

Code of Ethical Business Conduct

Internet Version



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1. Statement of the Group Executive Committee

Dear Colleagues,

At Siegwerk, our commitment to ethical conduct is not just a matter of policy, it is a reflection of who we are. As a global family-owned company with deep roots in tradition and innovation, we recognize that our long-term success depends on the integrity of our actions and the trust we build with our stakeholders.

This **Code of Ethical Business Conduct** serves as a compass for all of us—employees, managers and directors alike. It defines the standards that guide our decisions, shape our culture and protect our reputation. It is not a rulebook for every situation but a framework that empowers us to act responsibly, transparently and in accordance with the law.

This Code addresses the most critical areas of our business conduct in the context with:

- Our People
- Our Company
- Our Customers & Suppliers
- Our Communities

This Code exists to protect all of us. Unlawful or unethical behavior can lead to serious consequences—for the company and for individuals. Acting in line with this Code helps safeguard our reputation, our relationships and our shared success.

Every employee must read this Code carefully, reflect on its meaning and apply it in daily work. Where questions arise, seek guidance. Where concerns emerge, speak up. At Siegwerk, compliance is not just a legal obligation, it is a collective responsibility. To ensure that this Code is a living reality at all times, regular training is provided on the Code itself and on specific areas it covers.

More detailed information on each topic of this Code is provided in the relevant policies, if applicable, and example cases, which are available on the Siegwerk Intranet. You will find direct links to these resources in each chapter of the Code which will direct you to the Siegwerk Intranet. The policies referenced include further details regarding implementation measures and targets, where applicable.

Let us continue to uphold the standards that define us and ensure that our actions today build a strong and compliant Siegwerk for tomorrow.

September 2025



Dr. Nicolas
Wiedmann

Chief Executive
Officer



Dr. Jan
Breitkopf

President
EMEA



Christopher van
Laack

President
Americas



Ashish Pradhan

President Asia



Dirk
Weißenfeldt

Chief Financial
Officer

2. Our People



2.1 Our Reputation

Siegwerk is committed to protect and strengthen its strong reputation which was built over decades through honorable business conduct as a global family-owned company. Our employees play a vital role in upholding this reputation. We welcome private involvement in associations, clubs, and similar organizations, provided it remains within legal boundaries and does not compromise Siegwerk's reputation.

Our employees shall clearly distinguish their personal views from their professional position at Siegwerk when expressing opinions in public forums, including social media.

Any behavior that risks damaging our reputation can undermine the trust placed in us by business partners and the public.

“We protect our reputation by separating personal views from professional positions.”

Example Incidents

2.2 Respectful Behaviour

Siegwerk is committed to maintain a professional, inclusive and respectful working environment. Fair and objective treatment of all individuals is essential to our operational excellence and reputation. We do not tolerate unfair treatment, discrimination or harassment of any kind—whether based on race, ethnicity, color, nationality, religion, ideology, gender, age, sexual orientation, physical characteristics or any other legally protected class.

Our employees shall conduct themselves with integrity, fairness and respect in all interactions with colleagues, business partners and third parties. Professionalism and mutual respect are fundamental to our daily collaboration.

Any violation of these principles can seriously harm our workplace culture, employee well-being and the trust we have built internally and externally.

“We treat everyone with fairness and respect.”

Example Incidents

2.3 Workplace Health and Safety

Siegwerk is committed to provide a safe, healthy and secure working environment for all employees and third parties visiting our sites. We view workplace safety not only as a legal obligation but as a moral responsibility. Through proactive risk management, continuous process improvement and a culture of shared responsibility, we strive to prevent injuries, illnesses and unsafe working conditions.

Our employees shall follow all applicable health and safety laws, internal policies and established procedures. This includes reporting hazards or incidents promptly, using protective equipment and participating in required training.

Any failure to comply with health and safety requirements can lead to serious harm to individuals and legal consequences for the company as well as for individuals.

“We foster a safe work environment by embedding health and safety into our daily operations.”

Example Incidents

HSE Policy

3. Our Company



3.1 Confidential Information Protection and Digital Responsibility

Siegwerk is committed to protect its confidential information and to act digital responsibly by navigating through cyberspace with appropriate care, applying required safety measures. Our confidential information, including trade secrets, know-how (especially our formulations) and intellectual property (especially our patents) stand for substantial financial investments. By protecting them, we secure our future business success. Furthermore, as digitalization transforms our business, we rely on the secure, lawful and purposeful use of digital tools and data. This applies also to the responsible use of artificial intelligence.

Our employees shall protect Siegwerk’s confidential information from misuse, unauthorized access or disclosure and apply digital tools in a secure, lawful and responsible manner.

Not protecting confidential information or improper handling of digital tools endangers our competitive advantage.

“We protect our confidential information and act responsibly in the digital space.”

Example Incidents

Acceptable Use Policy

Information Security Policy

Inf. Asset Classification Policy

3.2 Financial Integrity

Siegwerk is committed to transparency in all financial reporting. Financial data must be complete, accurate and reliable and documented in accordance with applicable accounting and financial reporting standards to reflect a true and fair view of our financial position.

Our employees shall take accountability for the correctness of the company's financial records, remain vigilant and verify business partners, when involved in financial processes. Any form of deception, such as falsifying records or misrepresenting facts, is strictly prohibited.

Inaccurate financial reporting and failure to verify business partners can lead to incorrect business decisions and regulatory violations, causing significant financial damage.

“We provide correct and truthful financial information.”

Example Incidents

3.3 Conflict of Interest

Siegwerk is committed to act with integrity and ensuring that personal interests do not influence business decisions. All decisions must be based solely on objective criteria and made having the best interest of Siegwerk in mind. By upholding these standards, we protect our credibility and the trust placed in us.

Our employees shall avoid situations that could create or appear to create a conflict of interest. For example, a common risk area are personal relationships with business partners. A conflict of interest is not a violation in itself, but it is a violation if it is not disclosed immediately and dealt with appropriately.

Undisclosed conflicts of interest can impair objective decision-making and lead to reduced confidence in the correctness of our processes.

“We act with having Siegwerk's best interest in mind.”

Example Incidents

4. Our Customers & Suppliers



4.1 Fair Competition

Siegwerk is committed to fair competition and full compliance with all applicable antitrust and competition laws wherever we operate. These laws safeguard open and fair markets by prohibiting collusion between competitors, restrictive agreements with suppliers or customers, abuse of dominant market positions and unfair limitations through mergers or acquisitions. Whether an act qualifies as an antitrust violation does not only depend on the jurisdiction in which the violation occurs. In some cases, causing an adverse effect on competition in another jurisdiction may as well constitute an anti-trust violation.

Our employees shall act in full compliance with antitrust and competition laws by avoiding any conduct that could restrict fair competition. This includes refraining from sharing sensitive information with competitors, engaging in price-fixing or entering into unlawful agreements.

Any violation of antitrust and competition laws may result in severe consequences such as substantial fines for the company as well as for the persons involved, including potential imprisonment.

“We compete fairly and lawfully.”

Example Incidents

Anti-Trust Policy

4.2 Anti-Corruption

Siegwerk is committed to build business relationships based on integrity, transparency and sound judgment. All business interactions must remain free from personal gain and any attempt to improperly influence decisions, especially involving public officials. Modest promotional gifts or hospitality may be allowed if their value is deemed unobjectionable under the locally applicable law. Siegwerk’s agents, distributors and business intermediaries are expected to fully comply with the business partner anti-corruption standards set up for them.

Our employees shall never give or accept anything of value in exchange for preferential treatment or inappropriate business advantage and ensure that all business conduct remains transparent and lawful.

Corruption undermines fair competition and exposes both the company and individuals to serious legal risks such as fines and imprisonment.

“We act with integrity.”

Example Incidents

Anti-Corruption Policy

Busin. Part. Anti-Cor. Progr.

5. Our Communities



5.1 Human Rights

Siegwerk is committed to provide products and services that are free from human rights violations. We uphold internationally recognized human rights by among others prohibiting child and forced labor, discrimination and environmental harm, while promoting fair wages, safe working conditions and freedom of association throughout our operations and value chains.

Our employees shall respect human rights and apply these principles in all business activities. Furthermore, we take measures that human rights are also respected along our supply chain.

Neglecting our human rights standards can lead to increased scrutiny from customers and regulators as well as supply chain disruptions.

“We respect and protect human rights.”

Example Incidents

Policy and Gui. Princ. on Hum. Rig.

5.2 Product Safety

Siegwerk is committed to ensure product safety through strict control of raw materials and formulations. We lead the industry with a dedicated raw material selection process, excluding hazardous substances far beyond legal requirements. All formulations undergo system-based checks to prevent any composition that could compromise intended use.

Our employees shall follow established requirements, use only approved raw materials and allowed formulations and immediately report potential deviations to ensure compliance and safety, when involved in product safety and production processes.

Any compromise in product safety can result in risks to health and safety, regulatory breaches, product recalls and serious business consequences.

“We take responsibility for product safety.”

Example Incidents

5.3 Environmental Sustainability

Siegwerk is committed to contribute positively and responsibly to society and the environment by embedding sustainability into all aspects of our business. We pursue this by leveraging opportunities from circular economy and enhancing efficiency and effectiveness in our core operations. Our efforts include reducing emissions, advancing circular packaging solutions and transparently communicate our environmental footprint. We engage with suppliers and customers to address key sustainability challenges together.

Our employees shall support reducing environmental impact and work actively on sustainability efforts whenever possible.

Neglecting environmental responsibilities can lead to inefficiencies, increased operational costs and reduced credibility in sustainability audits and stakeholder evaluations.

“We act sustainably and reduce our environmental impact.”

Example Incidents

Sustainability Policy

We expect our suppliers to adhere to the same standards in the areas of environment, human and labor rights. The expectations towards our suppliers is codified in the Business Partner Code of Conduct.

Business Partner CoC

6. Scope and Responsibilities

This Code applies to any of Siegwerk’s employees, managers and directors as well as to its temporary employees. Managers are responsible not only for their own conduct but also for the conduct of their staff. Each manager must inform, ensure understanding as well as compliance and allow training on this Code, including its relevant implementation.

The Group Executive Committee (GEC) of Siegwerk Group Holding AG & Co. KG has set up a Corporate Compliance Circle with the objective to establish a mechanism for monitoring compliance issues.

The Corporate Compliance Circle is composed of:

- Group Chief Financial Officer (GEC sponsor)
- General Counsel/Group Compliance Officer
- Vice President Global Human Resources
- Head of Global Health Safety & Environment
- Chief Information Officer
- Vice President Finance, Accounting, Tax & Internal Audit
- Head of Corporate Auditing
- Head of Global Sustainability and Circular Economy/ Human Rights Officer/
- Head of Global Product Safety + Responsibility
- Corporate Compliance Coordinator

The General Counsel functions as Group Compliance Officer and reports to the Group Chief Financial Officer. Regional Human Resources Officers are appointed as Regional Compliance

Officers who report functionally to the Group Compliance Officer for compliance matters. In addition, Local Compliance Officers are appointed for each entity which report functionally to the respective Regional Compliance Officers.

With the help of Compliance Officers Siegwerk ensures the following:

- to provide advice on compliance to Siegwerk employees, managers and directors
- to assess compliance risks
- to conduct compliance trainings
- to establish communication channels for reporting suspected compliance violations
- to investigate alleged compliance violations and assist in deciding possible sanctions against the individuals involved and
- to prepare and issue reports (annually and in individual cases)

In addition, Corporate Auditing will carry out reviews on the Code's effectiveness on behalf of the Corporate Compliance Circle at regular intervals.

This Code cannot encompass every aspect of ethical business conduct and is intended to be an overarching guidance document. Sub-policies will be applied on a topic where required.

7. How to Report a Concern

Siegwerk works hard to foster an environment of open, honest communication. If you have a concern about a business-related misconduct, there are several options to address it. You may notify the following persons:

- your Manager
- the Head of the Department or Business Unit
- the Human Resources Manager
- the Regional, Local or Group Compliance Officer

You also have the option to report a misconduct or concern via the established Siegwerk [Whistleblowing Tool](#) which is accessible on Siegwerk's Compliance Internet (optional anonymous reporting). In the [Whistleblowing User Guide](#) available on our website, you will find information on how the process works and answers to the most frequently asked questions (FAQ). Confidentiality will be maintained to the extent consistent with the best interest of Siegwerk, the employee, manager or director involved and Siegwerk's obligation under law. Siegwerk will ensure that no one is in any way disadvantaged because he or she, acting in good faith, reports a potential compliance violation.

The Code is reviewed regularly:

Version	Review Date	Effective Date	Version Number
Code of Ethical Business Conduct	-----	30.06.2010	1.0
Code of Ethical Business Conduct	15.07.2017	31.08.2017	2.0
Code of Ethical Business Conduct	01.04.2021	16.04.2021	3.0
Code of Ethical Business Conduct	11.08.2025	17.11.2025	4.0

Information: The internal version of this Code of Conduct includes links to relevant policies and illustrative case examples. As these resources are only accessible via the Siegwerk Intranet, they are not included in the public Internet version.