

Supplier Code of Conduct

SUSTAINABLE PROCUREMENT IN OUR SUPPLY CHAIN

Sustainable development has been at the heart 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 dialog 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 and their parent companies, subsidiaries and subcontractors. The Edelmann Group strives 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.

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.

Preamble

Our company is committed to respecting human rights and adhering to the highest standards of ethical and sustainable business practices. This Code of Conduct forms the basis of our commitment to responsible business practices and sustainable supply chains.

We recognize our responsibility to protect human rights and preserve the environment. We are therefore committed to meeting the requirements of the German and European Supply Chain Duty of Care Act (LkSG; CSDDD) and ensuring that our suppliers adhere to the same high standards.

Our principles include risk assessment, preventive measures, monitoring and reporting as well as the establishment of a complaint's procedure. This is described in a separate policy statement and published on our website.

We expect our suppliers to share these principles and actively take measures to ensure compliance with these standards. Together, we can shape a sustainable and fair future.



SOCIAL RESPONSIBILITY

Human rights and labor 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 labor

We strictly prohibit all forms of child labor. We refer to child labor as the subject of ILO Convention 138 “Minimum Age Convention” and ILO Convention 182 “Worst Forms of Child Labor”. Child labor refers to an abuse that should not be confused with “working children” or “juvenile labor”, which may not be abuses as defined by 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 that is permitted under country-specific regulations. In this case, children and young people may not work in a hazardous environment and/or work night shifts.

Forced labor

We strictly prohibit any form of forced or involuntary labor to avoid slavery and human trafficking within our supply chain. Recognized employment relationships ensure that no identification 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 hour laws, including compensation, benefits and overtime. Fair pay that provides for a local minimum wage to meet the basic needs of employees. We expect the principle of equal pay for equal work. Suppliers comply with the statutory minimum wages and ensure that employees are paid enough to cover their basic needs and provide workers and their families with a decent standard of living. In this way, our suppliers 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 ensure a living wage of 100% 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 vacations must be complied with. Working hours must not exceed the maximum number of hours permitted by local law. In addition, the weekly working time, including overtime, should not exceed 60 hours. Exceptions are emergencies and exceptional circumstances. All overtime must be voluntary. Workers are granted a 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 employees the opportunity to join or form trade unions of their choice and to engage in collective bargaining. We expect our suppliers to comply with applicable laws and collective bargaining agreements, where these are in force. Employee representatives are free to carry out their activities within reasonable limits, not exceeding their representative function. We encourage our suppliers to establish works councils wherever possible.

Non-discrimination

Based on the guidelines of the International Labor Organization, discrimination may occur based on race, color, gender, religion, political opinion, social origin or age, to name a few. Our suppliers prohibit any kind of discrimination in hiring, compensation, promotion, career development, daily 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. Suppliers must implement a whistleblowing procedure so that incidents can be reported and all registered cases are investigated and remedied.

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. Awareness of the issue is to be raised among employees and partners as part of internal training.

Occupational health and safety

We expect our suppliers to:

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



ENVIRONMENT

Protecting the environment

Our suppliers must have an effective environmental policy 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 environmentally friendly technologies and implement sound life cycle practices.

GHG emissions and climate change

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

In line with our shared responsibility for effective climate protection, we expect our suppliers to set targets for reducing greenhouse gas emissions for their entire business operations. Energy consumption and all relevant greenhouse gas emissions of 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. Examples of measures include the use of energy-efficient technologies, employee awareness programs and the use of energy-saving devices, to name but a few.

Water consumption

The human right to water, proclaimed by the UN Global Compact, insists on clean, safe, accessible and affordable water. We therefore expect our suppliers to conserve this vital resource by using it efficiently, disposing of wastewater properly and monitoring the risk of water pollution at sites close to 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 volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals and combustion by-products.

Biodiversity

Our suppliers must identify 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 are to be reported directly to Edelmann Group representatives



Responsible resource management

We expect our suppliers to promote and support the efficient use of sustainable, renewable resources. Edelmann Group suppliers must comply with all applicable laws and regulations that prohibit or restrict 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 protection

Chemicals and hazardous substances

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

We expect this from our suppliers:

- that they comply with all applicable legal norms and international standards regarding environmental protection
 - ensure safe and environmentally compatible development, transportation and disposal of their products
 - promote efficient use and application of environmentally friendly technologies
 - implement and maintain a responsible environmental management system to monitor environmental protection
- and make appropriate efforts to continuously and sustainably improve the environmental performance of the products and services they offer

Restricted or notifiable hazardous substances

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

The supplier undertakes to strictly adhere to certain obligations with regard to safety and the environment. To ensure product safety, products must meet the following requirements, among others:

- Regulation (EC) No. 1907/2006 concerning the Registration, Evaluation and Authorization of Chemicals (REACH). This regulation obliges suppliers of articles to provide information on substances that are present in concentrations of more than 0.1% by mass. As the list of substances may change, the supplier undertakes to inform Edelmann as soon as a new substance appears on this list



- Directive 94/62/EC on packaging and packaging waste and the EU packaging regulation (2025/40 - PPWR), in particular with regard to maximum concentrations of heavy metals (maximum total of 100 ppm for lead, cadmium, mercury and chromium VI)
- The Stockholm Convention on Persistent Organic Pollutants. The Convention obliges its Parties to take measures to prevent or reduce the release of POPs into the environment. Production and use is permitted for laboratory-scale research or as a reference standard (Art. 3 para. 5), under the exemptions of Annex I, under the grace period of Art. 4 para. 2 sentence 1 of Regulation (EU) 2019/1021 or in accordance with Annex I Part B of Regulation (EC) No. 850/2004. Handling, collection, storage and disposal are permitted in accordance with Art. 6
- The Minamata Convention on Mercury. The manufacture of mercury-added products is permitted under the exemptions in Annex A, under registered exemptions or if there is an alternative strategy for the product that is notified by a country to the Conference of the Parties (Art. 4 para. 2 lit. a). The use of mercury (compounds) in manufacturing processes is permitted under Annex B or under registered exemptions (Art. 5 para. 2 and Art. 6). The Convention also deals with the interim storage of mercury and its disposal once it becomes waste, with mercury-contaminated sites and with health issues. Mercury waste must be treated in accordance with Art. 11 para. 3
- The Basel Convention prohibits the import and export of hazardous waste from and to third countries and some contracting states. In addition to the provisions of the Convention, Council Directive 91/689/EEC must be taken into account when defining hazardous waste
- The following compounds may not be added constitutively (as recipe components) to the materials supplied to Edelmann
 - Per- and polyfluorinated alkyl compounds (PFAS)
 - Phthalates
 - Bisphenol A (CAS No. 80-05-7)
 - Free or releasable microplastics

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.

Waste water and solid waste

Wastewater and solid waste generated by businesses, industrial processes and sanitary facilities must be monitored, controlled and treated as necessary before discharge or disposal.



Minimizing waste, maximizing recycling

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

FORESTS POLICY

The products manufactured by Edelmann are packaging solutions based on paper and wood. This means that our business is entirely dependent on wood as a renewable raw material and must be given special consideration. Responsible procurement and the implementation and safeguarding of sustainable forestry are therefore at the heart of our procurement strategy. This section of the guideline communicates the commitments and targets we have set ourselves for forest-related issues and which we expect our suppliers of wood-based raw materials to support and implement.

Key Commitments

The Edelmann Group expects the suppliers concerned to commit to responsible procurement of wood-based materials (paper and cardboard) through a series of core principles:

- Full compliance with the law in our own operations and in our supply chain
- Full traceability of sourced materials
- No deforestation and/or conversion (including intact forest landscapes)
- No deforestation, no peat and no exploitation
- Endorse the highest social and environmental principles in our supply chain
- Support the Universal Declaration of Human Rights and the principles of the United Nations International Labor Organization
- Uphold the rights of indigenous peoples
- Respect ecosystems, biodiversity and habitats

A key aspect is compliance with the EU Deforestation Regulation (EUDR):

Our suppliers are obliged to comply with the requirements of the EU Deforestation Regulation (EUDR). This means that all wood-based raw materials and products supplied to our company must be deforestation-free. In particular, suppliers must ensure the following:

- Sustainable sourcing: Raw materials must not come from areas that were deforested after December 31, 2020.
- Sustainable harvesting: Harvesting practices must not lead to the degradation of forest ecosystems and must maintain the biological and economic productivity and complexity of forests.
- Documentation and verification: Suppliers must provide detailed evidence and documentation on the origin and sustainability of the raw materials.
- Due diligence obligations: Suppliers must implement a three-step due diligence process that includes risk assessment, risk mitigation and monitoring.



By complying with these requirements, our suppliers help to prevent deforestation and promote sustainability in our supply chain.

Implementation mechanisms

As we are highly dependent on the social and environmental practices of our raw material suppliers, we have introduced several control mechanisms:

- **Monitoring**
In addition, we monitor our suppliers through annual assessments, including the collection of wood origin certificates, in which the wood sources (wood species, sourcing countries and regions) are specified.
- **Certification of raw materials**
Our suppliers ensure the availability of FSC- or PEFC-certified material on request. As we are guided by customer specifications, non-certified materials are also procured. In such cases, we ask our suppliers to adhere to the "FSC-controlled wood" approach.

Our goals

A number of ambitious targets support our responsible procurement strategy:

- FSC Chain of Custody certification for all Edelmann sites by 2025
- Full traceability of purchased paper and cardboard by 2030 through certified wood source declarations
- Continuous increase in certified purchasing volume (FSC) through customer awareness programs
- Establishment of a robust forest-related risk assessment by 2025
- Deforestation and conversion-free supply chain by 2025, based on a cut-off date of December 30, 2020
- Integration of forest-related risks into supplier selection and supplier evaluation by 2025



BUSINESS ETHICS

When delivering goods and providing services, suppliers must fulfill 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 respective supplier.

Laws and regulations

Our suppliers are expected to comply with applicable laws and regulations depending on their business activities and the countries in which they operate. Where there are differences between regional and national laws and this Code, the higher standard takes precedence.

Fighting corruption

The Edelmann Group prohibits all forms of corruption, including but not limited to extortion, fraud, embezzlement and bribery. Our suppliers will neither accept nor offer payments and gifts that could lead to binding dependencies or obligations that could potentially influence business decisions. We expect our suppliers to implement appropriate risk management systems for the scope of potential corruption activities. In addition, our suppliers must understand the legal aspects of interacting with government officials in order to assess under what circumstances a payment or gift may be construed as an act of bribery.

Antitrust law 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 any business activities that may restrict trade or competition. We expect our suppliers to take precautions in terms of price agreements, customer relationships and corresponding exchange of information.

Money laundering

Money laundering refers to the use of funds that come directly or indirectly from criminal activities and are introduced later 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 possible case. Our suppliers do not fund illegal activities, including fraud and terrorism.

Privacy / Protection and Use of Information

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

Disclosure of confidential information to third parties is strictly prohibited.



Conflicts

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.

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 about the value or nature of the gifts, offers or invitations directly or indirectly related to 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 dependence.

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

If the nature of the breach is such that the Supplier is unable to terminate it within a foreseeable timeframe, the Supplier shall immediately develop and implement a plan to end or minimize it. The supplier must 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 measures. In such cases, the auditor must be granted access to the relevant areas and provided with the necessary documents.

Appeal proceedings

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 internal and external rules ("whistleblower reports") relating to Edelmann's business activities; These reports can be submitted anonymously if desired. Edelmann has established an internal procedure for dealing with whistleblower reports.



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 and purchasing team, and all changes will be communicated to interested parties. Please direct any questions you may have to the Head of ESG.

Confirmation

The terms of the Supplier Code of Conduct are hereby accepted by:

Company Name:

Address:

Contact person:

Position:

Date and signature:

Company stamp, if available:

01.04.2024

Dr. Frank Hornung

Chairman of the Management Board, Edelmann Group

