

**Disclaimer: In accordance with §§ 10 (2) and 12 (1) of the Act on Corporate Due Diligence Obligations in Supply Chains, Heidelberger Druckmaschinen AG is obliged to report in German language. In order to ensure better comprehensibility for all interested parties, the report will be published in both German and English. In case of discrepancies between the two versions, the German version shall prevail.**

## **Report on the Corporate Due Diligence Obligations in Supply Chains**

Reporting period from 01.04.2023 to 31.03.2024

**Name of the organization:** Heidelberger Druckmaschinen AG

**Address:** Gutenbergring, 69168 Wiesloch

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## **A. Strategy and anchoring**

### **A1. Risk management monitoring and management responsibility**

**What responsibilities for monitoring risk management were defined during the reporting period?**

An LkSG Steering Committee was set up, consisting of executives from Corporate Sustainability, the Legal Department, Procurement, Internal Audit and Quality. Supervisors also implement risk management in their own departments, record breaches of duty and implement preventive measures.

## **A. Strategy and anchoring**

### **A1. Risk management monitoring and management responsibility**

**Has management established a reporting process to ensure that it is regularly - at least once a year informed about the work of the person responsible for monitoring risk management?**

**It is confirmed that the management has established a reporting process which, in the sense of §4 (3) LkSG, ensures that it is regularly - at least once a year - informed about the work of the person responsible for monitoring risk management.**

- Confirmed

**Describe the process that ensures reporting to senior management at least annually or on a regular basis with respect to risk management.**

Reporting to the Executive Board has been included as a standing agenda item in the ESG Council meeting, which is held at least every six months. The ESG Council, under the direction of the Corporate Sustainability department, reports regularly on sustainability issues to HEIDELBERG's management. In addition, the Head of Corporate Sustainability reports directly to the CEO of the company in his capacity as head of the LkSG Steering Committee on an ad hoc basis.

## A. Strategy and anchoring

### A2. Policy statement on the human rights strategy

**Is there a policy statement that is established or updated based on the risk analysis conducted during the reporting period?**

The policy statement has been uploaded

[https://www.heidelberg.com/global/media/en/global\\_media/company\\_\\_\\_about\\_us/sustainability/Declaration\\_of\\_Principles\\_for\\_the\\_Respect\\_of\\_Human\\_Rights.pdf](https://www.heidelberg.com/global/media/en/global_media/company___about_us/sustainability/Declaration_of_Principles_for_the_Respect_of_Human_Rights.pdf)

## A. Strategy and anchoring

### A2. Policy statement on the human rights strategy

**Has the policy statement for the reporting period been communicated?**

**It is confirmed that the policy statement has been communicated to employees, the works council if applicable, the public and the direct suppliers where a risk was identified in the risk analysis.**

- Confirmed

**Please describe how the policy statement was communicated to the relevant target groups.**

The policy statement was published on the company's website; within the company, the update to the policy statement was published on the intranet and referred to via news. Reference was made to the policy statement when communicating with suppliers due to an abstract risk.

## A. Strategy and anchoring

### A2. Policy statement on the human rights strategy

**What elements does the policy statement contain?**

- Establishment of a risk management system
- Annual risk analysis
- Establishment of prevention measures in the company's own business area, with direct suppliers and, if applicable, indirect suppliers and reviewing their effectiveness
- Corrective measures in the company's own business area, at direct suppliers and, if applicable, at indirect suppliers and their effectiveness review
- Provision of a complaints procedure in the company's own business area, at suppliers and their effectiveness review
- Documentation and reporting obligation
- Description of the priority risks identified
- Description of human rights and environmental expectations of own employees and suppliers

## A. Strategy and anchoring

### A2. Policy statement on the human rights strategy

#### **Description of possible updates during the reporting period and the reasons for them.**

The policy statement has been updated in the “Priority risks” section, as HEIDELBERG has changed the process and prioritizes now child labor and slavery risks.

## A. Strategy and anchoring

### A3. Anchoring the human rights strategy within the own organization

**In which relevant departments / business units was the anchoring of the human rights strategy ensured within the reporting period?**

- Human Resources
- Site development / management
- Environmental management
- Occupational safety and occupational health management
- Communication / Corporate Affairs
- Research and Development
- Purchasing
- Supplier Management
- Corporate Social Responsibility
- Legal / Compliance
- Quality management
- Mergers and Acquisitions
- Business Development
- IT / Digital infrastructure
- Community / Stakeholder engagement
- Revision
- Economic Committee

**Describe how responsibility for implementing the strategy is distributed within the various departments / business processes.**

The Declaration of Principles on Human Rights at Heidelberger Druckmaschinen AG stipulates that the implementation and responsibility for implementing the human rights strategy within various departments/business processes falls within the remit of superiors and department heads. The implementation of the values of Heidelberger Druckmaschinen AG is anchored by the managers in the departments. This ensures that the strategy is implemented in each department and that clear responsibility for implementation is defined.

**Describe how the strategy is integrated into operational processes and procedures.**

The strategy was communicated to employees in training sessions, guidelines and requirements were developed and implemented. A software tool was procured for the risk analysis and evaluation of direct suppliers and integrated as a tool into the processes of the purchasing department and risk management. Responsibilities and processes were clearly defined for implementation in the individual areas.

**Describe the resources and expertise provided for the implementation.**

Human resources were provided to build the processes and implement them, as well as external expertise through consulting. Trainings for employees were designed and conducted to increase knowledge within the company. In addition, an investment was made in a software tool for analyzing the risks posed by direct suppliers.

## B. Risk analysis and prevention measures

### B1. Implementation, procedure and results of the risk analysis

**Was a regular (annual) risk analysis conducted during the reporting period to identify, evaluate, and prioritize human rights and environmental risks?**

- Yes, for the own business area
- Yes, for direct suppliers

**Describe in which period the annual risk analysis was conducted.**

- For the own business area: April 2023 – March 2024
- For direct suppliers: April 2023 – March 2024

**Describe the risk analysis process.**

The requirements of the LkSG were added to and integrated into the existing risk analysis process for the own business area. In addition, a risk analysis is conducted annually by surveying all business areas. The basis for this is all active and controlled subsidiaries of the Heidelberg Group. A questionnaire is used to conduct the risk analysis by the risk management department and the results are analyzed jointly with the corporate functions for compliance and sustainability. If anything is unclear or if there are indications of specific risks, the results of the online survey are followed up by personal discussions and individual preventive measures are implemented if necessary.

Heidelberg uses a risk management tool to conduct the risk analysis for direct suppliers. The system offers a comprehensive software solution for the IT-based implementation of the requirements of the LkSG, thus enabling risk and supplier management that is aligned with the requirements of the LkSG. The software provides a detailed overview of the direct suppliers and adequately reflects their specific human rights and environmental risks. Direct suppliers are entered into the system. Based on recognized indices (U.S. Department of Labor ILAB, Human Freedom Index (HFI), ITUC Global Rights, UN Minamata Convention, UN Stockholm Convention, UNICEF Child Labor Statistics, Global Slavery Index (GSI), MVO Risk Checker) and press releases, an abstract risk is determined for each company and each protected legal position. Depending on the abstract risk disposition of the company, the specific risks for individual suppliers are determined in a second step. Plausibility checks were conducted on the risk of direct suppliers with a high-risk exposure using questionnaires. These are suppliers with ongoing business relations.

The specific risk is calculated based on a self-assessment, proof of compliance with audit-based standards, certificates, experience gained from the supplier relationship or indications from the complaints procedure. Individual preventive measures can then be implemented based on the specific risk.

## **B. Risk analysis and prevention measures**

### **B1. Implementation, procedure and results of the risk analysis**

#### **Were event-related risk analyses conducted during the reporting period?**

- Yes, due to other occasions: Yes, due to information provided through the complaints mechanism regarding possible violations in our own business area and at direct supplier.

#### **Describe the specific occasions.**

There have been five reports filed in the reporting period through the complaints mechanism as per §8 (1). Based on these reports, a case-related risk analysis was conducted for the affected direct suppliers or the own business areas as part of the clarification of the circumstances.

#### **Describe the insights the analysis provided concerning a significantly changed and/or expanded risk situation.**

The findings from the clarification of the circumstances have not led to any changes or additions to the risk situation.

#### **Describe the extent to which insights from the processing of reports/complaints have been incorporated.**

There have been five reports filed in the reporting period through the complaints mechanism as per §8 (1). These have been incorporated into the assessment of the risk situation.



## **B. Risk analysis and prevention measures**

### **B1. Implementation, procedure and results of the risk analysis**

#### **Results of the risk identification**

##### **Which risks were identified in the risk analysis(es) in your own business area?**

- Prohibition of commissioning or using private/public security personnel who may cause harm due to a lack of instruction or supervision.
- Disregard of occupational health and safety and work-related health hazards.
- Destruction of the natural basis of life through environmental pollution.
- Disregard for freedom of association and the right to collective bargaining.
- Illegal infringement of land rights.
- Prohibition of forced labor and all forms of slavery.
- Prohibition of unequal treatment in employment.
- Prohibition of child labor.
- Prohibition of withholding a reasonable wage.
- Prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of waste containing POPs.
- Prohibited import/export of hazardous waste as defined by the Basel Convention.
- Prohibited production, use and/or disposal of mercury (Minamata Convention).

## **B. Risk analysis and prevention measures**

### **B1. Implementation, procedure and results of the risk analysis**

#### **Results of risk identification**

##### **Which risks were identified in the risk analysis(es) of direct suppliers?**

- Prohibition of commissioning or using private/public security personnel who may cause harm due to a lack of instruction or supervision
- Disregard of occupational health and safety and work-related health hazards
- Destruction of the natural basis of life through environmental pollution
- Disregard for freedom of association and the right to collective bargaining
- Illegal infringement of land rights
- Prohibition of forced labor and all forms of slavery
- Prohibition of unequal treatment in employment
- Prohibition of child labor
- Prohibition of withholding a reasonable wage
- Prohibited production and / or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of waste containing POPs
- Prohibited import/export of hazardous waste as defined by the Basel Convention
- Prohibited production, use and/or disposal of mercury (Minamata Convention)

## **B. Risk analysis and prevention measures**

### **B1. Implementation, procedure and results of the risk analysis**

#### **Results of risk identification**

##### **Which risks were identified in the risk analysis(es) of indirect suppliers?**

- None

## B. Risk analysis and prevention measures

### B1. Implementation, procedure and results of the risk analysis

**Were the risks identified during the reporting period evaluated and if necessary prioritized and if so, based on which appropriateness criteria?**

- Yes, based on the expected severity of the violation by degree, number of people affected and irreversibility
- Yes, based on our own ability to influence
- Yes, based on the probability of occurrence
- Yes, based on the nature and scope of its own business activities
- Yes, based on the nature of the causal contribution

**Describe in more detail how the evaluation and potentially the prioritization were conducted and what trade-offs were made.**

#### Own business area

In the own business area, the risk analysis revealed only a small number of risks. All identified risks were processed with the same prioritization.

#### Direct suppliers

Using an IT-based risk management tool, risks are prioritized based on the following factors: the severity of the violation that can typically be expected, the irreversibility of the violation, the probability of the violation occurring, the nature of our organization's contribution to the violation, the type of business conducted by the supplier, the scope of the supplier's business activities, and our organization's ability to influence the immediate cause of the violation or risk.

Particularly serious and irreversible violations include most notably violations of the prohibition of the worst forms of child labor, the prohibition of torture, and the prohibition of forced labour and slavery. Such risks are given high priority. Subsequently, risks that always affect a large number of people, such as violations of occupational safety standards, wage discrimination and the causing of harmful soil, air and water pollution, are considered. As part of the prioritization process, suppliers from high-risk industries are always given priority consideration. The potential to influence the direct cause of the potential violation is assessed primarily on the volume of sales with the supplier in question.

## B. Risk analysis and prevention measures

### B2. Prevention measures in the own business area

**Which risks related to your own business area were prioritized during the reporting period?**

- None

**If no risks were selected, explain your answer.**

The risk analysis from the previous reporting period showed that no priority risks can be identified. As a result, a prioritization for the risk analysis was not performed.

## B. Risk analysis and prevention measures

### B2. Prevention measures in the own business area

**Which preventive measures were implemented in your business area during the reporting period to prevent and minimize priority risks?**

- Conducting trainings in relevant business areas
- Conducting risk-based control measures

#### Conducting trainings in relevant business areas

**Describe the implemented measures and specify especially the scope (e.g. number, coverage/area of application).**

In accordance with §6 (3) no. 3 LkSG, all employees with PC access were trained for the first time in 2023 via an e-learning program in order to achieve awareness and an understanding for the concerns of the LkSG in their daily work. Additionally, all employees in purchasing and those who deal with suppliers received more in-depth training on the implemented processes. A cycle of 24 months has been set for a repetition of the training. All new employees receive training on the relevant content as part of the onboarding process.

**Describe how the trainings are appropriate and effective in preventing and minimizing the priority risks.**

The trainings shall raise awareness among employees regarding the legal positions regulated in the LkSG. The attention to and understanding of the topics and processes ensures that employees are able to recognize and report violations of human rights or environmental law to the appropriate office via the designated communication channels.

### Conducting risk-based control measures

**Describe the implemented measures and specify especially the scope (e.g. number, coverage/area of application).**

As part of the internal audits conducted by the Group Internal Audit Team, selected subsidiaries were also audited on a risk basis with regard to human and environmental risks, such as the prohibition of child labor, discrimination, and the handling of waste.

**Describe how the trainings are appropriate and effective in preventing and minimizing the priority risks.**

The integration of human rights or environmental violations into the control mechanisms of the internal audit team is essential. Through the close integration with the group-wide risk management, risks can be preventively identified and minimized.

## B. Risk analysis and prevention measures

### B3. Prevention measures at direct suppliers

**Which risks related to direct suppliers were prioritized during the reporting period?**

- Prohibition of forced labour and all forms of slavery
- Prohibition of child labour

#### Prohibition of forced labour and all forms of slavery

**What is the specific risk?**

The risk that suppliers fail to comply with regulations for the prevention of forced labour. The risk is often rooted in the countries of origin of procured goods or the industry. This is based on the MVO Risk Checker.

**Where does the risk occur?**

- Egypt
- Brazil
- China
- India
- Morocco
- Mauritius
- Mexico
- South Africa
- Turkey
- United Arab Emirates
- Zambia

## Prohibition of child labour

### What is the specific risk?

The risk that suppliers fail to comply with regulations for the prevention of child labour. The risk is often rooted in the countries of origin of procured goods or the industry. This is based on the MVO Risk Checker.

### Where does the risk occur?

- China
- India
- Israel
- Morocco
- Mauritius
- Mexico
- Philippines
- South Africa
- Thailand
- United Arab Emirates
- Vietnam
- Zambia

## B. Risk analysis and prevention measures

### B3. Prevention measures at direct suppliers

**What preventive measures were implemented to prevent and minimize priority risks related to direct suppliers during the reporting period?**

- Development and implementation of appropriate procurement strategies and purchasing practices
- Integration of expectations in the selection of suppliers
- Agreement and implementation of risk-based control

#### Other categories:

Selected:

- Integration of expectations in the selection of suppliers
- Agreement and implementation of risk-based control

**Describe how the measures are appropriate and effective in preventing and minimizing the priority risks.**

The preventive measures are designed to increase awareness and clearly communicate the requirements for the suppliers' behaviour. Direct suppliers with identified risk potential were therefore trained regarding the human rights and environmental principles, obligations and values of the HEIDELBERG Group, a management statement was obtained and, as a preventive measure, certain suppliers were dropped. The selected measures adequately address the risks.

#### Category: Procurement strategy and purchasing practices

Selected:

- Development and implementation of appropriate procurement strategies and purchasing practices

**Describe the implemented measures and the extent to which the determination of delivery times, purchasing prices or the duration of contractual relationships were adjusted.**

Sustainability was anchored as a component of the purchasing strategy. An essential aspect is compliance with the requirements of the LkSG. Integrating these aspects into the supplier relations and including a quantified LKSG score in the supplier evaluation (Preferred Supplier Card) are intended to transparently strengthen long-term partnerships. There were no adjustments with regard to delivery times, prices or the duration of contractual relationships.

**Describe how adjustments to procurement strategy and purchasing practices are appropriate and effective in preventing and minimizing the priority risks.**

The long-term advance delivery scheduling and the more transparent cooperation with strategic suppliers, including supplier development, should enable suppliers to produce in compliance with the LkSG.

## B. Risk analysis and prevention measures

### B4. Prevention measures at indirect suppliers

**Which risks related to indirect suppliers were prioritized based on the incident-related risk analysis?**

- None

**If no risks were selected, explain your answer.**

During the reporting period, the regular risk analysis did not identify any priority risks related to indirect suppliers. Nevertheless, any risks identified would lead to appropriate measures being taken for indirect suppliers pursuant to the process description.

## B. Risk analysis and prevention measures

### B4. Prevention measures at indirect suppliers

**What preventative measures were implemented to prevent and minimize priority risks related to indirect suppliers during the reporting period?**

- None

**If no preventative measures were selected, explain your answer.**

The regular risk analysis did not identify any priority risks at indirect suppliers.



## **B. Risk analysis and prevention measures**

### **B5. Communication of results**

**Were the results of the risk analysis(es) for the reporting period communicated internally to key decision-makers?**

**It is confirmed that the results of the risk analysis(es) for the reporting period, in accordance with §5 (3) LkSG, have been communicated internally to the relevant decision-makers, such as the Board of Management, the Executive Board or the Purchasing Department.**

- Confirmed

## **B. Risk analysis and prevention measures**

### **B6. Changes in risk disposition**

**What changes have occurred with regard to priority risks compared to the previous reporting period?**

Compared to the previous reporting period, child labour and forced labour/slavery risks were prioritized for direct suppliers. This is due to the modification of the abstract risk analysis process and the introduction of a software-based IT solution with associated underlying risk indices.

## C. Identification of breaches and remedial action

### C1. Identification of breaches and remedial action in the own business area

**Were any breaches identified in the own business area during the reporting period?**

- No

**Describe the procedures that can be used to identify breaches in your own business area.**

Review of business practices as part of the tasks of the “Internal Audit” department, integrated internal control system, complaints procedures (office of the ombudsman, online complaints tool SpeakUp, internal reporting channels to the Compliance Office)

## C. Identification of breaches and remedial action

### C2. Identification of breaches and remedial action at direct suppliers

**Were any breaches identified at direct suppliers during the reporting period?**

- Yes

**Describe the basis on which the breaches identified were evaluated and prioritized, and the considerations that were taken into account.**

Media screening with market monitoring, complaints procedures, supplier visits / audits

**In which areas were breaches identified at direct suppliers?**

- Disregard of occupational health and safety and work-related health hazards
- Destruction of the natural basis of life through environmental pollution

**Describe the appropriate remedial actions that were taken.**

The breaches were discussed with the direct suppliers and corrective measures were specified. Specifically,, this entails providing employees with hearing protection and ensuring the availability of overflow facilities to prevent the uncontrolled discharge and ingress of polluted water into the soil.

**Describe the considerations made regarding the selection and design of the actions in the context of the corresponding follow-up concepts for termination and minimization.**

The selection and design of actions within the scope of the follow-up concept are based on the consideration of our own ability to influence, economic dependency, legal parameters and bargaining power with respect to the direct supplier.

**Describe how the effectiveness of the remedial actions is verified.**

The implementation of the agreed actions were verified in an audit.

**Did the corrective actions lead to an end of the breach?**

- Yes

**Explain.**

After the breach was identified and the remedial action agreed, an on-site inspection was performed. The missing hearing protection was provided to the employees and the overflow facilities were functional.

**Did you analyze to what extent the breach identified indicates a possible adjustment/addition to existing prevention measures? Describe the process, the results and the effects.**

If violations are detected, they are thoroughly reviewed and appropriately documented in the software-based IT tool. This provides a template for future reference should similar cases arise. An adjustment of preventative measures was not deemed appropriate in this situation.

## **C. Identification of breaches and remedial action**

### **C3. Identification of breaches and remedial action at indirect suppliers**

**Were any breaches identified at indirect suppliers during the reporting period?**

- No

## **D. Complaints procedure**

### **D1. Establishment or participation in a complaints procedure**

**How was a complaints procedure offered during the reporting period?**

- A combination of internal and external procedures

**Describe the company's own internal procedure and/or the procedure your company participates in.**

Office of the ombudsman, online and telephone complaints tool SpeakUp, internal reporting channels to the Compliance Office

## **D. Complaints procedure**

### **D1. Establishment or participation in a complaints procedure**

**Which potential stakeholders have access to the complaints process?**

- Our own employees
- Communities near our sites
- Employees of suppliers
- External stakeholders such as NGOs, labour unions, etc.

**How is access to the complaints procedure ensured for the various groups of potential stakeholders?**

- Publicly accessible rules of procedure in text form
- Accessibility information
- Responsibility information
- Process information
- All information is clear and understandable
- All information is publicly available

#### **Publicly accessible rules of procedure in text form**

**Optional: -**

#### **Accessibility information**

**Optional: -**

#### **Responsibility information**

**Optional: -**

#### **Process information**

**Optional: -**

#### **All information is clear and understandable**

**Optional: -**

#### **All information is publicly available**

**Optional: -**

## **D. Complaints procedure**

### **D1. Establishment or participation in a complaints procedure**

**Were the rules of procedure publicly available during the reporting period?**

File was uploaded

**Rules of procedure:**

[https://www.heidelberg.com/global/en/about\\_heidelberg/company/compliance/compliance\\_management\\_system/compliance\\_1.jsp](https://www.heidelberg.com/global/en/about_heidelberg/company/compliance/compliance_management_system/compliance_1.jsp)

## D. Complaints procedure

### D2. Requirements for the complaints procedure

**Indicate the person(s) responsible for the procedure and their function(s).**

Hellweg, Dominik: Head of Compliance

Melters, Leslie: Head of Legal Department

**It is confirmed that the requirements for the responsible persons according to §8 (3) LkSG are fulfilled, i.e. that they guarantee impartiality, are independent and not tied to instructions, and are bound to confidentiality.**

- Confirmed

## D. Complaints procedure

### D2. Requirements for the complaints procedure

**It is confirmed that arrangements have been made to protect potentially involved stakeholders from being disadvantaged or penalized as a result of a complaint during the reporting period.**

- Confirmed

**Describe what arrangements have been made, particularly how the complaints procedure ensures the confidentiality of the identity of whistleblowers.**

All issues raised are treated confidentially. Information is only shared with a limited number of people on a strict need-to-know basis. Depending on the purpose of the disclosure, the information is anonymized before it is shared. Information is only shared with third parties if we are legally obliged to do so, if there is a significant public interest at stake, or if explicit consent was granted. HEIDELBERG is committed to consistently pursuing and sanctioning reprisals against internal whistleblowers and third parties in need of protection.

**Describe what arrangements have been made, particularly the additional measures put in place to protect whistleblowers.**

Heidelberg ensures that in the case of an anonymous report via SpeakUp or the office of the ombudsman, the anonymity of the internal whistleblower is guaranteed during the internal investigation of the reported case. The persons managing the reports are also trained on their rights and obligations when handling reports.

The ombudsperson, being an external lawyer, is professionally bound to secrecy in his function. The confidentiality of the identity of the whistleblower and third parties mentioned in the report is therefore always maintained and unauthorized employees are denied access to it.

## D. Complaints procedure

### D3. Implementation of the complaints procedure

**Were any reports submitted through the complaints procedure during the reporting period?**

- Yes

**Provide further information on the number, content, duration and outcome of the procedures.**

During the reporting period, five complaints related to the LkSG were received through the complaints procedure. Three of these concerned the own business area and two related to direct suppliers.

The cases in the own business area:

The plausibility check and assessment of the complaint submitted in the own business area, which was conducted as part of the investigation, led to the conclusion that the facts of the case did not constitute a human rights violation in terms of the LkSG. In one case, an adjustment was made to comply with labour law requirements.

The investigation of the complaint regarding direct suppliers also concluded that no human rights violations had occurred. The subject of the complaint related to potential violations of working hour regulations.

Another complaint within the direct supply chain concerns working conditions. This complaint could not be resolved during the reporting period and is still subject to further investigation.

**On what topics have complaints been received?**

- Prohibition of unequal treatment in employment

**Describe the conclusions drawn from the complaints/reports received and the extent to which the findings have led to adjustments in risk management.**

The complaints received have not led to any general conclusions. Therefore, the findings have not led to any adjustments in risk management.



## **E. Review of risk management**

**Is there a process in place to review risk management across the board for adequacy and effectiveness?**

**In which subsequent areas of risk management is adequacy and effectiveness assessed?**

- Resources and expertise
- Risk analysis and prioritization process
- Prevention measures
- Remedial actions
- Complaints procedure
- Documentation

**Describe how this audit is conducted for the respective area and what result it has led to - in particular with regard to the prioritized risks.**

The LkSG Steering Committee performs the oversight function for the above areas of LkSG risk management. It is supported in this by Internal Audit / Internal Control System (ICS). Regular consultations are held with stakeholders on remedial actions, complaint procedures, and effectiveness reviews through KPIs.

## E. Review of risk management

**Are there processes or measures in place to ensure that the establishment and implementation of risk management adequately considers the interests of your employees, employees within your supply chain, and those who may otherwise be directly affected by the economic actions of a company in your supply chains in a protected legal position?**

**In which areas of risk management do processes or measures exist to take into account the interests of those potentially affected?**

- Resources and expertise
- Remedial actions
- Complaints procedure

**Describe the processes or measures for each area of risk management.**

Resources and expertise: Regular training is provided in our own business area to raise employee awareness regarding human rights and environmental aspects.

Remedial actions: If violations occur, remedial measures are defined in consultation with those affected.

Complaints procedure: A central element of our complaints procedure is confidentiality, which protects individuals from reprisals. We therefore ensure that complaints remain confidential.