

Safety, Health and Environmental Policy

hubergroup

Released September 2024

Version 1.0

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The expression “employee” is used gender neutral and covers female employees and male employees as well as persons designating themselves as diverse.

Management Summary

Our Safety, Health and Environmental policy applies to all employees and office-holders, named employees further on, at the group companies of the hubergroup (MHM Holding GmbH) around the world.

The care for Safety, Health and the Environment (SHE) is of paramount importance for the realization of hubergroup purpose to our environment and fellow human beings which are at the heart of what we do. We are therefore strongly committed to continually working towards increased sustainability and safety in the printing industry through our products and services.

The hubergroup is committed to environmental stewardship and sustainable business practices across our global operations. As a leading manufacturer of printing inks and chemicals, we recognize our responsibility to minimize our environmental impact and promote health and safety throughout our value chain. This policy applies to all operations, subsidiaries, and value chain partners. This policy outlines our approach to managing our health and safety and environmental impacts and risks. With this policy, we define in more depth our commitment to protecting the environment and the health and safety of our workers, as set out in our Code of Conduct.

hubergroup leadership commitment:

- To deploy a leadership culture on Safety, Health & Environment and to develop relevant knowledge and skills throughout the company;
- To comply with local laws, legislation and regulations and to work in conformity with internal requirements;
- To protect the safety and health of our employees, contractors and other third parties working on all our premises, customers and neighbours at all times, in close collaboration with them;
- To protect the environment along the value chain from the impact of our products, processes, and operations;
- To include Safety Health & Environment implications in the development & design of our products and processes and further minimizing the use of raw materials, energy, and water as well as waste generated and emissions to the environment;
- In case of mergers and acquisitions, conducting SHE assessments as part of a due diligence and integration process;
- To engage and contribute to the societies in which we operate;
- To publicly report on our Safety, Health & Environmental performance;
- To implement operational requirements (including emergency response) and have a local adapted environmental management system in place
- To provide the resources necessary for delivering on this commitment.

1. Regulatory compliance

As a global chemical industry company, we are fully committed to complying with the relevant national and local regulations. In addition, we guarantee full compliance with all applicable regulations across our markets and product lines, exemplary:

- EU - REACH (Registration, Evaluation, Authorization and Restriction of Chemicals)
- US - TSCA (Toxic Substances Control Act)
- EU - CLP (Classification, Labelling and Packaging)
- GHS (Globally Harmonized System of Classification and Labelling of Chemicals)

1.1 Exceeding legal requirements

Our commitment to safety and environmental protection extends beyond regulatory compliance:

- We adhere to the [European Printing Ink Association \(EuPIA\) Exclusion Policy](#) which often imposes stricter safety standards than legal requirements.
- We have developed and implemented our own Good Manufacturing Practice (GMP) guidelines to ensure the highest level of safety for food packaging.
- We are partner in the [responsible care initiative of the chemical industry](#) since 2016.
- Participants by [CEFLEX](#) and [INGEDE](#)

2. Policy goals

It is hubergroup's policy goal to maintain business activities and products that do not adversely affect safety or health and that fit with the concept of sustainable development. We have set the following objectives:

- To provide an injury-free and incident-free workplace
- To prevent all work-related disabilities or health problems
- To control and minimize the risks associated with our products for their total life cycle
- To choose production processes and products such that the use of raw materials, water and energy is minimized
- To evaluate and improve our practices, processes and products continuously in order to make these safe and acceptable to employees, the customers, the public and the environment.

3. Risk management and strategy

We integrate health and safety and environmental considerations into our risk management processes and overall business strategy. This includes assessing climate-related risks and opportunities, developing transition plans to address identified risks and incorporating environmental factors into decision-making processes. We conduct risk assessments for all chemicals used in our processes and products.

3.1 Risk and impact assessments

In 2024, we carried out a double materiality analysis in accordance with the CSRD (Corporate Social Responsibility Directive) at the hubergroup. As part of our materiality assessment, we have conducted an intensive impact assessment of our environmental and health & safety impacts and risks. The material risks which were identified:

- carbon emissions and energy use
- impacts of raw material production on the environment (fossil and biobased)
- water use and impacts on water quality
- reduction and handling of waste
- use of substances with concern
- air and noise emissions
- health & safety risks in production,
- handling and end of life of our products

Within the impact analysis, all relevant stakeholders of the hubergroup were included in the assessment for an evaluation of the material topics.

Carbon emissions and energy use were identified as a topic because of the higher energy prices, but also because of hubergroup's goal to lower the emission numbers.

The impact of raw material production on the environment is chosen as a topic because of the chemicals used in the production process and the goal to substitute the raw materials used through biobased materials.

According to the use of chemical substances with the core production process the hubergroup has an impact on the water quality, but also on the waste disposal and use of substances of (high) concern.

Throughout the production process air and noise emissions are emitted and defines another material topic for the hubergroup. The impact analysis shows which ecological risks and opportunities the hubergroup faces and which measures need to be taken. The company's comprehensive approach to environmental stewardship and social responsibility positions it as a leader in sustainable practices within its industry.

4. Environmental Objectives

Based on our impact assessment the following objectives were defined

4.1 Climate Action and Emission Reduction

- We recognize the urgent need to address climate change and are taking decisive action to reduce our greenhouse gas emissions.
- We aim to achieve net zero emissions by 2050, demonstrating our long-term commitment to climate neutrality.
- We align our efforts with the Paris Agreement, striving to limit global warming to 1.5 degrees Celsius by 2030.
- We are committed to measuring and reducing our Scope 3 emissions, acknowledging the importance of addressing our entire value chain's impact.

4.2 Sustainable product development

Innovation in environmentally friendly products is a key focus area:

- The top priority on our R&D agenda is to continuously increase the proportion of renewable raw materials in our products with the aim of significantly reducing our environmental impact.
- We will increase the percentage of our product portfolio classified as environmentally friendly to 50% by 2027.
- We will prioritize the development of environmentally friendly products, including low-VOC (volatile organic compounds) inks and bio-based alternatives.
- It goes without saying that we do not use any of the listed restricted substances (Stockholm and Rotterdam conventions). As soon as substances are restricted, they are no longer included in our product formulations when the restriction comes into effect, to ensure the safety and sustainability of our offers.

4.3 Water management

Responsible water use is crucial for environmental conservation at the hubergroup. We are taking a holistic view of water management by addressing the problem of freshwater scarcity and quality, as well as wastewater. Hence, we have built a water treatment unit at our site in India, which enables us to re-use 60 percent of our waste water and we are working on making it possible to recover 100 percent of waste water till 2030.

All waste water is subject to strict monitoring and analysis according to the applicable local legal regulations before it is discharged into disposal channels. An increasing number of regions are suffering from reduced access to sufficient fresh water supplies to meet industrial or sometimes even basic health needs.

For hubergroup production activities the availability of fresh water is essential and therefore we work to ensure that our water usage does not lead to a lack of fresh water for the local population.

Although most of our production sites are currently not yet affected by water scarcity,

hubergroup has initiated a water risk assessment based on the WWF water risk filter with the aim to continuously adapt and improve its approach. This risk assessment includes a range of factors, including water availability and quality, risk of flooding and forecasted water consumption.

This corporate risk-based approach enables hubergroup to set priorities for establishing local measures at production sites.

- We will implement a closed-loop water management system at all major production sites by 2033,
- significantly reducing our water consumption per kg of product (baseline 2023)
- and minimizing wastewater discharge further.

4.4 Resources and circular economy

We are recycling printing inks that our customers return, for example because they have exceeded their expiry date. We produce low-migration or cobalt-free printing inks – and many of our inks and varnishes are used for print products certified with the Blauer Engel (Blue Angel).

- We strive to reduce our energy consumption, water consumption/use/withdrawals, and raw materials through efficiency improvements and innovative technologies.
- We commit to minimizing waste generation and increasing recycling and reuse initiatives across our operations.
- We will increase our use of recycled materials to 30% by 2033
- We aim to achieve zero waste to landfill at all facilities by 2033

At hubergroup we ensure an active review of our environmental management system and are in the process of implementing the ISO 14001 certification for sustainable environmental management and the ISO 50001 certification for sustainable energy management at our production locations.

4.5 Biodiversity and ecosystems

We will assess and mitigate our impacts on local ecosystems at all operational sites.

We are committed to using 100% certified biobased raw materials till 2033 which are sourced from sustainable certified production systems like FSC, PEFC, ISCC, RSPO (Roundtable of Sustainable Palmoil) or RTRS (Roundtable of Responsible Soy). The use of certified sustainable biobased materials demonstrates our commitment to 100% deforestation-free supply chains and compliance with the European Deforestation Regulation EUDR requirements when using bio-based materials from forestry or agriculture.

4.6 Pollution prevention

We are dedicated to preventing pollution by implementing best practices in our manufacturing processes and facilities.

5. Health and safety objectives

We are committed to a safety and healthy environment for our employees, contractors and other third parties working on all our premises, customers and neighboring communities. All workers who work in an environment with a potential H&S risk are entitled to the free provision of protective clothing.

We set ourselves the following targets in the field of Health & Safety

- Reducing and preventing injuries at the workplace by developing safe working practices and training of employees, contractors and other third parties - at least one mandatory H&S training per year/employee
- Providing access to safe drinking water, sanitation, hygiene at the workplace, as well as access to programs on physical and mental wellbeing.
- Roll out ISO 45001 certification for all production sides till end of 2033
- 0 fatal incidents at hubergroup – annually
- Reducing lost time injury frequency rate by the end of 2033 (baseline 2023)

6. Chemical management

As a company working extensively with chemicals, we recognize the importance of responsible chemical management.

6.1 Safety first

We prioritize the safety of our employees, customers, and the environment in all aspects of chemical handling and use. We use safer chemical substances, and we shall collect, maintain, and provide information on the health and environmental effects of the chemical substances we handle while striving to use safer chemical substances. Our local health and safety guidelines are based on this policy and specify the points to be fulfilled by our employees and suppliers locally.

6.2 Substitution

Where possible, we substitute hazardous chemicals with safer alternatives without compromising product quality. We shall work to maintain and improve the level of our environmental management while working to upgrade our environmental management technology and skills, performing self-auditing, and taking other measures.

6.3 Responsible sourcing

We work with suppliers to ensure responsible sourcing of raw materials and chemicals. The requirements for our suppliers are set out in writing in our Supplier Code of Conduct. We aim to work closely with our suppliers and customers to ensure our compliance throughout the supply chain.

6.4 Transparency

We commit to transparent communication about the chemicals used in our products and their potential environmental impacts. We give procedural instructions for the disposal and use of chemicals which are available to all employees and are based on standardized hubergroup guidelines.

7. Implementation and oversight

We are implementing this policy through a comprehensive Health & Safety and environmental management system, and employee training programs. This policy applies to all hubergroup operations globally and will be communicated to all employees, contractors, and business partners.

Compliance with the relevant laws as well as with this policy must be regularly monitored at all hubergroup companies.

We encourage our stakeholders to join us in our commitment to environmental protection and health & safety business practices. Our Board of Directors oversees the implementation of this policy, with day-to-day management delegated to our Sustainability Committee.

All employees and other stakeholders can use our whistleblower system to report if the requirements of this policy are not implemented in the correct way or ignored locally.

7.1 Data collection and sharing

We pledge to collect and generate comprehensive data on all substances we manufacture, import or use. We assess and manage the risks associated with these substances and share relevant safety information throughout our supply chain.

7.2 Training and resources

We are committed to providing comprehensive training for our employees on our requirements and best practices. As well as allocating necessary resources to maintain compliance and stay updated on regulatory changes.

7.3 Continuous improvement

Our SHE policy is a living document that evolves with new scientific insights and industry best practices. We regularly review and update our standards to ensure we remain at the forefront of safety and environmental stewardship in the printing ink and chemicals industry. By setting our own high standards and actively contributing to industry-wide improvements, we strive to create a safer, more sustainable future for our employees, customers, and the environment.

We commit to continually improving our Health & Safety and Environmental performance and regularly reviewing and updating this policy to reflect evolving environmental challenges and best practices. This policy will be reviewed at a minimum of every five years.

8. Consequences of non-compliance

This SHE Policy brings together the applicable statutory and internal company regulations. The obligation to comply with the herein-outlined principles arises either directly from the relevant laws and internal company regulations, such as guidelines and process instructions, or as a collateral duty under the employee's contract of employment. Violations of these principles do harm to both the hubergroup and the employee and can result in sanctions under both criminal and environmental law.