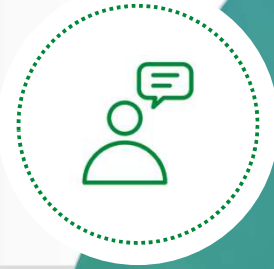




SIEGWERK

Policy and Guiding Principles on Human Rights

Statement of the Group Executive Committee



Siegwerk's Human Rights Guiding Principles



Expectations towards employees, suppliers and business partners



Processes

- Governance
- Risk analysis
- Prevention & remedial actions
- Grievance mechanism



Statement of the Group Executive Committee



Nicolas Wiedmann
CEO



Jan Breitkopf
President EMEA



Ralf Hildenbrand
President AMERICAS



Dirk Weissenfeldt
CFO



Ashish Pradhan
President ASIA

We believe human rights and environmental protection are crucial for creating a fair and equitable society. As a family-owned company with a history spanning two centuries, we recognize our responsibility to uphold human rights and safeguard the environment. For Siegwerk's owners and employees, this is not only a legal obligation but also a moral imperative, and of high relevance to build resilient operations and supply chains.

Respecting human rights means treating our employees and business partners, such as customers and suppliers, with dignity and respect. This includes providing safe working conditions, fair wages, and opportunities for growth and development for all our partners. By doing so, we can build a loyal and dedicated workforce that is committed to our values and suppliers that share our vision and help us on our journey to a sustainable, circular future.

As a company, we are following a holistic sustainability approach as outlined in our sustainability strategy 'HorizonNOW' (Sustainability - Siegwerk Druckfarben) and we believe that there is no sustainable future development without promoting human rights. Operating in a global market, we are committed to conducting our business in a responsible and sustainable manner in all countries we and our business partners operate. We believe that these values are essential for creating a sustainable and prosperous future for ourselves and the communities we operate in.

To provide orientation to Siegwerk management, employees and partners on human rights related decisions and actions, we have defined guiding principles: these are like puzzle pieces, each one crucial and interconnecting, to construct a holistic strategy for tackling human rights issues.

Siegwerk's Human Rights Guiding Principles



1. Commitment and Aspiration

We are committed to selling products and providing services that are free of human and labor rights violations

2. Risk Acknowledgment

We acknowledge the human rights risks within our value chains and understand that adhering to legal standards is just the beginning of our responsibility.

3. Seeking Knowledge

We act upon knowledge and do not actively avoid receiving knowledge.

4. Collaboration is Key

We welcome partnerships in preventing, investigating, and addressing human rights issues.

5. Stakeholder Focus

Our actions will always put an emphasize on the welfare of affected individuals or stakeholder groups.

8. Continuous Improvement

We recognize that addressing human rights is an ongoing journey that requires stakeholders to raise concerns and share observations. To foster this, we do not judge past behaviors or decisions, but focus on future improvements.

7. Guidance and Consistency

The Human Rights Officer with the Supplier Sustainability Hub provides clear behavioral rules and guidance to Siegwerkers to protect the individual employee from possibly difficult decisions and creating consistency across Siegwerk.

6. Last Resort Measures

Ending a relationship with a business partner is a measure of last resort, taken only after efforts to rectify violations collaboratively were unsuccessful.



Expectations towards employees, suppliers and other business partners

The declarations set forth herein apply to our own business activities and all employees of the Siegwerk Group. In addition, we also expect our suppliers and other business partners to commit to adhering to the principles and implementing appropriate processes and measures. This includes providing information on how these principles are being complied with, when requested.

We are guided by the following international standards and principles:


- Universal Declaration of Human Rights (United Nations)
- Guiding Principles on Business and Human Rights (United Nations)
- International Labor Organization's Declaration on Fundamental Principles and Rights at Work (ILO)
- Convention on the Rights of the Child (United Nations)
- Convention on the Elimination of All Forms of Discrimination against Women (United Nations)
- International Covenant on Civil and Political Right (United Nations)
- International Covenant on Economic, Social and Cultural Rights (United Nations)
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (United Nations)
- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants (POPs)
- Basel Convention on the Export of Hazardous Waste.
- Ten Principles of the United Nations Global Compact
- The Responsible Care® Global Charter of the chemical industry

We are committed to respect the internationally recognized human rights, to apply them in our own business activities and along our value chains. This includes, in particular:

- The prohibition of child and forced labor
- The prohibition of all forms of slavery and discrimination
- Forced eviction and the use of security forces if their employments represents a risk to disregard or restriction of human rights
- The strengthening of the freedom of association
- Compliance with occupational health and safety
- The payment of adequate living wages
- Prohibition of environmental pollution

This statement illustrates our fundamental commitment to human rights, which is also reflected in other company policies. Namely:

- Code of Ethical Business Conduct
- Sustainability Policy
- Anti-Corruption Policy



Expectations towards employees, suppliers and business partners (Cont'd)

These policies are available under: [Database for Siegwerk Group Policies & Procedures - Home \(sharepoint.com\)](#)

We always comply with applicable national law. In cases where international human rights law is restricted by local laws, we strive to promote the principles behind international standards without conflicting with local laws. To the extent that local laws go beyond international standards, we will comply with them.



GOVERNANCE

We have a strong governance and organization structure on human rights. Siegwerk has nominated a Human Rights Officer with global responsibility. For human rights due diligence execution Siegwerk has established a centrally responsible Supplier Sustainability Hub. The Supplier Sustainability Hub executes all relevant due diligence activities such as risk assessments, coordination of preventive and corrective measures, reporting and incident investigations towards our suppliers. The Supplier Sustainability Hub works closely with the purchasing and procurement colleagues globally.

The Supplier Sustainability Hub is also responsible to ensure due process in the human rights risk analysis and central reporting for human rights in our own operations. The execution of the risk analysis, preventive and corrective measure and investigations of incidents, however, are in the responsibility of Human Resources and Health, Safety & Environment departments across Siegwerk.

To ensure focus on human rights in the top management of Siegwerk, the Human Rights Officer is represented in two key governance structures. Firstly the Sustainability Council. The Sustainability Council is a senior leadership circle which is responsible for the implementation and advancement of Siegwerk's sustainability strategy 'HorizonNOW'. The Sustainability Council is headed by the Group CEO.

As mentioned, we see human rights as an integral part of sustainability and therefore include it as a material topic in the Sustainability Council. Second, the Human Rights Officer is a member of the Corporate Compliance Circle. The Corporate Compliance Circle is a senior leadership circle focusing on compliant conduct of employees of Siegwerk. The Human Rights Officer reports on activities with suppliers and brings possible human rights infringements to the attention of the Corporate Compliance Circle if they have a direct connection to a Siegwerk employee. The Corporate Compliance Circle is headed by the Group CFO.

Further, the Human Rights Officer reports in accordance with Section 4 (3) of the "Gesetz über die unternehmerischen Sorgfaltspflichten zur Vermeidung von Menschenrechtsverletzungen in Lieferketten" (LksG) regularly and on an ad hoc basis to the Group Executive Committee to ensure compliance under the LKSG.

In order to live up to our commitment to respect human rights, we have implemented appropriate due diligence processes to identify and mitigate risks and impacts. We focus on improvements and will adapt our policy statement accordingly over time if needed.



Process description to meet due diligence obligations



RISK ANALYSIS (1/2)

We strive to analyze, document and better understand our risks and their specific connection to our company in a step-by-step and regular manner through structured risk analysis in our own business activities and our supply chain in relation to our products and services.

Own operations

The risk analysis process for our operation considers inherent risks based on factors such as likelihood, scale, severity, and reversibility. Additionally, we consider risks resulting from the country of our operations and job categories.

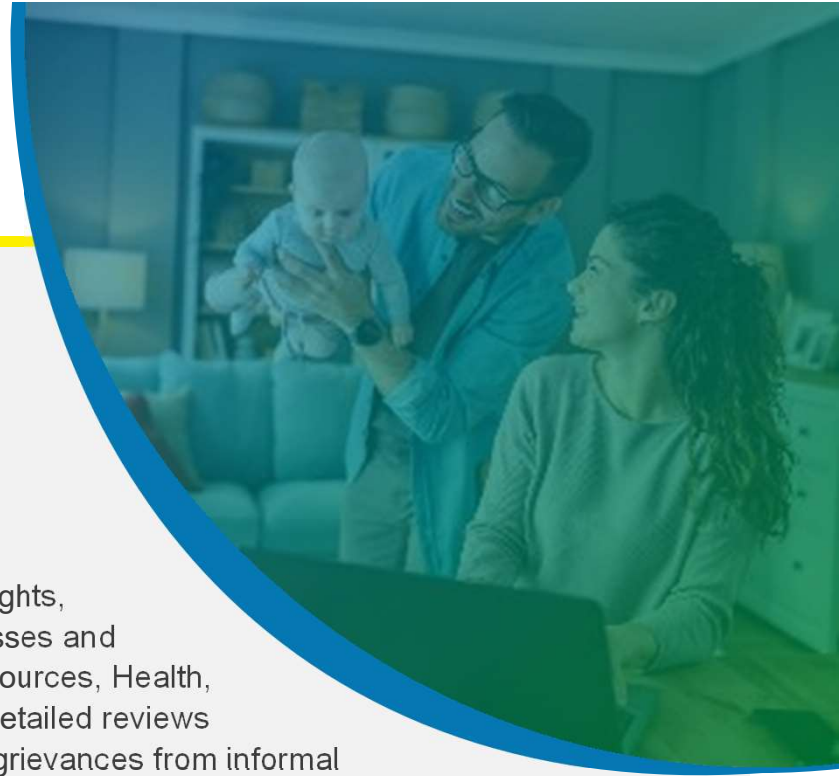
We have developed the “Siegwerk Sustainability Checklist”, which is a comprehensive tool checking on all relevant human rights, business integrity and environmental risks that might occur in our own operation. Furthermore, it reviews if all needed processes and checks are in place to detect and prevent any such issues. Together with stakeholders from all global sites from Human Resources, Health, Safety & Environment and Supply Chain, the risk assessment is being conducted on an annual basis. Interviews and more detailed reviews are being conducted with stakeholders from high-risk countries or operations to complete the picture. Global information on grievances from informal and formal processes and audits are added. As a next step, opportunities for improvement are being identified and action plans drafted where needed on global, regional or local level.

When it comes to workplace safety and environment protection, Siegwerk already follows clear internal risk analysis processes. This is also confirmed by the corresponding ISO certifications, which we maintain globally. Especially our certifications based on occupational health and safety (ISO 45001) and environment protection (ISO 14001) deserves mentioning here. A full overview of our ISO certificates is available here: [Certifications - Siegwerk Druckfarben](#)

Suppliers and business partners

To ensure the integrity and sustainability of our upstream operations, Siegwerk has established a comprehensive risk assessment process. This process is designed to identify, evaluate, and mitigate risks associated with our business activities and supply chain. A key component of this process is an external IT platform for both abstract and specific risk analyses which are updated continuously.

For the abstract risk analysis, we have analyzed all raw material and non-raw material suppliers globally based on their country and industry risk with focus on the potential impact on people rather than the company. Prioritizing suppliers based on the identified risks, we then conduct an initial evaluation to determine the severity and relevance of the risks for Siegwerk. The analysis showed that the highest risks are with our raw material and packaging suppliers. The results can be shared upon request.





RISK ANALYSIS (2/2)

Suppliers and business partners (cont...)

Following the abstract analysis, a more detailed specific risk analysis is conducted for high and very high-risk suppliers. The specific risk analysis consists of onboarding suppliers to the IT platform for a detailed assessment of their management capacity and gives them a score. It utilizes a sustainability checklist for self-assessment where documents are needed for proof. We also leverage the knowledge of our purchasing and procurement colleagues and onboard suppliers with lower risk scores in case they a potential risk is seen.


Risk analysis process



1 Abstract Risk Analysis
 (Based on country/Industry, identification of major risk themes)



2 Specific Risk Analysis
 (Continuously, identification of specific risks and actual issues)



3 Internal & External Reporting
 (Compliance & Sustainability Council, German LKSG, CSRD/CS3D)

4 Prioritization & Action Definition
 (External: specific supplier or raw material category, internal: department & country specific)

5 Implementation



Furthermore, the IT platform gathers information from public sources, including NGOs, media, trade unions, and other stakeholders and alerts Siegwerk automatically in case there are actual issues in its supply chain. In case this happens, we reach out via our local purchasing and procurement colleagues to the respective supplier to get more insights and discuss on actions. This outreach highlights that Siegwerk puts a high focus on human rights, business integrity and environmental protection and gives us an opportunity to emphasize this with our suppliers.

These processes are coupled with our own research as well as on-site assessment and broader human rights impact assessments.



PREVENTIVE AND REMEDIAL MEASURES (1/2)

Measures

Based on the specific risk analysis, we have set minimum scores for the sustainability questionnaires for suppliers and in case a supplier is not able to reach it, Siegwirk and the IT platform supports and guides about needed steps for improvements. On the IT platform, there are many resources for trainings available on how to improve many aspects of sustainability so that it guides our suppliers on their improvement journey. We are also conducting trainings on various material topics either directly with the respective supplier or towards a broader audience.

Furthermore, the Business Partner Code of Conduct was created and is being communicated to all suppliers. It clearly defines the expectations Siegwirk has towards its business partners. It also underlines the pursuit of transparency within our end-to-end supply chain by encouraging suppliers, partners, customers to check if they have human rights and environmental risks within their own operations and their upstream supply chain. To accompany the Business Partner Code of Conduct, we are using the aforementioned "Siegwerk Sustainability Checklist" to analyze the status so that in a collaborative approach, improvements can be initiated. The code and the checklist are also an integral part of our Supplier Onboarding Process.

In addition, our sustainability strategy 'HorizonNOW', includes targets related to human rights. These targets strongly guide us in the implementation of measures.

Achieve carbon neutral **scope 1 & 2** emissions globally

100% **suppliers** committed to the principles of the UN Global Compact

Double **female gender representation** at executive level

Achieve **Total Incident Rate (TIR) < 1.0**



Establish **product environment footprint data** for 100% of products

Be the trendsetter for safest inks and coating by proactively improving our own products and setting new industry standards in **consumer and environmental safety**

75% of **all products or services sold** enable the reducing, reusing, or recycling of packaging

To be achieved by 2025



Reducing scope 3 emission by 25% by 2030. Net zero by 2050 (SBTi approved)

Human rights due diligence in the supply chain





PREVENTIVE AND REMEDIAL MEASURES (2/2)

These are some examples of measures in our own operations and with business partners:



Siegwerk, under the motto 'Safety First-It starts with me', prioritizes occupational health and safety which follows the HorizonNOW target of "reducing the TIR (Total Incident Rate) globally below 1.0". Adhering to EU directives, the Framework Directive of Safety and Health at Work, and conducting global HSE audits, the company ensures stringent safety measures. Regular inspections, risk assessments, communication activities, and training courses are integral. Siegwerk identifies needs via surveys, sets safety performance goals, and provides relevant safety training, continually striving for safety practice improvements.



We regularly audit our in-house services where our employees are working at our customers to support them with their ink management. If issues arise, we work together with our in-house employees and the respective customer to ensure appropriate working conditions.



The HorizonNOW target "doubling female representative at executive level" is shown in several initiatives e.g. establishing complete data transparency to managers with a split of gender diversity, mentoring programs ("Frauen in Führung") and analysis of a potential gender pay gap to prevent these.



Siegwerk's commitment for "being trendsetter on the safest inks and coatings" is also embodied in the HorizonNOW strategy. Sophisticated policies and procedures were established, which ensure involvement of expertise based on the latest scientific findings, regulatory developments, market demands and finally close and effective cooperation of important stakeholders in the company on global scale in order to continuously review the safety of our products with regard to health and environmental risks.



Supplier selection and evaluation: We take into account human rights and environmental criteria when selecting and evaluating our suppliers.



Part of our HorizonNOW strategy is that "100% of our suppliers will be committed to the principles of the UN Global Compact". Through standardized questionnaires, we ask all existing and new suppliers if they adhere and follow up regularly to track the development.

Please refer to Siegwerk's Sustainability Report for further details.

In addition, we follow the preventive and remedial actions resulting from our ISO certifications.

Awareness

We firmly believe that measures are most effective when implemented within a culture of human rights awareness. Therefore, regular trainings are taking place to familiarize also our employees with the topic of human rights due diligence and our guiding principles (as outlined in chapter 2) such as webinars and presentations at internal conferences. Where needed, in-depth awareness raising and workshops are mandatory for those colleagues that are being exposed the most to human rights and environmental risks such as purchasing, procurement and Human Resources. We hold workshops with stakeholders to collaboratively identify roadblocks for the implementation and to identify actions to overcome them.

Establishing a human rights-conscious culture begins within our own organization and serves as a solid foundation for extending this ethos beyond our own operations.

Some already implemented measures are e.g.:



GRIEVANCE MECHANISM

A grievance mechanism process for internal and external stakeholders exists via an E-mail based process to report potential compliance or human rights violations and can be accessed online ([Compliance - Siegwerk](#)).

Any grievances concerning suppliers will be assigned to the Human Rights Officer. Any grievances concerning a Siegwerk employee will be assigned to the Group Compliance Officer.

To optimize our grievance mechanism and ensure wider accessibility, we have launched a tool on both the intranet and internet. This tool is available in multiple languages and features an in-software translation engine to facilitate seamless communication. Voice messages can be recorded to increase accessibility. The user can decide on whether they want to stay anonymous or not. The user will be informed about status and outcome of the procedure. All messages will be reviewed and feedback provided.



In case you have questions or inquiries, please contact our Human Rights Officer

E-Mail:
humanrights@siegwerk.com

This policy is a living document that will be reviewed and updated periodically to ensure its alignment with the latest developments at Siegwerk and best practices in the field of human rights. We invite all our stakeholders to join us in advancing human rights and to provide us with feedback and suggestions on how to improve our policy and practices as well as take joint action.



Siegwerk Grievance Mechanism

Please use this QR code in case you want to report an issue with human rights, environmental impact or business misconduct in connection to Siegwirk or it's upstream supply chain: