

EDS Group GmbH Responsible Sourcing Policy

Commitment by our Management.

EDS Group GmbH (composed of the following companies: Severotisk s.r.o., Svoboda Press s.r.o., Typos s.r.o., Eurodruk - Poznań Sp. z o.o., EDS Zrínyi Zrt., Passavia Druckservice GmbH & Co. KG and EDS România) is committed to establishing sustainable supply chains, via the ethical sourcing of agricultural and forestry commodities. We are dedicated to implementing comprehensive policies across all business aspects, setting specific, measurable goals to prevent deforestation and ecosystem conversion, and to uphold human rights throughout our purchasing activities.

In alignment with international norms and standards, our Responsible Sourcing Policy seeks to ensure legally compliant and environmentally sound sourcing practices while upholding our commitment to human rights at every supply chain level. The implementation of our policy includes consistent policy reviews and updates, robust supplier engagement and capacity building, transparent reporting, and the implementation of an effective complaints mechanism. All of these measures are aimed at fostering supply chains that reflect our commitment to environmental integrity, ethical practices and social responsibility.

This sourcing policy is developed under the guidance of the [Preferred by Nature Sustainability Framework](#), ensuring alignment with established best practices for responsible business activities, in relation to people's well-being, the environment and the climate.

The policy is endorsed at the executive level of our organisation. Updates and further information in relation to the policy can be found on our website here: www.edsgroup.de. For any questions regarding our Responsible Sourcing Policy please contact Ms. Iva Prošková, Sustainability Manager, iva.proskova@severotisk.cz.

Scope of our Responsible Sourcing Policy

All wood- and paper-based materials

- graphic papers and other printed substrates
- components used in printing production, if they contain wood fibre.

All supply chains associated with these materials, namely:

- primary production (forestry),

- raw material processing (paper mills, paper traders),
- distribution, storage, and subsequent reprocessing,
- suppliers, subcontractors, and intermediaries within the EU.

All operating units and departments of the company, in particular:

- purchasing, logistics, production, warehousing, sales department, quality and sustainability management.

Due diligence procedures in accordance with the EUDR, including:

- collection, verification, and archiving of data on the origin of materials,
- working with reference and verification numbers,
- providing information to customers within the chain.

Geographical coverage

- The principles apply to all materials used in the manufacture of products intended for sale in the EU, regardless of their country of origin.

1. Responsible Management and Business Practices

As part of our commitment to responsible sourcing, we will uphold the highest standards of environmental stewardship, social responsibility and ethical conduct across all of our operations. This is reflected in our comprehensive approach to sourcing products, commodities, and services, ensuring that our practices are not only in full compliance with legal requirements in the country of origin but also contribute positively to the communities and landscapes within which we operate.

1.1 Corruption, Fraud and Conflict of Interest are Avoided.

Our operations are founded on principles of integrity and accountability, with stringent measures in place to avoid corruption, fraud and conflicts of interest, while business integrity is ensured according to best practices. We seek to ensure compliance with all legal requirements addressing bribery, fraud and conflict of interest. We also take measures to avoid the falsification of data and documents, in order to foster a culture of honesty and transparency.



This is an EUDR legality-relevant indicator (tax, corruption, trade and customs)

1.2 Trade and Procurement are Responsible.

Trade and procurement practices must be conducted in accordance with legal requirements, including those relating to trade and transport of products, trade restrictions and sanctions, laws relating to product classification and import/export regulations.

Respecting principles of fairness and transparency in contractual obligations, we also adhere to legal requirements for offshore trading, transfer pricing and due diligence, ensuring that our sourcing practices are not only lawful but also ethically and socially responsible.



This is an EUDR legality-relevant indicator (tax, corruption, trade and customs)

2. People's Well-being and Human Rights

We are committed to ensuring that people's welfare and the rights of individuals are respected and avoid engaging in or benefitting from controversial business practices. This commitment encompasses a broad spectrum of subject matters intended to uphold human dignity, promote fair labour practices, and foster positive community relations.

2.1 Human Rights are Respected.

Our company respects and actively supports the protection of human rights throughout the supply chain. We do not tolerate any form of forced or child labour, discrimination, or other violations of fundamental rights, and therefore we only work with suppliers who demonstrably apply responsible and ethical working practices and comply with international standards such as FSC or PEFC certification, or equivalent internal policies.



This is an EUDR legality-relevant indicator (human rights).

2.2 Child Labour Is Absent from Our Operations. The Employment of Young Workers Is Responsibly Managed.

We respect and supports the protection of human rights throughout the supply chain. We do not tolerate any form of forced or child labour and comply with applicable legislation on the employment of minors, where assigned work activities, working hours, and conditions are managed safely and responsibly. We only work with suppliers who demonstrably ensure ethical working conditions and comply with international standards such as FSC or PEFC, or equivalent internal control systems.



This is an EUDR legality-relevant indicator (labour rights).

2.3 Modern Slavery, Forced or Compulsory Labour Do Not Occur.

Our operations are free from forced labour, modern slavery, and human trafficking. We ensure that workers have the freedom to choose their employment, without undue restrictions or dependences.



This is an EUDR legality-relevant indicator (labour rights).

2.4 Workers' Rights are Respected.

Employee rights are fully respected and protected in our company. We provide our employees with fair working conditions, equal opportunities, a safe and healthy working environment, and we respect their right to freedom of association. We reject any form of forced labor, discrimination, or abuse of labor. We expect the same standards and ethical practices from our suppliers and partners throughout the supply chain and require them to demonstrate compliance with applicable legislation and international labor law standards. As part of our internal processes, we focus on transparency, risk prevention, and open communication. Our goal is to foster a long-term work environment based on respect, safety, and dignity for every employee.



This is an EUDR legality-relevant indicator (labour rights).

2.5 Discrimination Does not Occur.

There is no discrimination in our company, and we evaluate all employees fairly regardless of gender, age, ethnic origin, nationality, religion, health status, sexual orientation, or other personal characteristics. Equal treatment is a fundamental principle of our work processes and personnel policy. We actively promote an inclusive work environment where differences are seen as an asset and where everyone has the opportunity to apply their skills. At the same time, we require that the same principle of non-discrimination be observed by our suppliers and partners throughout the supply chain. Our procedures and regular training ensure that discrimination is not only prohibited but also actively prevented.



This is an EUDR legality-relevant indicator (labour rights).

2.6 Workers are Remunerated in a Responsible Manner.

Our employees are rewarded in a responsible, fair, and transparent manner. Remuneration corresponds to their qualifications, job responsibilities, and performance, while fully complying with applicable legislation and collective or internal rules. We ensure that wages and benefits enable decent living conditions and are paid on time and in accordance with labour regulations. At the same time, we ensure equal pay for equal work regardless of gender or other personal characteristics. We also place the same expectations on our suppliers throughout the value chain.



This is an EUDR legality-relevant indicator (labour rights).

2.7 Facilities, Operations and Activities are Safe.

The equipment, operations, and work activities at our company are managed in such a way as to ensure safety for all employees, visitors, and the surrounding environment. We apply strict occupational safety standards, regular inspections, and preventive measures aimed at minimizing the risk of accidents and incidents. Employees receive regular training in occupational health and safety and are provided with appropriate protective equipment and clearly defined procedures. We continuously monitor, evaluate, and improve our safety system. We expect the same emphasis on safety from our suppliers and partner organizations.



This is an EUDR legality-relevant indicator (labour rights).

3. Environmental Responsibility

In our pursuit of a responsible approach to our sourcing, we are committed to promoting responsible stewardship toward the environment and the Earth's natural resource capital. We are committed to avoiding negative impacts on the environment caused by our own activities and those activities of our forest and farm suppliers.

3.1 Forests and Other Ecosystems are not Converted.

We recognise that forests and natural ecosystems are vital for maintaining biodiversity, regulating the climate, and supporting the livelihoods of millions of people. Deforestation and ecosystem degradation not only contribute to climate change but also threaten the survival of communities and species worldwide. Moreover, respecting human rights is essential to fostering equitable and fair practices across our supply chains.

Understanding these global challenges, EDS Group GmbH is deeply committed to responsible sourcing practices that protect the environment and uphold the dignity and rights of all individuals involved. This commitment drives our actions to contribute to a sustainable and just future.

We work to ensure our activities do not contribute to deforestation or the conversion of natural ecosystems. After 31 December 2020, we ensure that none of our supply chains source raw materials from areas that have been converted from forest to agricultural land, degraded or converted primary forests to plantations or other wooded lands, or from degraded naturally regenerating forests.



This is an EUDR deforestation-free-relevant indicator.

3.5 Waste Is Reduced and Managed Responsibly.

The amount of waste generated in our operations is actively reduced and waste is handled responsibly in accordance with applicable legislation and environmental standards. We sort, recycle, and prioritize the reuse of materials, minimize waste generation during production, and monitor its flow throughout our operations.

Our goal is to maximize the use of recyclable materials, reduce the amount of mixed waste, and continuously improve the environmental impact of our activities. The companies that are part of the EDS Group hold a number of environmental certifications that demonstrate a responsible approach to individual environmental requirements.



This is an EUDR legality-relevant indicator (land use rights, environmental protection).

4. Climate Responsibility

We are dedicated to addressing climate change through a comprehensive strategy that includes reducing greenhouse gas emissions, implementing proportionate climate change adaptation efforts, and pursuing GHG removal and ecosystem restoration initiatives.

The company actively bears climate responsibility by monitoring and minimizing its impact on the environment and climate. We implement measures to reduce greenhouse gas emissions, optimize energy consumption, and promote the use of renewable energy sources. Our practices also include selecting suppliers and partners who adhere to climate-responsible practices. Where possible, we use products and materials with environmental certifications such as FSC, PEFC, or other relevant sustainable forest management certifications that confirm the responsible origin of wood and paper. Our goal is to **Increase energy efficiency, reduce our carbon footprint, and promote sustainable supply chains with measurable climate goals.**

4.1 Greenhouse Gas Emissions are Reduced.

Greenhouse gas emissions generated by our operations are actively monitored, and we strive to minimize their impact on the climate through measures to reduce them. We optimize energy consumption, use efficient technologies, and prefer suppliers and transport services with a low carbon footprint. Our goal is to continuously reduce greenhouse gas emissions, increase energy efficiency, and contribute to fulfilling the company's climate commitments.



This is an EUDR deforestation-free-relevant indicator.

4.2 Climate Change Adaptation Efforts are Implemented Proportionate to the Risks.

Our company approaches climate change adaptation in a targeted manner and in proportion to the identified risks. We assess the risks associated with extreme weather events, monitor their impact on operations, the supply chain, and continuity of supply, and implement preventive measures to mitigate these risks. Our goal is to **ensure the resilience of our operations and supply chain to climate change and minimize potential economic, environmental, and social impacts.**

Targets for the Implementation of Our Policy

Specific timebound targets have been set for achieving policy commitments for our organisation. These targets are intended to provide clear and specific goals for our Responsible Sourcing Policy, aligning with other organisational relevant plans and priorities. The targets are measurable, including quantifiable measures of performance or qualitative indicators. This will allow the tracking of progress and determining when targets have been achieved.

Policy element	Commodity	Specific Target(s)	Performance Indicator(s) ¹	Timeframe
Respect for human rights	All materials and activities	Ensure that all suppliers and employees respect human rights principles	100% of suppliers with compliance confirmation / number of employee training	Annual revision, min. 1 training per year
Workers' rights	Own operations	Equal treatment, safe and fair working environment	Number of complaints = 0, regular internal audits	Annual evaluation
Fair remuneration	Own operations	Provide performance appropriate wages and benefits, equal pay	Regular pay check	Annual evaluation
Operational safety	Facilities, activities	To ensure safe a working environment, minimize the accidents	Number of incidents $\leq$ 2%	Continuous revisions 1x per year

¹ How achievement of the target will be assessed.

Waste management	Plant	Minimize waste, maximize recycling	≥ 70% of waste recycled amount of mixed waste	Annual evaluation
Reducing greenhouse gas emissions	Energy operations, Plant	Reduce GHG emissions and increase energy efficiency	Tons CO2e/year	Target reduction of 5% each year
Adaptation to climate change	Operations and Supply Chain	Ensure the resilience of operations and the chain to climate risk	Number of implemented measures, assessment	Continually revised 1x per year
Climate responsibility	Materials and supply chain	Increase the % of FSC/PEFC certified and low-emission sources	FSC/PEFC certified materials, energy efficiency of operations	Continuous annual revision

Responsible Business Practices We Will Undertake

In order to ensure the success of our Responsible Sourcing Policy, we will carry out the following actions:

Due Diligence Processes

Our organisation has implemented a robust due diligence system, to manage potential risks relating to the criteria described in sections 1 to 4 above. These include ongoing assessments and a strategy for engaging with and monitoring suppliers:

- We will ensure that information about suppliers and sources of material is collected and evaluated to enable traceability and effective risk assessment
- We will conduct risk assessments on all suppliers and the supplies of relevant commodities and products to evaluate whether they meet the requirements of our policy.
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- In case risks are identified and cannot be classified as negligible we will carry out appropriate risk mitigating actions to mitigate the potential risks.

Supplier Engagement and Capacity Building

We will engage with suppliers to communicate key aspects of this policy and clarify conditions and expectations. We will support the alignment of our suppliers' operations with our policy by providing resources, training and support, especially to those who need more assistance.

Certification Schemes and Engagement In Other Initiatives

We are committed to procuring products that have been certified against a credible and internationally recognised standard for responsible forest management or agricultural production, where possible, to ensure that the product originates from a well-managed source.

The following schemes are valued by our organisation to meet all core elements of this policy:

Certification or verification scheme	Claim(s)	Comments
FSC	All complaints related to invalid certification or errors in the origin of the material	We use FSC-certified paper and monitor the validity of certificates for all suppliers.
PEFC	All complaints related to invalid certification or errors in the origin of the material	We use PEFC-certified paper and monitor the validity of certificates for all suppliers.
EU Ecolabel	Complaints regarding non-compliance with environmental criteria	We use it where available to support environmentally friendly printing.
Blue Angel	Complaints regarding non-compliance with environmental criteria, and all complaints related to invalid certification or errors in the origin of the material	We use it where available to support environmentally friendly printing.
ISO 14001	Complaints related to environmental management of suppliers	We take into account the environmental practices of suppliers to support sustainable operations.

Stakeholder Engagement

We strive for open, transparent, and meaningful dialogue with all our stakeholders, including customers, suppliers, community members, and industry partners. This engagement is vital for understanding diverse perspectives, gaining valuable feedback, and building strong, trust-based relationships.

Regular updates, reports, and discussions ensure that our stakeholders are well-informed about our practices, progress, and challenges in our supply chain. We believe that this inclusive approach to communication not only enhances our policy's effectiveness but also contributes to the overall sustainability and integrity of our operations.

Complaints Mechanism

We recognise the importance of an accessible and responsive complaints mechanism as a key aspect of our business practice. This mechanism needs to be user-friendly, confidential and impartial. It should ensure that every complaint is addressed promptly and effectively while upholding the principles of fairness and respect for all parties involved. This approach underscores our dedication to continuous improvement and accountability in our operations.

If you wish to voice your concern about or report a potential or actual violation of our Responsible Sourcing Policy please contact us:



Public Reporting

We are dedicated to fostering transparency and open communication across all facets of our operations. This commitment includes regularly disclosing information about our sourcing practices and the level of conformance with our Responsible Sourcing Policy that we have achieved.

By providing clear and accessible reports, we aim to maintain accountability and reinforce trust among our stakeholders. We ensure that our practices not only comply with legal requirements but also align with our

core values of integrity and responsibility in all aspects of our business.

Review and Adaptation of This Policy

We will monitor internal systems and procedures which underpin the implementation of this Responsible Sourcing Policy. As necessary and applicable, access will also be made for external evaluations of the performance of the relevant systems are in place, to ensure that they are implemented and functioning as intended.

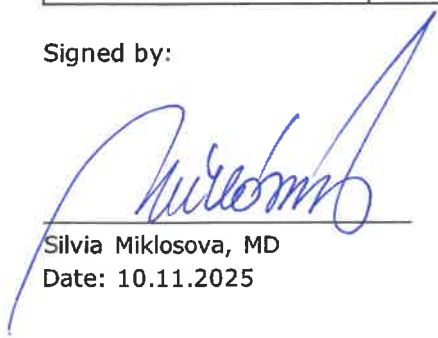
Adaptions will be made to both the Responsible Sourcing Policy and the systems and procedures which underpin its implementation, in response to new insights, changes in international norms or regulatory requirements, and stakeholder feedback. This dynamic approach allows us to be agile and responsive to emerging challenges and opportunities, ensuring our policies not only meet current sustainability standards but also anticipate future needs and trends. Through this continuous improvement process, we reaffirm our commitment to sustainability, ethical practices, and social responsibility.

Over time, we expect to continuously raise the sustainability standards of our sourcing activities by improving their credibility and robustness of our sourcing activities, certification and verification standards and sourcing requirements.

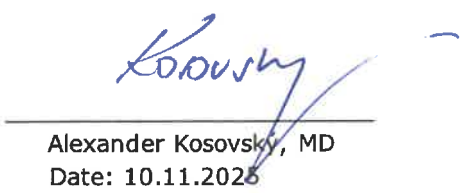
Version History

Version Reference	VersionDate	Description of revisions made
1.0	10.11.2025	

Signed by:



Silvia Miklosova, MD
Date: 10.11.2025



Alexander Kosovsky, MD
Date: 10.11.2025