standard working week meet, at a minimum, national legal standards.	High
2.2.2	Wages paid are in line with an amount that is sufficient to meet basic human needs in the applicable community, in line with credible living wage benchmarks (e.g. Global Living Wage Coalition / https://wageindicator.org/salary/living-wage/gap-check).	
2.2.3	In case the wages do not amount to living wages yet, a roadmap is in place to comply.	

Labor Practices and Standards		Priority
2.2.4	Workers receive the insurances and benefits, including leave entitlements, they are legally or contractually entitled to.	High
2.2.5	Workers receive a pay slip or equivalent with complete pay, benefits and deduction information that reflects the pay received. They are provided with relevant information regarding the grounds for wage deductions.	High
2.2.6	Wage deductions are not used as a disciplinary measure.	High
2.2.7	Insurance covers workers in the case of any work-related injuries, accidents, illness, invalidity or death, in accordance with local worker compensation laws, as a minimum.	High
2.2.8	What is the % of health care coverage of the employees in your location(s)?	
2.2.9	All above mentioned points with high priority are being checked and ensured for all non-permanent employees working on site or under operational control as specified in BPCoC/Chapter 2.	High
2.3.	Freedom of associations	
2.3.1	Workers are free to exercise their right to form or participate in work-related associations, including labor unions, professional organizations, and other relevant groups.	High
2.3.2	Workers are free to engage in collective bargaining, seek representation and/or join workers' councils.	High
2.3.4	Legitimate trade unions and union representatives have access to workers in the workplace.	High
2.3.6	You act in good faith to reach a collective bargaining agreement and this is implemented where it exists.	
2.3.8	In case freedom of associations is legally restricted, do you provide other means of dialogue (please elaborate)?	
2.3.9	_____	
2.3.9	In case freedom of associations is legally restricted, do you provide other means of dialogue (please elaborate)?	
2.3.10	_____	
2.4.	Discrimination, harassment and abuse	
2.4.1	There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation or any other protected characteristics.	High
2.4.2	Workers and potential candidates are not subject to health checks, including pregnancy or HIV/AIDS tests, that may lead to discrimination at any point during recruitment or employment.	
2.4.3	Exceptions to this are strictly in compliance to local law and only used to ensure health and safety. Results are only being shared with the company after written consent of the individual.	High
2.4.4	Workers are not subject to threats, penalties, coercion, physical force, violence, harsh or inhumane treatment, or bodily searches.	High

Labor Practices and Standards		Priority
2.4.5	Preventive measures are established to protect workers from sexually intrusive, threatening, insulting or exploitative behaviour, and from discrimination or termination of employment on unjustifiable grounds.	
2.4.6	Steps are taken to promote diversity, equality and inclusion in the workplace.	
2.4.7	What is % of the total workforce across your location(s) who received training on diversity, discrimination and/or harassment (please give number or choose "no" in case unknown)	
2.4.8	All above mentioned points with high priority are being checked and ensured for all non-permanent employees working on site or under operational control as specified in BPCoC/Chapter 2.	High
2.5.	Professional Development & training	
2.5.1	You have a clear set of principles and processes for professional development (career management) and training that address the main career stages, including recruitment, evaluation, training, and management of layoffs. These principles aim at promoting equal opportunity, diversity, and non-discrimination in the workplace.	
2.5.2	Your recruitment process is fair and transparent with equal opportunities to all candidates.	High
2.5.3	The following mechanisms are in place to ensure a fair and transparent recruitment process:	
2.5.4	<ul style="list-style-type: none"> • Clear Job Descriptions: Providing detailed and accurate job descriptions helps candidates understand the role and its requirements, ensuring they can assess their suitability before applying. 	
2.5.5	<ul style="list-style-type: none"> • Standardized Recruitment Procedures: Implementing standardized procedures for screening, interviewing, and evaluating candidates helps eliminate biases and ensures consistency. 	
2.5.6	<ul style="list-style-type: none"> • Diverse Recruitment Panels: Having a diverse panel of interviewers can help mitigate unconscious biases and provide a more balanced evaluation of candidates. 	
2.5.7	<ul style="list-style-type: none"> • Training for Recruiters: Providing training on diversity, equity, and inclusion for recruiters and hiring managers ensures they are aware of and can mitigate their biases. 	
2.5.8	<ul style="list-style-type: none"> • Feedback Mechanisms: Offering constructive feedback to candidates, whether they are successful or not, helps them understand the decision-making process and areas for improvement. 	
2.5.9	You regularly evaluate your employees' performance and provide constructive feedback. This process is fair, transparent, and linked to the employees' career development.	
2.5.11	You provide your employees with necessary skills training and personal development opportunities.	

Labor Practices and Standards		Priority
2.6.	Grievance channels & remedy	
2.6.1	A formal grievance mechanism is in place for workers to voice their concerns which is easily accessible without cost, provides anonymity and protects workers from discrimination, intimidation or retaliation.	
2.6.2	Grievance channel is aligned with the effectiveness criteria for operational grievance mechanisms, as set out in the UN Guiding Principles on Business & Human Rights. (https://unglobalcompact.org/library/631)	
2.6.3	Informal grievance mechanisms are in place e.g. trained workers representatives or management & HR visits to offices and shopfloor. In case "yes", please elaborate.	High
2.6.4		
2.6.5	Issues raised by workers are taken seriously, actions are defined & progress openly communicated. Please give details.	High
2.6.6		
2.6.7	In case a grievance is upheld, remedy is provided to the stakeholders affected, with responsibility for remedy.	High
2.6.8	How many grievances have been raised during the last 12 months (both informal and formal channels)?	
2.6.9	Provide more details on the number, content, duration, and outcome of the procedures. What topics have the complaints been about?	
2.6.10		
2.6.11		
2.6.12		
2.6.13	Non-permanent employees working on site or under operational control as specified in BPCoC/Chapter 2 have access to the companies grievance mechanisms to raise concerns or report abuses.	High

Environmental Standards - compliance & minimizing environmental impact		Priority
3.1.1	Air, water and soil pollution	
3.1.2	All legally required thresholds for pollution of air (including noise), water and soil are being kept and regularly monitored.	High
3.1.3	Water-related impacts arising from your operations and the products and services you provide are identified and, where present, are managed and minimized.	High
3.1.4	You put efforts in addressing the impacts and reducing and mitigating other hazardous and non-hazardous air emissions throughout your operations and supply chain, such as - but not limited to - sulfur and nitrogen oxides, volatile organic compounds (VOC), particulate matter (PM), dust, odor, noise and light polluting the local environment.	
3.2.	Waste & material management	
3.2.1	Waste management complies with local regulations at any time.	High

Environmental Standards - compliance & minimizing environmental impact		Priority
3.2.2	In case there are no local legal requirements, different types of waste are separated, stored, handled, transported, disposed of or treated in a way that protects the health and safety of people and the environment.	
3.2.3	There is conclusive ongoing documentation what amount and types of waste are generated.	
3.2.4	Wastewater is discharged into a sewer or drainage system.	High
3.2.5	Where re-use or recycling processes and machinery is used, these are properly maintained and working.	
3.2.6	Chemicals and other materials posing a hazard to humans or the environment are identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.	High
3.3.	Deforestation	
3.3.1	For suppliers of agriculture and forest products and materials, these do not originate from areas where there has been deforestation after 31 December 2020.	High
3.3.2	You are not sourcing materials that harm endangered species' habitats.	
3.4.	Greenhouse gasses	
3.4.1	You track your Corporate Carbon Footprint (CCF) in accordance with GHG protocol or other global standard.	
3.4.2	You strive to reduce your own carbon footprint and have set relevant targets for reductions.	
3.4.3	You have product carbon footprint (PCF) for the products supplied to Siegwerk.	
3.4.4	You base the calculation of the PCF on ISO 14067, so that the data can be shared and used across the supply chain	
3.4.5	Upon request, information on targets for CCF and PCF, emissions and development can be shared with Siegwerk.	
3.4.6	You are moving towards green energy sources e.g. from solar, wind parks, hydropower, geothermal sources or green hydrogen and have taken first steps already.	
3.5.	Environmental Processes	
3.5.1	Environmental performance is monitored, with reference to targets and improvement plans. On request, data and information related to environmental performance is shared.	
3.5.4	Impacts on biodiversity and ecosystems are identified and, where present, are managed and minimized.	
3.5.5	Efforts are made to enhance the quality of the Product information on sustainability e.g. on the renewable and recycled content of products and materials, as well as their recyclability. Where required to comply with regulation, information is disclosed to Siegwerk .	
3.5.6	You take care of your customers and potential consumers health and safety by mitigating negative impacts of your products and services where it is applicable.	
3.5.7	You proactively share information with customers regarding the potential health and safety risks from product use, such as contamination. This can be e.g.	

Environmental Standards - compliance & minimizing environmental impact		Priority
	automated Material Safety Data Sheet sending, take-back programs, re-use and return processes (e.g. for pallets, solvents).	
3.5.8	You are striving to make your products sustainable or ensure they are used in a sustainable manner (environmental services and advocacy). This includes efforts such as reducing greenhouse gas emissions or minimizing waste throughout the product life cycle.	

Operational Health and Safety		Priority
4.1.1	None of your plants has been shut by the government due to an incident during the last three years? If "no", please give an explanation.	
4.1.2	Reason(s) for shutdown(s): _____	
4.1.3	_____	
4.1.4	Occupational health and safety risks are assessed and actions are taken to mitigate them. These include:	High
4.1.5	• appropriate controls to reduce hazards e.g. engineering/administrative/PPE	High
4.1.6	• work procedures	High
4.1.7	• workplace inspections	High
4.1.8	• emergency plans	High
4.1.9	• trainings	High
4.1.10	• provision of personal protective equipment (PPE)	High
4.1.11	PPE is defined after a thorough risk analysis of the respective work and is appropriate for injury prevention.	High
4.1.12	PPE and uniforms/workwear are provided free of charge.	High
4.1.13	It is ensured that all workers employed by your business or from a sub-contractors have sufficient PPE.	High
4.1.14	Where contract workers are employed, they as well as the agency are well trained on the associated risks of the work.	High
4.1.15	First-aid and firefighting equipment are available and in working order.	High
4.1.16	Workers trained in first aid and firefighting are available during operating hours in sufficient number to fit the occupational risks.	High
4.1.17	Workers are prepared in case of emergency, including through the performance of emergency drills.	High
4.1.18	An independent evacuation alarm is audible and/or visible to all workers. It is possible to manually activate the alarm. Alarm buttons are clearly visible and marked.	High
4.1.19	Emergency evacuation routes and exits ensure quick and safe evacuation at all times.	High

Operational Health and Safety		Priority
4.1.20	Safety hazards are continuously reported, analyzed, followed-up and acted upon. All OHS-related incidents are investigated.	High
4.1.21	Buildings are safe as per local laws and suitable for their intended purpose.	High
4.1.22	The working environment is clean, hygienic and well maintained and has adequate light, ventilation and, when necessary, heating.	High
4.1.23	Toilets are safe, free of charge, hygienic, accessible during working hours, equipped with basic supplies and proportional to the number of workers.	High
4.1.24	There are sanitary facilities for food storage provided.	
4.1.26	Material storage conditions comply with applicable law. Hazardous materials (e.g. flammables and combustibles) are stored in HSE controlled risk zones.	High

Business integrity, legal compliance and ethic		Priority
5.1.1	All applicable laws and regulations are complied with and required permits are obtained including, but not limited to those related to health and safety, working conditions, working hours, working age, compensation, sharing of personal data, waste and chemical management and environmental protection.	High
5.1.2	Specific care is be taken that the sub-suppliers follow all applicable laws and standards because contract workers and workers of outsourced services are at heightened risk of human rights and legal violation.	High
5.1.3	All forms of corruption, including bribery, extortion and embezzlement are prohibited and prevented. Bribery of officials as well as facilitation payments and other forms of corruption (for example fraud or theft) are covered by this prohibition.	High
5.1.4	All business transactions are free of conflicts of interest. Any material ownership or beneficial interest in your company by a public official, representative of a political party, Siegwerk employee or their relatives are declared to Siegwerk prior to any business relationship.	High
5.1.5	Confidential information and trade secrets are safeguarded and measures to protect sensitive data from unauthorized access is implemented. All competitor information is legitimately obtained and in compliance with applicable laws and regulations.	High
5.1.6	You do not enter into or seek to enter into or otherwise engage in any form of discussions, agreements or activity that would be a breach of applicable competition laws and regulations.	High
5.1.7	Applicable international trade sanctions and other applicable export and import controls are complied with and you will inform Siegwerk immediately should we become subject to sanctions.	High
5.1.8	You do not participate in money laundering, tax evasion, or financing of terrorist, or criminal activities. You keep accurate and transparent records of business transactions.	High
5.1.9	You ensure the confidentiality and security of non-public information of Siegwerk. You respect the intellectual property of others. You respect privacy, and collect and process personal data only in compliance with applicable laws and regulations.	High

Business integrity, legal compliance and ethic		Priority
5.1.10	You meet all product quality requirements and service specifications, and quality and safety requirements as required by law.	High
5.1.11	Where applicable, actions are in place to identify and assess the risk of minerals ("conflict minerals") coming from conflict-affected or high-risk areas, in line with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.	High
5.1.12	In the manufacture of all products supplied to Siegwerk, substances based on columbite-tantalite (coltan), cassiterite, gold, wolframite minerals or their derivatives that might be reportable under sec. 1502 of the Dodd-Frank Wall Street Reform Act, or raw materials containing these substances are not used as intentionally added ingredients.	High
5.1.13	In the manufacture of all products supplied to Siegwerk, minerals or metals containing or consisting of tin, tantalum, tungsten or gold that might be reportable in the scope of Regulation (EU) 2017/821, or raw materials containing these substances are not used as intentionally added ingredients.	High
5.1.14	Your company has not received an official notice, fine, prosecution, or withhold release order (WRO) for any non-compliance with legislation, regulation, consent, or permits within the last three years?	
5.1.15	If no, what issues or potential violations were raised (select all that apply):	
5.1.16	<ul style="list-style-type: none"> Building and/or Site Safety (Please explain): <hr/>	
5.1.17	<hr/>	
5.1.18	<ul style="list-style-type: none"> Business license/permit (please explain): <hr/>	
5.1.19	<hr/>	
5.1.20	<ul style="list-style-type: none"> Bribery, corruption or tax avoidance (please explain): <hr/>	
5.1.21	<hr/>	
5.1.22	<ul style="list-style-type: none"> Gender equality (please explain): <hr/>	
5.1.23	<hr/>	
5.1.24	<ul style="list-style-type: none"> Health and safety (please explain): <hr/>	
5.1.25	<hr/>	
5.1.26	<ul style="list-style-type: none"> labor standards (please explain): <hr/>	
5.1.27	<hr/>	
5.1.28	<ul style="list-style-type: none"> Land rights (please explain): <hr/>	

Business integrity, legal compliance and ethic		Priority
5.1.29	_____	
5.1.30	<ul style="list-style-type: none"> Modern slavery/forced labor (please explain): _____	
5.1.31	_____	
5.1.32	<ul style="list-style-type: none"> Other (please explain): _____	
5.1.33	_____	

Processes and documents		Priority
6.1.1	The following processes and documents are advised to have in place to ensure compliance with the Business Partner Code of Conduct. Please select which ones are in place.	
6.1.2	<ul style="list-style-type: none"> Human Rights Policy 	
6.1.3	<ul style="list-style-type: none"> Code of conduct (internal) 	
6.1.4	<ul style="list-style-type: none"> Business Partner/Supplier Code of Conduct (external) 	
6.1.5	You have a process in place to monitor changes in regulations to keep up-to-date and you adopt measures to secure compliance continuously.	High
6.1.6	Are you a member of the following programs or do you have a "social responsibility" programs in place?	
6.1.7	<ul style="list-style-type: none"> SEDEX (Supplier Ethical Data Exchange) If yes: please request a trading relationship online (Ref. No.: S000000048584) and provide viewing rights	
6.1.8	<ul style="list-style-type: none"> EcoVadis If yes: please share your scorecard on the platform with "SIEGWERK DRUCKFARBEN AG & CO KGAA (GROUP)"	
6.1.9	<ul style="list-style-type: none"> UN Global Compact 	
6.1.10	<ul style="list-style-type: none"> UN Global Reporting Initiative 	
6.1.11	<ul style="list-style-type: none"> Carbon Disclosure Project 	
6.1.12	<ul style="list-style-type: none"> Other... 	
6.1.13	_____	
6.1.14	Records relating to the use of on-site sub-contractors are maintained. This includes, but is not limited to, information on the company name, location, dates of use and areas of responsibility.	High
6.1.15	Human rights and environmental due diligence is performed to identify, prevent, mitigate and account for potential impacts on people and the environment in your own operations and in your supply chain. Due diligence is proportional to the size	High

Processes and documents		Priority
	of the business and performed in line with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business & Human Rights.	
6.1.16	What is the % of your operative location(s) that have been subject to human rights reviews or human rights impact assessments.	
6.2.	Supplier management	
6.2.1	You have a supplier management in place that does not only focus on price aspects of the purchased products but also evaluates the human rights, environmental aspects and equivalent standards.	High
6.2.2	Suppliers are visited before onboarded and on a regular basis to review potential risks for human rights and environmental violations.	
6.2.3	Regular supplier evaluations are performed which incorporate human rights and environmental aspects. These are shared with the supplier and in case of non-compliance, actions are being defined to improve.	
6.2.4	You are able to disclose information of origin (country of origin, region) associated with the products and services produced for and ordered by Siegwerk.	
6.2.5	You use material of known origin and ensure traceability of raw materials and finished goods. For raw materials where this is not the case, these are highlighted to Siegwerk alongside anticipated risks.	
6.2.6	In case there is a potential severe breach of this code within your upstream supply chain, you will support Siegwerk to identify it's involvement by disclosing your supply chain.	High