

Slavery and Human Trafficking Statement

For the year ended 31 December 2022

Executive summary

Steinbeis Papier GmbH issues a statement on Section 54 of the United Kingdom Modern Slavery Act 2015. We are committed to the principles and measures for ensuring compliance with human rights due diligence.

*Steinbeis Papier GmbH has a **zero-tolerance approach** to any form of modern slavery. We are committed to behaving **ethically, transparently and with integrity** in our business dealings. As globalisation continues to advance and our value chain and supply chain grows even more complex, we are aware of our global responsibility, particularly with respect to human rights. This responsibility does not stop at our factory gates but extends well beyond them.*

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1. Organisational structure and supply chains

Facts and Figures (31.12.2022)

Turnover in €	Sales	Balance sheet total	Export quote	Purchasing volume DE
281.3m	304,280t	133.3m	43,7%	90%

Our business

As a pioneer in graphical recycled paper, Steinbeis Papier has known the market for many years and has been actively involved in shaping it from the very start. Market laws are constantly being redefined and require participants to undertake a high level of predictive action and flexibility in terms of new processes.

Steinbeis Papier GmbH is part of Steinbeis Holding. Various companies from the ecological paper production, recycling industry and green energy production segments are grouped under the umbrella of the holding. These include specialists in recycled paper and plastic recycling, waste paper and residual materials processors, state-of-the-art power plants, biogas plants and solar and wind farms.

Sustainability is an integral part of the business model of each of these companies. ¹

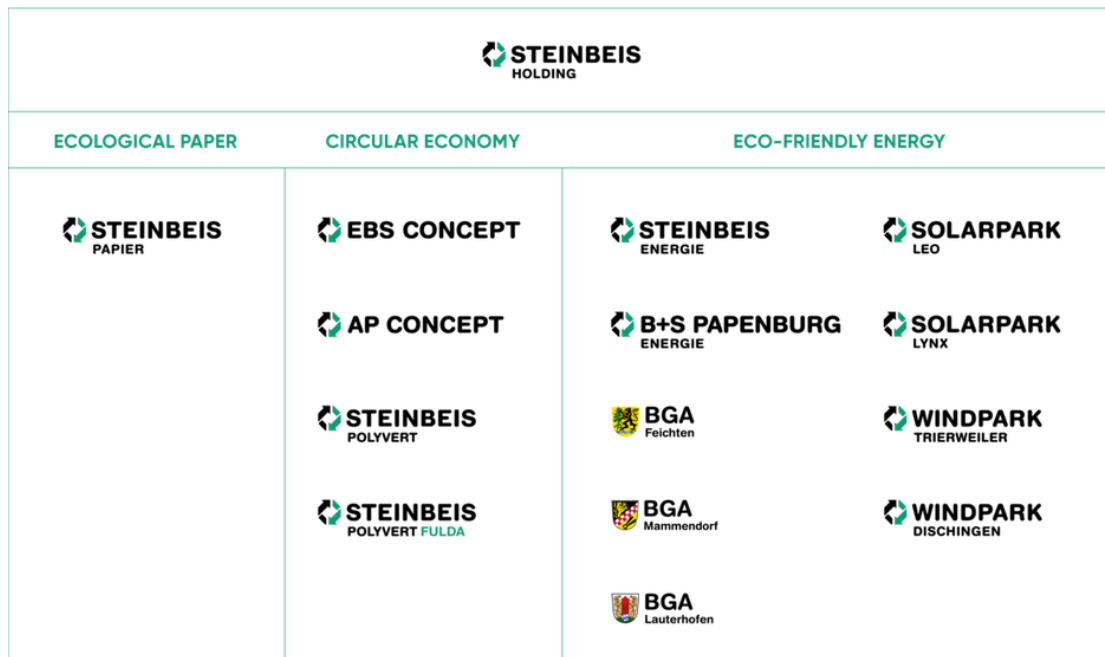


Figure 1: Our company – part of a sustainability group (The Steinbeis Group)²

¹ Company website: <https://www.stp.de/en/company>

² Company website: <https://www.stp.de/en/company>

OUR COMMITMENT-WHAT WE ARE ABOUT

*The company pursues the strategy of further developing **ecology and economy** not as opposites, but rather as reinforcing and mutually supporting elements. Through ongoing innovations, STP has become **a technological and ecological pioneer** in sustainable paper products. The principles of **sustainable economic management** are practised throughout our **entire value chain**.*

The measures to implement the strategy are defined as follows:

1. To consistently establish and promote ecology as a market advantage in combination with consistently high quality and economic awareness – for example, by routinely referring to the Blue Angel ecolabel.
2. To constantly refer to the claim "ReThinkingPaper" in order to show a clear commitment and continue inspiring other people and companies to act more sustainably.
3. To ensure competitiveness while implementing a sustainable model for raw materials, i.e. only use waste paper as a raw material base.
4. To conquer new, attractive markets with creative strategies.
5. To involve employees at all levels responsibly in the decision-making processes. This is also the aim of the newly formulated 'Principles for leadership and cooperation in the company'.

WHAT DIFFERENTIATES US

ReThinkingPaper

The Steinbeis Papier corporate motto is absolutely perfect for an environmental declaration. But it's far more than that: this striking slogan demonstrates that it wasn't just yesterday that we became so confident about the importance of the seamless interaction between quality awareness, ecological thinking and action and economic understanding in our company. This ongoing process to further develop paper and our pioneering role in sustainable papers within a global movement for a better future is what this claim stands for and is reflected in all parts of the Steinbeis Papier brand – not just in the paper itself.³

³ Environmental statement of Steinbeis
https://www.stp.de/fileadmin/user_upload/stp-de/07_Downloadcenter/Datenblaetter_und_Zertifikate/Untenehmen/EN/28362_Umwelterklaerung_2022_final_en.pdf

Top eco balance figures

Production comparison between virgin papers and Steinbeis printing and photocopying papers using 500 sheets of A4 as an example (source: IFEU Heidelberg GmbH, 2017 and 2018)⁴. Percentage savings using Steinbeis printing and photocopying papers:



Sustainability management at Steinbeis Papier GmbH is based on sustainability standards: ISO50001 Energy, 14001 Environment, EMAS. Conformity is verified and confirmed through external audits.⁵The high environmental standards for our finished products (Blue Angel, EU Flower) require qualitative cooperation, the development of solutions with our suppliers in the raw materials chain, and regular inspections of all products and materials we use.⁶

A high standard of technology

Our employees have a high standard of technology and expertise, which enables development and production processes that ensure efficient, i.e. protective, handling of natural resources. Our attention is given to the continual optimization of all work processes in terms of quality, ecology and economy in order to satisfy our customers. Keeping in line with statutory requirements, we will continue to do all we can to improve "ReThinkingPaper" and its production processes time and again.⁷

Production in closed cycles

The special competence of Steinbeis Papier lies in the technology and technical implementation of the material preparation of recycled paper. This results in the ongoing development of new, attractive magazine and office paper. The operating sites have been producing paper from 100%-recycled materials since 1976. The constant increase in environmental awareness among the population and by corporate decision makers has made Steinbeis Papier the market leader for graphical recycled paper in Europe for years.

- > 100% integrated
- > 100% resource protection
- > 100% recycling of waste material
- >

⁴ Company website: <https://www.stp.de/en/company>

⁵ Environmental statement of Steinbeis p. 6 and German Sustainability Code (DNK) criterion 1 Strategic analysis and measures p. 5 et seq.

⁶ DNK General Information p. 4 <https://www.deutscher-nachhaltigkeitskodex.de/Home/Database>

⁷ Environmental statement of Steinbeis

https://www.stp.de/fileadmin/user_upload/stp-de/07_Downloadcenter/Datenblaetter_und_Zertifikate/Untenehmen/EN/28362_Umwelterklaerung_2022_final_en.pdf

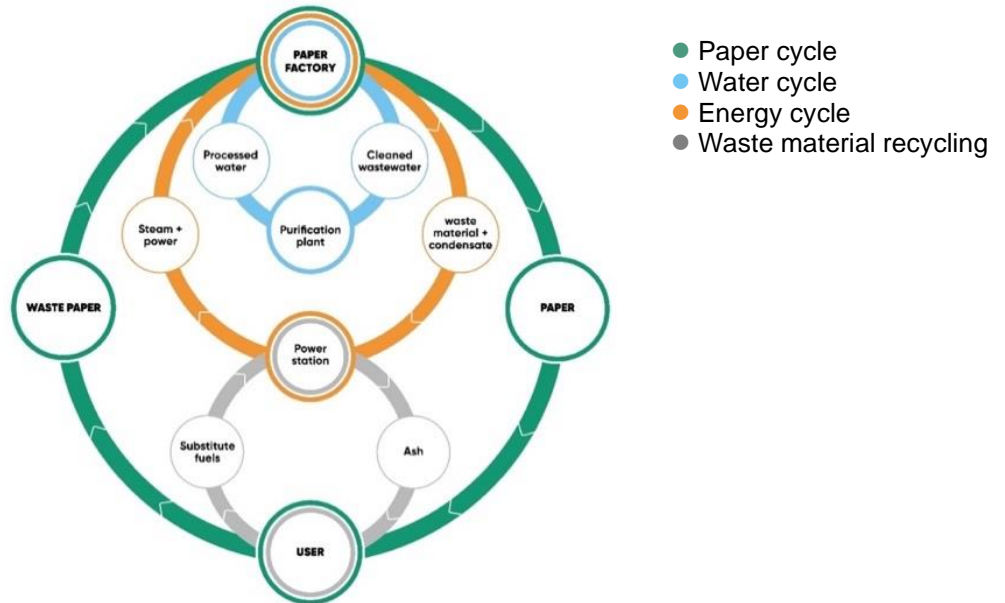


Figure 2: Production in closed cycles⁸

2. Policies in relation to slavery and human trafficking

*In accordance with the principles of our corporate policy, the duty to **act responsibly and lawfully** is deeply embedded in our companies. The applicable law provides the binding framework. This is why all employees must **know and comply with the legal obligations that are relevant to them.***

Our business

Code of business conduct

Fair competition and compliance with antitrust law are two of the key principles in pursuing our business objectives. All employees must comply with the applicable antitrust and competition regulations. Agreements with competitors, such as on prices, the contents of tenders, market allocations, territorial restrictions or conditions such as discounts, bonuses, delivery terms or other calculation bases, are prohibited, as is the exchange of confidential information about these or other competitively sensitive topics such as utilisation, product details, customers, or how we operate on the market. Nor should such information be inappropriately shared or discussed on the sidelines of training or association activities. Detailed guidelines on lawful conduct in competition are provided in internal training. (Procedural instruction V01-10 'Antitrust Processes'), corruption is not tolerated. This principle is described in detail

⁸ Company presentation EN

in our internal instructions 'Corruption Prevention' (procedural instruction VA 02-09), created for this purpose. A cooperative relationship must be maintained with all authorities. Information should be made available in full, in an open, correct, timely and understandable manner. Detailed specifications are described in internal instructions (VA 1-03 Dealing with Authorities and the Public).⁹

Statement on social responsibility

In order to protect the environment with intelligent solutions and manage raw materials and resources efficiently, responsibly and sustainably, our companies focus on ground-breaking companies in the resource economy. The protection of the environment and the health and safety of people are therefore an essential part of corporate policy. Environmental legislation sets binding standards that must be adhered to as a minimum. Adequate measures must be taken to prevent health risks at the workplace. Occupational health and safety is not an incidental matter, but a compulsory task for each individual. Detailed process descriptions for occupational safety are presented in internal documents/instructions (VA 2-03, 'Occupational Health and Safety'). Training and instruction sessions with supporting documents are held regularly.

Code for employees

Competence and willingness to perform are the key characteristics of our employees. Each individual is respected as an individual. Every employee is therefore expected to treat colleagues and third parties in a friendly, fair, and respectful manner. Discrimination and harassment of any kind are not tolerated.¹⁰ Remuneration is regulated by collective agreements. In addition, STP offers allowances for all employees within the pension scheme. Furthermore, STP participated voluntarily in the 'LogibD' project of the German Federal Ministry of Family Affairs, Senior Citizens, Women and Youth to promote equality for women in the workplace. Severely disabled people are integrated within the company. In addition to fixed employment, STP employs people from workshops for the disabled through work contracts. Occupational health management measures are established at STP, such as professional back training or company exercise programmes. STP has a long-term training rate of around 10%. Various training courses and dual studies are offered in both commercial and business areas. The goal is to maintain this training quota in the future. A satisfactory work-life balance is ensured, for example, by a modern 5-shift system in production, a flexitime model in administration and an annual working time model in technology.¹¹

In addition to these standards, our employees can influence the sustainable development of the company, for example, through the annual performance review, the company proposal system or the works council.

⁹ Contents from VA01-09 'Compliance – Duty to Act Responsibly and Lawfully' p. 3 et seq.

¹⁰ Contents from VA01-09 'Compliance – Duty to Act Responsibly and Lawfully' p. 3 et seq.

¹¹ DNK criterion 15 Equal opportunities, p. 22

<https://www.deutscher-nachhaltigkeitskodex.de/en-GB/Home/Database>

Our supply chain

*Steinbeis Papier GmbH will **not** engage or support business partners if they are involved in **human trafficking or slavery**. We will also terminate all contracts with business partners if we discover that they do not comply with the **principles of a modern slavery act**.*

Communication via the website

Our requirements for both existing suppliers and potential suppliers are set out on the company's website at <https://www.stp.de/en/suppliers> .

WHAT WE OFFER

- › Supplier code as a BME network partner
- › Excellent opportunities for expansion of the partnership within the Steinbeis Group
- › Enthusiasm and openness for new technologies and ideas
- › Fairness and trust
- › Competitiveness and transparency

WHAT WE EXPECT

- › Commitment to our high-quality standards
- › Reliability and adherence to delivery dates
- › Keeping competitive through constant cost optimisation
- › Compliance with social and environmental standards according to ISO 9001
- › Confidence and long-term planning reliability

The following key documents are available on the website:

- › **General Terms and Conditions for Purchase**
<https://www.stp.de/en/gtcp>
- › **BME Code of Conduct Certificate**
https://www.stp.de/fileadmin/user_upload/stp-de/14_PDFs_fuer_Regelwerke/BME_CoC_Certificate_2023.pdf
- › **Operating and construction site regulations**
<https://www.stp.de/en/suppliers>

Federal Association for Supply Chain Management, Procurement and Logistics (BME)

The Federal Association for Supply Chain Management, Procurement and Logistics (BME), one of the largest purchasing associations in Europe, has created a cross-industry Code of Conduct to protect against compliance risks in the supply chain. This certificate offers both Steinbeis Papier GmbH and its suppliers an international minimum standard and secures protection across all sectors.

By joining the BME, Steinbeis Papier GmbH has committed to compliance with accordingly high standards. This is also explained to customers on a regular basis when responding to their enquiries.

The BME Code of Conduct includes the fundamental rules on:

- › **Fighting corruption**
- › **Anti-trust agreements**
- › **Child and forced labour**

- › Adhering to ethical principles toward suppliers (compliance)
- › Respect for human rights
- › Environmental and health protection
- › Fair working conditions

The BME guidelines also refer to the international legal framework such as the 'UN Global Compact' and to the global interrelationships between companies. ¹²

German Minimum Wage Act (MiLoG)

If Steinbeis Papier GmbH commissions a service, the contractor agrees to work in accordance with the German Minimum Wage Act. This law includes the payment of a minimum wage, the payment of social security contributions for employees and the prohibition of slavery and human trafficking.

German Freight Forwarders' Standard Terms and Conditions (ADSp)

All shipments of Steinbeis Papier GmbH are subject to the latest version of the 'German Freight Forwarders' Standard Terms and Conditions' (ADSp) (2017). This is a joint recommendation of the associations of the shipping industry and the freight forwarders. ADSp provides the participating companies, from industry, trade and the freight forwarding and transport sectors, with predefined contract regulations for handling all types of forwarding conditions.¹³ The 'German Freight Forwarders' Standard Terms and Conditions' contain strict guidelines for legal compliance:

- › The compliance by referring to the Minimum Wage Act
- › The ADSp respects and supports the principles of the Global Compact
- › The ADSp is therefore based on a national and international legal basis

All agreements/contracts of Steinbeis Papier GmbH are based on German law: The tenders are based on the latest version of the ADSp and the place of jurisdiction, in deviation from the ADSp, is 25348 Gluckstadt, Germany.

¹² DNK criterion 14 Employee rights p. 22 et seq.
<https://www.deutscher-nachhaltigkeitskodex.de/en-GB/Home/Database>

¹³ German Freight Forwarders' Standard Terms and Conditions:
https://www.hsw-logistics.com/wp-content/uploads/2017/07/ADSp_2003_englisch.pdf

3. Due diligence and risk assessment

*With these guidelines and the above-mentioned values, Steinbeis Papier GmbH pledges that it will **not tolerate modern slavery**. Policies, processes and **management and control systems** monitor the implementation of human rights standards in business operations. **We communicate** our expectations to employees and suppliers regarding human rights and modern slavery and apply a number of mechanisms to ensure that we can monitor standards both in our operations and in the supply chain.*

Our business

The duty to act lawfully is enforced by the internal compliance document (VA), thereby ensuring respect for human rights and the prevention of forced and child labour and exploitation in any form.

‘Compliance’ means that we have a duty to act responsibly and lawfully.

It is a basic condition for the business success of the companies of the Steinbeis Group operating in Glückstadt to act responsibly and lawfully. Accordingly, company-specific and legal rules must be observed. This is based on the Code of Conduct (BME) as part of corporate governance. It highlights key areas and is intended to help identify legal risks and avoid legal violations. All employees must know and comply with the legal obligations that are relevant to them. We ensure the respect of human rights by committing to the Collective agreement for employees in the paper industry in the Federal Republic of Germany, complying with the Works Constitution Act and cooperating closely with the Group’s works councils.¹⁴

Our supply chain

Respect for human rights is also an important issue for STP, irrespective of its application of the BME Code of Conduct. This Code of Conduct requires compliance with the United Nations regulations on human and children’s rights and the ILO core labour standards. As more than 90% of our suppliers are located within the region of Europe, European legislation ensures respect for human rights and the prevention of child labour in these areas.¹⁵ In addition to self-monitoring, external audits are carried out. The works council established at Steinbeis also monitors this self-declaration. Therefore, no further goals are formulated with this approach. We manage our two employees working abroad in Spain and

¹⁴ DNK criterion 17 Human rights p. 26 et seq.
<https://www.deutscher-nachhaltigkeitskodex.de/en-GB/Home/Database>

¹⁵ DNK criterion 17 Human rights p. 26 et seq.

England in accordance with national law, but their contract status corresponds to that of a German employee with similar qualifications and responsibilities. ¹⁶

1. Supplier assessment

We also use our annual supplier assessment to monitor the overall performance of our key suppliers. If the results are not satisfactory, we suggest improvements and offer support in their implementation.

The supplier assessment ensures that our suppliers are regularly and consistently assessed in order to continuously identify and implement areas for improvement and recognise which suppliers have a particularly strong or weak performance.

The supplier assessment process can be mapped as follows:

- › The suppliers are divided into supplier groups (categories) according to the supplied product
- › The performance of the suppliers from the previous calendar year is evaluated.
- › The evaluation is carried out in the first quarter of the following year.
- › In principle, all suppliers with a prior-year turnover of \geq €150,000/net are assessed. In addition, system-critical suppliers (loss of supply would threaten production at STP) and suppliers with a negative performance in the previous year should be evaluated irrespective of turnover.
- › Irrespective of the turnover, system-critical suppliers are also checked for their financial performance directly at the time of the new admission or at the time of the annual assessment.
- › In addition, Purchasing can have additional suppliers evaluated together with the specialist department, which are not subject to the above criteria.
- › Incidents, anomalies during visits, results from performance reviews and complaints procedures must be included in the evaluation.

The following evaluation criteria were developed by Steinbeis:

'Compliance with occupational safety and environmental requirements' is evaluated as part of the annual supplier assessment. The suppliers are almost entirely based in Germany or the EU.

The following criteria are evaluated and weighted as follows:

1. Product/service quality – 25%
2. Price – 15%
3. Compliance with deadlines – 20%
4. Complaint handling – 10%
5. Service & communication – 15%
6. Compliance with occupational safety & environmental requirements – 15%

The product/service quality is weighted at relatively high percentage, as it is an essential factor in operations. Only the criteria for which a reliable statement can be provided are part of the evaluation (otherwise the 'not applicable' button is applied).¹⁷ There is also a free comment field in the form for anonymous information.

¹⁶ DNK criterion 14 Employee rights p. 22 et seq.
<https://www.deutscher-nachhaltigkeitskodex.de/en-GB/Home/Database>

¹⁷ Work instruction AA9104 'Supplier assessment'

2. Purchasing risk assessment

A routine risk assessment is also carried out by the SCM/ purchasing manager on a quarterly basis. It assesses corporate risks according to their impact, probability, and risk factor. In addition, it lists and develops measures aimed at reducing or completely preventing the risk. This also includes the criterion of non-compliance with the Minimum Wage Act and supplier dependency. However, these were assessed with the risk factor 1 (low) and 2 (medium); therefore, no countermeasures need to be taken.

3. Environmental assessment of suppliers according to ISO 14001/EN 16001

Products and activities must comply with legal environmental requirements. For evaluated suppliers, this separate assessment is part of the evaluation criterion for compliance with occupational safety and environmental (including energy) requirements. As part of the supplier self-assessment on environmental requirements and sustainability, our suppliers have the opportunity to position themselves using a detailed questionnaire. Furthermore, they can upload existing environmental certificates. This self-assessment is based on DIN 14001.¹⁸ STP expects the customers to comply with essential environmental requirements and all legal requirements. In addition, as Purchasing at Steinbeis Papier GmbH, we attach great importance to the fact that our suppliers act in an environmentally conscious manner and constantly work to operate more sustainably.¹⁹

1. Role of environmental protection in the company – 10%
2. Classification or test seal for environmentally friendly and quality-assured business operations – 20%
3. Certification or test seal for classification as an environmentally friendly product – 30%
4. Environmental policy established in written form and communicated – 10%
5. Corporate measures for protecting the environment – 10%
6. Published life-cycle assessment or environmental statement – 10%
7. Planned future promotion of environmental protection by the company – 10%

¹⁸ Work instruction AA9104 'Supplier assessment'

¹⁹ Environmental requirements and sustainability

https://www.stp.de/fileadmin/user_upload/stp-de/14_PDFs_fuer_Regelwerke/2021-06-28_Self-assessment_of_the_environment_and_sustainability_from_business_partners.pdf

5. Key performance indicators to measure effectiveness of steps being taken

The company's goal in the UK is to have zero incidents within the direct business or direct supply chain.

Our supply chain

As part of our commitment to zero tolerance within our supply chain, we identify and mitigate risks by conducting regular supplier audits to assess and monitor potential risk areas. The main focus is on suppliers of the most critical materials and services of Steinbeis Papier GmbH.

We build a trusting relationship of integrity with all our suppliers based on mutually beneficial factors. Our supplier selection and engagement process includes due diligence on the reputation of the supplier, compliance with laws, compliance with health, safety and environmental standards and references. We have not become aware of any allegations of human trafficking/slavery against any of our suppliers. However, if this were to occur, we would immediately take action against the supplier and report it to the authorities. All new suppliers, both indirect and direct, are still subject to an assessment according to the company's risk assessment criteria before being accepted as new suppliers to Steinbeis Papier GmbH.

Performance monitoring

The defined objective of mandatory zero tolerance is re-evaluated and analysed on a quarterly basis as part of the risk assessment and as part of the annual supplier assessment along with the environmental assessment. According to the assessment in 2022, Steinbeis Papier GmbH's raw materials and purchasing model does not imply any risks along the supply chain that may lead to non-compliance with human rights due diligence. In view of this result, there is no need for Steinbeis Papier GmbH to initiate any measures at this time. Annual interviews with the Head of Supply Chain Management /Head of Purchasing are required in order to obtain information on a potential risk. The interviews revealed the following anomalies for the 2022 financial year:

Jan Geier Head of Supply Chain Management and Purchasing	No identified risks
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Environmental Committee

An environmental audit is carried out annually by the persons appointed to the Environmental Committee with defined objectives. Based on the guidelines and regulations defined by the legislator, this superordinate monitoring instance investigates all environmentally relevant processes in the company and monitors the compliance of all measures and programmes.

6. Training on modern slavery and trafficking

*We continually raise **awareness and understanding** within our Group of our commitment to eliminating the risk of forced labour and human trafficking in our direct operations and supply chain.*

We continue to use the Modern Slavery Act as an opportunity to foster a deeper understanding of human rights in our product supply chains. For Steinbeis, this means that we continue to develop targeted training for those employees who are most directly involved in purchasing decisions that have an impact on the risk of modern slavery across our company. It also means recognising the complex nature of modern slavery and developing informative and accessible training for all employees in order to raise their awareness of the risk of modern slavery in our company and industry.

Training materials for employees

All procurement processes and procurement guidelines are regulated in internal instructions and training materials (AA). These instructions are certified externally and internally. All employees are aware of these policies. They are always informed of any changes or corrections by means of circular emails and notices. In addition, every employee must follow the Code of Conduct and be informed of the principles of the Code of Conduct. The manager must ensure that every employee is kept informed of any changes to the Code of Conduct and that they lead by example.

Workplace safety

Steinbeis Papier GmbH operates an occupational health and safety management system according to EN ISO 45001, which aims to protect employees and business partners from injury or illness resulting from activities at Steinbeis Papier GmbH. An essential part of the management system is the identification and elimination of hazards and training in safe working practices.

Responsibilities and transparency

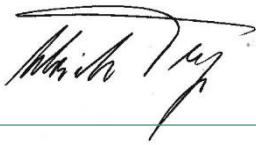
Furthermore, an audit is commissioned annually to an independent auditor in varying subject areas (including corruption). The management of Steinbeis Papier GmbH is directly responsible for ensuring conduct that complies with the law and the guidelines. Training on general and labour law at the management level is conducted on a regular basis with the aim of raising awareness and encouraging managers to act in accordance with the law. Internal work and procedural instructions ensure that procedures and processes are strictly defined and transparent. Continuous audits by auditors ensure accuracy and legal compliance.²⁰

²⁰ DNK criterion 20 Conduct that complies with the law and directives p. 29

<https://www.deutscher-nachhaltigkeitskodex.de/en-GB/Home/Database>

This statement is issued in accordance with Section 54 (1) of the 2015 British Modern Slavery Act and has been signed by the management of Steinbeis Papier GmbH and the Head of Supply Chain Management.

Glückstadt, 11.05.23



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Rauscher



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Bibliography

Steinbeis Papier GmbH corporate website

<https://www.stp.de/en/>

<https://www.stp.de/en/suppliers>

Environmental declaration

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[de/07_Downloadcenter/Datenblaetter_und_Zertifikate/Untenehmen/EN/28362_Umwelterklaerung_2022_final_en.pdf](https://www.stp.de/fileadmin/user_upload/stp-de/07_Downloadcenter/Datenblaetter_und_Zertifikate/Untenehmen/EN/28362_Umwelterklaerung_2022_final_en.pdf)

German Sustainability Code

<https://www.deutscher-nachhaltigkeitskodex.de/en-GB/Home/Database>

<https://datenbank2.deutscher-nachhaltigkeitskodex.de/Profile/CompanyProfile/7191/de/2021/dnk>