

# Principle

## Declaration of Principles for the Respect of Human Rights

#### **Corporate Sustainability**

Responsible function: Approved by:

CS Management Board

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Groupwide

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### **Contents**

1	Pream	ble	2	
2	Standa	Standards and guidelines		
3	Scope	and expectations	3	
4	Priority risks and risk management procedures			
5	Respo	Responsibilities & Measures		
	5.1	Internal responsibilities	4	
	5.2	Prevention measures	4	
	5.3	Remedial action	5	
	5.4	Complaint's procedure and ombudsman's office	5	
6	Revisi	Revision history		



#### 1 Preamble

The Heidelberg Group (hereinafter referred to as HEIDELBERG) is committed to respecting human rights, recognizing the rights of employees and their representatives, protecting the environment, and taking responsibility for its supply chain. The Code of Conduct already defines essential values and ideas of the HEIDELBERG Group with regard to our actions. This policy statement builds on this and deepens our ideas regarding human rights issues.

HEIDELBERG firmly anchors sustainable and lawful action within the meaning of legislation to comply with human rights and environmental due diligence obligations as well as internationally recognized human rights agreements in its corporate strategy.

To fulfil human rights and environmental due diligence within our own business unit as well as within our sphere of influence along our value chain, we demand and encourage a binding commitment from our employees and business partners. Through our global presence, HEIDELBERG is actively engaged and in constant exchange with external stakeholders (e.g., supplier networks, industry associations). It is our concern not only to address the understanding and our non-acceptance of human rights and environmental violations, but also to actively work towards a quick and effective elimination within the scope of our responsibility and resources.

With this Declaration of Principles, HEIDELBERG emphasizes and substantiates, as in the Code of Conduct, our binding commitment to human rights and environmental due diligence towards our employees, business partners and society in general. Given the importance of the undertaking, HEIDELBERG has anchored management of the implementation of the individual elements listed in the Declaration of Principles for respecting human rights and environmental due diligence obligations at the highest corporate level. We require our technical and managerial staff to ensure that all employees worldwide are aware of their obligations and are able to integrate them into everyday company practices. These human rights and environmental due diligence obligations go hand in hand with our requirements, which are contained in the Code of Conduct for employees and the Business Partner Code of Conduct for business partners.

Board of Management of Heidelberger Druckmaschinen AG



#### 2 Standards and guidelines

HEIDELBERG stands for integrity, reliability, and fairness as well as for quality, innovation, and sustainability. As an internationally active company, we maintain business relationships with business partners around the world. HEIDELBERG is committed to human rights and environmental standards. We promote and demand compliance with human rights in our supply chain.

To this end, we are guided by ethical values and principles, in particular integrity and probity, and respect for human dignity, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the principles of the UN Global Compact and the core labor standards of the International Labor Organization (ILO), as well as the United Nations Guiding Principles on Business and Human Rights. Furthermore, we recognize the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, the Minamata Conventions on Mercury, and the Stockholm Convention on Persistent Organic Pollutants.

#### 3 Scope and expectations

The principles given in this Statement of Principles apply to all corporate hierarchies, from the Supervisory Board and the Management Board to individual employees in the Group. All divisions of the Heidelberg Group (domestic and foreign sites, employees of the Heidelberg Group) stand behind this declaration. We also demand the principles set out in this declaration from our (un)indirect suppliers and other business partners (e.g., externally hired sales partners).

Our cooperation is based on trust and honesty. By acting together, we promote the basic principles of sustainability and avoid environmental risks. By acting together, we protect respect for human rights and always put human rights above the pursuit of profit. We stand for transparency in the supply chain and promote dialogue.

#### 4 Priority risks and risk management procedures

HEIDELBERG has an appropriate and effective risk management and internal control system. Our systems are designed in such a way that they are regularly updated on an occasion-related but also non-occasion-related basis to identify and assess risks and opportunities. Our risk analyses relating to direct suppliers include not only country-specific risks but also risks typical of a manufacturing company, such as material risks and health risks from working conditions. The topics of child labor and slavery were specified as priority risks related to direct suppliers. Child labor is defined as the employment of a child below the permissible minimum age, where the permissible minimum age corresponds to the age at which compulsory schooling ends according to applicable national law and is at least 15 years. Slavery is any work or service that is exacted from any person under the threat of punishment and for which the person has not offered himself voluntarily, such as debt bondage or human trafficking. Slavery includes all forms of slavery, slave-like practices,



servitude or other forms of domination or oppression at work, such as extreme economic or sexual exploitation and humiliation.

Our employees work every day to minimize risks as much as possible and to realize opportunities, while keeping the overarching goals in mind. Due to the existing HR management and processes for material compliance and waste management, no specific prevalent risks could be identified in the own business area. No risks particularly related to the Act on Corporate Due Diligence Obligations in Supply Chains could be identified in the HEIDELBERG risk inventory either.

Based on the results of the regularly conducted risk analysis, HEIDELBERG has established workflows for both preventive and necessary remedial measures.

#### 5 Responsibilities & Measures

#### 5.1 Internal responsibilities

The Executive Board of HEIDELBERGER DRUCKMASCHINEN AG is responsible for managing the principles on human rights and environmental protection set out here in the Declaration of Principles. The Executive Board has delegated the operational monitoring of compliance with due diligence obligations in the individual functional areas in its own business area and along the supply chain to an LkSG Steering Committee set up specifically for this purpose; the Executive Board receives corresponding reports and has given the committee the corresponding authority to take measures.

#### 5.2 Prevention measures

HEIDELBERG implements general and specialized training for both internal business units and employees of selected, high-risk suppliers.

General training includes content on all

- in the policy statement,
- in the Code of Conduct for Employees and
- in the Code of Conduct for Business Partners

and environmental guidelines and are mandatory for all employees of the company and the selected supplier staff. Specialist training courses are aimed at employees from the purchasing department and other procuring units.

The contents of the Code of Conduct for Business Partners are an integral part of HEIDELBERG's purchasing conditions. Respect for the principles enshrined therein is urgently expected in the context of all existing supplier relationships. In addition, HEIDELBERG undertakes not to enter any new business relationships with suppliers who



cannot fulfill the human rights and environmental due diligence obligations anchored in the Declaration of Principles or the Code of Conduct for Business Partners.

HEIDELBERG reserves the right to verify compliance with human rights or environmental due diligence obligations by means of on-site audits at selected suppliers.

#### 5.3 Remedial action

If HEIDELBERG becomes aware of human rights or environmental due diligence violations in its own business unit or along the direct supply chain, standard workflows with corresponding action and target specifications have been established. It is mandatory to report this to Risk Management. In principle, the responsibility for eliminating a violation lies with the so-called affected risk owner; in the event of changes, the risk owner must proactively report these to risk management. The areas defined in the process monitor these events and provide expert assistance for elimination.

Heidelberg has also taken precautions with organizational and procedural workflows and can activate them at any time if required.

HEIDELBERG regularly evaluates the effectiveness of remedial procedures implemented in its own business unit or at the supplier.

#### 5.4 Complaint's procedure and ombudsman's office

As a neutral body not bound by instructions, the Ombudsman office cooperating with HEIDELBERG receives complaints about breaches of duty of care by employees or third parties in confidence and passes them on to the Compliance Office for further processing, if desired while preserving anonymity.

HEIDELBERG offers its employees and third parties the opportunity to report complaints about human rights violations or environmental violations confidentially and, if desired, anonymously to the whistleblower system, which can be accessed digitally or by telephone. Reports can be submitted around the clock in various languages. The whistleblower system is technically managed by an independent operator. Reports received are processed by the company's internal Compliance Office.

This policy statement is based on the requirements of the German Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) as well as on the above-mentioned standards on human rights and environmental protection. HEIDELBERG guarantees a regular review of the up-to-datedness as well as the practical feasibility and effectiveness of the principles enshrined in this Statement of Principles and undertakes to make an adjustment to the provision in the event of regulatory or company-related changes.

All current information on strategic decisions, processes and measures relating to the principles outlined in this policy statement are published in the annual edition of the non-financial report and as part of the human rights report on HEIDELBERG's corporate website.



The Declaration of Principles on Respect for Human Rights and Environmental Due Diligence enters into force on the day of its signing and supplements applicable codes of conduct for Group employees and external supplier networks (Code of Conduct for Employees and Business Partners). Both the German and English versions of this Code of Conduct are legally binding.



### 6 Revision history

Version	Date	Revision
1.0	19/12/2022	Publication of the Declaration of Principles for the Respect of Human Rights of Heidelberger Druckmaschinen AG.
1.1	19/01/2023	Update policy statement due to organizational change in the Management Board.  Update of document format.
2.0	22/01/2025	Update to the priority risks section due to adjustments in the risk prioritization process.  Generalization of Management Board signature.