

Syntegon Declaration of Principles

Commitment to respect due diligence obligations along the supply chain in accordance with §6 of the Act on Corporate Due Diligence Obligations in Supply Chains

As a responsible, globally active group of companies, we are fully committed to ensuring compliance with human rights principles and environmental protection requirements along our entire value chain and to continuously identifying, assessing and minimising risks to human rights and environmental protection.

Human rights

We are supporters of the *UN Global Compact* and signatories to the *Diversity Charter*. Legality and fairness are the basis of all our business practices. As part of our [Code of Conduct](#), we commit ourselves, our employees and our business partners to sustainable business practices and the protection of fundamental human rights in accordance with Section 2 of the *Act on Corporate Due Diligence Obligations in Supply Chains (Supply Chain Act)*:

- The prohibition of child labour, including its worst forms
- The ban on the employment of persons in forced labour
- The prohibition of all forms of slavery and slavery-like practices
- Compliance with the occupational health and safety obligations applicable at the place of employment
- Respect for the freedom of association
- The prohibition of unequal treatment in employment (prohibition of discrimination)
- The prohibition of withholding an appropriate wage
- The prohibition of causing harmful effects on the environment that result in an impairment of the food and water supply or health
- The ban on unlawful forced evictions
- The ban on employing private security services without supervision that prevents violations of fundamental human rights.

According to the [Code of Conduct](#), all of our company's business practices must comply with applicable law and our company's behavioural requirements. The human rights and environmental due diligence obligations in accordance with Section 3 of the *Supply Chain Act* are integrated into our company's existing regulations and procedures, such as for occupational health and safety, environmental protection, supplier management, site management and compliance.

More detailed information on the respective regulations and procedures can be found in Syntegon's sustainability reports and on the global Syntegon website in addition to this policy statement:

www.syntegon.com

[Syntegon Sustainability Report](#)

Human rights in the supply chain

Along our supply chain, we also commit our business partners to the principles set out in our *Code of Conduct* (see above).

These principles are part of our [Code of Conduct for Business Partners](#) and we expect our suppliers to commit to them or to have an equivalent *Code of Conduct* themselves.

Environmental protection

We are aware of our responsibility for future generations and continuously endeavour to prevent damage to the environment and to minimise the impact of our activities, products and services on the environment, people and resources. In accordance with the commitments of the *UN Global Compact*, we expect our employees and suppliers to:

- act in accordance with the applicable legal norms and international standards relating to the environment,
- minimise environmental pollution and continuously improve environmental protection and
- maintain an appropriate environmental management system to ensure these minimum requirements are met.

We lead by example and are also committed to initiatives outside of our business activities that contribute to the protection of the environment, health and the supply of food and medicines to people.

Risk analysis and prevention

We take a risk-based approach to identifying potential risks in the supply chain and in our business area.

Firstly, an abstract company-specific risk analysis is carried out, which takes into account the general risk factors of the respective industry sector and country of origin. In the second step, risks relating to environmental and human rights issues are analysed and assessed in accordance with Section 5 of the *Supply Chain Act*. In some areas, our risk analysis goes beyond the requirements of the *Supply Chain Act* and covers the following topics:

- Environmental protection
- Human and labour rights
- Corruption and anti-bribery
- Occupational safety
- Responsibility in the supply chain
- Financial information
- Conflicts of interest
- Customs security programmes
- EU SRR
- Quality management
- Energy management
- Cyber security
- Data protection (DSGVO)
- Conflict minerals
- Cobalt and mica
- REACH & RoHS
- PBT5 (TSCA)
- Diversity, justice and inclusion
- Business continuity
- CO₂ footprint
- Living wages
- Management and owners

The risk is assessed for each individual topic based on the responses. All individual risks are then aggregated to form an overall risk.

We first carried out this assessment for our own business areas and found a low overall risk. The detailed assessment can be viewed here: [Company profile Syntegon](#)

In addition to the abstract risk analysis, the annual sales volume is decisive when prioritising suppliers: suppliers with very high risks and sales volumes are evaluated first, while those with lower risks follow later in the process.

We have identified the greatest risks in our supply chain in the areas of environmental protection, human rights, labour rights and occupational safety. The sectors with the greatest risks are the manufacture of metal products, the manufacture of machinery and equipment and the manufacture of computers and electronic and optical components. The main risk countries are India and China.

For suppliers with a high overall risk according to the risk analysis, an action plan is agreed with the aim of improving the situation or reducing the risk. Furthermore, we contractually reserve the option of subjecting suppliers to an on-site ESG check and agreeing further remedial measures. If all attempts are unsuccessful, we will review whether the supplier relationship can be maintained under the given circumstances.

In the event of demonstrably serious violations (prohibitions pursuant to Section 2 of the *Supply Chain Act*), the supply relationship will be terminated immediately and the corresponding legal steps required by law will be taken.

Training and capacity building

We take a target group-oriented approach to training and sensitising our employees to compliance and human rights issues: General training courses on compliance, sustainability and human rights issues are held for all employees at set intervals. Training on specific topics is mandatory for all relevant areas and departments (e.g. ESG training for purchasers).

Human Rights Officer

We have appointed a person as Human Rights Officer. The Human Rights Officer monitors risk management to ensure compliance with the due diligence obligations under the *Supply Chain Due Diligence Act*. He checks whether the measures taken to implement and execute risk management are effective and appropriate in order to fulfil the due diligence obligations. He monitors the risk analysis as well as the remedial and preventive measures in addition, the Human Rights Officer supports the fulfilment of documentation obligations and the preparation of the annual report.

The Human Rights Officer informs the Management Board about his or her activities at least once a year and on an ad hoc basis.

Complaints procedure

We have a grievance system through which internal and external persons (business partners and other third parties) (hereinafter referred to as "whistleblowers") can inform the company of human rights or environmental risks, violations or imminent violations worldwide in their own business area and/or in the supply chain. Persons who are not directly affected by risks or violations also have the opportunity to submit information on risks and possible violations via the reporting channels listed below.

Reports made in this way are forwarded to our Legal & Compliance department and tracked.

We operate a company-wide, transparent, public and accessible standardised complaints and reporting system. The complaints and reporting system is accessible to everyone. Employees as well as individuals and organisations outside Syntegon can report complaints and information here.

We offer various reporting channels that can be used for complaints or reports: *The Syntegon Compliance Hotline* (BKMS) is a tool where complaints or reports can be submitted 24 hours a day, seven days a week. This can be done in writing or by telephone - anonymously if desired. BKMS is available in many different languages and is managed by an independent operator. The data is processed in a dedicated high-security data centre, contractually guaranteed in Germany. Reports and complaints can also be submitted directly to our Legal & Compliance department: compliance.management@syntegon.com.

Our employees can also submit their reports to their managers.

All incoming reports of possible violations are dealt with in a binding company-wide procedure. This is impartial and takes into account the presumption of innocence in favour of the accused as well as the participation rights of employee representatives. The confidentiality of the whistleblower's identity is maintained, unless the whistleblower has remained anonymous. Appropriate disciplinary measures are taken in the event of demonstrable offences.

We do not tolerate retaliation of any kind against complainants or whistleblowers and endeavour to prevent this through comprehensive clarification. Violations of this prohibition will be penalised as compliance violations.

Our Complaints Procedure Rules are published on the Syntegon website.



Torsten Türling - CEO