

**SEMPERIT** 

**HUMAN RIGHTS AND  
MODERN SLAVERY ACT  
STATEMENT**

For the Financial Year 2025



Environment · Social · Governance

# Semperit AG: Modern Slavery Act Statement 2025

Issued pursuant to Section 54 of  
the Modern Slavery Act 2015



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## Introduction

The UK Modern Slavery Act 2015 (the 'Act') requires businesses to state the actions they have taken during any given financial year to ensure modern slavery is not taking place in their operations and supply chains. Semperit is fully committed to playing its part in eradicating modern slavery and human trafficking and firmly advocates transparency and collaboration to eliminate related risks throughout the value chain. Semperit takes responsibility for individuals that work with and for Semperit.

This Modern Slavery Act Statement sets out the actions Semperit has taken during the financial year 2025 to ensure that its corporate activities and supply chains are free from modern slavery.

## Semperit – a brief portrait

Publicly listed company Semperit AG has been a global supplier of quality products made from natural and synthetic rubber or polymer materials for more than 200 years. The international group of companies develops, produces and markets elastomer products in over 100 countries for industrial and medical industries.

The roots of the Semperit Group date back to 1824. At the end of 2025, the Group employed around 4,000 people. Semperit operates 16 production sites and markets its products in the B2B space through its own sales network in Europe, Asia, Africa, North and South America, and Australia. The most important product groups are hydraulic and industrial hoses, conveyor belts, escalator handrails, window and door profiles, cable car rings, ski foils, products for railway superstructures and liquid silicones.

## Semperit Corporate Values

<p><b>WE TRUST</b> BY MAKING COLLABORATION WORK</p> <p>We collaborate and appreciate each other no matter who we are and where we come from. We are loyal, communicate openly and respectfully. Being reliable on our actions and learning from mistakes, we build trust.</p> 	<p><b>WE CREATE</b> BY ENCOURAGING CHANGE AND INNOVATION</p> <p>We develop smart and innovative processes and products that match our customers' needs. We add value by designing solutions – for today and the future. We encourage and embrace change.</p> 	<p><b>WE OWN</b> BY TAKING RESPONSIBILITIES</p> <p>We take responsibility and are dedicated to our tasks. We stand up for our common beliefs and have high expectations of our results. Passion drives us to make the difference.</p> 	<p><b>WE DELIVER</b> BY HAVING STRONG BUSINESS UNDERSTANDING</p> <p>It all begins with our customers. Our thinking starts from their point of view. We listen. And we deliver upon promised solutions and products. We are strong partners - internally and externally.</p> 
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# Semperit's commitment to the ten principles of the UN Global Compact

The United Nations Global Compact (UNGC) is a global initiative for responsible corporate governance. The vision of the UNGC is an inclusive and sustainable global economy based on the ten universal principles. The goal of the worldwide movement of economy, politics, and civil society: to make globalization more social and ecological

The central pillar of the UNGC is composed of the ten universal principles and supports the 17 Sustainable Development Goals (SDGs). In 2020, Semperit decided to join the network and contribute to the promotion of and compliance with these ten principles.

## THE TEN PRINCIPLES OF THE UN GLOBAL COMPACT

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### HUMAN RIGHTS

# 01

Businesses should support and respect the protection of internationally proclaimed human rights.

# 02

Businesses should make sure that they are not complicit in human rights abuses.

### WORKING STANDARDS

# 03

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

# 04

Businesses should uphold the elimination of all forms of forced and compulsory labour.

# 05

Businesses should uphold the effective abolition of child labour.

# 06

Businesses should uphold the elimination of discrimination in respect of employment and occupation.

### PROTECTION OF THE ENVIRONMENT

# 07

Businesses should support a precautionary approach to environmental challenges.

# 08

Businesses should undertake initiatives to promote greater environmental responsibility.

# 09

Businesses should encourage the development and diffusion of environmentally friendly technologies.

### ANTI-CORRUPTION

# 10

Businesses should work against corruption in all its forms, including extortion and bribery.

# Semperit and the Sustainable Development Goals (SDGs)

In 2015, the “Agenda 2030 for Sustainable Development” was adopted at the summit meeting of the United Nations (UN). All 193 member states of the United Nations committed themselves to work towards implementing Agenda 2030 with its 17 Sustainable Development Goals (SDGs) on a national, regional, and inter-

national level by 2030. Semperit has analysed the 17 sustainable development goals in terms of their significance for its business activities. The goals on which Semperit has the greatest influence are presented below.



## **SDG 3** **GOOD HEALTH AND WELL-BEING**

Semperit makes a significant contribution to SDG 3 on a wide variety of levels. Health and safety of employees have top priority for the company. Semperit has implemented an ISO 45001-certified management system for occupational health and safety, which protects employees from potential hazards along all processes – from the storage of raw materials and the handling of hazardous substances and chemicals to the operation of machinery. Training courses, information offers, and a raft of other services and measures are designed to prevent accidents of any kind and ensure maximum safety for employees.



## **SDG 12** **RESPONSIBLE CONSUMPTION AND PRODUCTION**

Semperit attaches great importance to research and development and is characterized by its high level of innovation and high-quality standards. This not only satisfies customer needs, but also makes a significant contribution to issues such as resource efficiency, the circular economy, and long product life cycles. In addition, Semperit strives to optimize the use of secondary materials to keep material waste as low as possible and the internal recycling rate as high as possible.



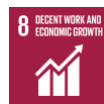
## **SDG 5** **GENDER EQUALITY**

Diversity and equal opportunity are important components of successful employee management. For Semperit, diversity and respect are integral and indispensable components of the corporate culture, and are taken into account when filling all positions, among other things. In 2023, Semperit made an important step towards equality by setting quantitative targets for gender distribution. This is reflected in a triple quota for women across the entire organization, in management and senior management, as well as in the signing of the UN Women’s Empowerment Principles.



## **SDG 13** **CLIMATE ACTION**

The Semperit Group works continuously on optimizing its production processes. The associated activities aim at using resources more efficiently, promoting the use of clean and environmentally friendly technologies, and constantly promoting innovation. The focus here is on energy and emissions, material use, and avoidance of waste with a focus on circular economy initiatives. The “Energy Excellence” program implemented in 2021 is dedicated exclusively to the topic of energy, with the aim of creating greater awareness and sustainably improving the energy efficiency of production processes.



## **SDG 8** **DECENT WORK AND ECONOMIC GROWTH**

Through long-term investments and the appropriate innovative performance, the Semperit Group promotes the local economy and contributes to regional value creation, thus creating numerous secure jobs. The health and safety of employees and respect for human rights always have top priority. Semperit attaches great importance to issues such as future-oriented work, fair pay, development opportunities, and a diverse working environment and works continuously on these issues.



## **SDG 16** **PEACE, JUSTICE AND STRONG INSTITUTIONS**

Integrity and compliance are the prerequisite and basis for success and sustainable cooperation. Internal compliance mechanisms ensure that there is no place for corruption and bribery. Semperit is thus consolidating its reputation as a fair and reliable business partner. In addition, Semperit constantly works to align its business relations with environmental and social criteria.

# Core elements of human rights due diligence

A systematic approach is required to fulfil the corporate duty of due diligence to respect and uphold human rights. The [OECD Due Diligence Guidance for Responsible Business Conduct](#) recommends the following six steps. In line with this recommendation, Semperit

is taking measures to prevent violations and is developing appropriate activities to raise awareness and transfer information. The specific measures taken by Semperit in connection with the individual steps are listed in bold.

**1. EMBEDDING AND PUBLIC COMMITMENT**  
Definition and anchoring of the relevant principles in the corporate policy (**Code of Conduct, Sustainability policies as listed on page 17, Modern Slavery Act Statement, confirmation of compliance with the United Nations Global Compact Principles and the UN Women Empowerment Principles, Charter of Diversity, etc.**) and the management systems.

**2. CO-DETERMINATION AND EVALUATION**  
Actual Identification and assessment of actual or potential negative impacts from direct or indirect business activities (annual assessment of ESG risks as part of the Impacts, Risks and Opportunities analysis (IRO analysis) based on the European Sustainability Reporting Standard, as well as traditional risk management).

**3. INTEGRATION, ELIMINATION, AVOIDANCE, OR MITIGATION**  
Incorporating the findings from the impact assessments obtained in step 2 into all relevant company processes and taking appropriate measures (knowledge transfer, training and awareness-raising, whistleblower hotline, employee surveys, etc.).

**4. MONITORING**  
Effectiveness of measures and procedures to address negative impacts is tracked (internal and external audits such as TfS Audits (Together for Sustainability) and quality audits, rating and monitoring by EcoVadis, CDP, Integrity Next etc.).

**5. COMMUNICATION**  
Regarding measures taken and their impact (Modern Slavery Act Statement, Sustainability Report, progress report within the context of the UNGC and the Women Empowerment principles, internal and external communication measures, etc.).

**6. TAKING RESPONSIBILITY**  
Development of or participation in remedial actions where needed (cooperating with relevant organizations and initiatives such as “Together for Sustainability”).

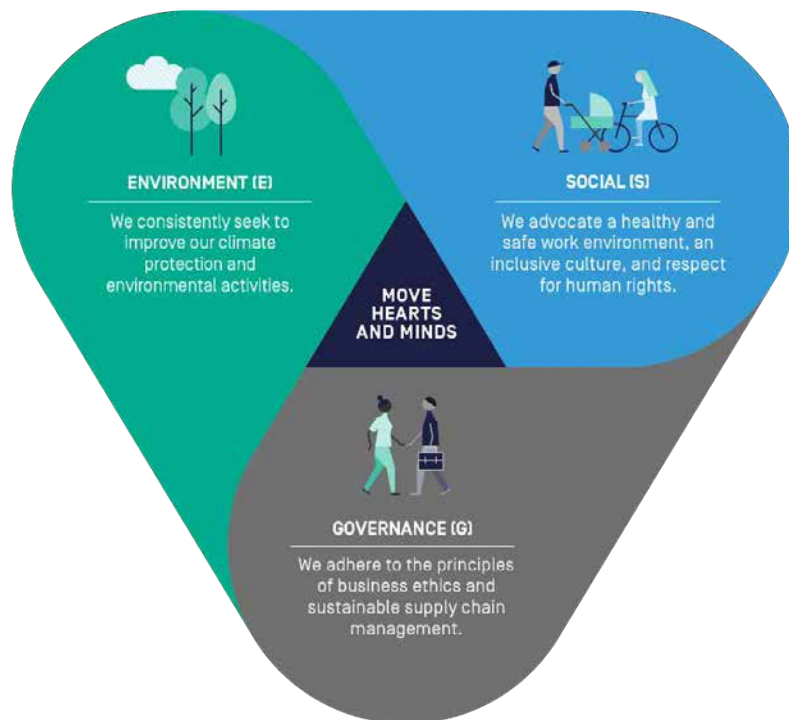


# Semperit Sustainability Strategy 2030 “Move hearts and minds”

The Semperit Sustainability Strategy 2030 “**Move hearts and minds**” aims to improve existing processes within the framework of the current business model in order to meet the industry standard and prevent or minimise negative environmental and social impacts as far as possible. Creating awareness and commitment is one of the most important tasks of the Sustainability Strategy 2030. The goals can only be achieved if internal and external stakeholders can be involved and if everyone commits to being part of the change.

Semperit’s Sustainability Strategy, based on the motto Move hearts and minds, embeds the multifaceted aspects of sustainability in all areas of the company, but especially in the hearts and minds of its employees.

It establishes a basis that addresses people’s needs (HEART), complies with industry standards and at the same time leaves room for further development (MIND).



ESRS statement			SEMPERIT Sustainability Strategy 2030		UN Sustainable Development Goals
ESRS	ESRS topic	ESRS subtopic	Topic in Strategy 2030	Target set for 2030	
E1	Climate change	Climate change adaptation	-	-	
		Climate change mitigation	Emissions (Scope 1 and Scope 2)	-10% per good product <sup>1</sup> by 2030	
		Energy	Energy	-5% per good product <sup>1</sup> by 2030	
E2	Pollution	Pollution of air	Pollutants	100% of European sites below EU pollutant thresholds of E-PRTR	
		Microplastics	-	-	
E6	Resource use and circular economy	Resource inflows, including resource use	Sustainability in the supply chain	75% of expenditure covered by suppliers certified by Ecovadis by 2030	
		Resource outflows related to products	-	-	
		Waste	Waste reduction	-7% per good product <sup>1</sup> by 2030	
S1	Own workforce	Working conditions	Incident rate	-8% annually	
		Equal treatment and opportunities for all	Female ratio overall Female ratio in leadership Female ratio in senior leadership	+0.5 PP / +1.0 PP / +1.0 PP p.a.	
S2	Workers in the value chain	Working conditions Other work-related rights	Responsible business conduct in the value chain	95% completion rate of assigned trainings on responsible conduct in the value chain	
G1	Business conduct	Corporate culture	Employee engagement	No. of submitted improvement ideas (kaizens) from employees p.a.	
		Protection of whistleblowers Corruption and bribery	Violations of compliance-relevant laws and regulations	0 annually	
		Management of relationships with suppliers	Sustainability in the supply chain	75% of expenditure covered by suppliers certified by Ecovadis by 2030	

1... Good product is a unit of output that has been marketed or stored for future sale

# Overview of the objectives of “Respecting Human Rights” within the framework of the Sustainability Strategy 2030

Measures to safeguard and respect human rights can be as wide-ranging as the various aspects of human rights (30 articles in the Human Rights Charter) and can range from risk assessments to addressing the issue proactively with measures and cooperation with partners to solve specific tasks. Here, Semperit primarily focuses on training and monitoring. Employees working in potentially sensitive areas of human rights are continuously trained through e-learning courses and workshops. Managers at the headquarters and in relevant management positions at the sites will also attend these training courses. In addition to employee training, there is also a need for appropriate monitoring. In addition, a detailed analysis of compliance with Minimum Social Safeguards – known as minimum protection criteria – was carried out as part of the EU Taxonomy Regulation with the support of external

experts and will be annually reviewed. Among other things, it was confirmed that the guidelines – OECD Guidelines, UN Guiding Principles, Fundamental Principles of the International Labour Organization and International Bill of Human Rights (based on Article 18 of the EU Taxonomy Regulation (EU) 2020/852) – are met. With the combination of the measures described, Semperit assumes responsibility for compliance with high social standards and human rights in particular. Semperit plans to further strengthen its human rights due diligence obligations in the supply chain and to gradually deepen related activities. To this end, the company continues its focus on industry-wide cooperation with the members of the “Together for Sustainability” initiative, using existing synergies to address supply chain challenges and support sustainable impact.

## Targets 2030 Business Ethics



Zero legally confirmed  
violations of compliance  
relevant laws and regulations



# Human rights and social standards

Semperit vehemently opposes child and forced labour and stands for fair wages as well as freedom of assembly and freedom of expression. There is zero tolerance for discrimination, harassment, and violations of minimum social protection and corporate principles, regardless of where they occur in the value chain. Information, training, and corrective actions will be implemented to ensure that high social standards are consistently maintained and that human rights are respected at all times. The principles and internal guidelines of the Semperit Group for respecting human rights and interacting with one another, as well as the applicable social standards, are outlined in the Code of Conduct as well as in the [People Policy](#) and the [Supplier Policy](#), which are publicly available on the Semperit website. The [Code of Conduct](#) applies to employees, business partners, and third parties that do business on our behalf. All employees and members of management must acknowledge the Code of Conduct by signing the Integrity Declaration annually. By signing, they confirm that they have read, understood, and accepted the Code, and commit to reporting any potential incidents. We also expect our suppliers and other business partners to adhere to the principles of our Code of Conduct. These principles are a prerequisite for initiating and maintaining business relationships with the Semperit Group. The revised Semperit Code of Conduct and Supplier Policy was published in 2025.







All business activities must be conducted in accordance with the UN Guiding Principles on Business and Human Rights and the core labour standards of the International Labour Organization (ILO), as well as in strict compliance with local laws.

The Speak up platform “SemperLine”, launched in 2018, ensures that reports can also be submitted anonymously. The SemperLine hotline offers a secure whistleblowing platform in twelve languages, 24/7, is free of charge and can be used by any stakeholder (employees, customers, suppliers, business partners, their employees and other stakeholders in their value chain) worldwide.

The Compliance Board is informed about the reports, reviews the final investigation reports and determine appropriate measures. In addition, the company’s human rights requirements are integrated into the Group-wide compliance management system to ensure compliance at all sites. Semperit’s goal is to act with integrity and fairness at all times and to be perceived as an entrepreneurial role model.

Semperit stands for the protection of human rights and compliance with the highest social standards. This is not only the core of corporate culture but also an important component when it comes to retaining existing employees and attracting new ones.

### THE SEMPERIT PRINCIPLES

 <p><b>Discrimination</b> is not tolerated. Semperit provides equal opportunities.</p>	 <p>Local laws regarding maximum acceptable <b>working hours</b> are observed.</p>	 <p>Employees are hired based on written <b>employment contracts</b> and documented employment relationships in accordance with the law.</p>
 <p>Care is taken to ensure appropriate and fair <b>remuneration</b> while taking account of local market conditions.</p>	 <p>Child labor, forced or compulsory labor, human trafficking and other forms of exploitation of human beings <b>are not tolerated.</b></p>	 <p>The employees' rights to <b>free formation of opinion</b> and expression are respected.</p>

## Awareness raising, communication, and training

The education and training of all employees is an important feature in the fight against modern slavery. In 2025, the Compliance department addressed compliance topics relevant to the entire Group. Several existing training courses were adapted and new ones introduced. Trainings and information on specific situations and issues were provided as well. The annual Integrity Declaration applies to all employees, including management positions. The training courses were held either online via the e-Learning platform or in the form of face-to-face events. The training course format depends on the topic, language, and attendees. Different trainings available to Semperit employees are captured under categories listed. The type of training courses that employees are required to complete depends on their position and operating area. Basic training courses are mandatory for all employees.

Numerous training courses have to be completed each year as a regular refresher of the course content. Training course content must be acknowledged in writing. Further down the line, employees are assigned advanced training courses and e-learning programmes based on their job responsibilities. These must be completed within a specified time frame.

The training provided is continuously expanded in terms of topics, but also in terms of available languages. The language barrier, in particular, must be taken into account in the area of compliance. Offering key content in the most common Semperit languages is crucial from Semperit's point of view when it comes to conveying knowledge successfully. This is the only way to ensure subsequent compliance with the guidelines and values and achieve broad involvement.

The following table shows the number of employees trained in compliance-related topics. Further information on these trainings can be found in the Sustainability Statement 2025.

### Employees trained in compliance-relevant topics 2025

(Headcount)	Total	Female	Male	Non-binary	Undeclared	Unknown
Anti-corruption and anti-bribery	1,120	392	728	0	0	0
Fraud detection and prevention	919	338	581	0	0	0
Code of Conduct	1,340	432	908	0	0	0
Whistleblowing	1,527	384	1,143	0	0	0
Conflicts of interest	906	332	574	0	0	0
Antitrust and competition law	179	79	100	0	0	0
Export control & third-party due diligence checks	34	20	14	0	0	0
Harassment, discrimination, mobbing	897	332	565	0	0	0
Privacy	1,563	412	1,151	0	0	0
Cybersecurity	1,130	400	730	0	0	0
ESG	1,088	379	709	0	0	0

The category "Code of Conduct" covers the topic of integrity declarations. The category "Anti-corruption & anti-bribery" also covers the topics of gifts, travel and entertainment.

# Semperit and the supply chain

A systematic process for selecting and evaluating suppliers as well as close cooperation with suppliers ensure compliance with the standards defined by Semperit. Potential sustainability risks, which generally exist in connection with supply chains and supplier management, are identified as part of the annual reassessment of ESG risks. The selection of suppliers as part of the evaluation process is based on criteria such as procurement category, geographical presence of the suppliers, and total expenditures. In addition, the internal regulations such as the updated Procurement Guideline and Business Partner Check Guideline provide a Business Partner Check for every new supplier in order to verify whether the potential partner is also authorized to do business. Supplier due diligence checks are carried out using a tiered, risk-based approach and prior to signing any contract or placing an order. Other evaluation processes involve different methods and range from acknowledgement of the Supplier Policy, self-disclosure, or third-party assessments (e.g. an evaluation by EcoVadis) to conducting audits.

## Supplier Policy and Business Partner Check

The requirements that Semperit places on its suppliers in the ESG context are described in the Supplier Policy and follow international guidelines such as the principles of the UN Global Compact, the Charter for Sustainable Development of the International Chamber of Commerce (ICC) Charter for Long-term Sustainable Development and the relevant Conventions of the United Nations International Labour Organization (ILO). Semperit expects its suppliers to comply with these standards and encourages them to take this responsibility into their respective supply chains. The Supplier Policy is sent to suppliers with a purchasing volume of over EUR 300,000 with a request for signature. In 2025, Semperit generated 91% of its purchasing volume over EUR 300,000 with suppliers who have signed the Semperit Supplier Policy or follow a policy that is at least equivalent (the percentage does not include suppliers of the Rico Group). In addition, new and existing suppliers are subjected to a Business Partner Check by the Compliance Department in order to identify any risks in advance.



## Together for Sustainability (TfS)

SDG 17 “Partnerships for the Goals” makes it clear that in some areas it takes the combined effort and collaboration of multiple stakeholders to make a big difference. With this in mind, Semperit joined the “Together for Sustainability” (TfS) initiative in 2021. More than 60 well-known and internationally active chemical companies have joined forces in this initiative with the aim of making the global supply chains of the chemical industry more sustainable. Some of Semperit’s suppliers are also taking part in this initiative. TfS evaluates the sustainability performance of suppliers with the help of expert opinions and audits and makes the results available to all members. The initiative follows the principles of the UN Global Compact and Responsible Care and proactively improves sustainable procurement in the chemical industry through the cooperation of its members. TfS is a global organization supported by regional working groups in Asia and North and South America.

TfS works closely with the EcoVadis supplier evaluation platform, which has gained importance across all industries in recent years. In addition to the supplier evaluations, TfS cooperates with recognized auditing firms and conducts on-site audits based on an audit standard developed for the chemical industry. All results, activities and developments are shared within the network with the aim of creating transparency, using synergies, and promoting sustainability at all levels. Along with the EcoVadis evaluations and TfS audits, the close links between TfS members are at the forefront of the cooperation. In addition to the step-by-step evaluation of suppliers, the aim is also to address various challenges, such as offsetting and reducing Scope 3 emissions or ensuring compliance with human rights in the supply chain, and to develop solutions together. Each member is part of a topic-based working group. Regular meetings provide a vehicle for a professional exchange of views and ensure that the high standards of the TfS initiative are maintained and that work on the various remits proceeds consistently. Consequently, being part of the TfS network not only means purposefully driving sustainability issues forward, but also being a pioneer in developing the highest standards. TfS is not “only” a label that a company pays for, or where a company can be a passive observer; rather, the member company is also required to devote human resources to it and to make a considerable contribution in terms of work to the network. This ensures continuous improvement as was demonstrated by the fact that Semperit was awarded [Gold status by EcoVadis](#) in 2025. More information can be found at [www.tfs-initiative.com](http://www.tfs-initiative.com).



## ESG (environment, social and governance) risk management

In order to be able to make a statement as to where and in what form the business activities (including corresponding business relationships) and products of the Semperit Group could have an effect along the value chain, Semperit conducts an ESG (environment, social and governance) risk assessment on an annual basis. Within a comprehensive process, ESG and Risk Management identify and assess the main risks. In addition to potential risks, opportunities, and the relevant measures to mitigate risk and utilise opportunities are discussed and documented.

In 2023, Semperit identified the impacts, risks and opportunities in accordance with the requirements of the ESRS for the first time and has updated them over the past two years. The following table lists the material ESG risks and negative impacts in connection to human rights and modern slavery identified and assessed in accordance with the ESRS and the Austrian Sustainability Reporting Act (Nachhaltigkeitsberichtsgesetz - NaBeG) that potentially could have material impact on non-financial concerns or on Semperit's business activities. Countermeasures and possible opportunities are also listed in the overview. For the full list of all material IROs refer to the Sustainability Statement in the Annual Report 2025.

# Own workforce

Subtopic	Sub-Subtopic	Occurrence in the value chain	Affected stakeholders <sup>1</sup>	Potential/actual	Time horizon: short, medium or long-term	Negative impact	Risk	Measurable target	Key measures (implemented or continued in the reporting period)
Working conditions	Safe employment	Own operations	4, 5	P	S, M, L	Fear of layoffs during economic downturns can affect the emotional well-being of employees.		-	
	Working hours		4	P	S, M	Overtime and irregular working hours can have a negative impact on the health and well-being of employees.		-	No employment without written agreement with fixed terms, working hours and times that comply with local laws;
	Social dialog								Flexible working time models (flexitime and part-time arrangements), remote work;
	Freedom of assembly, works councils, employees' rights to information, consultation and co-determination		4, 5	A	S, M, L		Loss of revenue and operating losses due to possible strikes (transition risk).	-	Collective agreements Group Bonus Policy (STI, LTI); Benefits for the social or financial security of employees, such as accident or health insurance, contributions to pension schemes
	Collective bargaining, workforce covered by collective agreements								Regular quality management audits at all sites;  Publicly accessible, anonymous whistleblowing hotline SemperLine
	Health protection and safety		4	P	M, L	Rising temperatures (due to climate change and extreme weather events) can lead to an increase in heat-related illnesses and negatively affect the general health and well-being of employees in the workplace if no adequate buildings and infrastructure are provided.	Increase in operating costs due to effects on employee health caused by rising temperatures (climate change) if no appropriate buildings and infrastructure are provided (physical risk).		"Safety first": daily production meetings always start with the topic of safety;  Focused occupational safety campaigns such as "Focus on Safety, Next Level!";
		4	P	S, M, L	Injuries (including temporary and permanent effects) and accidents, including fatal accidents have a material impact on the individuals affected and their families, and can also affect the emotional well-being of others in the workplace.	Incidents or accidents that may occur when the company fails to follow safety regulations, e.g. operating instructions, occupational safety instructions, occupational safety obligations, may result in reputational damage and/or (financial) sanctions (physical risk).	8% reduction of the incident rate annually	Designated safety officers at each site;  Monthly reporting on unsafe actions and working conditions; Reduction of accident rate as one of the LTI components.	
Equal treatment and equal opportunities for all	Gender equality and equal pay for equal work	Own operations	4	P	S, M, L	Unaddressed gender discrimination and unequal pay in workplaces that lack inclusive, fair structures and defined processes could widen the gender pay gap and cause long-term economic disadvantage for individuals.		+0.5 PP overall increase of female ratio annually	D&I Global Council and D&I Local Councils – global and local focus groups of dedicated employees across organizational hierarchies, functions, sites and business areas, focusing on identifying and implementing D&I initiatives with a focus on gender, age, disability and cultural inclusion.
	Diversity		4	P	M, L	Creating a non-inclusive work culture that might contribute to lower morale among employees and potential future workers in the market, their lack of commitment and low work motivation by tolerating social inequalities, create systemic barriers and reduce opportunities for marginalized groups		+1 PP increase of female ratio in leadership annually  +1 PP increase of female ratio in senior leadership annually	Integration of the D&I target (quota of women) into the LTI.  Women International Network (WIN) – a dedicated network initiative with a focus on inclusion, empowerment and inspiration of female colleagues in their daily work.

<sup>1</sup>Overview of Semperit stakeholders in the annual report, p. 86.

## Workers in the value chain

Subtopic	Sub-Subtopic	Occurrence in the value chain	Affected stakeholders <sup>1</sup>	Potential/actual impacts	Time horizon: short, medium or long-term	Negative impacts & risks	Measurable target	Key measures (implemented or continued in the reporting period)
Working conditions	Health protection and safety	Upstream value chain	6, 7	P	S	Accidents, injuries or temporary or permanent damage to the health or even deaths of employees in the value chain that can occur if business partners fail to properly follow safety regulations and preventive measures.	75% coverage of expenses to suppliers certified by EcoVadis by 2030	Due diligence in the value chain: Business Partner Checks and ESG assessments of suppliers through EcoVadis and TFS audits
	Child labor	Upstream value chain	6, 7	P	S	Business partners who allow child labor under unsafe and exploitative conditions can cause serious health risks and physical injury, as well as educational deprivation and other serious human rights violations.	95% completion rate of assigned trainings to own white collar employees on responsible conduct in the value chain	Signing of the Supplier Policy and the CoC  Publicly accessible, anonymous whistleblowing hotline SemperLine
	Forced labor	Upstream value chain	6, 7	P	S	Business partners who support forced labor or force people to work under threat of violence or other forms of intimidation can cause serious health risks and physical harm, as well as other gross violations of workers' rights, dignity, restrictions of freedom and other serious human rights violations.		Designated obligatory trainings on responsible business conduct (human rights, ESG regulations, sustainable supply chain, business ethics etc.) in the value chain for white collar employees

<sup>1</sup>Overview of Semperit stakeholders in the annual report, p. 86.

# Business conduct

Subtopic	Sub-Subtopic	Occurrence in the value chain	Affected stakeholders <sup>1</sup>	Potential/actual impacts	Time horizon: short, medium or long-term	Negative impacts & risks	Measurable KPI or target	Key measures (implemented or continued in the reporting period)
Corporate culture		Own operations	4	P	S, M, L	If management does not translate laws and regulations into a fair and transparent corporate culture, this can lead to negative effects on trust and integrity with the Code of Conduct and principles of Continuous Improvement, erosion of trust among employees and the public, disregard for social norms, and the containment of long-term prosperity. These risks also affect critical areas including cyber security, data security, and consumer protection, where ethical leadership and regulatory alignment are essential to maintaining resilience and credibility.	Annual number of submitted and solved improvement ideas (kaizens) from employees	Corporate values as the backbone of the Code of Conduct; Annual performance reviews of employees based on corporate values; Employee involvement on continuous improvement of production processes, management and shopfloor culture  Since 2025: Leadership Operating System – the tool for corporate culture, values, and standards in everyday leadership.
Business conduct	Incidents	Own operations, downstream value chain	4, 5, 6	A	S, M, L	Corruption incidents lead to the erosion of trust among employees, customers, suppliers, investors and the general public and contribute to broader problems in society, such as economic inequality and reduced trust in the fairness of the industry market and the effectiveness of regulatory mechanisms.	0 violations of compliance-relevant laws and regulations	Wide range of mandatory and voluntary training: e-learning and classroom training for white-collar workers with a focus on compliance, sustainability and cybersecurity;  On-the-job and classroom training for blue-collar workers with a focus on process knowledge and occupational safety;  Publicly accessible, anonymous whistleblower hotline SemperLine

<sup>1</sup>Overview of Semperit stakeholders in the annual report, p. 86.

# Pollution

Subtopic	Sub-Subtopic	Occurrence in the value chain	Affected stakeholders <sup>1</sup>	Potential/actual impacts	Time horizon: short, medium or long-term	Negative impacts & risks	Measurable target	Key measures (implemented or continued in the reporting period)
Pollution		Own operations	4, 8	P	S, M, L	Air pollution in industrial undertakings can have short- and long-term negative impacts on the health of exposed workers and indirectly on affected communities. Respiratory diseases caused by particles in the air can have long-term respiratory and cardiovascular effects.	100% of European sites below EU pollutant thresholds of the E-PRTR	Preventive measurement of relevant pollutants in accordance with the threshold values set by the EU, local authorities or site management.  Strict compliance with REACH and other regulations on chemical substances and material conformity.

<sup>1</sup>Overview of Semperit stakeholders in the annual report, p. 86.

# Semperit compliance policies dealing with human rights

Semperit informs all its counterparts about integrity in business. Agents, customers, suppliers and other partners are reminded about ethical business through our publicly available internal policies. All suppliers are required to comply with the Semperit Supplier Policy, which summarises the core values, principles, and standards for suppliers concerning the production and delivery of goods and services according to recognised, globally applicable principles. Semperit encourages its business partners to communicate these guidelines to their employees as well as to their suppliers. Customers are asked to get acquainted with the Code of Conduct. The principles of the Code of Conduct apply to all our business partners. Furthermore, business partners should share their efforts in the fight against corruption, bribery, and in respecting human rights and labour standards, as well as in upholding business integrity and ethics. By sharing the Code of Conduct they are informed about the Speak up system [SemperLine](#). Business partners are required to comply with Semperit's principles of the Code of Conduct and the Supplier Policy, which require them to:

- Provide employees with good working conditions, fair treatment, and reasonable rates of pay;
- Respect workers' human rights and labour standards and comply fully with all applicable laws;

- Implement safety, health, and environmental standards;
- Ensure transparency in the supply chain;
- Act with business integrity and ethics;
- Comply with local and international anti-corruption and bribery laws;
- Commit to data protection and privacy.

Mitigation of corruption risks in value chains is important to Semperit. Corruption enables a flourishing environment for modern slavery, and modern slavery allows corruption to thrive. Semperit has a "zero tolerance" policy for bribery and corruption. Consistent and robust efforts are made to eliminate corruption, including comprehensive ongoing training for staff, transparency in business, and adequate internal controls. Semperit introduced an [Anti-Bribery and Anti-Corruption Programme](#), a Conflict of Interest Policy, and updated the [Anti-Bribery and Anti-Corruption Policy](#), along with group guidelines on giving and receiving benefits, donations, and sponsorships, as well as dealing with third-party intermediaries, including agents. They took effect in January 2025. Anyone, including suppliers and customers, can report any wrongdoing on the publicly available Speak up platform SemperLine. Semperit is fully committed to preventing and combating human rights abuses both inside the organization and inside its business partners' organizations.

The following documents contain the main requirements, both for internal employees and for Semperit business partners:

## Documents published on Semperit website



Semperit People Policy



Semperit Innovation Policy



Semperit HSEQ Policy



Speak up System „Semperline“



Semperit Code of Conduct



Semperit Supplier Policy

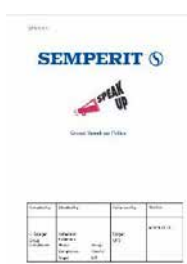
## Internal documents



Anti-Bribery and Anti-Corruption Policy



Anti-Bribery and Anti-Corruption Programme



Speak up Policy



Recruitment Policy

## Ethics and integrity in business

The [Semperit Code of Conduct](#) guides employees in their daily business, clearly and simply specifying what is expected of them and external business partners, as well as how leaders are expected to behave in return.

It serves as a foundation for Semperit policies, procedures, and guidelines, which provide additional guidance on expected behaviours working across our businesses globally.

### **Words, behaviours, and actions matter.**

Misconduct of any kind will not be tolerated, and Semperit expects all our stakeholders to adhere to national and international laws and act in accordance with comparable guidelines, ethics, and compliance principles.

### **Semperit is committed to integrity.**

It is everyone's responsibility to understand the rules of our Code of Conduct and to comply with them in the course of business activities for Semperit. The Code of Conduct is available online. For further information you can contact [compliance@semperitgroup.com](mailto:compliance@semperitgroup.com).

The Semperit Speak up system enables anyone to report wrongdoing through different channels. Employees can post a letter using SEMPERbox, which is located in production sites, email [compliance@semperitgroup.com](mailto:compliance@semperitgroup.com), or get in touch via the online platform "SemperLine". In addition to that, employees can also directly contact their direct leader or line manager, People & Culture (P&C), the Group Compliance Department, or local compliance coordinators.

SemperLine is a specialized communication platform managed by an external partner, ensuring that the information provided is processed securely and confidentially. [SemperLine](#) is available 24/7 in 12 different languages to anybody and therefore plays an active role in ensuring proper conduct within the Semperit Group. Semperit protects anyone who speaks up and has reasonable grounds to believe that the reported matters are true from any retaliation measures, including informal pressure.

If anyone is aware or has knowledge of any form of harassment, bullying, discrimination, malpractice, corruption, fraud, waste, abuse, misconduct, or allegations of mismanagement, they can [contact us!](#)



# Business Partner Check due diligence process

Semperit is part of a complex network of various types of business partners – from suppliers to agents and customers.

Semperit is aware of the regulatory and reputational risks to which a supplier, customer, partner, or other third party can expose the company to. To prevent any risks from contracting with business partners that are subject to human rights breaches, modern slavery, corruption, bribery and/or any other international provisions, Semperit has a standardized Business Partner Check (BPC) in place. It enables Semperit to manage business partner relationships and associated risks effectively. This third-party risk management and due diligence platform creates transparency, minimizes compliance risks, and supports the company in making informed decisions. Semperit performs background checks in the BPC tool, which provide the required information on the business partner and offer the possibility to engage business partners' responsibility by answering external due diligence questionnaires.

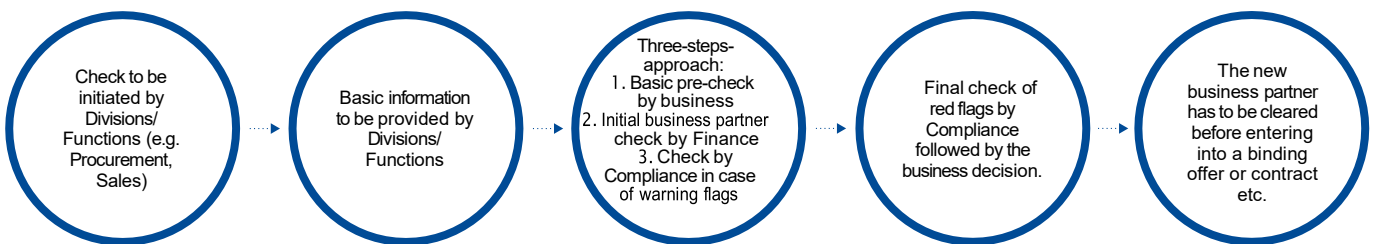
The Semperit Business Partner Check includes a background check, screening, and monitoring of the supplier, customer, sales agent or other third party, and – if applicable – end-user (including its shareholders/beneficial owners) within the following areas:

- bribery and corruption,
- sanctions exposure,
- modern slavery and supply chain integrity,
- adverse media, and
- status of the company and owners, and relationship with potential risk counterparts for managing reputational risk.

Continuous and periodical checks with a comprehensive risk-based approach support Semperit in identifying risks and enable the company to increase the level of due diligence and mitigating actions. The tool also enables the documentation of decision-making and due diligence conducted.

## Initial check

### New business partner



## Periodical review

### Checked business partners



- Alerts are automatically set in case of a status change.
- Business and Finance has to review the existing alerts on a monthly basis.

- Manual review minimum every 36 months.
- Including existing business partners in the BPC tool.
- Group Compliance may propose a shorter review period for selected business partners.

## Definition of terms

Topic area	Major risks
<b>Slavery</b>	The status or condition of a person over whom all or any of the powers attached to the right of ownership are exercised. Since legal 'ownership' of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom. (in accordance with the 1926 Slavery Convention)
<b>Servitude</b>	The obligation to provide services that is imposed using coercion and includes the obligation for a 'serf' to live on another person's property and the impossibility of changing his or her condition.
<b>Forced or Compulsory Labour</b>	It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work, or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily. (ILO's Forced Labour Convention 29 and Protocol)
<b>Human Trafficking</b>	An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.
<b>Exploitation</b>	A person is exploited only if one or more of the following subsections apply in relation to the person: slavery, servitude and forced or compulsory labour; sexual exploitation; removal of organs etc. while securing these services etc. by force, threats or deceptions or securing services etc. from children and vulnerable persons.
<b>Child Labour</b>	Children below 12 years working in any economic activities, those aged 12 – 14 engaged in more than light work, and all children engaged in the worst forms of child labour (ILO). The work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Whether or not particular forms of "work" can be called "child labour" depends on the child's age, the type and hours of work performed, the conditions under which it is performed, and the objectives pursued by individual countries. As children are vulnerable to exploitation, Semperit will analyse if the children in question are being exploited in such a way as to constitute slavery, servitude and forced or compulsory labour or human trafficking. For example, it is possible for children to undertake some 'light work' which would not necessarily constitute modern slavery. 'Light work' is defined by article 7 of ILO Convention No. 138.
<b>Bonded Labour</b>	Bonded labour, also known as debt bondage or peonage, happens when people give themselves into slavery as security against a loan or when they inherit a debt from a relative. It can be made to look like an employment agreement, however, where the worker starts with a debt to repay – usually in brutal conditions – only to find that repayment of the loan is impossible. Then, their enslavement becomes permanent.

Topic area	Major risks
<b>Corruption</b>	<p>Corruption is the deliberate abuse of entrusted power for private gain. It includes any unlawful, unethical, or improper action or breach of trust undertaken for the purpose of personal, commercial, or financial gain. Corruption includes activities such as: bribery, embezzlement, antitrust violations, influence peddling, cronyism, nepotism, graft, and others. <i>“Bribery is a criminal and corrupt practice where an entity offers something of value to a corporate or public official in exchange for their cooperation in influencing a decision-making process, committing or allowing fraud against the official’s organization, or otherwise violating their official duties”</i> (GAN Integrity). Corruption reduces chances for ethical business, violates human rights and freedom, and erodes a company’s reputation. Semperit has a strict zero tolerance for bribery, facilitation payments, and corruption in any form, whether direct or through third parties.</p>
<b>Bribery</b>	<p>Bribery is a criminal and corrupt practice. It occurs when a person offers something of value to an- other person in order to receive something in return. Employees of Semperit or their counterparts must never offer, pay, make, seek, or accept a benefit (not even a minor one) in exchange for the performance or omission of an act, a favourable treatment, or personal gain. It is strictly prohibited to offer, pay, make, seek or accept cash payments or small bribes (facilitation payments that speed up a routine process or necessary actions).</p>
<b>Third-Party Risk Management</b>	<p><i>“Organizations must be aware of the regulatory and reputational risks to which a supplier, customer, partner or other third party can expose them to”</i> (Dow Jones). With policies in place and regular, periodical checks, Semperit ensures the third parties we work with are conducting business legally and ethically. Semperit business partners are checked for bribery and corruption risks, sanctions exposure, modern slavery, and supply chain integrity, among others. These important checks pre- vent damage to Semperit’s reputation, possible loss of order, termination of business relations, or even freezing of assets as a result of impending legal action.</p>
<b>Whistleblowing</b>	<p><i>“Whistleblowing is one of the most effective ways to detect and prevent corruption and other malpractice. A whistleblower discloses information about corruption or other wrongdoing being committed in or by an organisation to individuals or entities believed to be able to effect action – the organisation itself, the relevant authorities, or the public. Protecting whistleblowers from unfair treatment, including retaliation, discrimination or disadvantage, can embolden people to report wrongdoing and increase the likelihood that wrongdoing is uncovered and penalised”</i> (Transparency International). Semperit has a whistleblowing system in place called Speak up!. Anyone can report harassment, bullying, discrimination, malpractice, corruption, fraud, waste, abuse, misconduct, or allegations of mismanagement. Semperit handles reported cases with the utmost care, preserving confidentiality and, if requested, anonymity. Reports can be submitted in numerous languages via the online system SemperLine, by dropping a physical letter into a SEMPERbox located in production sites, or via the Compliance email <a href="mailto:compliance@semperitgroup.com">compliance@semperitgroup.com</a>. Semperit protects anyone who speaks up and has reasonable grounds to believe that the reported matters are true from any retaliation measures, including informal pressure.</p>

**The Executive Board Semperit AG Holding**

May 2026



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