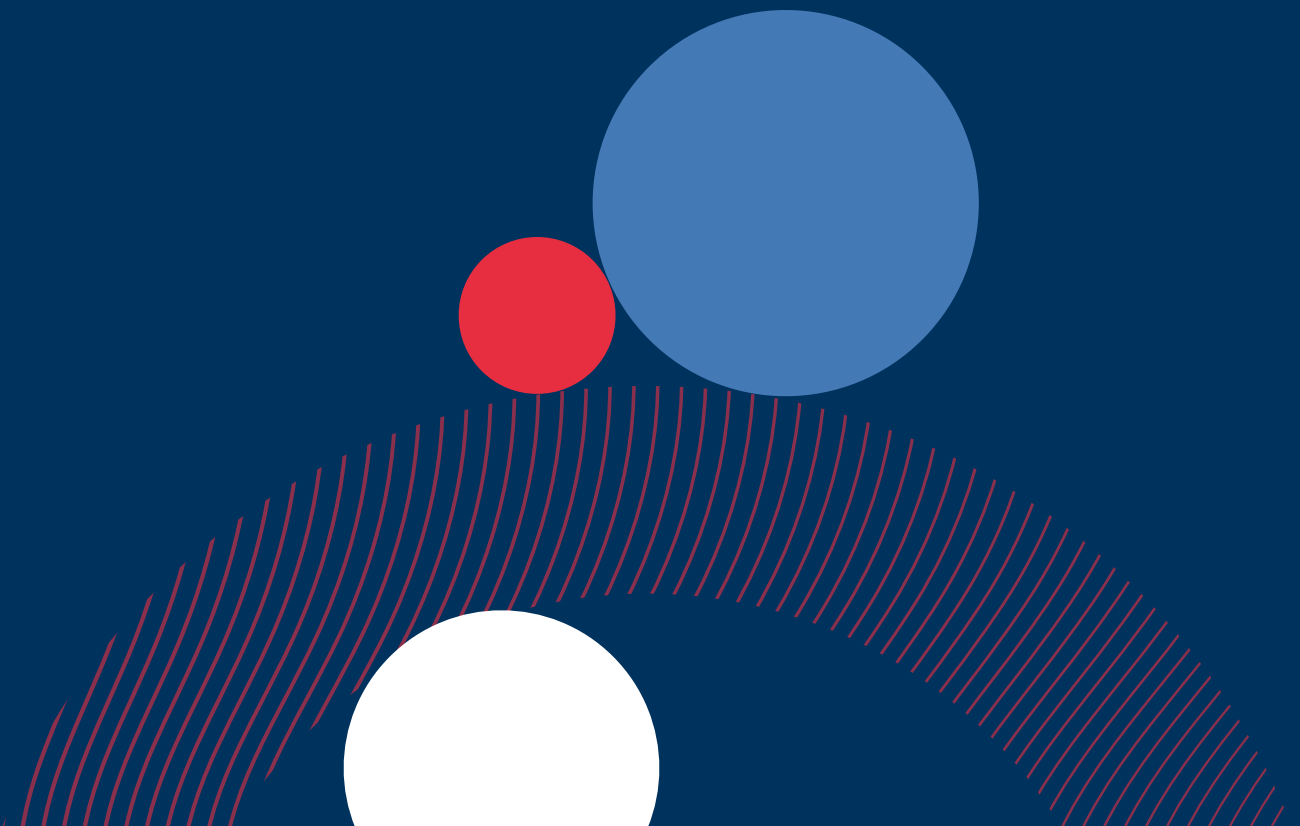


# Policy Statement

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October 2022



# Policy statement on corporate human rights strategy

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## We are committed to respecting human rights

The All4Labels Global Packaging Group wants to satisfy its responsibility in society and towards its employees, customers and business partners as well as its shareholder. Therefore, the All4Labels Global Packaging Group commits to clear principles as a framework for its entrepreneurial and business actions.

Economic success and moral commitment are not contradictory for us, but are an indispensable prerequisite for positive, sustainable economic activity.

As a company with high standards of compliance, due diligence and integrity, we are committed to respecting all internationally recognised human rights in our business areas and in our supply chain. In this context, we base our human rights policy statement on:

- United Nations Universal Declaration of Human Rights (UN-UDHR)
- Conventions and recommendations of the International Labor Organization (ILO) on labor and social standards
- Principles of the United Nations Global Compact (UNGC)

Furthermore, we comply with local laws wherever we operate.

## We define concrete requirements for ourselves and our partners

In order to live up to our claim regarding recognition and respect for human rights in the All4Labels Global Packaging Group, we have implemented guidelines that express our attitude for ourselves, our employees and for our suppliers. In particular the following two guidelines are relevant:

### - Code of Conduct

With the Code of Conduct we have created a compass that provides our employees with orientation in their daily work. It is intended to help us meet ethical and legal challenges in our daily work. In addition to human rights and environment-related topics, the guideline also contains specifications on anti-corruption and other related issues.

### - Supplier Code of Conduct

It is our declared goal to implement our principles and values together with our business partners. We therefore require our business partners to act in accordance with the same or similar principles as we do and to support us in doing so. These principles, values and legal requirements are defined in our Supplier Code of Conduct, which all relevant business partners must agree to comply with.

## **We identify risks and address them appropriately**

At least once a year, we assess potential risks with regard to human rights and environmental pollution, both with regard to our own business areas and our supplier base. Based on these risk analyses, risks can be prioritized and addressed. Therefore, we conduct expert interviews and evaluate e.g. regions of origin and category groups of our suppliers in a structured way. The prioritized risks based on these analyses include the following points which could potentially be relevant along our value chain:

- Discrimination risks
- Environmental risks
- Health & safety risks

Wherever we identify risks - whether in our own business area or at suppliers - appropriate measures are taken to minimize them.

Guidelines, e.g. on health & safety measures, have been implemented in our own business area to limit these risks. Compliance with these guidelines is regularly monitored by the compliance department.

Depending on the level of risk, additional information is first obtained from our suppliers, for example by requesting risk strategies and action plans or by conducting human rights audits. After a closer examination of the risks, we define together with the suppliers how the risks are to be dealt with. We also offer all our suppliers trainings on human rights and environmental due diligence along the supply chain.

We are aware that violations can occur even though we are careful about human rights. We have therefore established a complaints procedure and whistleblower system through which those affected, whistleblowers or other stakeholders, can report abuses at any time. This applies not only to our own business area, but also to suppliers and sub suppliers.

Whistleblowers who report abuses for ethical and moral reasons play a key role in preserving social values and the rule of law, and therefore contribute to the success of our company. That is why we have set up an anonymous whistleblower portal.

## **We continuously improve our efforts and report on them**

We regularly evaluate the effectiveness of our established measures in order to continuously improve them. This also includes critically questioning existing processes again and again and redefining them where necessary.

We report annually on the risks we have identified and the measures we have taken in order to deal with them. We also evaluate the effectiveness of our measures at this point and derive conclusions for future activities.

The management of the All4Labels Global Packaging Group is responsible for the implementation and compliance with this policy. In this regard, the management is supported by the human rights officer, which is embedded in the legal department and regularly informs the management about risks and taken measures.



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