



Declaration of Principles on Respect for Human Rights and Social Responsibility (SA8000) of the SÜDPACK Group

Human Rights Policy

The SÜDPACK Group is a family-owned company that operates internationally and is focused on innovation, technology, and quality, as well as close customer relationships. We consider it our duty and one of our highest priorities to respect human rights and the whole environment.

With this declaration of principles, the company management admits observing our corporate duty of care and takes responsibility for the implementation throughout the company. In this way, we ensure that all areas of the company are aware of the contents of this declaration of principles, maintain them and contribute to compliance.

This policy statement extends our Code of Conduct and our Supplier Code of Conduct and specifies our corporate duty of care for human rights towards our employees, suppliers, and business partners, as well as towards society. At the same time, it shows that we are committed to the contents of SA8000 and comply with the requirements of the management system.

We are further guided by the Sustainable Development Goals of the United Nations and are committed to the

principles of the following internationally recognized human rights frameworks and standards:

- United Nations Universal Declaration of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- Principles of the United Nations Global Compact
- Charter of Fundamental Rights of the European Union
- International Standard on Social Responsibility (SA8000)

This declaration of principles is reviewed annually as well as on an ad hoc basis and adjusted if necessary.

This statement covers the following topics used to identify risks to our business and supply chain.

SÜDPACK



Relevant Labor and Human Rights Risks:

- Child labor
- Forced labor
- Slavery
- Freedom of association and collective bargaining
- Occupational health and safety
- Procurement risk
- Appropriate compensation
- Discrimination

Relevant Environmental Risks:

- Air pollution
- Hazardous waste
- Persistent organic pollutants (POP Convention)
- Soil pollution
- Water pollution

Risk Management and Risk Analysis

We provide sufficient resources to ensure compliance with the above issues and the requirements of the Act on Corporate Due Diligence Obligations in Supply Chains, as well as to follow the international standard on social responsibility (SA8000) and ensure the continuous improvement of our management system.

Therefore we identify and analyze the environmental and human rights-related risks associated with our business activities and our supply chain (direct suppliers and indirect suppliers with substantial knowledge).

By maintaining, implementing, and further developing SA8000 and ISO standards regarding environment, energy, occupational health and safety, product safety and sustainability in our strategic corporate direction, we identify, prevent, and minimize the risks associated with our business activities.

We assess and analyze the risks in our supply chain internally and with the help of the EcoVadis rating platform. As a first step, all our direct suppliers are subjected to a risk assessment and reviewed based on their industry and country risk to identify actual and potential human rights and environmental risks in our supply chain. Indirect suppliers are also analyzed if there is substantial knowledge of a violation.

The identification of the above-mentioned risks serves as the basis for implementing measures to prevent and minimize risks. For suppliers with a high risk for these issues, both an in-house and an external assessment is carried out via the EcoVadis Scorecard. Through regular reporting and the review and updating of our risk analysis, we can monitor the effectiveness of the measures and continuously develop ourselves.

The Following Applies to SÜDPACK:

We do not tolerate any form of child labor, forced or compulsory labor, slavery, or human trafficking.

- SÜDPACK does not hire children under the age of 15 or assign young workers (i.e. workers with a minimum age of 15 years but younger than 18 years) to dangerous work that could threaten their health and safety.
- SÜDPACK has documented procedures regarding working time regulations for its employees, in particular for employees under 18 years and is committed to respecting the rights of young employees, protecting them, and taking corrective action if it is determined that child labor is involved.
- Through a defined hiring process and age verification for each applicant, we act in accordance with our duty of care and prevent the hiring of children.

We ensure that every employee has the freedom of association and collective bargaining.

- SÜDPACK encourages employees to address issues directly and without fear of reprisal. We recognize that every employee has the right to form an employee representative.

We ensure and promote the health and safety of our employees.

- At SÜDPACK, occupational safety-related parameters are firmly established in our corporate objectives. In addition, SÜDPACK promotes the health of its employees through a comprehensive preventive health care program as part of its value „Care“.

We do not tolerate any form of discrimination.

- In our vision and corporate policy, we speak out against any form of discrimination in the workplace and demand that our employees comply with the ethical rules of corporate governance (CSR) and the internal code of conduct.
- Inhumane and inappropriate treatment or any form of violence as well as mental or verbal harassment as a disciplinary measure will not be tolerated at SÜDPACK.

We ensure safe and healthy working conditions and appropriate compensation.

- We ensure that employees are granted at least the working conditions, including the minimum wage, to which they are entitled under applicable laws and regulations. Our compensation policy ensures that all employees are aligned to the same corporate goal



and participate in a variable compensation component. Working hours are regulated in accordance with the Working Hours Act.

We recognize our contribution to environmental protection.

- The use of processes that save energy and raw materials is preferred by SÜDPACK. SÜDPACK also seeks to avoid emissions, noise, and waste wherever possible.

Prevention and Remedial Measures

Based on the risks we have analyzed in the supply chain and the demands we place on our own business activities, we implement various measures, such as initiating appropriate corrective measures via EcoVadis, to avoid and minimize environmental and human rights risks and to comply with our social responsibility, within our scope of influence.

We train our employees on our corporate principles and values. Our annual training includes content on sustainability, the environment and social responsibility. Our compliance training focuses on the following five topics, which are also established in our Code of Conduct:

- Conduct within our company
- Protection of intangible & tangible assets
- Environment & sustainability
- Legal & regulatory framework
- Behavior towards business partners & competitors

Our SA 8000, ISO 140001 and ISO 45001 certifications represent additional preventive measures in the areas of social responsibility and environment. Besides, our company has a compliance representative, a compliance committee, and a social performance team.

We evaluate our suppliers and select them among other things because of sustainable criteria. For this purpose, we use the EcoVadis rating platform. Moreover, as part of their supply contracts, they are required to recognize our Supplier Code of Conduct or to provide us with a comparable document from their company. The Code applies to the signing company, its management and its employees and is used as the basis for all business relationships.

This includes the following elements:

- Legal and regulatory framework
- Ethical business practices (corruption, competition law)
- Employees (prohibition of forced and compulsory

- labor, respect for human rights, anti-discrimination, fair working conditions and minimum wage)
- Health and environmental protection

If suppliers show abnormalities, audits or feedback meetings are conducted and corrective measures are defined. The supplier has the opportunity to improve within a defined period of time. If no improvement can be seen, we reserve the right to exclude the supplier from our portfolio.

If we gain substantial knowledge of a violation at an indirect supplier, individual measures will be developed.

Complaints Procedure

In order to give our employees, suppliers and all other affected stakeholders the opportunity to report risks and violations of human rights and environment, various complaints mechanisms have been implemented at SÜDPACK.

An anonymous, internal complaints management system is available to our employees, where reported deficiencies are treated confidentially. We also encourage employees of our direct and indirect suppliers to use our external complaints mechanism in the case of specific evidence.

The following options are available for making an anonymous and confidential complaint:

- Directly to our Compliance Representative via compliance@suedpack.com
- To an external ombudsperson via suedpack-whistle@fgvw.de or by calling Dr. Hendrik Thies, Dr. Jan Henning Martens, Dr. Meike Kapp-Schwoerer, Dr. Johanna Hennighausen +49 761 21808 935 or +49 15116340961 or +49 151 15034 079.

Documentation and Reporting

We report transparently on our sustainability and CSR activities in a sustainability report published every two years, which is validated according to the GRI standard. The report is available on our homepage at [20230127_Nachhaltigkeitsbericht_EN.indd \(suedpack.com\)](#). In non-reporting years, we publish a progress report that is based on the corresponding sustainability report. In addition, further information on sustainability at SÜDPACK and our activities for a sustainable and transparent supply chain can be found on our homepage, together with our Supplier Code of Conduct: [Südpack: Sustainability by SÜDPACK | Climate neutrality \(suedpack.com\)](#).

As part of our social responsibility and in accordance with the Act on Corporate Due Diligence Obligations in Supply Chains, we regularly review and report internally on the status quo of our progress toward a sustainable and transparent supply chain. Furthermore, we provide annual information on our human rights-related risk analysis, preventive and remedial measures, and the review of their impact.

Accreditation Body

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Certification Body

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Management of the SÜDPACK Group

Ochsenhausen, 04.07.2023

Erik Bouts

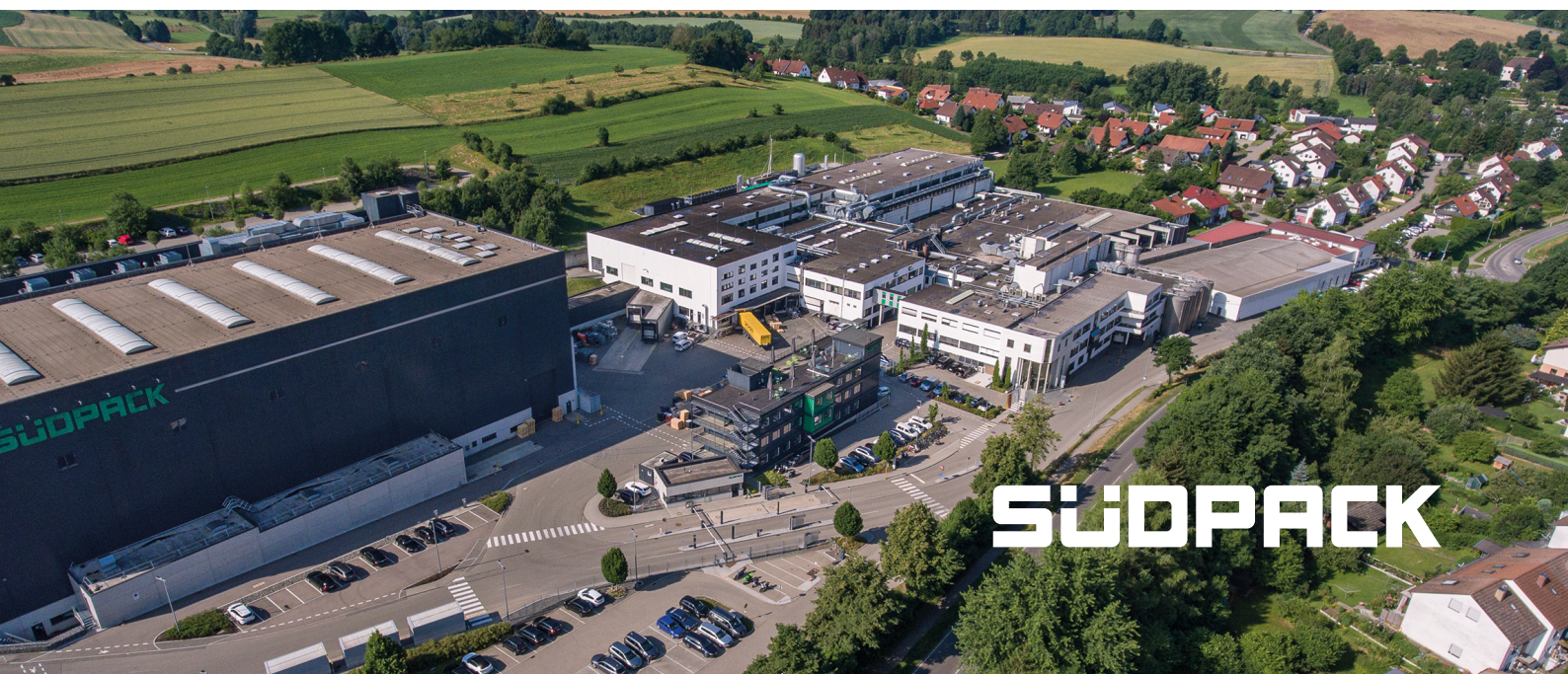
chief executive officer

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