

## Environmental, Social and Governance (ESG) Policy

### Preamble General

Sustainable management is a central management principle at the Edelmann Group – today more than ever. Last but not least, our own company history has strengthened our conviction that only a company that is sustainable, safe and quality conscious can develop positively and be economically successful in the long term. Based on our corporate values, we establish the following principles that oblige us to meet applicable requirements and ensure that they are implemented and maintained. Human rights, health and safety, environmental protection, but also ethical principles are central management tasks of the Edelmann Group.

Edelmann Group is committed to the concept of sustainable development, which requires a balance between the responsible protection of human health, the natural environment, and the preservation of our natural resources in line with the need for profitable growth of its operations.

Our ESG sustainability policy is based on three main pillars: social compatibility, ecology, and economy. Each pillar represents corresponding principles, which we have developed based on equally weighted priorities of our sustainability agenda and which we are systematically expanding and developing in the interests of responsible corporate governance.

### Scope

This policy applies to all companies of the Edelmann Group worldwide and all of its legal entities. It covers all employees, managers, contractors and business partners. We also expect our suppliers, service providers and partners to commit to high ESG standards and to work to protect and preserve our livelihoods, as set out in our Supplier Code of Conduct.



## SOCIAL RESPONSIBILITY

A strong commitment to social responsibility is central to the Edelmann Group. We believe that people are at the heart of our business and are proud of our excellent work culture. We strive to be an optimal employer for our employees and are also committed to those in our supply chain as part of our business operations.

### Labour & Human Rights

Respect for human rights is one of the core values of the Edelmann Group. This policy describes the underlying human rights principles that we support, promote and strengthen. We are committed to the principles of the Universal Declaration of Human Rights, including the International Charter of Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

The human rights of workers are respected and treated with dignity and respect in accordance with the understanding of the international community. This applies to all workers, including temporary and migrant workers, working students, temporary workers, permanent employees, and all other types of workers.

### Employment relationship

A secure employment relationship is guaranteed by written employment contracts that set out the terms and conditions, including notice periods. All our employment contracts comply with national laws and existing company regulations and guidelines for part-time, full-time and temporary employees.

### Ethical recruitment

Potential employees are clearly informed in advance about the nature of the work. We do not require our employees to pay recruitment fees and/or passports and other government-issued identification documents. These will not be confiscated, destroyed, or denied access.

### Forced and compulsory labour

We have zero tolerance for modern slavery, all forms of forced, bonded or compulsory labour, including human trafficking in accordance with ILO Conventions 29 and 105 and the Declaration of Human Rights (Article 4). We ensure that all our operations are free from such practices.

### Child labour and young workers

We always comply with the local legal regulations on the minimum working age. We respect the dignity of children and their fundamental right to healthy and safe development in accordance with ILO Conventions 138 and 182. We do not tolerate child labour in our own operations or in the entire supply chain.

### Freedom of association and collective bargaining

We recognize the right of employees to become members of a trade union and to engage in collective bargaining to the extent permitted by local laws and regulations. We are committed to complying with ILO Conventions 135, 87 and 98. Our "open door" policy enables our employees to speak openly with management about working conditions and management practices without fear of reprisals, intimidation or harassment.



## Fair pay and benefits

We apply the principle of equal pay for equal work. We comply with the statutory minimum wage and ensure that employees are paid enough to meet their basic needs and provide a decent standard of living for employees and their families. In this way, we also respect the minimum living wage, overtime pay, sick leave and state-mandated benefits. Deductions from wages as a disciplinary measure are not permitted. Our goal is to pay a living wage at 100% by 2030.

## Working hours

We are committed to reasonable working hours for all employees. We comply with all local laws and regulations regarding working hours, rest breaks, paid holidays and regular paid leave. Working hours must not exceed the maximum number of hours permitted by local law. All overtime must be worked voluntarily. Employees have a day off at least every seven days. We respect the right to rest and holidays. Parental leave, including maternity and paternity leave, is granted in accordance with local laws and regulations.

## Working conditions

We ensure that all employees have access to appropriate working conditions. High health and safety standards are maintained at all sites in accordance with ILO 187. We also ensure accessibility and make the necessary arrangements for people with disabilities where required.

## Humane treatment

Brutal or inhumane treatment of employees is not permitted, including violence, gender-based violence, sexual harassment, sexual abuse, physical restraint, psychological or physical assault, bullying, public shaming and verbal abuse. This also applies to the threat of such treatment. The disciplinary principles and procedures to support these requirements are clearly defined.

## Non-discrimination

In all aspects of employment, such as hiring, compensation, training, promotion or termination, we ensure fair treatment and access to equal opportunities. We respect diversity and do not tolerate discrimination based on gender, age, race, nationality, gender identity, ethnicity, religion, marital status, pregnancy, disability, sexual orientation, veteran status or political views. Current and future workers will not be subjected to medical tests, including pregnancy or virginity tests or physical exams, which could be used in a discriminatory manner. ILO 111 is the guiding framework of this principle.

## Diversity, equality and inclusion

We promote an inclusive culture where diversity is valued and tolerated and where everyone is empowered to contribute and realise their full potential. We are committed to diversity at all levels of our workforce and leadership, including management. The Edelmann Group endeavours to create equal opportunities for all people through active employment measures in all plants and promotes the inclusion of vulnerable groups such as women, children and young people, people with disabilities, people on the move, LGBTIQ+ and ethnic and religious minorities.

## Harassment

All employees and third parties are to be treated with dignity and respect. All forms of harassment, including physical and verbal harassment, are strictly prohibited.



## Women`s rights

We ensure equal employment opportunities and are committed to equal pay for equal work. An important focus to promote diversity is to increase the number of women in leadership positions.

## Rights of minorities and indigenous peoples

We respect the right of local communities to decent living conditions, education, employment, social activities and the right to free, prior and informed consent to developments that affect them and the land on which they live, with particular attention to the presence of vulnerable groups.

## Land rights and forced evictions

As part of our business activities, we avoid forced evictions and the deprivation of land, forests and waters when we acquire, develop or otherwise utilize land, forests and waters.

## Private or public security guards

We do not employ private or public security guards to protect business operations if their use may lead to human rights violations due to a lack of training or control by the company.



## Health & Safety

Health and safety in the workplace for all persons associated with our company and our activities is our top priority. Our primary goal is to avoid work-related accidents and health impairments. Compliance with the applicable statutory occupational health and safety regulations and the standards of the Edelmann Group form the basis for this. Through our behaviour-based approach, we work continuously to improve our performance. Every employee has the right and the duty to intervene to prevent accidents. Our aim is to continuously reduce the number of accidents and keep them below the industry average.

As part of our management system, we ensure a safe and healthy working environment, which includes the following:

### Safety in the workplace

Potential safety risks such as hazards from chemical substances, electricity and other energy sources, fire, vehicles and fall hazards are identified, assessed and systematically mitigated. This includes hazard elimination and substitution of processes or materials, control through proper planning, implementation of engineering and administrative controls, preventive maintenance and safe work procedures (including lockout and tagout), and ongoing health and safety training.

Pregnant women and nursing mothers enjoy special protection and specific health and safety measures apply to this group.

### Personal Protective Equipment

Our employees are provided with the necessary personal protective equipment (PPE) and are informed about its correct use.

### Emergency preparedness

We are actively working to reduce occupational risks and have developed an emergency preparedness and response plan. We identify and assess potential emergency situations and events, including reporting emergencies, notifying workers and conducting evacuation procedures, training and drills. Emergency drills are conducted at least once a year or in accordance with local laws. Emergency plans also include appropriate fire detection and suppression equipment, clearly marked and unobstructed exits, contact information for emergency responders and recovery plans.

The focus of these plans and procedures is to minimize damage to life, the environment and property.

### Incident and accident management

We have implemented hazard and risk analysis systems to minimize the potential for incidents or accidents in the workplace. The causes of incidents and accidents are investigated and through appropriate corrective measures we want to ensure that all permanent accident prevention measures are taken to minimize the likelihood of recurrence.

### Accidents at work and occupational diseases

We have implemented procedures and systems to prevent, manage, track and report occupational accidents and diseases. These include the following: encouraging workers to report such incidents; classification and recording of accidents and illnesses; Providing the necessary medical care; Investigate incidents and take action to address the root causes and facilitate the return of workers to work.



## Occupational hygiene

The exposure of workers to chemical, biological or physical agents is assessed and monitored as part of the hierarchy of control measures. When potential hazards are identified, we look for ways to eliminate and/or reduce the potential hazards. If elimination or reduction of hazards is not possible, potential hazards are monitored through proper design, engineering and administrative controls. If hazards cannot be adequately reduced by these measures, the health of workers is safeguarded by appropriate, well-maintained personal protective equipment, which is provided to them free of charge. The protection programs are ongoing and include educational material on the risks associated with these hazards.

## Physically demanding work

If workers are exposed to physically demanding work, this work is identified, assessed and monitored. This includes, for example, manual material handling, heavy or repetitive lifting, prolonged standing and assembly work that requires a high level of repetitive or forceful exertion.

## Machine safety

Production facilities and other machinery are inspected for safety risks. When machinery poses a risk of injury to workers, we install physically separating guards, interlocks and locks that are properly maintained.

## Sanitary facilities, food and accommodation

We provide clean sanitary facilities, drinking water and facilities for the hygienic preparation, storage and consumption of meals for workers at all times. The accommodation is well-maintained, clean and safe. They have suitable emergency exits, hot water for bathing or showering, adequate lighting and heating and ventilation systems. There are also individually secured rooms for the storage of personal belongings or valuables with sufficient space.

## Health and safety communications

We provide workers with appropriate information and training to ensure their health and safety in the workplace. The information and training is provided in their native language or a language they understand. As a result, workers are adequately informed about workplace hazards, including mechanical, electrical, chemical, physical and fire hazards. Information on health and safety issues is clearly visible and accessible to workers. All workers are trained before starting work and at regular intervals thereafter. Workers are encouraged to raise health and safety concerns without retaliation.



## ENVIRONMENT

### Responsibility for the environment

Protecting the environment and preserving our natural resources are among the Edelmann Group's core values. A responsible approach to the environment is an integral part of our corporate strategy. Our aim is to continuously reduce our environmental impact along the value chain. Our sustainability programme is committed to climate protection, the circular economy and the efficient use and conservation of resources. Raw materials should come from fossil-free and renewable sources wherever possible. We want to systematically reduce the ecological footprint and negative environmental impact of our production, goods and services through sustainable innovations. The ideas and creativity of our employees and partners support us in this endeavor.

Efficient use of energy is a top priority. We focus on maximizing the proportion of renewable energy and increasingly avoid fossil fuels such as oil, coal and gas. The Edelmann Group also attaches great importance to the responsible handling of waste. Waste avoidance is at the forefront of this.

### Environmental management system

Edelmann is establishing an environmental management system in accordance with the European Eco-Management and Audit Scheme (EMAS).

### Climate protection

#### *Energy consumption and greenhouse gas emissions*

In line with our responsibility for effective climate protection, the Edelmann Group has set itself a target to reduce greenhouse gas emissions across its entire business activities. Energy consumption and all relevant greenhouse gas emissions under Scopes 1, 2 and 3 are tracked and documented.

#### *Our climate goals and climate neutrality*

The Edelmann Group has set targets for 2030 that are science-based, validated in accordance with SBTi and in line with the Paris Climate Agreement.

The Edelmann Group is committed to:

- Reduce absolute Scope 1 and Scope 2 GHG emissions by 42% by 2030 compared to the 2021 baseline.
- increase the annual purchase of renewable electricity from 43% in 2021 to 100% by 2030.
- Reduce Scope 3 GHG emissions by 52% per million units manufactured by 2030 compared to the 2021 baseline

In a further time horizon, a "net zero" target is being pursued by 2045 at the latest.

We strive to find solutions to improve energy efficiency and minimize energy consumption and greenhouse gas emissions by systematically switching to renewable sources.



## Circularity and circular economy

We promote the goal of closed loops and actively engage in a circular economy by supporting the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling. In line with our sustainability roadmap, we have set ourselves the target of 95% of our production volumes being fully recyclable by 2027.

## Water quality, consumption and management

As part of our business activities, Edelmann's production activities do not cause high water consumption. We strive to minimize water consumption, reuse and recycle water effectively. We have a water management program in place that documents and characterizes water use and discharge and monitors pollution channels.

## Emissions to air

As part of our business activities, Edelmann's production activities do not cause any significant air emissions. Air emissions are mainly caused by heating or power generation processes (operation of combined heat and power plants). Edelmann routinely monitors air emissions in accordance with requirements and in accordance with applicable laws.

## Responsible chemicals management

The Edelmann Group continuously identifies, minimizes and/or eliminates the use of restricted substances in manufacturing processes and end products to ensure compliance with legal regulations.

The use of hazardous substances, chemicals, waste or other materials that pose a risk to the environment or humans in processes and products is reviewed and, in the case of critical and harmful substances, suitable substitutes are actively sought to ensure product safety and environmental responsibility.

## Product Ingredient Restrictions

We comply with laws, regulations and customer requirements applicable to our products regarding the prohibition or restriction of specific substances in products or in the manufacturing process, including labeling requirements for recycling and disposal.

## Waste management

Edelmann Group has implemented an appropriate waste management system that ensures that our waste, including hazardous waste, is disposed of responsibly in accordance with local regulations, including handling, storage, transportation and disposal processes. Our goal is to minimize waste and maximize recycling and reuse of materials by adapting production, optimized maintenance and equipment processes, material substitution, conservation and recycling.

## Noise emissions

We monitor and control the level of industrial noise and, where possible, avoid and reduce noise pollution for our employees and neighboring residents. Our employees are provided with suitable hearing protection for production areas with unavoidable noise emissions.





## Biodiversity, land use and deforestation

As part of our business activities and sphere of influence, we protect ecosystems, in particular important biodiversity areas, and avoid illegal deforestation in accordance with international biodiversity legislation and the European Deforestation Directive EUDR, including IUCN resolutions and recommendations on biodiversity.

## Soil quality

Impacts on soil quality are monitored and controlled to prevent soil erosion, nutrient degradation, subsidence and contamination. We are not aware of any negative effects on soil quality at our production sites.

## Protection of animals

As part of our business activities, we do not use raw materials of animal origin.



## ECONOMIC AND GENERAL PRINCIPLES

We consider good corporate governance to be essential to creating and maintaining value for our investors and other stakeholders. This includes sound corporate governance that complies with all applicable laws, rules, regulations and guidelines, as well as full respect and living of our values.

### Business Ethics

We are committed to upholding the highest standards of integrity and are committed to acting honestly and fairly throughout the supply chain. In order to fulfil our social obligations and to successfully position ourselves in the market, we want to adhere to the highest ethical standards.

### Business Integrity

We apply the highest standards of integrity to all our business activities. We have a zero-tolerance policy when it comes to prohibiting all forms of bribery, corruption, extortion and embezzlement.

### Combating corruption and money laundering

We do not engage in or support corrupt practices, including offering or accepting bribes, inappropriate gifts, hospitality or kickbacks. Suspicious transactions are reported, and we watch for signs of money laundering. To this end, we have established a monitoring, documentation and enforcement process to ensure compliance with anti-corruption laws.

### Data protection and data security

We respect the privacy and civil liberties of our business partners, including suppliers, customers, consumers and employees, with regard to the collection, storage, use, disclosure and other processing of personal data. We comply with data protection and information security laws and regulatory requirements when collecting, storing, processing, transferring and disclosing personal data.

### Financial Responsibility/Disclosure of Information

All business processes of the Edelmann Group are transparent. The disclosure of information is accurately reflected in the books of account. Information about labour, health, safety, and environmental practices, business operations, structure, financial condition, and performance will be disclosed in accordance with applicable regulations and industry practice.

### Conflicts of interest

We ensure that our employees avoid and disclose situations in which their financial or other interests conflict with professional responsibilities, or situations that give the appearance of impropriety.

### Fair business, fair advertising and fair competition

Fair dealings with our business partners are important to us. We adhere to the standards of fair trade, fair advertising and fair competition.

### Counterfeit parts

We minimize the risk of introducing counterfeit and/or diverted parts and materials into deliverable products. The relevant technical regulations in the product development process are complied with.



## Intellectual property

We respect applicable intellectual property rights. The transfer of technology and know-how is carried out in such a way as to protect intellectual property rights as well as customer and supplier information.

## Export controls, trade and economic sanctions

Applicable restrictions on the export or re-export of goods, software, services and technology as well as existing trade restrictions with certain countries, regions, companies or organizations and individuals are complied with.

## Grievance mechanism

We have established an effective grievance mechanism in line with UN Guiding Principle 31 and the Whistleblower Protection Act, which allows concerns about business ethics, human rights or other issues to be raised anonymously, confidentially and without retaliation. In order to detect irregularities at an early stage, business partners, interested parties and other third parties are expressly requested to report violations of this Code of Conduct and risks of a human rights or environmental nature to the Edelmann Group via our whistleblower system. This also applies in particular with regard to violations and risks in the business areas of the supplier's upstream suppliers and subcontractors.

Our whistleblower system is available for this purpose, which enables anonymous, confidential and secure communication with the investigation team. [Speeki Web Portal](#)

Every reported incident is followed up, with particular care being taken to ensure that the whistleblower in question does not have to fear reprisals or other disadvantages as a result of using the whistleblowing system. We want to use the feedback to initiate a continuous improvement process.

## Protection of identity and prohibition of retaliation

We avoid any form of threats, intimidation, and physical or legal attacks against interest groups, including those exercising their legal rights to freedom of expression, association, peaceful assembly, and protest against their business activities.



## SUSTAINABLE PROCUREMENT

Sustainable development has been at the center of our strategy since the beginning of our history. Since then, many improvements have been achieved in terms of resource efficiency, health and safety, employee well-being and sustainable innovation. We see our suppliers as strategic partners who support us in strengthening our sustainable procurement practices through continuous dialogue and collaboration. Therefore, we find it very important to engage our valued suppliers and share our common interest in a better future.

The Edelmann Group's Supplier Code of Conduct supports our commitment and describes our expectations of our suppliers as well as their parent companies, subsidiaries and subcontractors. The following requirements are binding requirements towards our suppliers, and we expect they forward this standards as binding requirements along their supply chain as well. The Edelmann Group endeavors to select trustworthy business partners whose business policies are committed to high ethical standards, health and safety in the workplace, the protection of human rights, dignity, environmental protection and compliance with the law.

The expectations contained in this Code do not replace specific contractual agreements. Rather, this Code is intended to supplement specific contractual requirements. If a contractual provision is stricter than the corresponding provision in this Code, the stricter contractual provision must be observed. This Code does not alter the terms of any contract and does not constitute any express or implied contractual obligations.

## SOCIAL RESPONSIBILITY

### Human rights and labour standards

Suppliers must support and respect the protection of internationally proclaimed human rights and comply with international guidelines and standards. In addition, they must apply these requirements to both their own employees and temporary workers in accordance with applicable local laws and regulations.

### Child labour

We strictly prohibit any form of child labour. We refer to child labour as the subject of ILO Convention 138 "Convention on the Minimum Age" and ILO Convention 182 "Worst Forms of Child labour". Child labour refers to an abuse that should not be confused with "working children" or "youth work", which must not constitute abuses within the meaning of ILO Convention 138. Based on ILO standards and local regulations, employees under the age of 18 may only be employed for training purposes or light work permitted under country-specific regulations. In this case, children and young people are not allowed to work in a dangerous environment and/or work night shifts.

### Forced labour

We strictly prohibit any form of forced or involuntary labour to prevent slavery and human trafficking within our supply chain. Recognized employment relationships ensure that no identity documents are kept in the company as a condition of employment. All employees are free to leave the company at their own discretion within the agreed notice period.

### Fair pay and working hours

Our suppliers must comply with all wage and working time laws, including compensation, benefits, and overtime.

Fair pay, which provides for a local minimum wage to meet the basic needs of employees. In doing so, we expect the principle of equal pay for equal work. Suppliers comply with the minimum wages required by law and ensure that employee compensation is sufficient to meet basic needs and provide a decent standard of



living for workers and their families. In this way, our suppliers also respect the minimum living wage, overtime pay, sick leave, and government-mandated benefits. Deductions from wages as a disciplinary measure are not permitted. Our goal is to ensure a 100% living wage payment by 2030.

We require our suppliers to ensure reasonable working hours for all employees. All local laws and regulations regarding working hours, rest breaks, paid vacation, and regular paid vacation must be complied with. Working hours may not exceed the maximum number of hours applicable under local law. All overtime must be voluntary. Workers are granted one day off at least every seven days. Our suppliers respect the right to rest and vacation. Parental protection, including maternity and paternity leave, is provided in accordance with local laws and regulations.

## Freedom of association

Our suppliers must give their workers the opportunity to join or form trade unions of their choice and to bargain collectively to the extent permitted by local laws and regulations. We expect our suppliers to comply with applicable laws and collective bargaining agreements where they are in force. Workers' representatives shall be free to carry out their duties within reasonable limits, provided that their representative function is not exceeded. We encourage our suppliers to set up works councils wherever possible.

## Discrimination

Based on the guidelines of the International Labour Organization, there may be discrimination based on race, color, sex, religion, political opinion, social origin, or age, to name a few. Our suppliers prohibit any kind of discrimination in hiring, compensation, promotion, career development, day-to-day work practices, or termination and retirement. The principle of non-discrimination also applies to business relationships, in particular to communication with the Edelmann Group, but also with other customers, suppliers and business partners. We encourage our suppliers to implement a whistleblowing process to report the incidents and investigate all registered cases.

## Anti-Harassment

Harassment refers to physical or sexual abuse, unfair treatment, coercion, and any form of intimidation. Our suppliers prohibit any form of harassment and ensure that mechanisms are in place to prevent incidents and investigate registered cases. As part of the internal training courses, awareness of the topic is to be created among employees and partners.

## Diversity, equality and inclusion

We expect our suppliers to promote an inclusive culture where diversity, equality and inclusion is valued and tolerated and where everyone is empowered to contribute and realize their full potential. They are committed to diversity at all levels of our workforce and leadership, including management.

## Women`s rights

We expect our suppliers to ensure equal employment opportunities and are committed to equal pay for equal work. An important focus to promote diversity is to increase the number of women in leadership positions.

## Rights of minorities and indigenous peoples

We expect our suppliers to respect the right of local communities to decent living conditions, education, employment, social activities and the right to free, prior and informed consent to developments that affect them and the land on which they live, paying particular attention to the presence of vulnerable groups.



## Land rights and forced evictions

Our suppliers should avoid forced evictions and deprivation of land, forests and waters when acquiring, developing or otherwise utilizing land, forests and waters.

## Private or public security guards

Our suppliers should not employ private or public security guards to protect business operations if their use may lead to human rights violations due to a lack of training or control by the company.

## Occupational health and safety

We expect our suppliers to:

- Educate their employees on health and safety standards through regular training
- Ensure a safe working environment for both administrative and production staff. Our suppliers ensure that sufficient measures are taken to prevent injuries, accidents at work or negative health effects that may result from the hazards
- Suppliers shall provide the necessary personal protective equipment and make it easily accessible.
- Designation of a responsible employee/manager who is responsible for occupational health and safety
- Implement a communication tool that allows employees to report on health and safety risks they observe
- Comply with relevant health and safety laws and regulations, such as fire safety standards, emergency exits, escape routes, and first aid assistance
- Carrying out applicable audits, if required by law, in relation to the current hazards, machinery and/or work activities. If not required by law, we encourage you to undertake similar audits on a voluntary basis.



## ENVIRONMENT

### Protection of the environment

Our suppliers must have an effective environmental policy in place and comply with existing environmental laws and regulations. Wherever possible, suppliers should support a precautionary approach to environmental issues, take initiatives to promote greater environmental responsibility, advance green technologies, and implement sound lifecycle practices.

### GHG emissions and climate change

We expect our suppliers to understand that climate change is caused in part by companies' business activities resulting from raw material sourcing, energy consumption, transportation, waste disposal, and business travel. Therefore, we strongly encourage all suppliers to implement greenhouse gas reduction initiatives like the usage of renewable energy associated with optimizing energy consumption and transportation, to name a few. Wherever possible, we encourage starting carbon offset projects either internally or for existing customers.

As part of our shared responsibility for effective climate action, we expect our suppliers to set targets to reduce greenhouse gas emissions across their operations. Energy consumption and all relevant greenhouse gas emissions under Scopes 1, 2 and 3 are monitored, documented and publicly reported.

### Energy consumption

Our suppliers are aware of their energy consumption and report on it. We strongly encourage our suppliers to implement measures and projects aimed at reducing their energy consumption and increase the usage of green electricity. Examples of measures include the use of energy-efficient technologies, employee awareness programs, or the use of energy-saving appliances and the use of renewable energy, to name a few.

### Water consumption

The human right to water, proclaimed by the UN Global Compact, consists of clean, safe, accessible and affordable water. Therefore, we expect our suppliers to preserve this vital resource through their efficient use, proper disposal of wastewater, and monitoring the risk of water pollution at sites near bodies of water.

### Air emissions

Our suppliers must routinely monitor air emissions, establish air emission controls, and follow a greenhouse gas reduction plan that meets or exceeds regulatory requirements. Air emissions include, but are not limited to, volatile organic chemicals, aerosols, corrosives, particulate matter, ozone-depleting chemicals, and byproducts of combustion.

### Biodiversity

Our suppliers need to identify the areas that are close to important biodiversity areas that could be negatively impacted by their business activities. We expect them to monitor and minimize the impact on endangered species, flora and fauna within protected areas. All cases of non-compliance with fines or non-monetary sanctions must be reported directly to the representatives of the Edelmann Group.

### Responsible Resource Management

We expect our suppliers to encourage and support the efficient use of sustainable, renewable resources. Edelmann Group's suppliers must comply with all applicable laws and regulations prohibiting or restricting the use or handling of certain substances in products or manufacturing, including all labeling requirements related to recycling and disposal.



Energy and water are natural resources and must be managed responsibly. Energy consumption and greenhouse gas emissions must be tracked and documented by the supplier. Suppliers must take measures to improve the efficient use of energy.

## Environmental Management and Environmental

Our suppliers must identify chemical and other materials that pose a hazard when released into the environment. In addition, Edelmann Group's suppliers must ensure the safe handling, transportation, storage, recycling, reuse and disposal of such materials.

We expect our suppliers:

- that they comply with all applicable legal norms and international standards regarding environmental protection,
- safe and environmentally friendly development, transport and disposal of their products
- promote the efficient use and deployment of environmentally friendly technologies
- implement and maintain responsible environmental management to monitor environmental protection
- as well as make reasonable efforts to continuously and sustainably improve the environmental performance of the products and services they offer;

## Restricted or Notifiable Hazardous Substances

Substance restrictions are a tool to protect human health and the environment from unacceptable risks from chemicals. Restrictions may restrict or prohibit the manufacture, placing on the market or use of a substance.

The supplier undertakes to comply absolutely with specific obligations relating to safety and the environment. In order to warrant the product safety, the products need to comply:

- with Regulation 1907/2006 relating to the registration, evaluation and authorization of chemical substances (REACH). This Regulation imposes an obligation on suppliers of articles to provide information in particular about substances present in concentrations in excess of 0.1% by mass. Since the list of substances is liable to evolve, the Supplier undertakes to inform Edelmann as soon as a new substance appears on this list;
- with Directive 94/62/EC relating to packaging and packaging waste, and in particular with the maximum concentrations of heavy metals (a total of 100 ppm for all lead, cadmium, mercury and chromium);
- with Directive 2001/95/EC relating to the general safety of products. In this respect, the supplier undertakes to ensure that the products and articles supplied do not pose a risk to the health and safety of consumers in normal or reasonably foreseeable conditions of use. The Supplier will also transmit the relevant information (warnings, precautions, etc.);
- with the Stockholm Convention on Persistent Organic Pollutants.
- with the Minamata Convention on Mercury.





## Waste management

Our suppliers must ensure the implementation of an appropriate waste management system, including handling, storage, transportation and disposal processes. Hazardous waste must be disposed of in accordance with local regulations. If this is not the case, suppliers must ensure that no soil or water pollution is caused. We strongly encourage our suppliers to engage in product development that facilitates recycling through the use of renewable and recyclable materials.

In particular, waste shall not be treated in violation of the applicable laws of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal.

## Wastewater and solid waste

Wastewater and solid waste generated by operations, industrial processes and sanitation must be monitored, controlled and treated as needed before discharge or disposal.

## Minimizing waste, maximizing recycling

Edelmann's suppliers must implement reduction targets for waste of all kinds, including water. Options include customization of production, optimized maintenance and equipment processes, material substitution, conservation, recycling, and reuse of materials.

## Noise emissions

Our suppliers should monitor and control the level of industrial noise and, where possible, avoid and reduce noise pollution for our employees and neighbouring residents. The employees should be provided with suitable hearing protection for production areas with unavoidable noise emissions.

## Biodiversity, land use and deforestation

As part of our business activities and sphere of influence, our suppliers should protect ecosystems, in particular important biodiversity areas, and avoid illegal deforestation in accordance with international biodiversity legislation and the European Deforestation Directive EUDR, including IUCN resolutions and recommendations on biodiversity.

## Soil quality

Our supplier should monitor and control impacts on soil quality to prevent soil erosion, nutrient degradation, subsidence and contamination.

## Protection of animals

As part of our business activities, we assume our suppliers do not use raw materials of animal origin.

## Responsibility/Control and Consequences

Suppliers must comply with this Code and applicable laws. They are responsible for monitoring and documenting their compliance obligations, as well as their efforts to comply with laws and regulations within their supply chain.

If the Supplier finds that there are factual indications that the due diligence obligations listed herein have been breached or that such a breach is imminent, the Supplier will immediately inform Edelmann and take appropriate remedial measures to prevent, remedy or minimize the scope of the breach.



If the nature of the breach is such that Supplier is unable to bring it to an end within a foreseeable timeframe, Supplier shall immediately develop and implement a plan to terminate or minimize it. The Supplier shall submit this plan to Edelmann, including a specific timetable.

Edelmann reserves the right to terminate the business relationship without notice if the implementation of the measures specified in the supplier's plan does not remedy the situation by the end of the period specified in the plan.

Suppliers may be audited annually and on an ad hoc basis, either directly or by third parties, to ensure compliance with our Supplier Code of conduct and, where appropriate, the implementation and effectiveness of remedial actions. In such cases, the auditor must be granted access to the relevant areas and provided with the necessary documents.

## BUSINESS ETHICS

When delivering goods and providing services, suppliers must comply with their contractual obligations and comply with the law. All information provided to the Edelmann Group must be accurate and truthful. In addition, suppliers must keep accurate records in accordance with accounting principles. Our suppliers are expected to ensure that their internal conduct contributes to fair business relations between the Edelmann Group and the relevant supplier.

### Laws and Regulations

Our suppliers are expected to comply with applicable laws and regulations depending on their operations and the countries in which they operate. In the event of differences between the regional and national laws and this Code, the higher standard shall prevail.

### Anti-corruption

Edelmann Group prohibits all forms of corruption, including but not limited to extortion, fraud, embezzlement and bribery. Our suppliers will not accept or offer payments and gifts that may result in binding dependencies or obligations that may influence business decisions. We expect our suppliers to implement appropriate risk management systems for the scope of potential corruption activities. In addition, our suppliers need to understand the legal aspects of interacting with government officials in order to assess the circumstances under which a payment or gift can be construed as an act of bribery.

### Antitrust and Fair Competition Antitrust

The Edelmann Group is committed to the principles of fair competition. Our suppliers will not enter into agreements or engage in business activities that may restrict trade or competition. We expect our suppliers to take precautions in terms of pricing arrangements, customer relationships and related information sharing.

### Money laundering

Money laundering refers to the use of funds that come directly or indirectly from criminal activities and are later introduced into the business cycle. The Edelmann Group strictly prohibits any form of money laundering with criminal charges and disciplinary measures used as a means to respond to a potential case. Our suppliers do not fund illegal activities, including fraud and terrorism.



## Privacy / Protection and Use of Information

Our suppliers are committed to protecting the intellectual property, trade secrets and proprietary information of the Edelmann Group. In addition, they must protect personal data they hold for the Edelmann Group from unauthorized access, destruction, alteration, use and disclosure. In doing so, they use state-of-the-art information security systems.

The disclosure of confidential information to third parties is strictly prohibited.

## Data protection and data security

Our suppliers should respect the privacy and civil liberties of our business partners, including suppliers, customers, consumers and employees, with regard to the collection, storage, use, disclosure and other processing of personal data. They have to comply with data protection and information security laws and regulatory requirements when collecting, storing, processing, transferring and disclosing personal data.

## Financial Responsibility/Disclosure of Information

All business processes of the Edelmann Group are transparent and we expect the same from our suppliers. The disclosure of information is accurately reflected in the books of account. Information about labour, health, safety, and environmental practices, business operations, structure, financial condition, and performance will be disclosed in accordance with applicable regulations and industry practice.

## Conflict of interest

Our suppliers disclose any conflicts of interest. This also applies to cases where an employee of the Supplier (or a person close to an employee of the Supplier) has direct contact with an employee of the Edelmann Group, whose opinions and/or decisions may affect the Supplier's business or where an employee is involved in the Supplier's business.

## Fair business, fair advertising and fair competition

Fair dealings with our business partners are important to us. Our suppliers should adhere to the standards of fair trade, fair advertising and fair competition.

## Counterfeit parts

Our suppliers should minimize the risk of introducing counterfeit and/or diverted parts and materials into deliverable products. The relevant technical regulations in the product development process are complied with.

## Intellectual property

Our suppliers have to respect applicable intellectual property rights. The transfer of technology and know-how is carried out in such a way as to protect intellectual property rights as well as customer and supplier information.

## Export controls, trade and economic sanctions

Applicable restrictions on the export or re-export of goods, software, services and technology as well as existing trade restrictions with certain countries, regions, companies or organisations and individuals are complied with.

## Sensitive Transactions

Sensitive transactions include inappropriate or overly generous gifts, payments, entertainment, or other offers that may be binding. In the event of any uncertainty as to the value or nature of the gifts, offers or invitations directly or indirectly associated with the Edelmann Group, our suppliers are advised to contact direct representatives of the Edelmann Group if necessary. All gifts are accepted with caution to avoid cases of binding dependency.



## Grievance mechanism

Our suppliers must provide and publicize grievance procedures for reporting potential misconduct. All employees of suppliers, including employees throughout the supply chain, as well as all employees and managers of Edelmann, customers and other external parties are invited to use the Edelmann whistleblowing system: [Speeki web portal](#)

This system can be used to report possible violations of this ESG policy ("whistleblower reports") relating to Edelmann's business activities; These reports can be submitted anonymously if desired.

Edelmann has established a procedure for dealing with whistleblower reports.

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## Distribution of policies

This policy will be made available to all employees and will be included in regular training programs. It is the responsibility of the Edelmann management team to monitor compliance with the Human Rights Policy.

## Violation of the guidelines

Suspected policy violations are reported to the Edelmann Group following the whistleblowing process. No retaliation or retaliation will be taken against employees who raise concerns under this policy. We will investigate, address and respond to employee concerns and take appropriate corrective action as needed.

## Public Reporting

We report on our commitments and efforts in the areas of human rights, environmental protection, health and safety, ethics and sustainable procurement in our annual Sustainability Report, which is published.

## Allocation of Responsibility and Policy review

A dedicated ESG team has been appointed by management. The policy is regularly updated by the ESG team, and all changes will be communicated to interested parties. Please direct any questions you may have to the Head of ESG.

01.04.2024

Dr. Frank Hornung  
Chief Executive Officer, Edelmann Group

Dr. Eric Nebel  
Head of ESG, Edelmann Group

