

Supply Chain Due Diligence Act

# Policy Statement

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Our commitment to respecting human rights  
and environmental obligations



## Part 1

# Human Rights and Environmental Strategy

## Our expectations of our employees and suppliers as regards human rights and the environment

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STAEDTLER is committed worldwide to complying with human rights and environmental due diligence obligations, to strengthening human rights and to enabling remedies for data subjects in the event of identified human rights violations. This applies both to our own business area and to the value chains.

The overall responsibility for the strategic direction for compliance with and monitoring human rights and environmental due diligence obligations lies with the Managing Board, including the procedures and allocation of resources to implement the measures. The respective departments, in particular Compliance, Sustainability and Purchasing, are tasked with the implementation and continuous further development of measures within the framework of the defined strategy. The Compliance department is responsible for collecting the data required for complying with these due diligence obligations. The Compliance Officer has been appointed as the Human Rights Officer.

The strategy for implementing the human rights and environmental due diligence obligations is based on the following international frameworks:

- Ethical Trading Initiative Base Code
- The Ten Principles of the United Nations Global Compact
- United Nations Universal Declaration of Human Rights
- Conventions and Recommendations of the International Labour Organization (ILO)
- UN Guiding Principles on Business and Human Rights (UNGPR)
- OECD Guidelines for Multinational Enterprises
- UN Principles for the Rights of the Child and Business
- OECD Sectoral Guidelines
- Supply chain due diligence obligations (LkSG) and EU supply chain requirements (CSDDD)

## Part 2

# Description of the Procedure

## Our procedures for implementing human rights and environmental due diligence

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### Risk analysis and management

An initial risk analysis was carried out taking into account the above-mentioned frameworks for each business unit and the upstream and downstream components of the value chain. This includes our subsidiaries, agencies and production suppliers. In addition to country risks, product group-specific risks were also taken into account. The analysis was based on a recognised risk analysis tool from an external service provider.

As part of the risk analysis of STAEDTLER business partners, risks were prioritised based on their severity (scale, scope, irreversibility, probability of occurrence and ability to influence) and their probability of occurrence. These risks are mitigated in that we develop appropriate concepts and take various measures, as described in the section "Prevention and remedial measures" below. Existing internal risk management processes were expanded to include a compliance-related perspective in order to achieve our aim of comprehensive risk assessment.

The initial risk analysis revealed that, due to the business activities of stationery production in our business unit and with our business partners, there were no net risks, i.e. after our preventive and corrective measures, for which additional special measures were necessary.

### Preventive and Corrective Actions

#### Own business unit

STAEDTLER employees are obliged to respect and promote human rights and environmental rights in their sphere of influence. STAEDTLER has anchored the values and principles described in the international frameworks as guidelines in the Code of Conduct, which must be complied with by all employees. Employees receive regular training on the Code of Conduct and other topics relating to compliance. Employees from supplier-related units will be specially trained to deal with human rights issues in the supply chain in the context of their own procurement practices. Sustainability criteria will be increasingly integrated in the procurement processes on a gradual basis with the aim of continuously minimising our exposure to risks.

The STAEDTLER sustainability strategy sets goals that are aligned with medium-term planning and the principles of ISO 14001. This also includes the requirement to „fulfil obligations“ with the objectives of protecting the environment, including preventing environmental pollution, fulfilling binding obligations, and continuously improving the environmental management system in order to improve environmental performance.

The ISO 14001 certification of all production sites helps to implement the goals into concrete measures and track them. At the German sites, emissions have already been significantly reduced through various efficiency measures, targeted investments, photovoltaics and the use of green electricity.

To implement the German Federal Government's sustainability goals, a transformation concept towards CO<sub>2</sub> neutrality has been developed. The measures prioritised therein will be implemented step-by-step in the coming years.

In preparation for the CSRD, a system of key performance indicators was set up which - based on the ESRS standards - surveys information on health, occupational safety, discrimination, diversity and the personnel structure internationally on an annual basis.

STAEDTLER uses external social audits (SMETA) at its German production sites and, in future, at its subsidiaries to optimise its performance in this area and contribute to a further reduction in risks.

For example, STAEDTLER has introduced a complete due diligence management system in accordance with the OECD Guidelines on Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. For more details, please see our Sustainability Report on our global website. If a violation of a human rights or environmental obligation has already occurred or is imminent in its own business area, STAEDTLER shall immediately take appropriate remedial measures to prevent, end or minimise the extent of this violation. The type and scope of the measures taken depend on STAEDTLER's contribution to the cause and its ability to exert influence.

## The value chain

STAEDTLER expects the values based on international frameworks to be supported and adhered to by all of the company's stakeholders, but in particular by business partners and, accordingly, their respective business partners. STAEDTLER wants to work towards this goal together with its business partners. For this reason, we have specified the STAEDTLER Business Partner Code of Conduct and expect business partners to adhere to the described principles and pass on the requirements to their business partners. This code also includes compliance with the nine requirements of the ETI Base Code (<https://www.ethicaltrade.org/resources/ETI-base-code>) and the ten principles of the UN Global Compact.

STAEDTLER verifies compliance with these principles by carrying out SMETA audits. In the event of violations, appropriate improvement measures are initiated. Additionally, sustainability topics at suppliers are scrutinised as part of quality audits. STAEDTLER also collects information about suppliers via surveys in the supply chain and discusses possible improvement and development potentials on this basis. Through our eLearning platform, suppliers undergo training on human rights and environmental topics. If a violation of a human rights or environmental obligation by a direct supplier has already occurred or is imminent, STAEDTLER shall immediately take appropriate remedial measures to prevent, end or minimise the extent of this violation. If it is not possible to end the infringement in the foreseeable future, STAEDTLER will develop a scheduled concept for ending or minimising the infringement. In the event of a very serious breach, if agreed measures do not remedy the situation and/or STAEDTLER's ability to exert influence is not sufficient, STAEDTLER reserves the right to suspend or, as a last resort, terminate the

business relationship. In the event of an established or imminent human rights violation by indirect suppliers, STAEDTLER will examine ways of remedying the situation. The type and scope of the measures taken depend on STAEDTLER's contribution to the cause and its ability to exert influence.

### **Complaints procedure**

Information on misconduct, in particular violations of human rights and environmental law in the supply chain, can be reported by our employees and external third parties via the anonymous whistleblower system at <https://staedtlermars.integrityline.org/>. This is available on our global website at <https://www.staedtler.com/de/de/service/business-partner/>.

### **Effectiveness monitoring and continuous further development**

The implementation of human rights due diligence is a continuous process that requires regular review. All measures described for the fulfilment of due diligence obligations, including the risk analysis, are subject to an annual and event-driven review with regard to their relevance, effectiveness and efficiency, and are revised if necessary. The review is carried out on the basis of accumulated knowledge and experience and is monitored and continuously developed by the Compliance Officer.

### **Documentation and reporting**

STAEDTLER continuously monitors the impact of its business activities on compliance with human rights and environmental obligations and reports to employees and external stakeholders via the Sustainability Report from 2025, in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) on our global website.

Nuremberg, 20 November 2025  
STAEDTLER SE



Matthias Greiner  
Chief Executive Officer



Dr. Konstantin Czeschka  
Chief Operating Officer



Hannes Marohn  
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