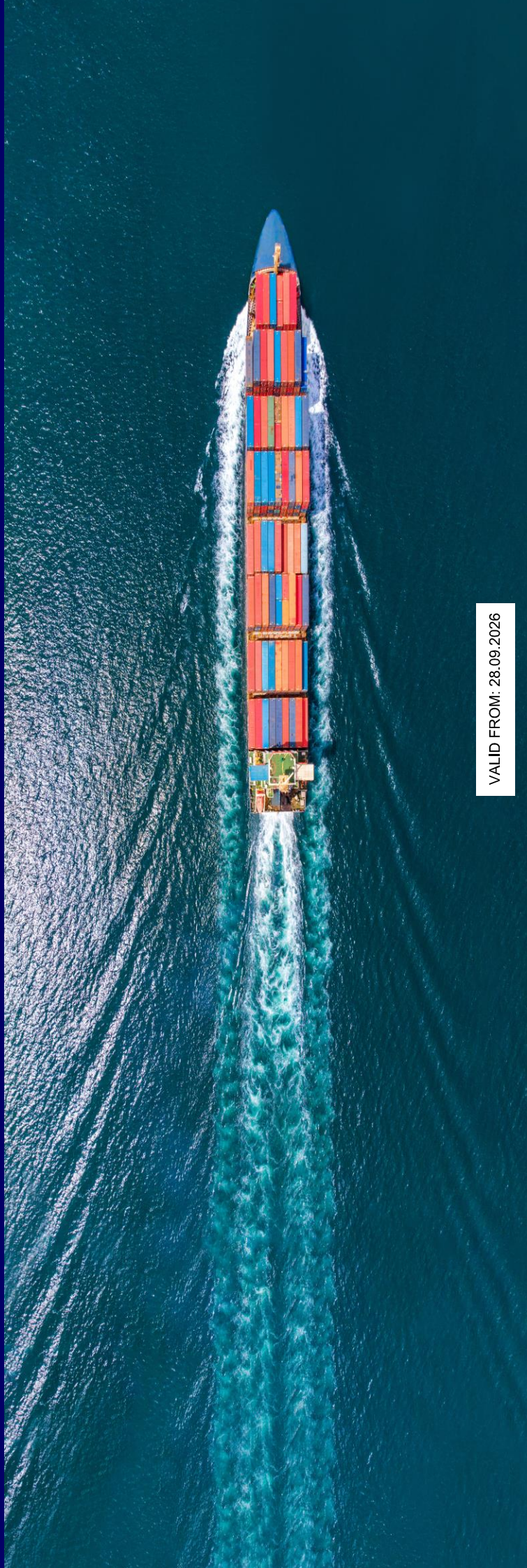
Giesecke+Devrient

Human Rights Strategy of the G+D Group

Statement of Principle



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Our strategy in terms of compliance with human rights and environmental due diligence obligations

1. Our Approach

We are committed to respecting universal human rights and fulfilling our human rights and environmental due diligence obligations in our own operations and throughout our supply chains. We comply with all applicable laws, in particular the German Supply Chain Due Diligence Act (LkSG), respect internationally recognized human rights and ensure that we proactively implement measures to prevent human rights violations in the course of our business activities.

We encourage and support our employees, business partners, and suppliers in meeting their due diligence obligations, avoiding negative impacts, and passing on the LkSG requirements to their subcontractors. These principles and expectations are reflected in our Code of Conduct for employees and in our Supplier Code of Conduct.

To protect human rights and the environment, we are committed to complying with national and international standards and principles:

- The Universal Declaration of Human Rights (UN)
- The UN Guiding Principles on Business and Human Rights
- The OECD Guidelines for Multinational Enterprises
- The Fundamental Principles and Rights at Work of the International Labour Organization (ILO)
- The Stockholm Convention on Persistent Organic Pollutants (POPs Convention)
- The German Diversity Charter
- The UK Modern Slavery Act

As a participant and signatory to the UN Global Compact we are committed to upholding human rights, respecting the rights of employees and their

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representatives, and protecting the environment. We also support the 17 UN Sustainable Development Goals.

This policy statement applies to the entire Giesecke+Devrient Group, including all subsidiaries. The standards and obligations set out in the LkSG form a binding framework for our employees, business partners, and suppliers

2. Governance

For us at G+D, respect for human rights and the associated environmental standards is an integral part of responsible corporate governance.

Our Group Management Board bears overall responsibility for fulfilling and complying with human rights and environmental due diligence obligations. Our Human Rights Officer is responsible for overseeing the human rights risk management system and coordinates the implementation across the Group, reporting to the Group Management Board at least annually and as needed.

Several functional departments, such as Compliance, Sustainability, Procurement, Quality, and Human Resources, are involved in the operational implementation of our due diligence processes.

We have established a group-wide human rights risk management system to protect human rights and the associated environmental rights. We expect our business partners, especially direct suppliers, to comply with labor and social standards. We ensure that human rights, social standards, and environmental rights are observed both when selecting suppliers and in ongoing business operations.

Risk Analysis

We see compliance with the LkSG due diligence requirements as a continuous process. We conduct ongoing and ad hoc risk analyses to identify and evaluate potential and actual negative impacts on human rights and the environment within our supply chain.

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The risk analysis is conducted at least annually to identify potential human rights and environmental risks within our own business operations and among our direct suppliers.

The process begins with an abstract risk assessment, evaluating country- and industry-specific risks based on recognized indicators. To ensure a comprehensive and in-depth assessment, this analysis is supported by ESG risk management software.

Direct suppliers are initially subject to a broad risk screening. Based on the results, we apply a risk-based approach to further assess and prioritize suppliers requiring closer review. This methodology is regularly evaluated and refined to enhance transparency across the supply chain.

Building upon the results of the abstract risk analysis, certain direct suppliers and entities are selected for a concrete risk analysis. This process is a targeted, self-disclosure assessment focusing on human rights and environmental risks. Insights from our grievance mechanism are incorporated into the risk analysis

After evaluating the results, any necessary preventive and remedial measures are determined. The risk analysis results are taken into account for the commencement or further cooperation with the suppliers and serve as a basis for adapting internal regulations, processes and training. The results are also taken into account in subsequent risk analyses.

When we receive substantiated information about potential or actual adverse human rights or environmental impacts involving indirect suppliers or other value chain partners, we conduct a risk analysis in accordance with the procedures described above.

Preventive Measures

The aim of our preventive measures is to minimize potential risks to people and the environment and to identify and prevent injuries at an early stage. The results of our risk analysis are taken into account when developing and implementing appropriate preventive measures.

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In accordance with the LkSG, we take, among others, the following preventive actions within our own business operations:

- Code of Conduct
  - Giesecke+Devrient Code of Conduct applies to all employees and sets standards for respecting human rights, preventing discrimination and harassment, implementing occupational health and safety regulations, and protecting the environment.
- Training and capacity building
  - Regular employee training on human rights, purchasing, and sustainability.
- Environmental Management System
  - Operation and continuous improvement of a management system in line with DIN EN ISO 14001.
- Occupational Health and Safety Management System
  - Operation and continuous improvement of a management system in line with DIN EN ISO 45001.

Our business relationships with our direct suppliers are based on human rights and environmental principles anchored in our Supplier Code of Conduct. In addition, we and our suppliers agree to implement risk-based control measures, which are part of our General Terms and Conditions of Purchase. We also expect our direct suppliers to take appropriate measures with their subcontractors to ensure compliance with the principles

Remedial Measures

If it becomes apparent that a breach of an LkSG due diligence requirement is imminent or has already occurred in our own business operations or at a direct supplier, we immediately take appropriate remedial measures to work towards preventing or ending the breach or minimizing the extent of the breach.

In our own business operation, the respective department shall take appropriate remedial measures to prevent or end the violation. The progress is

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monitored and reported to the Human Rights Officer and the responsible Management Board.

We have a catalog of remedial measures for violations at direct suppliers, which is used to check which remedial measures may be promising in individual cases. Communication with the supplier is always initiated first to develop a joint solution. If this does not remedy the situation, a corresponding improvement plan is drawn up containing a specific timetable, measures, and responsibilities. Other measures may include audits, temporarily suspension of the supplier relationship and, as a last resort, termination of the business relationship. In the event of reported or known violations, this procedure also applies to indirect suppliers.

In general, the content of the measures to be taken depends on the individual case, such as the type and severity of the impending or actual breach and, in the case of suppliers, their respective ability to exert influence, legal limitations and any contribution to causation by Giesecke+Devrient.

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Grievance Mechanism

We have established a whistleblower and complaints procedure that is available to all Giesecke+Devrient employees and external persons (e.g. employees of suppliers).

Complaints can be submitted in writing or verbally via the electronic whistleblowing tool “G+D Integrity Line”, by post, or in person to the Corporate Compliance Office of Giesecke+Devrient GmbH (also anonymously). Our employees can also contact their superior or the (local) Compliance Officer at any time.

Violations of human rights, environmental, health and safety regulations, and other serious violations can be reported in this way. All information is treated confidentially and only passed on to those people in accordance with a clearly defined and transparent process, as set out in our Group’s whistleblowing procedure. If a (potential) violation is identified, the competent reporting office develops appropriate follow-up measures and, where possible, involves the whistleblower and their expectations.

The relevant decision-makers are informed regularly or on an ad hoc basis about complaints received.

Findings from the complaints procedure are taken into account when reviewing the effectiveness of the Human Rights Management and for further preventive measures in order to prevent future risks and violations.

3. Documentation and Reporting

We regard the management of human rights and environmental protection, as well as the execution of related risk analyses, as a continuous process that must be regularly adapted and further developed. Measures are reviewed and adjusted whenever new results or insights emerge.

The reporting on the fulfillment of the LkSG due diligence requirements is carried out in accordance with legal requirements and their administrative implementation.

This Statement of Principles is communicated internally and externally and is also publicly accessible on the Giesecke+Devrient website.

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This document has been digitally approved by:

Date	Person	Role
11.09.2026	Jan Thyen	Group CFO G+D
28.09.2026	Ralf Wintergerst	Group CEO G+D

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