

**Statement of the  
Group Executive Committee**



**Siegwerk's Human Rights  
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# Policy and Guiding Principles on Human Rights



# Statement of the Group Executive Committee



**Nicolas Wiedmann**  
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President EMEA



**Christopher Van Laack**  
President AMERICAS



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CFO



**Ashish Pradhan**  
President ASIA

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

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

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

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

## Siegwerk's Human Rights Guiding Principles



### Commitment and Aspiration

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

### Risk Acknowledgment

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

### Seeking Knowledge

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

### Collaboration is Key

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

### Stakeholder Focus

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

### Continuous Improvement

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

### Guidance and Consistency

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

### Last Resort Measures

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



# Expectations towards employees, suppliers and other business partners

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

## We are guided by the following international standards and principles:

- Universal Declaration of Human Rights (United Nations)
- International Labor Organization's Declaration on Fundamental Principles and Rights at Work (ILO)
- Guiding Principles on Business and Human Rights (United Nations)
- Convention on the Rights of the Child (United Nations)
- Convention on the Elimination of All Forms of Discrimination against Women (United Nations)
- International Covenant on Civil and Political Right (United Nations)
- International Covenant on Economic, Social and Cultural Rights (United Nations)
- Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (United Nations)
- Convention on the Elimination of All Forms of Racial Discrimination (United Nations)
- Convention on the Rights of Persons with Disabilities (United Nations)
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (United Nations)
- Minamata Convention on Mercury
- Stockholm Convention on Persistent Organic Pollutants (POPs)
- Basel Convention on the Export of Hazardous Waste.
- Ten Principles of the United Nations Global Compact
- The Responsible Care® Global Charter of the chemical industry
- ISO 26000:2010 Guidance on social responsibility
- Ethical Trading Initiative (ETI) Base Code

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

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

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

- Code of Ethical Business Conduct ([Internet Link](#))
- Sustainability Policy ([Internet Link](#))
- Anti-Corruption Policy (to be shared upon request)



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

We systematically map and actively engage internal and external stakeholders—including NGOs, local communities, and governmental bodies—to ensure transparent dialogue and collaborative action on sustainability and human rights. We respect the land rights of local populations in our business operation areas.

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



## GOVERNANCE

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

Siegwerk is committed to systematically integrating human rights considerations into its governance, decision-making, and management systems. Human rights risks and performance are embedded into all major business decisions, including significant investments, new market entries, mergers and acquisitions, and new product development. Human Rights Due Diligence (HRDD) at Siegwerk is not a standalone activity; it is integrated into relevant management systems, particularly procurement, to ensure a holistic, consistent, and effective approach across our own operations and our supply chain. To support this, tailored human rights training initiatives are provided for senior leadership to enhance their understanding of their strategic oversight responsibilities and the critical importance of human rights across our operations.

Siegwerk has established a robust governance and organizational structure to oversee human rights responsibilities. A Human Rights Officer has been appointed with global responsibility for human rights governance. The Human Rights Officer reports regularly and on an ad hoc basis to the Group Executive Committee in accordance with Section 4 (3) of the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz, LkSG), thereby ensuring compliance with applicable legal requirements.

The centrally responsible Global Sustainability Department is tasked with the execution of human rights due diligence for suppliers. This includes conducting and coordinating human rights risk assessments, preventive and corrective measures, reporting, and the investigation of human rights-related incidents within the supply chain. Global Sustainability works closely with purchasing and procurement colleagues worldwide to ensure the effective implementation of due diligence measures.

Global Sustainability is also responsible for ensuring due process in the human rights risk analysis and for centralized reporting on human rights in Siegwerk's own operations. The execution of risk analyses, as well as the implementation of preventive and corrective measures and the investigation of incidents in own operations, are the responsibility of the Human Resources and Health, Safety & Environment (HSE) departments across Siegwerk.

In addition, the Human Rights Officer is a member of the Corporate Compliance Circle, a senior leadership body focused on ensuring compliant conduct by Siegwerk employees. Within this forum, the Human Rights Officer reports on supplier-related human rights activities and escalates potential human rights infringements where there is a direct connection to Siegwerk employees. The Corporate Compliance Circle is chaired by the Group Chief Financial Officer (CFO).



## Process description to meet due diligence obligations



## RISK ANALYSIS (1/2)

### Risk analysis process



- 1 Abstract Risk Analysis**  
 (Based on country/Industry, identification of major risk themes)
 
- 2 Specific Risk Analysis**  
 (Continuously, identification of specific risks and actual issues)
 
- 3 Internal & External Reporting**  
 (Compliance Council, German LKSG, CSRD/CS3D)
- 4 Prioritization & Action Definition**  
 (External: specific supplier or raw material category, internal: department & country specific)
- 5 Implementation**

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

### Own Operations



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

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

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



## RISK ANALYSIS (2/2) - Suppliers and business partners

To ensure the integrity and sustainability of our upstream operations, Siegwirk has established a comprehensive risk assessment process to identify, evaluate, and mitigate risks associated with our business activities and supply chain. A key component of this process is the conduct of abstract and specific risk analyses which are updated continuously.

For the abstract risk analysis, we have analyzed all raw material and non-raw material suppliers globally based on their country of origin and potential impact on people rather than the company. Prioritizing suppliers based on the identified risks, we then conduct an initial assessment of the severity and relevance of the risks. The analysis showed that the highest risks are with our raw material and packaging suppliers. We request.

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

Siegwerk maintains an IT based monitoring system to identify and assess actual and potential human rights, business integrity, and environmental risks in its supply chain. The system systematically gathers information from publicly available sources, including NGOs, media, trade unions, and other relevant stakeholders, and automatically alerts Siegwirk where credible concerns or incidents are identified.

Where actual or potential adverse impacts are identified, Siegwirk engages with the respective supplier through its local purchasing and procurement teams to seek further clarification, assess the situation, and discuss appropriate preventive, mitigating, or corrective actions. This engagement underscores Siegwirk's commitment to respecting human rights, upholding business integrity, and protecting the environment, and serves to clearly communicate these expectations to suppliers and exercise leverage where necessary.

These processes are complemented by Siegwirk's own research activities, on site assessments, and broader human rights impact assessments, forming an integrated approach to human rights due diligence. In line with the UNGPs, Siegwirk is also committed to direct and meaningful engagement with potentially affected stakeholders, including workers, local communities, and their legitimate representatives. Such engagement is an integral element of identifying, assessing, and prioritizing actual and potential human rights impacts, particularly in high-risk operations or supply chain segments, and ensures that stakeholder perspectives are appropriately considered and integrated into Siegwirk's human rights due diligence processes.





## STRATEGY & TARGETS (1/3)

Siegwerk wants to enable sustainable packaging by driving sustainability in every step of our value chain. At the global level, our sustainability strategy 'HorizonNOW' sets clear targets and guides us in the implementation of measures focusing on the three areas to achieve this: Sustainable Procurement, Sustainable Operation and Sustainable Products with the defined targets shown in the figure (next slide).

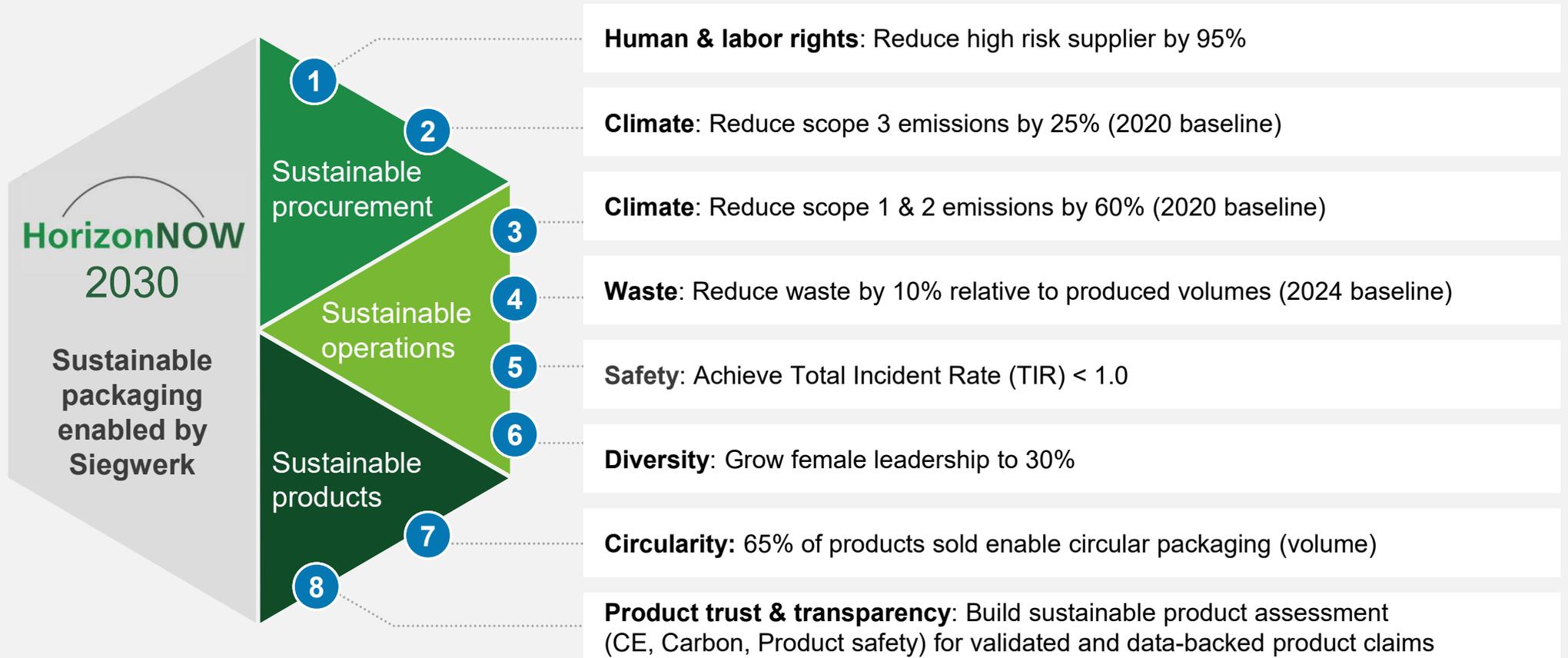
The Sustainable Procurement target concerning human & labor rights "Reduce high risk suppliers by 95%" is based on the abstract and specific risk analysis. We have set minimum scores for the sustainability questionnaires for suppliers.

Advancing human rights in our own operations, we focus on diversity and safety. We are furthermore committed to providing all employees with good working conditions by ensuring that they have adequate wages, working hours, and benefits. In case needed, we set additional targets and key performance indicators to improve on identified topics and continuously monitor adherence. For example, we ensure continuously that 100% of our own employees are earning a living wage and we are engaging with suppliers and business partners to move towards this goal as well.





## STRATEGY & TARGETS (2/3) - Siegwerek's Global Sustainability Strategy 'HorizonNOW'





## STRATEGY & TARGETS (3/3)

### Measuring Policy and Due Diligence Effectiveness

Beyond achieving specific targets, Siegwirk is committed to continuously evaluating and measuring the overall effectiveness of its human rights policy and due diligence processes. This evaluation will be based on a range of qualitative and quantitative metrics, which may include:

- Number and type of human rights impacts identified and mitigated.
- Trends in grievance reports received and their resolution rates.
- Feedback from affected stakeholders on the effectiveness of interventions.
- Results of periodic human rights performance reviews and audits.
- Percentage of employees trained on human rights and due diligence.
- Supplier human rights performance ratings and improvement trends.

These effectiveness measurements will be regularly reviewed by the Human Rights Officer and reported to the Group Executive Committee and Corporate Compliance Circle. Key findings and progress will also be communicated externally, for example, in our annual Sustainability Report, to ensure transparency and accountability.



## PREVENTIVE AND REMEDIAL MEASURES (1/3)

Extending core expectations towards our Business Partners



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

### Suppliers & Business Partners:



The Business Partner Code of Conduct defines the expectations Siegwirk has towards its business partners. It also underlines the pursuit of transparency within our end-to-end supply chain by encouraging suppliers, partners, customers to check if they have human rights and environmental risks within their own operations and their upstream supply chain. It is integrated in all purchase orders becoming a legally binding standard for all purchasing and procurement activities.



To accompany the Business Partner Code of Conduct, we are using the aforementioned "Siegwerk Sustainability Checklist" to analyze the status so that in a collaborative approach, improvements can be initiated.



Supplier selection and evaluation: We take into account human rights and environmental criteria when selecting and evaluating our suppliers. The Business Partner Code of Conduct and the Siegwirk Sustainability Checklist are also an integral part of our Supplier Onboarding Process.



In case a supplier is not able to reach the minimum score for the specific risk analysis questionnaire, Siegwirk and the IT platform providing the questionnaire support and guide about needed steps for improvements. On the IT platform, there are many resources for trainings available on how to improve many aspects of sustainability so that it guides our suppliers on their improvement journey.



We pursue direct engagement with suppliers to address salient human rights risks identified in our assessments. This includes targeted capacity-building through webinars and in-depth workshops on topics such as grievance mechanisms, fair wages and working hours, and occupational health and safety. In India, for example, we have engaged suppliers through dedicated training and dialogue formats, enabling them to develop concrete improvement plans and strengthen their own due-diligence systems.

As part of Siegwirk's Sustainable Procurement Program, SustainUP, we are also conducting trainings on various material topics either directly with the respective supplier or towards a broader audience. Training materials such as webinar recordings are available on our [SustainUP website](#).



## PREVENTIVE AND REMEDIAL MEASURES (2/3)

### Our own operation

### Customers and consumers



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



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



The HorizonNOW target “Diversity: Grow female leadership to 30%” is shown in several initiatives e.g. establishing complete data transparency to managers with a split of gender diversity, mentoring programs (“Frauen in Führung”) and analysis of a potential gender pay gap to prevent these.



Siegwerk's is committed to transparency when it comes to safe inks and coatings. Sophisticated policies and procedures are established, which ensure involvement of expertise based on the latest scientific findings, regulatory developments, market demands and finally close and effective cooperation of important stakeholders in the company on global scale in order to continuously review the safety of our products with regard to health and environmental risks. To further transparency on this complex topic for customers and consumer, our HorizonNOW strategy includes the target “Product trust and transparency: Build sustainable product assessment for validated and data-backed product claims”.



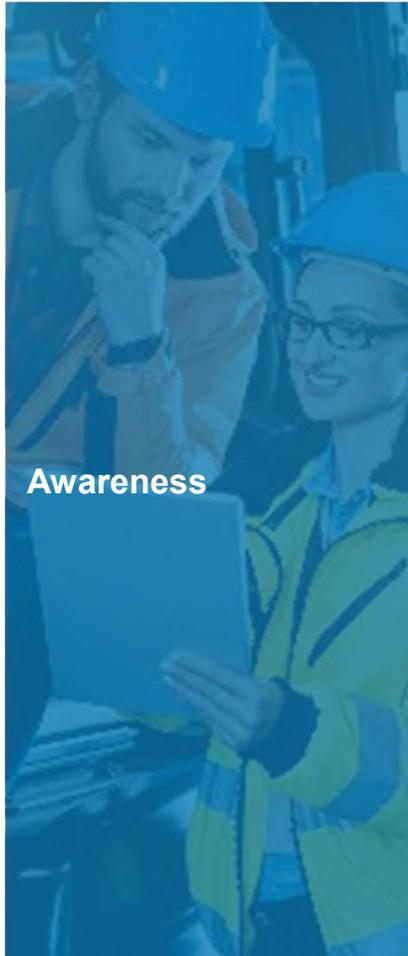
In addition, we collaborate with customers to identify and address upstream risks in the value chain, ensuring that emerging challenges are jointly understood and mitigated.

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

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



## PREVENTIVE AND REMEDIAL MEASURES (3/3)



Awareness



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



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



# GRIEVANCE MECHANISM

Siegwerk has launched its grievance mechanism on both the intranet and internet to ensure broad accessibility: [Compliance](#).

The tool is available in multiple languages, includes an integrated translation engine, and allows voice-message submissions. Users may choose to remain anonymous and will be kept informed about the status and outcome of their case. All submissions are reviewed, and feedback is provided within seven days in line with EU/German whistleblower requirements.

Grievances concerning suppliers are routed to the Human Rights Officer, while those involving Siegwerk employees go to the Group Compliance Officer. Investigation teams are formed wherever needed, including local responsible persons. Local Compliance Officers must report suspected breaches of the Code of Conduct to the Global Compliance Team via the tool.

This ensures a uniform, comparable, and consistent approach to case handling across all locations.

When adverse human rights impacts are identified, Siegwerk is committed to providing or cooperating in effective remediation. This includes, but is not limited to, offering appropriate remedies such as compensation, restitution, rehabilitation, and apologies. The effectiveness of these remedial actions will be systematically tracked, evaluated, and communicated to the affected parties to ensure that the harm is adequately redressed and to prevent recurrence.



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

**E-Mail:**  
[humanrights@siegwerk.com](mailto:humanrights@siegwerk.com)

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



## Siegwerk Grievance Mechanism

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