

Declaration of principles of the WEISS Group

to fulfil our corporate responsibility and due diligence obligations and to respect human rights and environmental standards

1. Preamble

The WEISS Group¹ (hereinafter referred to as 'WEISS') is a modern, high-performance media company. With the broad mix of our group of companies, which consists of printing plants, publishing houses, logistics and media services, we offer customers and business partners everything from a single source.

At WEISS, ecological and social responsibility are at the centre of our corporate values. Accordingly, we take responsibility for our decisions, our actions and our products and services. The conservation of resources, the minimisation of emissions, water protection and prudent waste management are of the utmost importance at WEISS. Our attitude is reflected in our receipt of recognised certificates such as the FSC, the PEFC, the Blue Angel, the EU Ecolabel and the Nature Office seal. We also comply with DIN 50001 (certified by TÜV Rheinland), which has created an international standard for energy management systems.

We strive to have a positive impact on the community and see it as our duty to take action to promote social justice, diversity, equality and ethical business practices.

We strive to achieve these goals together with our business partners. We therefore expect our suppliers and service providers to recognise their environmental and social responsibility in the supply chain and to support our holistic approach to sustainability. We encourage them to integrate these principles into their business practices in order to jointly develop a comprehensive sustainability strategy. We therefore require our contractual partners to comply with these requirements and principles and to actively endeavour to contractually oblige their suppliers and service providers to comply with the standards and regulations set out in this

document. We also expect our employees to respect the principles of ecological, social and ethical behaviour and to incorporate them into our corporate culture. A breach of these standards may ultimately lead to the company terminating the business relationship or being sanctioned under labour law.

WEISS is committed to maximising transparency and disclosure of information. We commit ourselves and our business partners to openly communicate relevant data and information about our business practices and supply chains. We implement concrete measures to ensure transparency. This includes regular reporting on environmental and social responsibility, publication of environmental impacts and social initiatives, and clear communication on progress towards our sustainability goals.

This declaration is based on national laws and regulations, such as the German Supply Chain Duty of Care Act (LkSG) and international conventions such as the United Nations Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, the Guidelines for Responsible Business Conduct, the UN Guiding Principles on Business and Human Rights and the international labour standards of the International Labour Organization (ILO).

We believe in the positive impact of a joint effort by all stakeholders on the environment and society and our goal is to be a pioneer in promoting environmental awareness and social responsibility.

¹See point 8

2. Social responsibility

WEISS is committed to respecting the human rights of its employees, local communities and vulnerable people and to treating them with dignity and respect. We expect the same from our business partners. They must take appropriate measures to ensure the health and safety of their employees, customers, visitors, contractors and other affected persons. This includes the following aspects:

2.1 Exclusion of forced labour

Our company firmly condemns any form of forced labour. We are committed to the core labour standards of the ILO and reject all forms of modern slavery, servitude, bonded labour, forced or compulsory labour and human trafficking throughout our supply chain. Every employment relationship must be entered into on a voluntary basis and must not be based on any threat of penalties. Employees have the right to terminate their work or employment relationship at any time.

All forms of unacceptable treatment of employees, including psychological hardship, sexual and personal harassment and humiliation, are strictly prohibited.

The hiring or use of security guards is not permitted if it leads to inhuman or degrading treatment or injury to persons or if it impairs freedom of association.

We define employees as all personnel who are employed or deployed by one of our companies or business partners.

2.2 Ban on child labour

Child labour is strictly prohibited at every stage of production. This applies both in our factories and at our business partners. They are also required to comply with the ILO recommendations on the minimum age for the employment of children and to pay particular attention to the legal requirements for the protection of underage employees.

Employees under the age of 18 may not be employed for work that is harmful to their health, safety or morals or that impairs their education. Special protective regulations must be observed.

2.3 Fair pay

The remuneration for regular working hours and overtime must correspond to the national statutory minimum wage or the minimum standards customary in the industry, whichever is higher.

The remuneration for overtime must in any case exceed the remuneration for regular hours.

It must be ensured that employees receive clear, detailed and regular written information on the composition of their remuneration.

2.4 Fair working hours

Working hours must comply with the applicable laws and the minimum standards of the ILO. Overtime is only permitted if it is worked on a voluntary basis and employees are entitled to at least one day off after six consecutive working days.

The weekly working time may not regularly exceed 48 hours.

WEISS and all business partners respect the right of their employees to rest and time off between working hours.

2.5 Freedom of organisation

In accordance with § 2 Para. 2 No. 7 of the LkSG and the ILO Convention, the right of employees to freely organise, form and join trade unions, appoint employee representatives, form a works council and actively participate in collective bargaining must be respected. Employees must not be discriminated against on the basis of their founding, joining or membership of such an organisation. Employee representatives must be granted free access to employees' workplaces to ensure that they can exercise their rights in a lawful and peaceful manner.

2.6 Non-discrimination

At WEISS, we attach particular importance to preventing any discrimination in our companies and business relationships.

Unequal treatment of employees is not permitted, including discrimination based on gender, ethnic origin, skin colour, disability, health status, political conviction, ideology, religion, age, pregnancy or sexual orientation. The personal dignity and privacy of each individual are always respected.

Equal treatment of all employees must also be a key component of the corporate policy of our business partners.

2.7 Health and safety at work

WEISS is committed to the highest standards of health and safety in the workplace. We rely on state-of-the-art and safe machinery, health-promoting offers and equipment and strictly adhere to the requirements for occupational health and safety and accident prevention. We expect our suppliers and partners to implement comparable standards for health and safety protection that at least fulfil the requirements of ILO Recommendation 164. This includes strict compliance with all relevant safety regulations, regular employee training and the immediate reporting of safety concerns or incidents with the aim of preventing accidents at work and damage to health.

To ensure a safe working environment, information on identified risks in the workplace and potential hazards, including components in intermediate products, must be made available to employees for awareness, training and safety. It is necessary to ensure minimum standards for a safe and healthy working environment, including the provision of drinking water, adequate

lighting, appropriate room temperature, good ventilation and sanitary facilities.

2.8 Preserving the natural basis of life

At no point in the supply chain may land, forests or waters whose utilisation secures the livelihoods of people be taken away against legitimate rights. Harmful soil changes, water and air pollution, noise emissions and excessive water consumption must be avoided if this harms people's health, significantly impairs the natural basis for food production or prevents or restricts people's access to clean drinking water or proper sanitary facilities.

2.9 Complaints mechanisms

WEISS has implemented a complaints procedure that can be accessed on our website. The complaints procedure safeguards the confidentiality of the identity of all employees and business partners and provides effective protection against any potential offences. Any recognised risks and violations of the principles set out in this declaration must be reported to WEISS in a transparent and comprehensive manner.

3. Climate and environmental protection

We have set high standards for climate and environmental protection for ourselves and also expect our business partners to actively contribute to fulfilling our shared responsibility to protect the climate and the environment. Accordingly, we must act responsibly and conserve resources in order to minimise the ecological im-

pact in the supply chain. This includes the following aspects: Natural resources, such as energy sources, water, forests, soil and raw materials, must be protected in order to prevent exploitation, destruction or neglect. Economically justifiable measures must be taken to minimise the generation of exhaust gases, waste water, waste, noise, energy waste and light pollution.

4. Ethical behaviour

In order to fulfil our social responsibility, we expect ourselves and all our business partners to act ethically and with integrity and to comply with all applicable laws and regulations. The ethical requirements include the following aspects in particular:

4.1 Fair competition

The standards of fair business, fair advertising and fair competition must be observed. In addi-

tion, the applicable antitrust laws must be applied, which prohibit agreements and other activities that influence prices or conditions when dealing with competitors. These regulations also prohibit agreements between customers, service providers and suppliers that are intended to restrict customers in their freedom to determine their prices and other conditions for resale.

4.2 International trade controls

The applicable export control regulations must be complied with and correct and truthful information must be provided to customs and other authorities (if required).

4.3 Integrity

The highest standards of integrity must be applied to all business activities. Corruption, extortion, embezzlement, misappropriation and money laundering in any form are strictly prohibited and are not practised or tolerated at any point in the supply chain. In business dealings with business partners, public officials or other third parties, no bribes or other illegal payments may be offered or accepted, as stipulated in the UN Convention against Corruption. The same applies to gifts or other benefits for personal gain that could be considered bribery.

4.4 Conflicts of interest

All business partners must inform WEISS of any situation that could lead to a conflict of interest.

4.5 Intellectual property

WEISS employees and all suppliers and service providers must use confidential information in an appropriate manner and protect it accordingly. They must ensure that sensitive data as well as the valid intellectual property rights of employees and business partners are protected.

Business partners may not use the name or trademarks of WEISS or products for advertising purposes without the prior written consent of WEISS.

4.6 Data protection

At WEISS, personal and sensitive data in particular, but also other data worthy of protection, are subject to special protection. The business partners undertake to fulfil the reasonable expectations of clients, suppliers, customers, consumers and employees with regard to the protection of private information. When collecting, storing, processing, transmitting and passing on personal information, the laws on data protection and information security as well as the official regulations are observed.

5. Risk management

WEISS has established a centralised risk management system to monitor all human rights and environmental risks in its own business operations and in the supply chains, i.e. at our (indirect) suppliers. This essentially comprises

- Processes for analysing (identifying, evaluating, weighting) risks in all of our business divisions and our supply chains,
- Measures to control/minimise abstract and concrete risks as well as risks that have already been realised/occurred,
- Maintenance of complaint and whistleblower management,
- informing management and controllers, documentation and reporting (regularly and as required).

5.1 Identification of risk

In order to meet the legal requirements and our own high standards for the protection of people and the environment, we analyse, evaluate and monitor potential risks in our company and our entire supply chain and take targeted measures

to minimise and manage them. The analysis is carried out centrally for all WEISS companies. The information from the individual companies and specialist departments is collected, bundled and analysed. The results and measures derived from this are in turn communicated to the relevant department(s). The risk analysis is carried out on an ad-hoc basis, but at least once a year.

5.1.1 Risk identification

Our approach to identifying human rights and environmental risks is based on a multi-layered model. We analyse our operations and all our supply chains for potential risks. In order to ensure ongoing protection, we also rely on our trained employees from the respective areas (e.g. purchasing, production), who report anomalies using established processes. Reports can also be made anonymously via our whistleblower system and our complaints mechanisms.

5.1.2 Risk assessment

Recognised risks are evaluated. In doing so, we use the criteria of appropriateness: extent of damage and probability of occurrence. On this basis, we gain insights into the abstract risk. As soon as certain parameters are met, a detailed risk analysis is carried out. With the help of control measures such as questionnaires or audits (e.g. with representatives of the affected departments/business partners), we endeavour to determine the risks more precisely and to name actual (concrete) negative effects on people and the environment.

5.1.3 Priorisation of risks

In the following, we prioritise the risks according to their severity and the degree of our responsibility. We base this on criteria such as our ability to exert influence. The insights gained from this are incorporated into our corporate decision-making processes. These relate in particular to the selection and evaluation of suppliers and business partners.

5.1.4 Measures to minimise risk

Once the risks have been identified and prioritised as such, we initiate suitable measures to minimise or avoid the respective risk or the effects of events that have already occurred. These measures can be multi-layered and include, in particular, the implementation/adjustment of guidelines and procedures, contractual obligations of our suppliers and business partners, employee training, external assessment (e.g. through certifications), monitoring systems and control mechanisms as well as our complaints mechanisms. We review the planned preventive and remedial measures on an ad-hoc basis, but at least annually, to ensure that they are up to date and effective, and adjust them as necessary. We follow up on indications of violations in a determined and responsible manner.

5.1.4.1 Preventive measures

We endeavour to eliminate, i.e. avoid or at least reduce to a minimum, existing risks in our area of business and at our direct or indirect suppliers through targeted measures. The range of measures is broad, but always aims to minimise the risks to people and the environment. Such measures include, for example

- Sensitising affected employees to the specific risk through training
- issuing (work) instructions that minimise the risk,
- Provide assessments, evaluations and recommendations regarding business partners,
- Written commitment from business partners and suppliers.

We ensure that relevant expertise on risks and the processes for recognising a risk are known in the relevant departments. We also ensure through commitment and monitoring that our business partners and suppliers comply with the necessary due diligence measures.

The handling of preventive measures is risk-oriented and takes into account the extent of damage and probability of occurrence of the respective risk.

5.1.4.2 Remedial measures

Based on justified suspicions of violations that have occurred or concrete indications, we carry out event-related fact checks. If we identify imminent violations or violations that have already occurred, we immediately draw up a concept for remedial action and initiate specific, individually appropriate measures to avert, end or minimize impairments/damage. The effectiveness of measures taken is reviewed and, if necessary, improved.

If the behavior of our employees leads or has led to violations of human or environmental rights, we will take action against this and impose appropriate sanctions.

Our business partners are contractually obliged to cooperate appropriately in the implementation of measures to clarify the facts as quickly as possible and/or to prevent, minimize or eliminate any imminent or existing violations. Depending on the severity of the violation, we reserve the right to demand that our business partners immediately remedy the misconduct, take legal action, temporarily suspend the business relationship or (as a last resort) terminate it.

The effect of long-term and abstract measures is monitored and documented on an ad hoc basis, but at least annually.

5.1.4.3 Complaints and whistleblower management

In order to increase our information density and offer those affected/vulnerable parties a (also anonymous) point of contact, we have established a comprehensive complaints and whistleblower management system as an integral part of our due diligence processes. Among other things, this includes a whistleblower system for employees and external persons, which offers the opportunity to submit confidential and (if desired) anonymous complaints/reports via various digital and analog communication channels. We take all reports and well-founded suspicions seriously and follow them up systematically. We guarantee anonymity and confidentiality - also through the centralization of risk management - in order to protect whistleblowers from possible reprisals.

5.2 Priority risk

We have not identified any acute risks or violations in the aforementioned sense in our business operations or in our supply chains.

In abstract terms, the priority risks of our business operations and our supply chains and business partners are in the following areas:

- Occupational safety
- Equal treatment
- Appropriate remuneration
- Protection of the environment from harmful influences

All human and environmental risks are subject to our strict monitoring. The four risk areas mentioned above are monitored even more strictly than the other risks due to their potentially higher probability of occurrence.

5.3 Monitoring

Through internal and, if necessary, external controls and audits, we ensure that our processes and guidelines are adhered to, both internally and externally, and that the measures taken can take full effect. In addition to continuous monitoring, an intensive review is carried out after one year at the latest or as required. There is a regular exchange with the company management and the respective managers of the companies and departments concerned.

5.4 Documentation, reporting and transparency

WEISS continuously documents all relevant information and incidents relating to its due diligence obligations, stores them to the extent required by law and reports annually and in a timely manner on the fulfillment of its obligations. Only transparency creates trust: We make our reports publicly accessible and make them available on our website for at least seven years. With our commitment to reporting and transparency, we ensure that we actively contribute to the promotion of human rights and environmental protection and fulfill our corporate responsibility.

6. Governance and management systems at our business partners

In line with our risk management, we also expect our business partners to meet certain standards. Our business partners must have or implement effective management systems and a governance structure that support compliance with applicable laws and regulations in their organizations and promote continuous improvement in relation to the expectations set out in this statement. This includes the following aspects:

6.1 Risk analysis

Our business partners are obliged to know and comply with all relevant international, national and local laws, contractual agreements and in-

ternationally recognized standards and conventions. This includes in particular the principles set out in this declaration.

6.2 Passing on the principles

Our suppliers should also implement the principles set out in this Code of Conduct in their upstream supply chains.

6.3 Commitment and responsibility

Our suppliers must comply with the principles set out in this declaration. Suppliers shall integrate all applicable aspects of the declaration into their management systems.

6.4 Right to evaluation and control

Our business partners grant WEISS the right to evaluate and monitor their performance after reasonable advance notice in order to determine the business partner's compliance with the principles set forth in this Code of Conduct. The evaluations and controls are carried out directly by WEISS, e.g. in the form of an assessment or audit.

6.5 Remedial measures

Our business partners are obliged to inform WEISS immediately in writing of any identified risks to and violations of the principles set out in this Code of Conduct. They must take appropriate measures to prevent, minimize or end violations.

6.6 Transparency

As part of our commitment to transparency, we strive to make the results of evaluations and controls transparent. WEISS reserves the right to publicly communicate relevant information about compliance with this Code of Conduct and our sustainability standards to ensure the highest level of transparency and accountability.

6.7 Breach of the obligation

If a breach of the above regulations by our company or third parties is detected and this is not rectified promptly, WEISS reserves the right, as a last resort, to terminate the existing business relationship immediately and to cancel all contracts.

7. Contact

Further information can be found on our websites (www.weissgruppe.de). There you will also find our whistleblower protection system (www.weissgruppe.de/hinweisgebersystem).

- by e-Mail
- by telephone
- by post

If you have any questions about this policy statement or would like further information, please do not hesitate to contact us

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8. Actuality

This declaration of principles applies to all companies of the WEISS Group (listed opposite) as well as their employees, business partners and suppliers. In order to meet the legal and our own requirements for the protection of human and environmental rights, we review our declaration of principles on an ongoing basis (but at least annually) to ensure that it is up to date and effective and adapt it as necessary.

This declaration comes into force on 01.01.2024 and has no retroactive effect. No rights of individuals or third parties can be derived from it.

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