



Combined non-financial statement

General information

General disclosures (ESRS 2)

Basis for preparation

General basis for preparation of the combined non-financial statement (ESRS 2 BP-1)

Legal information

This combined non-financial statement, hereinafter also “non-financial statement” or “non-financial report”, for the period from 1 January to 31 December 2024, has been prepared by preparing some of the European Sustainability Reporting Standards (ESRS) and included in the combined management report for the first time.

The Company elevated sustainability to a board-level topic in 2008 and it is now managed as part of Group-level strategy. Until the end of 2023, reporting was modelled on the GRI standards. The implementation of reporting according to ESRS is currently in progress within the CEWE Group. As the EU Corporate Sustainability Reporting Directive (Directive 2022/2464) has not yet been transposed into national law in Germany, the provisions of the German Commercial Code (HGB) on non-financial reporting continue to apply (HGB Section 289b (1) to 3, Section 315b (1)

and 3). The EU Taxonomy is included in ESRS E1, [page 149](#) and the disclosures were prepared pursuant to Article 8 of Regulation (EU) 2020/852. The relationship of HGB provisions to ESRS topics and disclosure requirements is as shown below:

- HGB Section 289c (2) no. 1 is fulfilled by the disclosures in ESRS E1, ESRS E2, ESRS E4 and ESRS E5
- HGB Section 289c (2) no. 2 is fulfilled by the disclosures in ESRS S1 and ESRS S2
- HGB Section 289c (2) no. 3 is fulfilled by the disclosures in ESRS S4
- HGB Section 289c (2) no. 5 is fulfilled by the disclosures in ESRS G1

In the context of its partial application of ESRS, the CEWE Group reserves the right to deviate from these standards in some cases. Such deviation is shown clearly and transparently in the appendix under ESRS Index: Disclosure requirements under other EU legislation, [page 187](#) and in the respective topic standards. As part of the transition to ESRS, some data collection processes are still under development, as is the derivation of corresponding metrics. The CEWE Group is working continuously on the further development of the necessary data structures and control mechanisms to ensure that the disclosures provided for financial year 2025 will be as comprehensive as possible. The achievement of this goal will also depend on the applicable regulatory and company-related circumstances.

The report does not include disclosures that, according to ESRS 1, are subject to phasing-in. The CEWE Group does not report on optional or phase-in data. For the preparation of this non-financial statement, all Group units reported their sustainability data for 2024 in January 2025. This resulted in a consolidated report for the CEWE Group, which is based on the same continuing units as in the consolidated financial statements.

The CEWE Group has chosen not to exercise the option of excluding certain types of information, relating to intellectual property, know-how or the results of innovations, from the reporting process.

Equally, the CEWE Group has waived the option of claiming exemptions to disclosures pursuant to article 19a (3) and article 29a (3) of Directive 2013/34/EU in relation to impending developments or matters in the course of negotiation for undertakings domiciled in an EU member state.

Basis of consolidation

A consolidated report is provided for the entire CEWE Group, including all subsidiaries. The consolidated report takes into account the same continuing operations as in the consolidated financial statements [page 223](#).



Unless otherwise indicated, the disclosures given in the report apply to the parent company and all affiliated companies, i.e. all companies in which CEWE Stiftung & Co. KGaA (hereinafter also “Company”) held a majority interest during the period 1 January to 31 December 2024.

The CEWE Group discloses all material information about sustainability-related impacts, risks and opportunities (IROs) in conformity with the current interpretation of the applicable ESRS. Relevant sector-specific standards for the CEWE Group were not available on the reporting date.

Insofar as specific disclosures apply only to individual companies or brands from the group of consolidated companies, this is indicated accordingly at the relevant location.

Value chain

The CEWE Group procures products and services from a wide range of suppliers. The CEWE Group supply chain is comprehensively described in the section “Key characteristics of the upstream and downstream value chain” on [page 110](#). The German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG) applies to the upstream supply chain (cf. [ESRS S2 “Workers in the value chain”](#), [page 166](#) and [ESRS G1-2 “Management of relationships with suppliers”](#), [page 181](#)).

Reporting covers the entire value chain of the CEWE Group – the upstream supply chain, own operations, business partners (B2B2C) and end consumers (B2B2C and B2C), both for the development of the IROs, and for the policies, actions and targets (PATs), and metrics.

The value chain has been comprehensively investigated as part of the materiality assessment. Strategies, actions and targets specifically take into account all relevant stages in value creation. The GHB balance fully represents both upstream and downstream processes. For other quantitative disclosures, the value chain is taken into account on each occasion within the context of available data and insofar as deemed applicable.

Disclosures in relation to specific circumstances (ESRS 2 BP-2)

Time horizons

The CEWE Group has defined the following time horizons:

- Short-term time horizon: corresponds to a period of up to one year
- Medium-term time horizon: corresponds to a period of one to five years
- Long-term time horizon: corresponds to a period of five to ten years

Estimates in the value chain

The Scope 3 greenhouse gas emissions for the upstream and downstream supply chain reported in [ESRS E1-6](#) [page 130](#) are calculated on the basis of general emissions factors from indirect sources. The calculation methodology applied is explained in the topical standard under the metrics. Particularly with Scope 3 emissions, measurement uncertainties exist as a result of methodological assumptions and the use of secondary data sources. These uncertainties are disclosed appropriately in this non-financial statement.

Using estimates is standard practice when preparing Scope 3 emission figures. In relation to capital goods, for example, the assumption has been made that each euro invested

in a piece of machinery gives rise to a corresponding volume of carbon emissions. Emissions resulting from business travel are calculated by applying database values for the various means of transport. However, this does lead to a lower level of precision for results in comparison with the use of product-specific emission factors from suppliers. Care has been taken to apply these methods of estimation so that the resulting emissions figures tend towards over-estimation. The calculation methodology and limitations for Scope 3 emissions are described in the process description E1 starting on [page 131](#).

In the future, however, the Company will seek to include some product-specific factors into calculations, with the aim of improving the accuracy and controllability of greenhouse gas (GHG) emissions, and increasing the use of primary data. The CEWE Group is preparing to roll out a software package that will enable metrics to be controlled in conformity to ESRS and thus the establishment of an internal control system (ICS) specifically for sustainability.

The CEWE Group also makes use of industry-standard databases such as DEFRA. Underlying estimates are explained in the “Minimum disclosure requirements – metrics” (MDR-M) for the metrics.

Changes in preparation

The present non-financial statement is the first report from the CEWE Group that has been prepared with reference to the ESRS.

Incorporation by reference

The CEWE Group has incorporated information into its combined non-financial statement by reference. These references are documented in the following list.



Incorporation by reference

ESRS	Disclosure topic	Reference to document/section	Page/URL
General disclosures			
Basis for preparation			
BP-1	The sustainability statement was prepared on a consolidated basis	Consolidated financial statements: List of consolidated companies	Page 223
	EU Taxonomy	Combined management report	Page 149 ff.
Governance			
GOV-1	Skills and expertise matrix of the Supervisory Board	Combined management report	Page 92
	Composition and CVs of the Supervisory Board	Website	https://www.cewe-group.com/en/about-us/corporate-group/executive-and-supervisory-boards.html
	Adoption of the profile of skills and expertise in October 2023 in accordance with the recommendation of the German Corporate Governance Code	German Corporate Governance Code	Section C.1, https://www.dcgk.de/en/code/current-version/c-composition-of-the-supervisory-board.html
	The names and composition of the Executive Board, Supervisory Board and Board of Trustees	Consolidated financial statements	Page 277 ff.
	Requirements for the composition and skills and expertise of the Supervisory Board	Combined management report	Page 91 ff.
	Report on opportunities and risks	Combined management report	Page 73 ff.
Strategy			
SBM-1	Total revenue for 2024	Combined management report	Page 63
Minimum disclosure requirements			
Policies			
MDR-M	Scope of energy and emissions figures	Combined management report	Page 132
Topical ESRS			
Environmental information			
E1 – Climate change			
E1-5	Revenue	Combined management report	Page 63
Social information			
S1-6	Number of employees	Combined management report	Page 163
S4 – Consumers and end-users			
G1	BME Code of Conduct	BME Website	https://a.storyblok.com/f/104752/x/a2b1b-b70aa/bme_code_of_conduct_en_v3.pdf

Governance

The role of the administrative, management and supervisory bodies (ESRS 2 GOV-1)

The CEWE Group executive management – consisting of the Executive Board and the Supervisory Board – determines the strategic orientation of the Company, plans and specifies the Company budget, and is responsible for distributing funds and monitoring business performance. It is also tasked with preparing the consolidated financial statements, and the half-year and quarterly financial statements. Furthermore, the executive management is responsible for compliance with legal requirements, regulations and internal company codes of practice, and enforces their observance in all CEWE Group companies. With its integrated governance, risk and compliance approach, the Executive Board has created and implemented a control framework for the CEWE Group that constitutes an internal control and risk management system. The actions taken in the context of this approach target the efficacy and adequacy of the internal control and risk management system, and are explained in greater detail in the opportunities and risk report starting on [page 73](#). Independent reviews and audits are carried out within the scope of this internationally recognised “three-line model” and in accordance with the applicable statutory framework. The Internal Auditing department conducts internal audits, and reports the results to the Executive Board and Supervisory Board Audit Committee. External audits are also carried out.



The Executive Board

The Executive Board of Neumüller CEWE Color Stiftung, which is responsible for the overall planning and achievement of the goals of the CEWE Group, comprised seven members until April 2024 and has had six members since April 2024. No employee representatives are members of the Executive Board. The members of the Executive Board all possess the necessary qualifications and experience to conduct business in an orderly manner. Both the Executive Board and the Supervisory Board have access to expertise in relation to strategic business decisions and risk-based aspects of sustainability. Specific sustainability topics are handled by the relevant departments and submitted to the members of these boards for attention. An all-day CSRD training workshop was also held by external experts for Company bodies (Executive/Supervisory Board and Board of Trustees) in summer 2024.

Executive Board and Supervisory Board members possess the necessary expertise both in relation to strategic business aspects and to the risk-based component within sustainability. Topic-specific disclosures are also made pursuant to ESRS G1 on the role of the administrative, management and supervisory bodies in relation to Company policy and the expertise of these bodies.

Additional activities are also offered:

- Regular training for administrative, management and supervisory bodies
- Strengthening of internal expertise with new hires
- Additional training activities are planned (e.g. workshops on specific topics with consulting firms, attendance at conferences on specific subjects, external network setup, etc.)

The Executive Board makes every effort to contribute its sustainability expertise and its expertise in relation to material impacts, risks and opportunities for material sustainability topics.

The Supervisory Board

The Supervisory Board of CEWE Stiftung & Co. KGaA consists of twelve members, and is equally split between employer and employee representatives. Of the six employee representatives, two are from trade unions and four are from the CEWE Group workforce. One of the latter four members represents the interests of executives at the Company.

Requirements for the composition and skills and expertise of the Supervisory Board

The Supervisory Board of CEWE Stiftung & Co. KGaA considers a board membership that reflects the business entity type and purpose to be an important aspect of good corporate governance. When considering new members, the Supervisory Board is guided by the principle of providing expert oversight and advice to the Executive Board of the Company. A distinction is made between personal requirements for the individual Supervisory Board member on the one hand and the requirements for the expertise of the Supervisory Board as a whole. The Supervisory Board adopted the profile of skills and expertise for its composition as shown below in October 2023, thereby following a recommendation published by the German Corporate Governance Code (GCGC item 5.4.1 (2)).

Personal requirements for Supervisory Board members comprise the following:

- Experience in the management or governance of companies or similar organisations
- Integrity
- Commitment to the role
- Domain expertise and experience from areas of the economy outside Company business
- Independence and sufficient time available
- Openness to adapting business models to match new technical developments and changes in the market
- Ability to understand and scrutinise the business model
- Basic knowledge of relevant legal standards
- Basic knowledge of compliance topics
- Basic understanding of financial matters, especially as regards financial accounting and reporting
- Ability to review the annual financial statements (with support from auditors as necessary)
- Ability to understand, scrutinise and draw one's own conclusions from the reports published by the Executive Board and Supervisory Board committees
- Ability to assess the correctness, cost-effectiveness, adequacy and lawfulness of the business decisions to be assessed, and to review these in terms of plausibility
- Readiness to engage in professional development by means of company-internal and external training programmes



An individual member does not need to possess all of the skills and expertise as listed. The various skills areas should instead be covered by the sum total of the individual expertise and experience contributed by each member of the Supervisory Board. The current membership of the Supervisory Board covers all of the skills and expertise required. The Supervisory Board skills and expertise matrix is shown in the diagram on [page 92](#) of the combined management report. A company profile and CVs for all Executive Board members can be found on the company website at <https://www.cewe-group.com/en/about-us/corporate-group/executive-and-supervisory-boards.html>. The Executive Board has prepared a profile of skills and expertise according to the provisions of the German Stock Corporation Act (Aktiengesetz – AktG).

In addition, and with reference to the requirements of AktG Section 100 (5), at least one member of the Supervisory Board and the Audit Committee must possess expertise in the field of accounting and another member must possess expertise in relation to financial statements audit.

For future nominations to the general meeting, the Supervisory Board will strive to observe this profile of skills and expertise while accounting for Company goals and the diversity policy, as set out in the corporate governance statement pursuant to Section 289 f HGB.

The skills and expertise profile developed and adopted in line with section C.1 of the German Corporate Governance Code ([recommendation C.1](https://www.dcgk.de/en/code/current-version/c-composition-of-the-supervisory-board.html) <https://www.dcgk.de/en/code/current-version/c-composition-of-the-supervisory-board.html>) defines ESG expertise as a general personal skill that should be exhibited by each member of the Supervisory Board. Beyond this, some members of the Supervisory Board, particularly members of the Audit Committee, can draw on additional expertise in relation to sustainability issues. Members of the Supervisory Board contribute their respective skills and expertise regularly by means of self-assessments, internal inquiries and discussions. As some members do not have sustainability-specific know-how, this expertise is established and broadened by a continuous programme of targeted training. As a result of the growing importance of this topic, the nature and scope of such training is currently under discussion; the frequency will be re-addressed in 2025.

The names and composition of the Executive Board, Supervisory Board and Board of Trustees can be found in the section “The CEWE Group – structure and governing bodies” on [page 292](#) of the consolidated financial statements.

Members

- Executive Board: 6 (since April 2024, 7 until April 2024), all executives
- Supervisory Board: 12, all non-executives

Proportion of women and independent board members

- Proportion of women on Supervisory Board: 50%
- Proportion of women on Executive Board: 16.67%
- Executive Board: 0/6 = 0.0% are independent
- Supervisory Board: 7/12 = 58.3% are independent

Employee representation

In the CEWE Group, the photofinishing operations are represented by the Works Councils at the four photofinishing sites, with a total of 37 members. The number, appointment and co-determination rights of these Works Councils are modelled on the German Works Constitution Act (Betriebsverfassungsgesetz – BetrVG). Further representation is provided in the form of a Group Works Council. At other sites, employees are represented by other forms of employee representation. Only two operations do not have employee representation: WhiteWall (Frechen) and DeinDesign (Bad Kreuznach).



Organisational structure – tasks and responsibilities

The CEWE Group has established organisational structures to achieve its sustainability targets and to implement the actions corresponding to their achievement. Sustainability management forms an integrated part of corporate governance within the Company, with responsibility for the same being assigned to the Executive Board and a new Sustainability department, which was set up in 2024. The strategy is based on five pillars: **Honest and fair conduct, economic viability, environmental protection and resource conservation, responsibility for employees and community engagement.**

The implementation of the CSRD – together with the monitoring and control of impacts, risks and opportunities – is being coordinated by a project team consisting of the Sustainability, Corporate Communications and Group Accounting departments. This project team reports directly to the Executive Board and coordinates all other relevant business departments and their input. Responsibility for specific sustainability topics is assigned to the respective business departments. Accordingly, the CEWE Group considers the topic of sustainability to be an interdepartmental topic that is integrated within all areas of the organisation.

A steering committee for CSRD implementation meets every four weeks and comprises the bodies responsible for sustainability: the Executive Board, the heads of Purchasing/Production/HR and the CSRD project team. In addition, a working group with the CSRD project group meets

every two weeks, with all relevant business functions and departments participating. Check-ins with the Executive Board are made every six weeks. The Sustainability Group, which features representatives of management staff and employees from key departments, is currently redefining its role as part of the transition to CSRD.

The impacts, risks and opportunities identified during the materiality assessment are managed by the CSRD project team. The monitoring, control and oversight for these topics is completed in collaboration with the affected business departments, and in close coordination with the steering committee or the Executive Board, as described above.

Within the Executive Board, Thomas Mehls is responsible for Sustainability. Dr Olaf Holzkämper is also responsible for Finance, Controlling and Legal, which includes the preparation of annual reports. Both individuals can draw on long experience in the management of a range of companies. As described above, the implementation of CSRD requirements is handled by the internal CSRD project group (business departments plus project team).

The CSRD project group at the CEWE Group has completed a materiality assessment, working closely with proxy stakeholders to identify material impacts, opportunities and risks. These proxy stakeholders were selected within the CEWE Group with the aim of representing the perspectives of various interest groups and ensuring their concerns are accounted for.

The insights thereby gained and other key milestones in sustainability reporting were directly communicated to the Executive Board and have been discussed by its members.

For its part, the Executive Board, with the support of the CSRD project team, informs the Supervisory Board at regular intervals about key milestones in CSRD reporting. Before the final audit, the Executive Board submits the report to the Supervisory Board for review; the latter is also responsible for monitoring all relevant impacts, risks and opportunities.

The Company intends to integrate the above-mentioned project structure into its organisational structure on a permanent basis.

The interdepartmental sustainability working group – the Sustainability Group – brings together management staff and employees from key business departments such as Environment, Purchasing, Legal, HR and Investor Relations. This team ensures a coordinated approach to the handling and implementation of sustainability topics, contributes to Executive Board decision-making and advises on addressing relevant sustainability topics at Executive Board level.

**Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies (ESRS 2 GOV-2)**

Der Vorstand der Neumüller CEWE Color Stiftung ist für die The Executive Board of Neumüller CEWE Color Stiftung is responsible for the overall planning and implementation of the goals of the CEWE Group. The Supervisory Board has established rules of procedure that serve as a key instrument for the organisation and specification of codes of practice within this board.

Updates on CSRD are provided to the Supervisory Board (SB), Supervisory Board Audit Committee (SBAC), Executive Board and Works Council, and to the Board of Trustees of Neumüller CEWE Color Stiftung. The SB, Board of Trustees and SBAC typically hold sessions once a quarter, while an update meeting on CSRD is held every six weeks by the Executive Board. The Steering Committee holds monthly meetings with the CSRD project team. Minimum notification requirements are also met as required by Section 90 AktG.

The risk management system at the CEWE Group records opportunities and risks from all relevant risk categories, including sustainability risks, as part of an annual, Group-wide risk inventory. This forms the basis of the annual report on opportunities and risks. The Company has yet to complete the integration of the risks derived from the CSRD materiality assessment into the Group-wide risk management system; these risks are currently managed by the CSRD project team. During the year, the current opportunity

and risk assessments are reviewed at least once a quarter; this review is also submitted to the Supervisory Board on a quarterly basis. There is also the option of flagging up and reporting on ad-hoc risks arising from short-term developments.

The Supervisory Board reviews the non-financial statement. The business strategy, in which sustainability constitutes one of four central principles, alongside efficiency, brands and innovation, and which sets out the respective key content areas, was adopted by the Executive Board and submitted to the Supervisory Board. This makes the topic of sustainability an explicit part of the 2024 company strategy and it is also addressed in the respective strategies of the individual business units, such as Production.

During an all-day workshop, the Executive Board, Supervisory Board and Board of Trustees completed an in-depth appraisal of material impacts, risks and opportunities. The results of this session were reviewed on several occasions in the Supervisory Board Audit Committee and specific issues – such as increasing the proportion of women in top management below Executive Board level – were discussed by the Executive Board. In financial year 2024, there was no focus topic that the Executive Board and Supervisory Board explicitly designated as such.



Material IROs for the CEWE Group

Environment (E)					
ESRS	((Sub-)sub-)topic	IRO category	IRO	Cluster	Time horizons
E1	Climate Change				
E1.1	Climate change adaptation	Negative impact	Climate-related hazards and natural disasters may affect raw material products.	Impairment of raw material availability	Short-, medium- and long-term
		Risk	Physical risk: Supply chain disruption (e.g. disruption to raw material extraction) and/or price increases triggered by material shortages as a result of acute and chronic climate-related hazards such as heat stress, sea level rise, water stress, drought, flooding or landslides (taking into account high-emission scenarios).	Impairment of raw material availability	Short-, medium- and long-term
		Risk	Physical risk: Higher operating costs and/or capital expenditure caused by climate change adaptation (e.g. need for more intensive cooling of production processes to cope with temperature increases).	Rising operating costs and potential business interruptions from climate-related hazards	Short-, medium- and long-term
E1.2	Climate change mitigation				
E1.2	Climate change mitigation	Negative impact	The CEWE Group directly contributes to global warming as a result of activities within its own operations that emit greenhouse gases (Scope 1)	(In-)direct contribution to global warming	Short-, medium- and long-term
		Negative impact	The CEWE Group indirectly contributes to global warming by procuring and consuming energy within its own operations (Scope 2).	(In-)direct contribution to global warming	Short-, medium- and long-term
		Negative impact	The CEWE Group indirectly contributes to global warming by causing GHG emissions from activities within its upstream value chain (in particular the extraction of raw materials such as wood and oil; the processing of raw materials into products like aluminium and paper or chemicals used as fuels; transport) (Scope 3).	In-)direct contribution to global warming	Short-, medium- and long-term
		Negative impact	The CEWE Group indirectly contributes to global warming by causing GHG emissions from activities within its downstream value chain (e.g. energy consumption of OSF terminals, transport and distribution, employee travel) (Scope 3).	In-)direct contribution to global warming	Short-, medium- and long-term
		Risk	Transition risk: An increase in carbon pricing can lead to direct additional costs (in particular carbon pricing of the CEWE Group) and indirect additional costs (in particular increased purchase prices due to passing on the costs carbon taxation in the value chain).	Rising operating costs and potential business interruptions from climate-related hazards	Short-, medium- and long-term
		Risk	Transition risks: Financial risks resulting from a tightening of regulatory requirements could lead to adaptation costs (e.g. for adjusting the ICS) and possibly non-compliance penalties.	Rising operating costs and potential business interruptions from climate-related hazards	Short-, medium- and long-term
		Opportunity	Market opportunities: Increasing competitiveness and gaining market share through reputational gains (e.g. climate-friendly products as a marketing tool) and expanding the product portfolio to include innovative and climate-friendly product solutions.	Increasing financial performance and competitiveness by implementing climate-friendly transformation measures	Short-, medium- and long-term
		Opportunity	Increased financial performance due to (better) access to funding (e.g. access to government subsidies or improved financing conditions) as a result of lower GHG emissions.	Increasing financial performance and competitiveness by implementing climate-friendly transformation measures	Short-, medium- and long-term



Environment (E)					
ESRS	((Sub-)sub-)topic	IRO category	IRO	Cluster	Time horizons
E1.2	Climate change mitigation	Opportunity	Implementation of climate-friendly transformation measures (e.g. introduction of new technologies) can lead to cost savings (e.g. through increased energy efficiency, switching to more climate-friendly and at the same time cheaper resources).	Increasing financial performance and competitiveness by implementing climate-friendly transformation measures	Short-, medium- and long-term
E1.3	Energy				
E1.3	Energy	Negative impact	Energy consumption (particularly in the production of photo products and relating to OSF terminals) from non-renewable resources within the CEWE Group's own operations.	(In-)direct contribution to global warming	Short-, medium- and long-term
E2	Pollution				
E2.5	Substances of concern	Negative impact	Contribution to pollution through the use or generation of substances of concern within the upstream (wide range of 200 – 250 hazardous substances and dangerous chemicals) or downstream (e.g. hazardous and contaminant production waste) value chain of the CEWE Group.	Use and/or generation of substances of concern	Short-, medium- and long-term
		Negative impact	Contribution to pollution through the use of hazardous substances in the CEWE Group's own operations.	Use and/or generation of substances of concern	Short-, medium- and long-term
E4	Biodiversity and ecosystems				
E4.1	Direct impact drivers of biodiversity loss	Negative impact	The CEWE Group's upstream value chain requires raw materials (especially wood for paper production) taken from ecosystems that are important for carbon sequestration (especially forests).	State of biodiversity	Short-, medium- and long-term
		Negative impact	Contribution to the loss of biodiversity through deforestation caused by activities (in particular the extraction of wood for paper production and the extraction of fossil raw materials) within the upstream value chain of the CEWE Group.	State of biodiversity	Short-, medium- and long-term
		Negative impact	Contribution to the loss of biodiversity through the pollution of air, water, soil and/or microorganisms caused by activities within the CEWE Group's own operations and the Company's upstream or downstream value chain (including extraction and processing of raw materials, chemical production/application, transport and distribution, disposal of production and end-product waste).	State of biodiversity	Short-, medium- and long-term
E5	Circular economy				
E5.1	Resources inflows, including resource use	Negative impact	Extraction and/or use of non-renewable resources through activities within the CEWE Group's upstream or downstream value chain (in particular many intermediate products such as plastics, chemicals or metals for the production of which (non-renewable) fossil raw materials are required).	Resource availability and substitution	Short-, medium- and long-term
		Negative impact	Use of non-renewable resources as part of chemical processes in the CEWE Group's own operations (e.g. chemicals in the production of photo products).	Resource availability and substitution	Short-, medium- and long-term
		Risk	Market risk: rising production costs due to higher prices for required resources.	Resource availability and substitution	Medium- and long-term



Environment (E)

ESRS	((Sub-)sub-)topic	IRO category	IRO	Cluster	Time horizons
E5.1	Resources inflows, including resource use	Risk	Political and legal risks: increased costs (e.g. due to process adjustments, transitioning to other resources) due to stricter regulations for the extraction and use of required resources.	Resource availability and substitution	Medium- and long-term
		Opportunity	Cost savings by increasing resource efficiency and reducing the need for resource inflows.	Resource efficiency	Medium- and long-term
		Opportunity	Market opportunity: Developing new business areas and market segments through product innovations that make use of recycled materials (e.g. recycled photo paper), addressing specific consumer groups.	Resource availability and substitution	Medium- and long-term
E5.2	Resource outflows related to products and services				
E5.2	Resource outflows related to products and services	Negative impact	Low durability, reusability, repairability, refurbishment, recycling and closed-loop management of products (especially photo products) from the CEWE Group's own operations.	Resource outflow reduction/substitution	Short-, medium- and long-term
		Positive impact	By integrating services aimed at extending the service life (maintenance and repair) and reusing product components (recycling), the CEWE Group contributes to reducing its own resource outflow.	Resource outflow reduction/substitution	Short-, medium- and long-term
E5.3	Waste				
E5.3	Waste	Negative impact	Hazardous waste materials are generated in particular in the context of several processes in the upstream value chain of the CEWE Group (including processing of raw materials, use of chemicals (e.g. in cotton cultivation)).	Supply chain waste management	Short-, medium- and long-term
		Negative impact	Generation of non-recyclable waste (e.g. residues from chemical processes) in the CEWE Group's own operations.	Own operations waste management	Short- and medium-term

Social matters (S)

ESRS	((Sub-)sub-)topic	IRO category	IRO	Cluster	Time horizons
S1	Own workforce				
S1.1	Working conditions	Negative impact	Negative impacts on employees' security for personal life planning due to the employment or deployment of temporary employees and/or non-guaranteed hours employees (e.g. agency workers).	Working conditions and labour rights	Medium-term (1 – 5 years)
		Negative impact	The working hours of employees are not recorded in all areas. This may represent an unknown risk of overtime or undertime, which could have a negative impact on both the employees themselves and the Company.	Working conditions and labour rights	Medium-term (1 – 5 years)
		Positive impact	Ensuring a high level of personal life planning security for employees thanks to long-term contracts based on collective agreements with guaranteed working hours and benefits.	Working conditions and labour rights	Medium-term (1 – 5 years)
		Negative impact	Inequality in the pay of workers depending on their contractual status and their coverage by collective agreements (particularly affects seasonal workers).	Working conditions and labour rights	Medium-term (1 – 5 years)



Social matters (S)

ESRS	((Sub-)sub-)topic	IRO category	IRO	Cluster	Time horizons
S1.1	Working conditions and labour rights	Positive impact	Enabling employees to vouch for their interests and views within the Company by upholding their right to freedom of association, which gives employees the opportunity to organise themselves, to form groups such as trade unions and to become members of such representative associations.	Working conditions and labour rights	Medium-term (1 – 5 years)
		Positive impact	Guaranteeing high-quality working conditions for employees by means of collective agreements for the CEWE Group workforce.	Working conditions and labour rights	Medium-term (1 – 5 years)
		Positive impact	Helping employees to fulfil their personal duties (examples include the CEWE Group's own crèche and holiday camps) and programmes for specific needs (e.g. "parent cafes").	Working conditions and labour rights	Medium-term (1 – 5 years)
		Negative impact	Work-related accidents and/or illnesses caused by the Company's operations (e.g., the production process).	Working conditions and labour rights	Medium-term (1 – 5 years)
		Opportunity	Increasing profitability by increasing production efficiency and reducing impairments to business by means of good working conditions (includes aspects such as secure employment, adequate wages, health and safety).	Working conditions and labour rights	Medium- and long-term
S1.2	Equal treatment and opportunities for all				
S1.2	Equal treatment and opportunities for all	Positive impact	Promoting equal treatment and equal opportunities by means of an Equality Network and training programmes.	Integrative and safe working environment	Short- and medium-term
		Positive impact	Promoting the continuous professional development of its employees in terms of their skills and opportunities for employment with a comprehensive range of training and qualification programmes.	Integrative and safe working environment	Medium- and long-term
		Positive impact	Incorporating the needs and wishes of people with disabilities as part of the corporate culture, e.g. by ensuring that they have easy access to common areas, that they can easily participate in company events, etc. Contributing to the integration of persons with disabilities into the labour market by employing a large number of persons with disabilities.	Integrative and safe working environment	Medium- and long-term
		Negative impact	Limited employment and inclusion opportunities for people with physical disabilities at CEWE Group sites lacking accessibility.	Integrative and safe working environment	Medium- and long-term
		Negative impact	Fostering cases of discrimination through inadequate prevention.	Integrative and safe working environment	Medium- and long-term
		Negative impact	Addressing existing inequalities, apart from gender imbalance, plays only a minor role.	Integrative and safe working environment	Medium- and long-term
S2	Workers in the value chain				
S2.1	Working conditions	Negative impact	Potential work-related accidents and/or illness as caused by the CEWE Group's operations in the value chain (as a result of the production process, for example).	Working conditions and worker safety for workers in the value chain	Short-, medium- and long-term



Social matters (S)

ESRS	((Sub-)sub-)topic	IRO category	IRO	Cluster	Time horizons
S2.3	Other work-related rights				
S2.3	Other work-related rights	Negative impact	Potential negative impacts on children (e.g. physical/psychological harm, disruption to school attendance, etc.) due to possible cases of child labour within the CEWE Group's value chain.	Forced labour and child labour	Short-, medium- and long-term
		Negative impact	Potential negative impacts on the well-being of workers in the CEWE Group's value chain due to possible work in the company's value chain that is required of any person under threat of penalties and for which the person has not volunteered.	Forced labour and child labour	Short-, medium- and long-term
S4	Consumers and end-users				
S4.1	Information-related impacts for consumers and end-users	Negative impact	Potential data leaks would contribute to the dissemination of very personal data of end consumers (photos, user data).	Privacy and compliance	Medium-term (1 – 5 years)
		Risk	Legal and political risks: Fines, penalties, sanctions or cost of remedies due to the breach of consumer and/or end-user data protection, as well as additional costs due to the need to adapt the existing IT infrastructure to regulatory requirements.	Privacy and compliance	Long-term (>5 years)

Governance (G)

ESRS	((Sub-)sub-)topic	IRO category	IRO	Cluster	Time horizons
G1	Business conduct				
G1.1	Corporate culture	Opportunity	The CEWE Group has the opportunity to strengthen employee identification by having identifiable corporate values, which can increase productivity and lead to long-term employee loyalty.	Corporate culture	Medium-term (1 – 5 years)
		Opportunity	Communicating values in a way that is suitable for the target group can help to strengthen the image and brand value.	Corporate culture	Medium-term (1 – 5 years)
G1.5	Management of relationships with suppliers				
G1.5	Management of relationships with suppliers	Positive impact	Positive impacts on suppliers' liquidity and their ability to plan with greater certainty by having a supplier code of conduct guaranteeing timely payments for small and medium-sized companies.	Supplier relationships and management	Medium-term (1 – 5 years)
		Opportunity	Reduction of transaction costs and improved conditions by maintaining long-term supplier relationships (e.g. as a result of active supplier management by CEWE and compliance with fair payment terms).	Supplier relationships and management	Long-term (>5 years)



Integration of sustainability-related performance in incentive schemes (ESRS 2 GOV-3)

The Company has not established any performance-related remuneration schemes in relation to sustainability for Executive Board members or management staff.

Statement on due diligence (ESRS 2 GOV-4)

Due diligence is integrated into the Company's governance, strategy and business model development (cf. SBM-1 [page 109](#)). This ensures that sustainability aspects are properly accounted for in the Company's most senior management and decision-making structures. At the same time, affected stakeholders also participate in activities at all relevant steps (cf. SBM-2 [page 115](#), S1 SBM-3 [page 154](#), S1-2 [page 158](#), S2 SBM-3 [page 166](#), S2-2 [page 168](#), S4 SBM-3 [page 171](#), S4-2 [page 175](#)). In this context, the competent business departments are primarily responsible for completing and reviewing due diligence; further details of corresponding controls are provided in this report.

The methods described in the section "Assessment of material impacts – methodology" [page 116 ff.](#) are applied to determine and assess potential negative impacts. This enables the precise identification of risk categories and their evaluation in terms of severity. To enable a targeted response to identified risks and impacts, the existing policies, actions and targets are assigned to the identified impacts, risks and opportunities (IROs). This IRO-PAT mapping, whereby content from policies (P), actions (A) and targets (T) is assigned to the relevant ESRS data points, creates a content-driven overview of progress, renders potential action areas visible and enables efficient control of the qualitative content items to be reported on. The underlying double materiality assessment is presented in detail in the section "Disclosures on the materiality assessment process", [page 116 ff.](#)

The respective departments have used internal workshops to prepare their policies, actions and targets as standardised fact sheets to ensure the content requirements are fulfilled for relevant ESRS data points. As of this writing, no specific disclosures exist for tracking the effectiveness of these efforts and for communicating their results. However, ongoing reviews are made as part of the processes as described, which aim to secure the continuous observance of due diligence and to make enhancements as necessary.

Risk management and internal controls over sustainability reporting (ESRS 2 GOV-5)

The German Corporate Governance Code (GCGC) attaches great importance to sustainable governance, in which environmental and social goals form an integral part of the strategies, planning and operational processes to be devised by a business. As a result, sustainability is also accounted for by risk management, compliance management and the internal control system.

To assess risks, the CEWE Group utilises a quantified estimate of the impact score, which together with the likelihood of occurrence produces the expected risk value (risk score). The associated control measures actions are documented as well and the indicators implemented for early detection are also specified. The Company prioritises risks using the respective expected risk value.

Risk management at the CEWE Group is embedded within a risk identification system that has been designed according to the provisions of the AktG. This system is used to identify, highlight and assess risks, including sustainability risks. The risks are presented regularly to the Executive Board for review. The results are also presented to the supervisory committees for discussion. The overall risk process is based on the provisions of German stock corporation law (AktG, German Securities Trading Act (Wertpapierhandelsgesetz – WpHG), etc.), which are partially reflected in internal policies.

In the context of strategic risks, the Company has already recorded two sustainability risks in its internal risk management solution. As of this writing, however, no link has been made between the risks identified during the double materiality assessment and the general risk management system (RMS). The internal control system (ICS) ensures that the results of the reporting cycle are regularly reported to the administrative, management and supervisory bodies. The software uses the dual-control principle as a control mechanism, whereby both the risk manager and the risk owner review and approve each step.

In the context of its partial application of ESRS, the CEWE Group reserves the right not to report on datapoint GOV-5 36c.

When addressing operational risks (e.g. price risks, risks affecting the technical infrastructure and production-/customer-relevant systems), the CEWE Group utilises standardised IT systems, high-availability architectures and backup data centres/lines throughout the Group. This ensures the stability of the technical infrastructure. The Company uses redundant processes at various locations to safeguard its production processes.



The Company uses the risk inventory to create an annual risk report, which consolidates the identified risks and their individual assessments. During the year, these risk assessments are reviewed at least once a quarter; the results are also submitted to the Supervisory Board on at least a quarterly basis. Beyond these periodic processes, developments occurring at short notice can also be reported as ad-hoc risks.

Strategy

Strategy, business model and value chain (ESRS 2 SBM-1)

The CEWE Group operates in three strategic business units. The Company's core business is photofinishing: this is based on digital data and encompasses all photographic products. The CEWE PHOTOBOOK is the core product, and is supplemented by photo calendars, photos, greetings cards, posters, wall art, phone cases and photo gifts. Alongside Photofinishing, the CEWE Group operates the CEWE RETAIL business unit, comprising the sale of photo hardware and photofinishing products, and including bricks-and-mortar stores as well as online shops.

The Company uses the third business unit, Commercial Online Printing, to produce and market printed advertising materials for commercial customers.

The Company makes targeted investments in the improvement of production processes, material efficiency and sustainable alternatives. Efforts are also made to actively promote ongoing developments in digital print and personalised print solutions.

Metrics on employees by geographic area are provided in the section "Characteristics of the undertaking's employees" (S1-6) [page 163](#).

CEWE Photofinishing

Measured by revenue, the CEWE Group is the European market leader in photofinishing – formerly based on analogue film, today using digital data. After establishing CEWE PHOTOBOOK as its main product, the CEWE Group has steadily and systematically expanded its product portfolio.

The CEWE Group not only develops new products, however, but also uses product and brand communication to boost demand and sales for existing products. Consumers can purchase the Company's photofinishing products either at the CEWE Group retail partners or directly from the company. For the vast majority of the photofinishing products ordered, the Company handles both order acceptance and customer communication.

In addition to the CEWE PHOTOBOOK, the CEWE brand's product range includes photo prints, posters and wall art, calendars, greeting cards and photo gifts. These products are available directly from CEWE Photo Service and from more than 20,000 retail partners across Europe. Many of these partners also offer CEWE Instant Photos from instore CEWE Photostations.

Cheerz's photofinishing apps are available in France, Spain and Italy in particular. With its strong focus on mobile ordering and designs, the brand primarily addresses a young target audience. Cheerz offers creative prints and photoboxes in various designs, as well as more traditional items such as photobooks and wall art.

DeinDesign specialises in personalising electronic devices such as smartphones, tablets, laptops and game consoles. Customers can use their own photos to create covers, cases and design foils or choose from a wide range of motifs.

Pixum sells high-quality branded products across Europe, including the Pixum Photo Book, Pixum Wall Art and Pixum Photo Calendar. This online photo service allows its customers to design and order items any time, anywhere – whether via the Pixum smartphone app, its website or the free Pixum Photo World software.

WhiteWall specialises in gallery-quality wall art for professional and amateur photographers. In addition to its home market of Germany, the brand operates in many other European countries as well as several selected markets outside Europe.

The Group operates its photofinishing business almost exclusively in Europe, with Germany, Austria and Switzerland (the "DACH" region) being its most important market. Overall, the CEWE Group's 13 photo labs and production facilities ship to customers in 21 European countries. The Company operates its retail business, comprising bricks-and-mortar stores and online platforms, in the Czech Republic, Norway, Poland, Slovakia and Sweden. The focus here is on creating photofinishing products, specifically the marketing of the CEWE PHOTOBOOK, calendars, greetings cards, wall art and photo gifts.

The contribution made by the products in photofinishing range to revenue and earnings is reported in the Photofinishing business unit.



The Company uses the total number of photos produced as a non-financial performance indicator in Photofinishing. This metric encompasses all photos either provided as individual prints or used in added-value products such as the CEWE PHOTOBOOK, photo calendars, wall art, greetings cards and photo gifts.

Owing to the economic importance of the CEWE PHOTOBOOK, the number of copies produced is reported as a separate metric and constitutes one of the Company's non-financial performance indicators. The CEWE Group management team analyses these performance indicators on a regular basis – at least weekly, sometimes daily. The annual report includes a variance analysis that presents the performance of these metrics, which is discussed in the “Results” section. The forecast also includes a target for the following year. In Commercial Online Printing, non-financial performance indicators do not play such a large role, however. Accordingly, they are not separately reported or discussed in external communications.

CEWE Retail

In the Retail business unit, revenue and earnings only result from the photo hardware business – for example cameras and photo accessories. The CEWE Group will continue to develop this retail goods business to maximise margins while consciously avoiding unprofitable revenue streams.

In the Czech Republic, Poland, Slovakia and Scandinavia, the CEWE Group operates its multi-channel retailing business for photo hardware and photofinishing products.

Commercial Online Printing

In Commercial Online Printing, the primary focus is on offering merchandising products and other corporate printed materials to businesses, agencies and advertising service providers. The Company is represented here by the brands SAXOPRINT and viaprinto. SAXOPRINT has positioned itself with a broad range of very inexpensive products, while viaprinto maintains a strong focus on business customers and has specialised in offering high print quality and an extensive service portfolio (including online previews and multi-carrier shipping). The CEWE Group operates its Commercial Online Printing business for printed advertising material in Germany as well as other European countries where it has a local website. While the Commercial Online Printing business offers a similar vertical integration to Photofinishing, the CEWE Group supplies less software for the creation of printing products (unlike CEWE PHOTOBOOK, for example).

In 2024, total Group revenue amounted to 832.8 million euros [page 63](#).

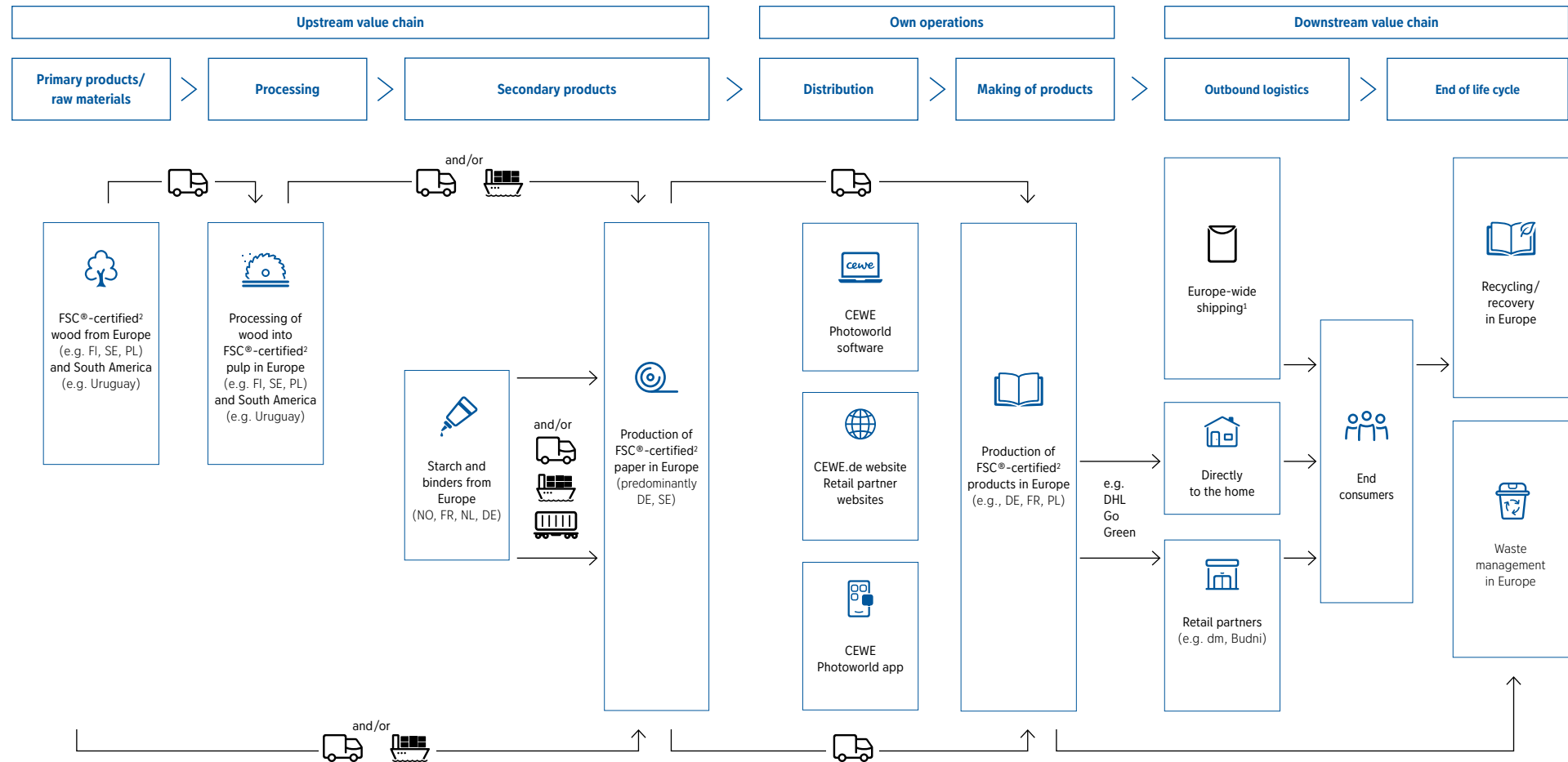
Key characteristics of the upstream and downstream value chain

The CEWE Group has presented the value chain as it relates to its main product, the CEWE PHOTOBOOK. An integral part of upstream value creation is the use of high-quality materials for the production of personalised printed products. The primary material is paper, largely obtained from FSC®-certified sources. The CEWE Group also makes use of paperboard, printer supplies (ink) and adhesives (glue), as well as film and other packaging. The ingredients and raw materials for the products purchased are sourced from the upstream supply chain, comprising around 8,000 suppliers.





Stages of a digitally printed CEWE PHOTOBOOK value chain



FSC®-certified paper FSC® C101851

¹ CEWE ships within DE, AT, CZ, DK, NO, SE and UK using shipping programmes from the respective local service providers that support various climate change mitigation projects.² All CEWE PHOTOBOOKS are FSC®-certified (FSC® mix 70%)



Beyond these specific materials required for the CEWE PHOTOBOOK, the CEWE Group sources a wide variety of other raw and processed materials for various production processes, including plastics, pigments, solvents, additives, and parts made from metal and glass. These materials are supplied by a large number of long-standing partners, who include papermakers, chemicals companies, plant engineers and packaging producers. Materials are shipped using a mixed-mode approach to logistics and transportation that includes road, rail and marine freight.

The downstream supply chain primarily comprises sales channels via apps, websites, software packages and photo booths. Products reach CEWE Group customers either via direct retail points or via the shipping department and the Group's shipping service providers. Alongside sales and distribution, the CEWE Group also offers other services such as customer support, marketing, and partnerships with retailers and resellers.

Further information about the value chain is included in the topical standards E2 and E5, in the sections "Pollution in the value chain", "Policies related to resource use and circular economy" and "Material impacts, risks and opportunities and their interaction with strategy and business model".

The CEWE Group has not prepared an assessment of its currently most important products and/or services as well as significant brands and customer groups in relation to its sustainability targets. The CEWE Group does not do business in areas of the economy subject to legal prohibitions. The Company does not earn revenue from fossil fuels, the production of chemicals or tobacco, or controversial weapons.

Sustainability reporting and control

Sustainability forms an integral part of the CEWE Group corporate strategy and is not only viewed within the context of corporate social responsibility but also as a long-term investment in the future viability of the company. Since 2010, the CEWE Group has been documenting its progress with an annual sustainability report. Projects have been implemented both by the core Sustainability Group and locally at company sites. This has worked to integrate sustainability into day-to-day business, and positioned the CEWE Group as a pioneer for transparency and engagement.

The CEWE Group has defined five dimensions of sustainability to describe its own activities:

- Honest and fair conduct
- Economic viability
- Environmental protection and resource conservation
- Responsibility for employees
- Community engagement

Further development and regulatory requirements

To further develop sustainability in a strategic context, clear targets have been formulated and actions drawn up for implementation. An internal control system (ICS) is also being set up to ensure the audit-ready documentation of progress on sustainability and monitor the implementation of measures. The sustainability strategy is also managed by a newly created central unit.

Sustainability strategy focus topics

Diversity and inclusion

The CEWE Group actively promotes an inclusive corporate culture by incorporating various perspectives, fostering creativity and innovation, and strengthening the customer focus.

Sustainable products

The CEWE Group is taking steps to enhance the sustainability of its product portfolio. New products must meet internal sustainability criteria, while non-sustainable products are being gradually relaunched or discontinued.



Sustainable production

Production is continuously optimised to reflect environmental aspects. This has included the installation of photovoltaic systems on Company premises.

Key stakeholder groups – responsibility towards stakeholders and their importance

Many groups of stakeholders are fundamental to the business success of the CEWE Group.

Employees play an instrumental role in value creation: their satisfaction, health and personal development are essential drivers of the Company's profitability and power to innovate. The corresponding actions taken to promote positive impacts on employees are explained in greater detail under "Summary of positive impacts" (ESRS S-1 Own workforce, [page 154](#)). The working conditions of employees in the value chain – especially employees of suppliers and logistics companies – are addressed by a wide range of actions with the aim of avoiding or mitigating potentially negative impacts.

Jobs, environmentally friendly practices and community projects are benefits that accrue to **affected communities** in the regions in which the CEWE Group operates. The Company helps to improve quality of life and sustainable development within these communities by investing in local educational and environmental projects, and supporting community initiatives. Region-specific projects can involve the provision of donations, sponsoring or grants. In 2024, the CEWE Group supported more than 200 organisations and clubs, including several sites run by SOS Children's Villages worldwide.

Consumers who use the products and services provided by the CEWE Group are key stakeholders. The needs of these consumers form a central point of focus for the Company's activities. The Company wants to help its customers preserve their special moments by offering personalised products with long lifetimes. To ensure that consumers can make responsible purchasing decisions, the Company takes action to implement transparency in the value chain and uses environmentally friendly materials in its production activities – see the section "Communication and transparency" [page 114 f.](#)

The Company pursues the goal of reducing its ecological footprint as a continuous process and has identified **Nature as a silent stakeholder**. This reduction process makes use of resource-friendly production methods, the deployment of environmentally friendly materials, and the reduction of emissions and responsible procurement as aided by FSC® certification.

Investors and credit institutions secure the financial resources for business activities and further development. Transparent reporting and sustainable growth strengthen the confidence of these stakeholders.

Business partners make up another stakeholder group that includes suppliers, distributors and external partners, who play an instrumental role in the manufacture and distribution of products. Transparent and fair business practices promote competitiveness and the power to innovate, and strengthen long-lasting partnerships along the value chain.

Non-governmental organisations (NGOs) address environmental and social issues. The Company cooperates with NGOs to promote environmental and social initiatives, and makes a positive contribution to communities and the environment.

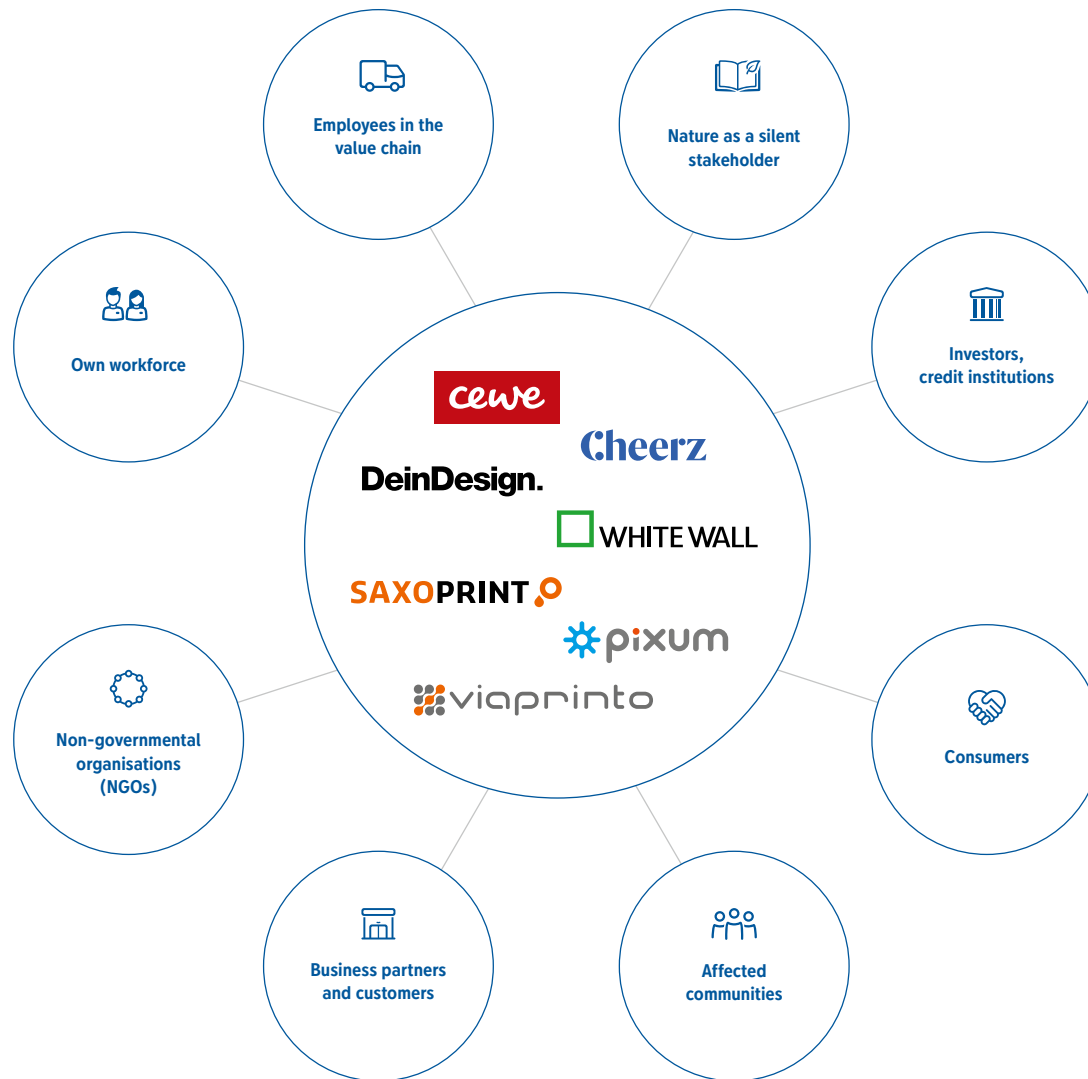
Interests and views of stakeholders (ESRS 2 SBM-2)

A key pillar of sustainability management at the CEWE Group is the transparent and continuous dialogue that it maintains with stakeholders. Key stakeholders are also taken into account in the course of the double materiality assessment (DMA). The topic-specific SBM-2 disclosures are made in the respective topical standards.

The CEWE Group keeps its stakeholders informed about progress, and records requirements or needs as part of determining key topics for the Company. This involvement is assured by internal analyses, external consulting opinions and targeted feedback processes.



CEWE Group stakeholder groups



Stakeholder engagement at the CEWE Group

The CEWE Group takes the following actions to actively implement stakeholder integration:

- Tours of company premises for interested customers and a multi-channel response to enquiries (email, phone, social media, etc.)
- Regular stakeholder surveys, workshops and dialogue events
- Regular consultations with the Works Council and internal feedback surveys
- Providing investors with information about long-term company planning
- Talking to investors at the Capital Market Days that are held regularly at roughly two-year intervals
- Regular communication via press releases, investor relations and one-to-one meetings
- Annual meetings and field sales interactions with retail partners
- Employees are represented by committees, working groups and industry projects, e.g. German Federal Association of Large Photo Labs (BGL)
- Review by Supervisory Board to ensure various stakeholder perspectives are accounted for

Communication and transparency

The CEWE Group informs its stakeholders regularly about relevant developments and takes steps to ensure their early involvement. Various communication channels are used for this purpose:



- Press releases about current projects and sustainability topics
- Information about new products, trends and seasonal events (e.g. Christmas, travel)
- Reports on the CEWE Group activities inside and outside the region
- Direct dialogue between PR and the Sustainability Group, and relevant business departments

The CEWE Group prioritises transparency and high-quality advice in its customer liaison work. High standards of communication are also upheld within social media. Customer opinion, expectations and needs are evaluated regularly, and used as input for the development of new products and services.

Alignment with international standards

The definition of stakeholder engagement is modelled on the OECD Guidelines. A systematic approach is taken to stakeholder groups to guarantee sustainable and long-term partnerships.

The CEWE Group performs regular analyses of customer and end-consumer opinions, expectations and needs, which enables the use of emerging trends to generate ideas for product innovations. As the Company always accounts for the interests of its stakeholders, it also wishes to understand their needs in relation to sustainability. These insights help the CEWE Group to focus the development of its sustainability actions on specific targets – such as increasing customer satisfaction, for example.

The CEWE Group provides updates on progress and surveys needs or requirements

The CEWE Group is keen to engage in regular dialogue with its various stakeholder groups, and systematically integrates their feedback into its operational business and company strategy.

To ensure the continuous improvement of customer satisfaction and service quality, the Company conducts comprehensive net promoter score (NPS) surveys. These surveys have the aim of analysing the experience with the Company's products and services – including sustainability aspects – and facilitate targeted optimisation actions for improving its NPS.

Talking to employees, suppliers and retail partners also forms an important part of stakeholder communication activities. Comprehensive surveys for measuring and promoting employee satisfaction are conducted regularly with Great Place to Work®. Such surveys are carried out every four to five years, and form the basis for actions that are aimed at improving working conditions and company culture.

The CEWE Group also maintains an ongoing dialogue with suppliers and retail partners. Although the Company does not yet envisage tracking these interactions in full, relevant stakeholders are kept involved by means of established communications channels and strategic partnerships.

The procedure for assessing material sustainability aspects uses proxy stakeholders to account for the interests of various groups of stakeholders. This is also reflected in the adjustment made to the materiality matrix, which aims to ensure that the material topics in the sustainability strategy correspond to the requirements of internal and external stakeholder groups.

As and when warranted, stakeholder opinions and interests are shared regularly within the Executive Board, and the Board of Trustees and the Supervisory Board of CEWE Stiftung & Co. KGaA are also kept informed about any material changes observed. These activities occur as part of the cyclical board meetings: the Executive Board meets once a week, while the Board of Trustees and Supervisory Board meet in in-person sessions at least once a quarter.

Assessment of resilience as part of the materiality assessment for all material ESRS topics

As part of the materiality assessment, the Company has assessed the resilience of the strategy and business model of the CEWE Group, with the aim of identifying material impacts, risks and opportunities, and analysing their potential effects on the Company. This process made use of qualitative approaches in order to assess the ability of the Company to address external influences such as climate risks, regulatory changes and developments in the market.



The analysis was completed while accounting for short-, medium- and long-term time horizons according to ESRS 1. The Company did not conduct a separate resilience analysis. The lack of this scenario analysis limited the overall volume of quantitative data that could be provided. The results of this assessment serve as a basis for strategic planning, while supporting the incorporation of material challenges and opportunities into future business development. A quantification of the financial effects of the material risks and opportunities is not possible, as the CEWE Group does not evaluate IROs within its risk management system (RMS). This applies equally to all topical environmental standards that follow. All impacts, risks and opportunities identified in this non-financial statement are modelled on the reporting rules for the topical ESRS. Company-specific topics have not been identified. This applies equally to all topical standards that follow.

Impact, risk and opportunity management

Disclosures on the materiality assessment process

Description of the process to identify and assess material impacts, risks and opportunities (ESRS 2/E1 IRO-1)

As part of carrying out the DMA, the CEWE Group has identified the material impacts, risks and opportunities as required for ESRS compliance. In this context, “impact materiality” has been applied to determine material impacts, and “financial materiality” has been applied to identify material risks and opportunities.

The analysis encompasses all departments and countries in which the CEWE Group operates, as well as the entire upstream and downstream supply chain. To determine the relevant scope, all material activities were identified along the value chain.

This analysis produced the following picture for the three areas:

Upstream supply chain

In analysing the upstream supply chain, the materiality assessment focused on the industries of greatest economic significance – first and foremost the paper industry. Employees in these significant industries were considered in just the same way as the actual and potential environmental impacts.

Own operations

In the analysis of own operations, the focus covered all three business units of the CEWE Group: Photofinishing, Commercial Online Printing and – as a secondary priority – Retail. The analysis assessed both production itself as well as the core services involved, including the teams who work within the order processes and who support the B2C business model.

Downstream supply chain

The analysis of the downstream supply chain considered both the sale of CEWE Group products by retail partners as well as the B2C business model. The corresponding impacts on consumers were also examined.

Stakeholder engagement

The following stakeholder groups were identified by the materiality assessment and the investigation of the value chain: customers, suppliers, investors, supervisory bodies (Supervisory Board, Group Works Council), employees, affected communities along the value chain, and society. These were represented by professionally qualified proxy stakeholders who were involved in the evaluation of the impacts, risks and opportunities, as they are either directly affected or are members of groups addressed by the non-financial statement.

As provided for in the ESRS, the interests of these groups were incorporated into the materiality assessment. These groups were not surveyed directly. Instead, proxy stakeholders with corresponding expertise (subject-matter experts) assessed the relevance of these interests pursuant to ESRS, using this as input for the identification and assessment of the IROs.

Assessment of material impacts – methodology

As required by the provisions of the ESRS, the materiality of current impacts was evaluated in terms of its severity. For potential impacts, the likelihood of occurrence was also taken into account. In both cases, the individual severity of an impact is comprised of its scale, scope and irremediable character. For potential impacts, the severity is not multiplied directly by the probability but by a factor weighted according to the degree of probability.



The following items were also analysed for each impact identified:

- Caused by the CEWE Group (direct responsibility)
- Contribution of the CEWE Group to impact
- Involvement via business relationships

As a final step, the chronological time horizon was determined for each impact.

Assessment of financial materiality – methodology

As specified by the ESRS, the materiality of risks and opportunities was assessed according to the likelihood of occurrence and the potential scale or magnitude. The potential magnitude describes the financial effect that would be caused by the occurrence of the risk or opportunity. As with potential impacts, the assessment of the potential scale or magnitude is multiplied by a factor that is derived from the likelihood of occurrence. Here too, the risks and opportunities are assigned to an expected time frame.

The CEWE Group used the following process to assess the materiality of the impacts, risks and opportunities in the double materiality assessment.

1. Preparation of the double materiality assessment (DMA)

In preparation for the DMA, the CEWE Group identified the scope of activities in own operations and in the value chain as well as the relevant stakeholders. This information was used to appoint internal subject-matter experts (SMEs) who then accompanied the materiality assessment process as proxy stakeholders.

2. Identification of impacts, risks and opportunities

In the context of the CEWE Group activities, the impacts, risks and opportunities were identified according to the prescribed process. When compiling the list of potential impacts, risks and opportunities, priority was given to those areas that had been observed to be particularly relevant in the last materiality assessment and during the preparatory steps for the current materiality assessment.

3. Assessment of “impact materiality” and “financial materiality”

The identified impacts, risks and opportunities were assessed by the SMEs in workshops, and in cooperation with the CSRD project team established for CSRD reporting. Participants were instructed beforehand in the assessment methodology. For the quantitative assessment, the SMEs arranged the identified IROs along the scales for the relevant factors. The qualitative assessment was completed by a supplementary explanation of the quantitative appraisal. Predefined questions were answered as part of assessing risks and opportunities. This provided the CSRD project team for sustainability reporting with the option of carrying out independent quantification.

As a final step, the CSRD project team reviewed the data on impacts, risks and opportunity for completeness, consistency and coherence.

4. Verification and acceptance of double materiality

Once the IRO list had been reviewed, it was made available to management staff in order to confirm the results. This process involved participating line managers from departments such as Environment or Purchasing, for example, as well as the Executive Board, the Board of Trustees, the Group Works Council, the Supervisory Board and the Supervisory Board Audit Committee.

The materiality assessment identified all relevant impacts, risks and opportunities, with a focus being placed on especially relevant topics relating to the Photofinishing (B2C and B2B2C), Commercial Online Printing and Retail business units. The possibility of dependencies existing between impacts, risks and opportunities was accounted for. To analyse these interdependencies, the impacts classified as material were correlated with the identified risks and opportunities. The aim was to assess whether these dependencies could lead to a situation where risks or opportunities originally classified as non-material could gain greater relevance from their interaction with material impacts and thus influence the overall materiality assessment.

An auditing firm provided support for the double materiality assessment process in the form of external consultants. Regular contact was also maintained with internal SMEs.



In the course of identifying the IROs, the Company wished to prioritise especially high-risk activities in own operations and the value chain. Accordingly, prior knowledge from the last materiality assessment was used to establish points of focus in step two of the DMA, “Identification of impacts, risks and opportunities”. In addition, insights from step one were also used with the aim of identifying especially high-risk topic areas and relationships. Impacts were identified at many stages in the entire value chain. For each impact, the SMEs were therefore careful to note the location in the value chain at which each impact occurred. Categorisation into the groups (1) “caused directly”, (2) “contributed” and (3) “involved indirectly via business relationships” also indicates the type of relationship that the CEWE Group has with the respective impacts.

For sector-agnostic topics, the stakeholder analysis was used to document the affected stakeholders who are to be accounted for. The interests of affected parties – represented by the proxy stakeholders – were also accounted for in the subsequent validation steps.

The consultants supporting the project ensured that the perspectives of affected stakeholders were properly accounted for throughout the process.

The following rating scales were defined to assess impacts:

Positive impacts

Scale:

- 0 = n/a
- 1 = Very low
- 2 = Low
- 3 = Medium
- 4 = High
- 5 = Very high

Scope:

- 0 = n/a
- 1 = Limited
- 2 = Localised
- 3 = Medium
- 4 = Widespread
- 5 = Very widespread (global)

Likelihood:

- 1 = Unlikely (< 25%)
- 2 = Less likely (25–50%)
- 3 = Likely (50–75%) und
- 4 = Very likely (> 75%)

Together with the respective quantitative factors for calculation:

- 1 = 0.65
- 2 = 0.75
- 3 = 0.85
- 4 = 0.95

Negative impacts

Scale:

- 0 = n/a
- 1 = Very low
- 2 = Low
- 3 = Medium
- 4 = High
- 5 = Very high

Scope:

- 0 = n/a
- 1 = Limited
- 2 = Localised
- 3 = Medium
- 4 = Widespread
- 5 = Very widespread (global)

Irremediable character:

- 0 = n/a
- 1 = Straightforward/short-term
- 2 = With moderate effort
- 3 = Difficult/medium-term
- 4 = Very difficult/long-term
- 5 = Irremediable

Likelihood:

- 1 = Unlikely (< 25%)
- 2 = Less likely (25–50%)
- 3 = Likely (50–75%)
- 4 = Very likely (> 75%)

Together with the respective quantitative factors for calculation:

- 1 = 0.65
- 2 = 0.75
- 3 = 0.85
- 4 = 0.95



Calculation of the value for impact materiality

The sum of the values for the scale, scope and irreversibility of the impact is multiplied by the respective factor for the likelihood of occurrence.

This calculation produces a materiality score between 0 and 15. All impacts whose scores achieve a value of 8 or more are considered material in the context of sustainability reporting.

Potential human rights impacts constitute an exception to this rating system. For these impacts, the likelihood of occurrence plays a minor role and the severity is instead definitive. To ensure the proper handling of these impacts, these potential impacts are treated as actual impacts.

Quantitative assessment

The quantitative assessment was carried out using the above-mentioned information from the proxy stakeholders. The scales as given below were defined and used to assess the risks and opportunities. As with the assessment of the impacts, the calculation of the overall score does not use the probability itself but applies a separate factor. This approach prevents a situation where risks with very serious consequences but a low likelihood of occurrence fall beneath the materiality threshold.

Scale:

- 0 = n/a
- 1 = Very low
- 2 = Low
- 3 = Medium
- 4 = High
- 5 = Very high

Likelihood:

- 1 = Unlikely (<25%)
- 2 = Less likely (25–50%)
- 3 = Likely (50–75%)
- 4 = Very likely (>75%)

Together with the respective quantitative factors for calculation:

- 1 = 0.65
- 2 = 0.75
- 3 = 0.85
- 4 = 0.95

Calculation of the value for financial materiality

The materiality score is obtained by multiplying the value assessed for the scale with the respective probability factor. This produces a result between 0 and 5. Impacts with a score of at least 3 are considered material for sustainability reporting.

When assessing sustainability-related risks and opportunities, care was taken to ensure that this process is consistent with the assessment of other company risks unrelated to sustainability. The financial values for scale and likelihood are therefore based on the existing criteria from risk management.

Decision-making processes and assessment methodology

The key decisions in the process involved the selection of proxy stakeholders, the assessment of each IRO by the respective, responsible representative and the final assessment of sustainability topics in the workshop. Internal controls were carried out during the entire process. For each sustainability topic (both sub-topic and sub-sub-topic), the proxy stakeholders identified the relevant impacts, risks and opportunities. These were discussed in workshops within the department and with the CSRD project team, and assessed according to ESRS requirements. The IROs identified in the course of the double materiality assessment are not currently integrated into the Company's overall risk management system.

The Company does not currently have a process for identifying, assessing and managing opportunities as part of its general management structure. The IROs identified in the course of the double materiality assessment are not currently integrated into the Company's overall risk management system.



Sources for identification and assessment

The most important input for the identification and assessment of impacts, risks and opportunities is the expertise held by the SMEs and the individuals who review their assessments. During the assessment process, SMEs, management and the CSRD project team for sustainability reporting were requested to use relevant internal qualitative and quantitative information, such as the previous materiality assessment, for example. Data from the risk management system were also used for the purpose of assessing risks and opportunities. Finally, specialised information on sector comparisons as well as benchmarks were also provided by the consultants supporting the process.

Although the CEWE Group has spent several years tracking key sustainability topics and also carried out a materiality assessment to identify material sustainability topics in 2023, it had not completed a double materiality assessment in accordance with ESRS requirements before 2024, as these standards had not yet come into force. A comparison with earlier reporting periods is therefore not possible.

Description of the processes to identify and assess material climate change-related impacts, risks and opportunities (ESRS 2/E1 IRO-1)

As part of carrying out the double materiality assessment (DMA), the CEWE Group has identified the climate change-related material impacts, risks and opportunities. Existing analyses and calculations were consulted, as well as proxy stakeholders to establish a well-informed basis for the assessment.

Identification process and methodology

The identification of impacts is based on greenhouse gas accounting records, which enabled a comprehensive analysis of emissions sources along the entire value chain. The identified drivers for emissions were also systematically assessed. This was supplemented by a resilience/climate risk analysis for climate change adaptation. The analysis process also took into account the scenarios RCP 2.6, RCP 8.5 and the Greenpeace Climate Transition Scenario. The RCP 2.6 scenario is based on significant reductions to emissions as well as negative emissions technologies and has the goal of limiting global warming to under 2 °C – and ideally 1.5 °C.

Physical risks and impacts

Physical climate-related risks were determined using a climate risk analysis. This process involved proxy stakeholders, who participated in the assessment on the basis of the Greenpeace 2015 Energy [R]evolution report, 5th edition and the TCFD Recommendations.

In the course of completing the double materiality assessment, the CEWE Group identified a series of physical climate risks that may have potential impacts on business processes. One of these is heat stress, which can place a greater strain on both infrastructure and the workforce, particularly in warmer regions. Another is sea level rise, which can threaten sites located near to coastal areas. Droughts and flooding also constitute material challenges, as they may endanger water supplies as well as the smooth flow of logistics. Forest fires and landslides also have the potential to damage production facilities and result in business interruptions.

These risks can disrupt business operations and therefore cause revenue losses. The analysis covers time horizons for 2025, 2030 and 2040.

The impacts of the RCP 8.5 scenario were assessed in relation to sites operated by the CEWE Group. This produced the following findings:

- Production sites in Montpellier and Budapest are especially susceptible to prolonged heat waves and drought.
- Sites in Oldenburg, Mönchengladbach and Paris are at greater risk of suffering flooding events.

The increasing frequency of acute climate-related risks such as drought, heat waves, heavy rain or flooding could also affect the availability of raw materials. Short-, medium- and long-term time horizons have been defined. However, the specific interrelationships of these horizons with the expected lifetime of company assets, strategic planning horizons and capital allocation plans have yet to be clearly presented.

Transition risks and opportunities

The analysis of transition risks and opportunities was completed while accounting for transition events from ESRS E1 AR 12. Risks identified include the following:

- Increased pricing of GHG emissions
- Enhanced emissions-reporting obligations
- Regulation of existing products, services and manufacturing methods
- Increased cost of raw materials



- High energy consumption in paper production and its potential impact on price stability
- Change in demand for photo products due to climate-related adjustments in consumption

At the same time, opportunities are provided by new technologies, and the substitution of existing products and services with lower-emission alternatives.

The detailed assessment of transition risks shows that, taken together, rising operating costs and capital expenditure on climate adaptation actions constitute a significant challenge. Key factors that influence business planning here include the cooling of production processes, increases in carbon pricing and more extensive regulatory requirements. The Company has not made any critical climate-related assumptions in the consolidated financial statements.

Description of the processes to identify and assess material business conduct-related impacts, risks and opportunities (ESRS 2/G1 IRO-1)

For the materiality assessment, the CEWE Group has accounted for all sites in its own operations, while also using business activities from the upstream and downstream supply chain as input. The Company conducted screening based on the basis of consolidation and competent stakeholders. With the aim of representing and accounting for the interests and needs of the respective stakeholder groups, proxy stakeholders appointed from within the CEWE Group were incorporated into the materiality assessment process. This group included proxy stakeholders from affected communities.

Affected communities are the neighbourhoods around production sites, and include both industrial and residential developments. The interests of neighbourhoods in avoiding exposure to emissions in the form of noise or odours are recorded as part of the dialogue between Group companies and these neighbourhoods. The Company takes appropriate action as necessary, such as avoiding the use of loud machinery, adjusting machine operation times or scheduling goods deliveries outside night-time hours. The interest of the general public in clean water is also taken into account.

Description of the processes to identify and assess material business pollution-related impacts, risks and opportunities (ESRS 2/E2 IRO-1)

The findings of the materiality assessment show that the topic of “Pollution” is material for the CEWE Group. This results from two material impacts identified in conjunction with “substances of concern” (SoC, defined similarly to Annex II of the CSRD).

When the CEWE Group manufactures photo and print products, mixtures of chemicals containing SoCs are used at various steps during production. These steps include the development of film and photographic paper, the coating of sheets of paper, and the gluing of book bodies. However, the Company’s finished products do not present any hazards to consumers, as all SoCs used in the process will have been rinsed out of the product or reacted with other chemicals to form harmless secondary substances. These pollutants do not enter the air, bodies of water or soils directly. The CEWE Group has established and further optimised long-standing process steps which ensure that the levels of pollution in waste water are permanently kept to a minimum. Group companies discharge their waste water into the urban sewage systems via indirect discharge. Regular internal and external water analyses are

utilised to ensure that the influx of pollutants is kept below the legal limits at all times.

Tasks that are carried out correctly by trained personnel while observing the corresponding laws and regulations (including the German Hazardous Substances Ordinance (Gefahrstoffverordnung – GefStoffV), the Water Management Act (Wasserhaushaltsgesetz – WHG) and the German Ordinance on Facilities Handling Substances that are Hazardous to Water (Gesetz über Anlagen zum Umgang mit wassergefährdenden Stoffen – AwSV)) produce no adverse effects on the environment. However, incorrect handling may result in negative impacts, including chemical spills that could occur during a transportation or transfer of chemicals that fails to meet safety standards.

Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities (ESRS 2/E4 IRO-1)

In ESRS 2-IRO-1, the CEWE Group describes its process for determining material impacts, risks and opportunities, including the assessment of impacts on biodiversity and ecosystems at its own sites as well as in the value chain, and the assessment criteria that are applied in this procedure. The Company investigated all sites in the CEWE Group for nature reserves in the vicinity. In its double materiality assessment, the Company also explains how it uses the identification of impacts, risks and opportunities to determine and assess its dependencies on biodiversity, as well as ecosystems and ecosystem services, at its own sites and within the value chain. In this process, the Company also analysed the impact of greenhouse gas emissions in the value chain and in its own operations on biodiversity, for example. The double materiality assessment



was conducted with the involvement of proxy stakeholders, who were selected from within the CEWE Group and represent the interests of various stakeholder groups. In relation to biodiversity, proxy stakeholders participated from the core Environment unit handling the environmental management of the overall CEWE Group value chain, as well as local expertise where needed.

In relation to impacts on biodiversity and ecosystems, the CEWE Group draws in particular on the subject-matter expertise and experience of its proxy stakeholders. The upstream supply chain is of material importance to the Company's operations, as – compared with other raw materials – the high demand for paper involves factors that influence biodiversity. These aspects were considered separately during the double materiality assessment with the aim of determining relevant impacts. During the assessment process, the CEWE Group did not take systemic risks into account, nor were any negative impacts identified on priority ecosystem services.


The CEWE Group sources its paper predominantly from FSC®-certified sources. This approach ensures compliance with important environmental standards and – in the Company's opinion – also avoids biodiversity losses. Protecting human rights also forms an integral part of FSC® certification. Accordingly, the Company assumes that no negative impacts on affected communities occur, such that could have been surveyed in the course of a sustainability assessment. As the Company's production facilities are also generally located in industrial or urban areas, this also precludes the likelihood of negative impacts on affected communities. As a result, the proxy stakeholders did not identify any material impacts on indigenous peoples.

Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities (ESRS 2/E5 IRO-1)

For the materiality assessment, the CEWE Group has accounted for all sites in its own operations, while also using business activities from the upstream and downstream supply chain as input. The Company conducted screening based on the basis of consolidation and competent stakeholders. Proxy stakeholders from the CEWE Group made it possible to incorporate and account for the perspectives of various stakeholders, and include these in the materiality assessment. The individuals involved also included experts from Purchasing. Thanks to their wealth of knowledge in relation to goods inflows and outflows, these persons were able to provide a comprehensive

assessment of the impacts, risks and opportunities in relation to resource use and the circular economy. In some cases, specific issues required consultations with local waste management and recycling companies. Further information about the materiality assessment procedure at CEWE Group is provided by the process description according to ESRS 2 IRO-1. No other specific methods, assumptions or tools were utilised for this topic area.

Disclosure requirements in ESRS covered by the Company's non-financial statement – disclosure requirement IRO-2

The materiality assessment forms the basis for sustainability reporting within the context of the ESRS. A sustainability aspect is considered material if it fulfils one or both of the criteria for impact materiality and financial materiality. A detailed description of the double materiality assessment and the assessment methods can be found in **ESRS 2 IRO-1**  [page 116](#).

If a sustainability aspect is classified as material, the corresponding information must be disclosed in the topical ESRS, pursuant to the corresponding disclosure requirements (including application requirements). In so doing, care must be taken to ensure that the information provided not only reflects the importance of the respective aspect but also supports the decision-making process for users.



Environmental information

Climate change (ESRS E1)

Strategy

Transition plan for climate change mitigation (E1-1)

The CEWE Group does not currently have a transition plan. In 2025, the Company plans to set a new climate target as a follow-on target for the target soon to expire. The Group will also implement a transition plan as part of this step.

Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

Global climate change is a result of anthropogenic greenhouse gas (GHG) emissions. A major component within overall emissions comprises direct and indirect emissions from the use of fossil fuels. Climate change impacts affect both natural ecosystems as well as our social and economic structures. Examples of impacts from climate change include changes in biodiversity patterns and an increase in extreme weather events, with both of these potentially creating economic risks and security challenges.

The CEWE Group recognises the far-reaching consequences of climate change and views mitigation efforts as the responsibility of our society as a whole. Within the context of its sustainability strategy, the CEWE Group is actively addressing measures to reduce greenhouse gas emissions and strengthen climate resilience.

The climate strategy of the CEWE Group forms a part of the Company's overall sustainability strategy. In the dimension "Environmental protection and resource conservation", the Company applies the guiding principle of "Preserving nature" to define action areas and implements these as part of business activities. The action area "Saving energy and driving climate change mitigation" specifically targets addressing and/or countering climate change.

All of the impacts, risks and opportunities identified in this non-financial statement cover the essential ESRS reporting requirements. No topics specific to the Company have been identified.

Current and expected risks and opportunities

Physical risks

- The Company's own operations could be made more difficult by climate risks such as heat stress, sea level rise, drought and flooding.
- Asset impairments may result from climate risks such as heat stress, forest fires or flooding.
- Business interruptions could occur as result of climate risks relating to temperature, wind, water or solid masses, such as heat stress, sea level rise, water stress, drought, flooding or landslides.

Transition risks

- Higher operating costs and levels of capital spending could occur, which would be attributable to climate change adaptation (e.g. use of cooling in production processes).
- Higher carbon prices can result in both direct and indirect additional costs.
- A tightening of regulatory requirements could result in financial risks that, in turn, give rise to adjustment costs.

Opportunities

- Improved conditions in the supply chain can lead to improvements in efficiency throughout the value chain. A focus on sustainability may strengthen relationships with business partners and customers.
- New business opportunities could arise – involving new technologies, innovative ideas and new ways of working, for example – that drive the transformation of the economy and society. The Company could also develop new business areas – such as by developing new products that make a positive contribution to sustainability.

The CEWE Group has audited the resilience of its strategy and its business model.



In 2021, the Company commenced implementation of a scenario analysis in line with the recommendations made by the Task Force on Climate-related Financial Disclosures (TCFD). The objective is to use various scenarios to assess climate-related risks, and to analyse the potential financial impacts of climate change and of the transition to a low-carbon economy. This scenario analysis aims to identify climate risks and opportunities, promote informed decision-making and increase transparency for investors.

The resilience analysis is based on the CDP platform completed in 2023, which therefore significantly predates the mapping guidance between the CDP Platform and the requirements of ESRS E1 that has been announced for 2025. The Company is still in the process of drafting specific action plans for strengthening its resilience to climate change impacts. However, initial action on climate, including a switch to green electricity and the deployment of PV systems and geothermal power, has already been taken.

Scenarios used:

- World Energy Scenario
- RCP 2.6 Scenario
- RCP 8.5 Scenario

The analysis draws on the [Intergovernmental Panel on Climate Change \(IPCC\)](#) and the [World Energy Scenario from Greenpeace Energy \[R\]evolution \(5th edition, 2015\)](#). The RCP 2.6 (“best-case”) and RCP 8.5 (“worst-case”) scenarios used are based on models from the [Coupled Model Intercomparison Project \(CMIP\)](#), and account for the direct influence of greenhouse gas concentrations on radiative forcing and global warming.

Among other aspects, the [World Energy Scenario](#) analyses the potential effects of a doubling of energy prices over the next 20 years. For production facilities, the resilience analysis is also conducted in line with the [ISO 14001 management system](#). The Company has yet to provide a definition of the business units that are to be included within or excluded from the resilience analysis. The ability of the CEWE Group to adapt to climate change has not been assigned to any short-, medium- or long-term time horizons.

Climate risks and adaptation actions

For the CEWE Group, climate change constitutes a material risk with the potential to affect company business over the short, medium and long term.

The Company has already taken action and is planning further measures – including more efficient technologies, improving energy and resource efficiency, and the increased use of renewable energy – with the aim of utilising the opportunities presented by the transition to a low carbon economy.

The Company will be providing further details in relation to its access to finance, its ability to redeploy, upgrade or decommission existing assets, and shifting its products and services portfolio.

Within the scope of ESRS, the ability of the CEWE Group to adapt to climate change has been considered in relation to a short-, medium- and long-term time horizon. The Company has selected these time horizons according to the ESRS definition.

Current and expected impacts

Contribution to global greenhouse gas emissions and relevance for business model

Direct and indirect contribution to global warming

The CEWE Group contributes directly to global warming as a result of activities within its own operations that emit greenhouse gases (Scope 1).



Indirectly, the Company contributes to global warming by procuring and consuming energy within its own operations (Scope 2). Activities within the upstream value chain of the CEWE Group also produce GHG emissions. Such activities include wood harvesting, oil extraction, the processing of raw materials into products like aluminium sheets and paper or chemicals used as fuels and lubricants, and transportation (Scope 3). The downstream value chain also creates GHG emissions. Examples here include the energy consumption of OSF (on-site finishing) terminals, transportation and distribution, employee commutes to the workplace, and service callouts (Scope 3).

Disclosure of expected time horizons for material impacts

The negative impacts identified in the section “Direct and indirect contribution to global warming” are all current and cannot be remedied quickly. The CEWE Group is taking specific action to reduce GHG emissions within its own operations, and in the upstream and downstream supply chain, with the ultimate aim of remedying their negative impacts.

The CEWE Group is pursuing the target of achieving net zero GHG emissions throughout its operations and value chain by 2045.

Impact, risk and opportunity management

Policies related to climate change mitigation and adaptation (E1-2)

The CEWE Group has assigned the impacts, risks and opportunities related to climate change mitigation and adaptation to a total of four clusters. Specific policies have been developed for these clusters, which are documented in the Environmental Management Manual and standard operating procedure 612. These policies contain actions and targets as part of the integrated management system (ISO 14001 and ISO 50001). Group-wide climate action policies are also disclosed for an external audience in the CDP climate questionnaire.

For the identification, assessment and control of climate-related risks and opportunities, the CEWE Group has established a structured management system, which is fully integrated into the company-wide risk management process. The Company reviews currency and efficacy on at least an annual basis. The risk assessment is completed for short-term (0–2 years), medium-term (2–6 years) and long-term (6–20 years) horizons, with financial or strategic impacts being defined as “material” if they affect more than 1% of revenue or profit.

The CEWE Group makes a distinction between transition risks (e.g. regulatory or technological changes) and physical risks (e.g. extreme weather events or long-term climatic change). Risk control is achieved by tight integration with company strategy and is based on scenario analyses that evaluate potential climate impacts on the business model. The Executive Board and environmental management team are responsible for climate strategy, with specific departments being in charge of implementing operational actions for reducing emissions and improving energy efficiency.

Cluster #1: Impairment of raw material availability

This cluster comprises financial risks resulting from the reduced availability of raw materials owing to climate-related disruptions to the supply chain or regulatory changes, such as introduced by the EU Regulation on Deforestation-free products (EUDR). This cluster is oriented primarily towards the upstream supply chain, with a focus on price increases and quality fluctuations.

The CEWE Group addresses these risks with a multi-supplier strategy, the identification of substitute materials and optimisations to material efficiency. Environmental criteria are accounted for by supplier selection, which aims to achieve the early identification of potential innovations and optimisation potential.

*Cluster #2: Rising operating costs and potential business interruptions from climate-related hazards*

This cluster comprises risks that could arise as a result of climate-related weather events. Such risks include rising operating costs driven by higher prices for raw materials as well as disruptions to production/supply chains as a result of extreme weather events (e.g. drought, heavy rain, flooding).

To minimise such risks, the CEWE Group pursues a multi-supplier strategy that absorbs price fluctuations and compensates for these with efficiency actions in the supply chain. The ISO 50001-certified energy management system also enables the continuous monitoring and optimisation of energy consumption, with the aim of achieving long-term cost savings.

These risks are regularly reviewed within the management review process and adaptation actions are derived as necessary.

Cluster #3: Emission management (Scope 3)

This cluster addresses risks from the indirect emission of greenhouse gases (GHGs) along the upstream value chain. Key drivers here are raw material procurement, transportation processes and further processing.

The CEWE Group has introduced actions to reduce Scope 3 emissions, especially in relation to logistics and transportation. The Company plans to develop more extensive strategic policies.

To improve transparency, the Company takes part in external initiatives like the Carbon Disclosure Project (CDP), and also engages in sustainable governance with its memberships of the UN Global Compact and the German B.A.U.M. non-profit.

Cluster #4: Emission management (Scope 1 and 2)

This cluster comprises direct greenhouse gas emissions from operations. Core actions taken here include the systematic optimisation of energy consumption with the ISO 50001-certified energy management system and the use of 100% certified green energy at sites in Germany.

The Company regularly documents the progress made in reducing emissions in its sustainability reports and annual reports. The CEWE Group participates actively in the organisation of trade association positioning on climate policy, with the aim of harmonising general regulatory conditions with the Company's targets.

To control risks, the Company has set up an integrated environmental management system according to DIN EN ISO 14001:2015, which includes an annual assessment of environmental aspects as well as GHG emissions in the supply chain.

In terms of environmental and energy policy, the CEWE Group Management Manual focuses on policies for areas of the Company that operate production facilities. These policies primarily address company-internal processes, with the upstream and downstream value chain being accounted for only in isolated cases.

The CDP Climate Questionnaire is used to control climate-related risks and opportunities, and covers identification, assessment and control in all operational areas. Alongside the integration of requirements from ISO 14001 and ISO 50001, the questionnaire also ensures compliance with the standards of the Carbon Disclosure Project (CDP).

**Actions and resources in relation to climate change policies (E1-3)**

The carbon footprint can also be used to derive starting-points for actions to take in relation to climate policy. The CEWE Group has yet to implement actions specifically intended to counter impairments affecting raw material availability, rising operating costs and potential disruptions to business.

Actions in cluster #3 and #4:

Climate change mitigation actions from cluster #3 and #4, relating to emission management for scopes 1, 2 and 3, target a variety of decarbonisation levers:

The CEWE Group will implement these actions at all of its production facilities. The Company will deploy photovoltaic systems only at sites where such a deployment is economically and technically feasible.

The Company has yet to quantify the emission reductions achieved and targeted by the individual actions in clusters #3 and #4.

Climate change mitigation action and decarbonisation lever

Cluster	Decarbonisation lever	Actions	Implementation status
#3	Supply logistics (3.04)	Optimisation of supply chain logistics; improved consolidation with larger quantities, full truck load orders for photo paper and digital printing paper.	Planned for 2025/2026
#3	Inbound goods deliveries (3.09)	Optimisation of delivery logistics, elimination of double stop in Germany, carbon-neutral shipping with DHL and UPS.	Ongoing project
#3	Employee commutes (3.06)	"Take your bike to work" initiative; employee bike rentals, job ticket	Ongoing project
#3	Business travel (3.07)	Foregoing business travel in favour of online meetings	Ongoing project
#4	Electricity/saving energy	Trialling/installation of new, low-power lighting installations; more effective machine usage; optimisation of cooling unit usage; waste heat recovery on air-conditioning units	Implementation in reporting year 2024
#4	Saving energy/renewable energy	Construction of new production/logistics site in Freiburg with photovoltaic systems and heat pumps.	Implementation in reporting year 2024
		Switch to green electricity at all sites in the CEWE Group; cost-effectiveness audit for PV systems at various sites	Ongoing project

Actions for climate change mitigation are implemented based on the availability and allocation of personnel and financial resources. All actions to reduce Scope 1, Scope 2 and Scope 3 emissions are implemented as a continuous process of optimisation without a specific budget being allocated.

This implementation requires personnel resources in both the central environmental department and the individual companies. In the reporting year, significant capital expenditure (capex) of 7,350 thousand euros was budgeted in cluster #4 for a new building in Freiburg. At the CEWE Group, significant capital expenditure is defined as expenditure that exceeds 5% of the CapEx reported in the EU Taxonomy tables.



Metrics and targets

Targets related to climate change mitigation and adaptation (E1-4)

The Management Manual defines the general approach taken by the CEWE Group to its environmental management. Environmental policy at the CEWE Group comprises environmental protection and resource conservation as key aspects of its sustainability strategy. The Company defines action areas under the guiding principle of “Preserving nature” and implements these as part of operations. Key action areas – such as “Saving energy and driving climate change mitigation” – are considered and decided on from the perspective of various stakeholder groups. These action areas are also reflected in the assessment of impacts, risks and opportunities (IROs) completed in the context of the double materiality assessment. In chronological terms, the Company first set out its targets (2017) and developed the IROs later (2023/2024). The reduction targets for GHG emissions quantify and provide more detail about the projects of the CEWE Group.

Targets in cluster #1: Impairment of raw material availability

The CEWE Group has not defined any targets for raw material availability.

Targets in cluster #2: Rising operating costs and potential business interruptions from climate-related hazards

The CEWE Group has not defined a target for the control of a climate-driven rise in operating costs.

Criteria for the targets set in cluster #3 (Scope 3) and #4 (Scope 1&2)

For cluster #3 and #4, the sustainability aspects “Energy efficiency”, “Use of renewable energy” and “Climate change mitigation” – derived from the action area “Saving energy and driving climate change mitigation” in the CEWE Group environmental policy – have an important role to play. In the context of cluster #3 and #4, the Company has modelled its definition of emission reduction targets on the standards and requirements from the Science Based Targets Initiative (SBTi).

Overview of target years

- 2025: target year for SBTi targets
- 2030: target year for mid-term targets
- 2045: target year for climate neutrality

The CEWE Group emission reduction targets for scopes 1 and 2 are science-based, and incorporate a validated SBTi near-term target of 1.5 °C by 2025. The Executive Board has confirmed this target as the current climate target by 2030. However, the Company aims to further define and adjust this target as needed in 2025 (based on the data current at that time).

This target will be set based on the annual measurement of GHG emissions in CO₂ equivalent (CO₂eq). Progress figures are given in the CEWE Group CDP report and (to date voluntary) sustainability report, the latter now published as the non-financial statement and (from next year) as the CSRD-compliant sustainability statement.

The CEWE Group follows the Greenhouse Gas Protocol (GHG Protocol) for reporting. The GHG Protocol provides

businesses with tools for calculating greenhouse gas emissions, and takes into account both direct and indirect emissions during the complete product lifecycle and a company’s full range of business activities.

Targets in cluster #3: Emission management (Scope 3)

The CEWE Group is pursuing efforts to reduce absolute Scope 3 emissions by 25% by 2025 compared with 2015. In so doing, the Company is making full use of the decarbonisation levers presented in E1-3. The Executive Board has confirmed the Scope 3 reduction target of 25% or 78,560 tCO₂eq as the current climate target by 2030. CEWE intends to become climate-neutral by 2045. After the SBTi target period expires, the Company aims to adopt a new target in 2025.

Target implementation will be tracked using annual carbon footprint data and therefore by means of emissions. The CEWE Group publishes its carbon footprint annually as part of CDP reporting.

The Company uses an identical inventory, methodology and set of boundaries for data collection every year. If adjustments are made, these are clearly documented and reported on. Each year, the Company also reviews its business model and key process flows to identify any significant changes. No material changes have been made since 2015, which therefore still applies as a base year.

Although the SBTi Scope 3 target is not aligned with the 1.5° pathway, it does correspond to the “well below 2°” pathway.

When determining decarbonisation levers, no scenarios were referenced, although these were accounted for in the resilience and climate risk assessment.



Targets in cluster #4: Emission management (Scopes 1 and 2)

The CEWE Group is pursuing reduction targets for direct and indirect greenhouse gas emissions (Scopes 1 and 2) based on the decarbonisation levers presented in section E1-3 [page 127](#) as also described in cluster #3. The Company has made commitments to achieve a 50% reduction in absolute Scope 1 and Scope 2 emissions by 2025 compared with the 2015 base year. The Company is also seeking to achieve climate neutrality by 2045.

The Executive Board has adopted a reduction target of 50% or 6,701 CO₂eq in Scopes 1 and 2 by 2030. After the current SBTi target period expires, the Company aims to adopt a new target in 2025. This target is based on the annual measurement of greenhouse gas emissions in CO₂ equivalent, which is modelled on cluster #3 methods. The energy management system implemented also collects data on energy use to facilitate targeted action on efficiency. The CEWE Group publishes its carbon footprint annually as part of CDP reporting.

Data is collected using a methodology, inventory and set of system boundaries identical to those in cluster #3.

Adjustments are clearly documented and reported on. No significant changes have been made since 2015, which therefore still applies as a base year.

When determining decarbonisation levers, no scenarios were referenced, although these do form part of the resilience and climate risk assessment.

Climate targets from 2025

The CEWE Group has defined its emission reduction targets by 2025. In 2025, the Company plans to begin a new target definition process for the post-2025 period, based on the emission reductions achieved to date.

Energy consumption and mix (E1-5)

Unless otherwise stated, the values presented here refer to financial year 2024 and therefore cover the period from 1 January to 31 December 2024.

The energy intensity, specified as total energy consumption per net revenue, amounts to 0.047 MWh/thousand euros. Net revenue is derived from the revenue categories of Photofinishing revenue, Retail revenue and Commercial Online Printing revenue. Photofinishing and Online Printing activities are assignable to Sector C, “Manufacturing” (18.1). Retail revenue is assignable to Sector G. In general, all revenue is generated in “high-emitting sectors”. An overview of revenue is given in the combined management report on [page 63](#).

Energy consumption and mix Energieverbrauch und Energiemix

	2024
Total energy consumption in MWh	38,926
Fuel consumption from coal and coal products (MWh)	0
Fuel consumption from crude oil and petroleum products (MWh)	4,765
Fuel consumption from natural gas (MWh)	6,457
Fuel consumption from other fossil sources (MWh)	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	2,669
(Production of non-renewable energy (MWh)	0)
Total fossil energy consumption (MWh)	13,891
Share of fossil sources in total energy consumption (%)	36%
Consumption from nuclear sources (MWh)	1,706
Share of consumption from nuclear sources in total energy consumption (%)	4
Fuel consumption for renewable sources, including biomass (MWh)	0
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	23,111
(Production of renewable energy (MWh)	219)
Consumption of self-generated non-fuel renewable energy (MWh)	218
Total consumption of renewable energy (MWh)	23,329
Share of renewable sources in total energy consumption (%)	60



Gross Scope 1, 2, 3 and Total GHG emissions (E1-6)

GHG emissions

	Retrospective				Milestones and target years			
	Base year 2015	Comparative 2023	2024	Change in % 2023/2024	2025	2030	by 2050	Annual % of target/base year
GHG Scope 1 emissions								
Gross Scope 1 GHG emissions (t CO ₂ eq)	3,017	2,385	2,605	9	1,509	1,509	–	–
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0	0	0	–	–	–	–	–
GHG Scope 2 emissions								
Gross location-based Scope 2 GHG emissions (t CO ₂ eq)	10,384	9,419	8,840	–6	–	–	–	–
Gross market-based Scope 2 GHG emissions (t CO ₂ eq)	10,384	1,983	1,816	–8	5,192	5,192	–	–
Significant GHG Scope 3 emissions								
Total Gross indirect (Scope 3) GHG emissions (t CO ₂ eq)	104,746	90,463	107,454	19	78,560	78,560	–	–
1 Purchased goods and services	54,214	63,067	73,491	17	–	–	–	–
Optional sub-category: Cloud computing and data centre services	–	–	–	–	–	–	–	–
2 Capital goods	7,500	6,000	7,247	21	–	–	–	–
3 Fuel- and energy-related activities (not included in Scope1 or Scope 2)	670	1,481	3,390	129	–	–	–	–
4 Upstream transportation and distribution	3,943	3,673	5,564	51	–	–	–	–
5 Waste generated in operations	500	950	638	–33	–	–	–	–
6 Business travelling	1,188	571	546	–4	–	–	–	–
7 Employee commuting	1,871	1,754	2,138	22	–	–	–	–
8 Upstream leased assets	0	0	0	–	–	–	–	–
9 Downstream transportation	12,533	7,436	9,940	34	–	–	–	–
10 Processing of sold products	0	0	0	–	–	–	–	–
11 Use of sold products	0	0	0	–	–	–	–	–
12 End-of-life treatment of sold products	19,675	225	223	–1	–	–	–	–
13 Downstream leased assets	2,652	5,306	4,277	–19	–	–	–	–
14 Franchises	0	0	0	–	–	–	–	–
15 Investments	0	0	0	–	–	–	–	–
Total GHG emissions								
Total GHG emissions (location-based) (t CO ₂ eq)	118,147	102,267	118,899	16	–	–	–	–
Total GHG emissions (market-based) (t CO ₂ eq)	118,147	94,831	111,875	18	85,260	85,260	–	–



A slight rise in Scope 1 can be attributed to fluctuations in consumption and a broadening of data acquisition – such as the first incorporation of coolant leakage data. Despite the expanded group of consolidated companies, Scope 2 has fallen slightly as a result of updated emission factors and a slight increase in green electricity procurement.

The rise in Scope 3 emissions can be attributed to methodological changes. This not only affects individual categories, for which significant effort has been made to improve data acquisition, but also the first internally calculated corporate carbon footprint for Saxoprint, whose calculation had been prepared in previous years by an external service provider.

The proportion of market-based Scope 2 emissions for which contractual instruments with guarantee of origin or renewable energy certificates were applied amounts to 76%. All 15 categories from the GHG Protocol are considered when calculating Scope 3 emissions. However, emissions in categories 8 (upstream leased assets), 10 (processing of sold products), 11 (use of sold products), 14 (franchises) and 15 (investments) have been reported as zero as these do not apply to CEWE. Approximately 3% primary data were used for calculating emissions in the value chain. In addition, in the context of Scope 3 emissions calculations, only material consumption and waste figures for production sites were accounted for. These values were not included from sales offices and shops, as these have no material influence on metrics.

Itemised by country, greenhouse gas emission figures are as follows:

Greenhouse gas emissions by country

	2024						
	DE	FR	UK	PL	CZ	HU	Other EU, CH, NO
GHG Scope 1 emissions							
Gross Scope 1 GHG emissions (tCO ₂ eq)	1,806	172	83	186	159	45	153
GHG Scope 2 emissions							
Gross location-based Scope 2 GHG emissions (tCO ₂ eq)	7,146	59	128	939	422	81	66
Gross market-based Scope 2 GHG emissions (tCO ₂ eq)	143	44	183	1,012	268	96	71
Significant GHG Scope 3 emissions							
Total gross indirect (Scope 3) GHG emissions (tCO ₂ eq)	81,901	2,614	536	3,996	1,786	631	15,991
Total GHG emissions							
Total GHG emissions (location-based) (tCO ₂ eq)	90,853	2,844	747	5,121	2,367	757	16,209
Total GHG emissions (market-based) (tCO ₂ eq)	83,850	2,829	802	5,194	2,213	772	16,214

The greenhouse gas intensity, calculated as GHG emissions per net revenue based on location-based Scope 2 emissions, amounts to 0.143 tCO₂eq/thousand euros. Intensity based on market-based data amounts to 0.134 tCO₂eq/thousand euros. To calculate greenhouse gas intensity, total net revenue is applied as reported in the consolidated financial statements. These amounted to 832.8 million euros.

Methodology, assumptions and limits of energy and emissions metrics

The scope of energy and emissions metrics encompasses all 15 production sites and all 12 sales offices in the CEWE Group basis of consolidation, plus the shops operated by Fotojoker, Fotolab, Japan Photo and Wöltje, and is the same as the basis of consolidation for the combined management report. Out of scope are the four WhiteWall stores, which despite the Company's best efforts offered no basis for qualified estimates. These four stores have smaller sales areas without production, which means there is no increased energy demand. The possible deviations due to an estimate lacking clear evidence are therefore estimated to be higher than the actual consumption. Work is in progress to properly account for this unit in the next reporting year.

Methodology for determining carbon emissions

Carbon emissions are calculated according to Greenhouse Gas Protocol standards. The "operational control" approach was selected for consolidation. For the quantification of emissions, no direct measurements are made. Instead, these are calculated by using activity data and the average-data method. Emission factors are primarily taken from database values, which are sourced from recognised databases such as DEFRA, and where possible also account for the current global warming potentials with a



time horizon of 100 years (GWP100) from the Intergovernmental Panel on Climate Change (IPCC). Primary data for emission factors are available only in isolated cases. No calculation tool is used.

Data acquisition and coordination

The respective sites are responsible for energy data acquisition. For Scope 3 data acquisition, the core departments at head office are primarily responsible, with occasional support from those responsible at the respective sites. The overall coordination, collection, review and calculation of data is completed by the Environmental department at Shared Services. The review is performed by the responsible executive management members for Chemicals, Quality and the Environment.

Calculation of Scope 1 and 2 emissions

The results of the energy consumption data for E1-5 are applied for the calculation of Scope 1 and 2 greenhouse gas emissions. These are preferably based on calculations for the respective consumption figures or on other reliable data – such as photographic records of meter readings.

- Scope 1: Primarily gas or refuelling bills, from which the actual fuel consumption can be calculated. Where necessary, these are converted into MWh using appropriate conversion factors such as energy density or the calorific value.

- Scope 2: Consumption figures are generally taken from electricity bills. If these are unavailable, a conservative approach is taken, especially for leased properties such as sales offices and shops. In the latter case, consumption is often billed via the landlord, which may involve significant delays and sometimes fails to offer the level of detail required. As an example, total electricity consumption (Scope 2) at the Fotojoker shops is calculated by means of the monthly statement and an average price per kWh. For two small sales offices in Dübendorf (CH) and Madrid (ES), estimates have been made based on the electricity consumption at sites of a similar size. These uncertainties are not regarded as significant, as these sites only make up around 1% of total consumption. A conservative approach is always taken to calculations, to avoid introducing bias into the CEWE Group metrics.

The conversion of consumption data into CO₂eq emissions is completed using emission factors from uniform data sources wherever possible. For Scope 1 and 2 (location-based), emission factors from DEFRA and the European Environment Agency were used. For Scope 2 (market-based), primary data from the respective electricity utility were used (with some exceptions where relevant data were unavailable).

A variety of methods are used to calculate Scope 3 greenhouse gas emissions:

- Category 1: This only accounts for purchased goods and not services such as consulting services. The calculation is made based on material consumption at production sites (cf. data collected within E5-4 [page 146](#)), with the aid of the corresponding emission factors.
- Category 2: This is the only category calculated using a spend-based method. Emissions are determined based on capital expenditure for machines and using supplier estimates.
- Category 3: Incorporates upstream chains for energy consumption and is based on energy data collected in E1-5.
- Category 4: Basis is formed by material consumption at production sites (cf. data collected within E5-4 [page 146](#)) as well as the distance to the respective primary supplier and the means of transportation used.
- Category 5: Based on waste volumes at production sites and their assignment to fractions such as paper or general waste. For waste transportation, an average distance of 25 kilometres is assumed.
- Category 6: Information from the business travel portal: number of flights, kilometres travelled by rail and hotel accommodation
- Category 7: Calculated using the number of employees and an estimated average emissions factor for commutes.



- Category 9: Calculated using downstream transportation based on emissions data from shipping service providers. If no information is available here, an estimate is made using the shipping weight. Internal logistics data on kilometres travelled and the means of transportation are provided by the core logistics department.
- Category 12: End-of-life treatment of sold products
End-of-life treatment of sold products calculated using material consumption and production waste (cf. E5-4 [page 146](#) and E5-5 [page 146](#)), which are used to determine the product weight (comparable to the breakdown by waste fractions in Category 5).
- Category 13: The CEWE Group supplies B2B customers with photo ordering and direct print booths. Associated key data – such as numbers, average runtime and energy consumption – are reported by the OSF department.

GHG removals and GHG mitigation projects financed through carbon credits (E1-7)

The CEWE Group has not developed any projects within its own value chain that have the objective of achieving a targeted removal or storage of greenhouse gas emissions.

Outside its own value chain, the Company retired carbon credits amounting to 36,600 tCO₂eq in the reporting period. It plans to retire a further 8,705 tCO₂eq in carbon credits. The acquisition of carbon credits is not used as part of carbon accounting or action planning but only for external communications, which were conducted only to a limited extent in 2024. All credits (100%) originate from initiatives in non-EU countries aimed at reducing greenhouse gases and comply with recognised quality standards. The Company plans to have the credits revoked in 2025.

The target of achieving carbon neutrality by 2045, as adopted by company management, has already been communicated. This target is set to a later date than Germany's net zero target. The scope encompasses the entire CEWE Group. A scientific methodology and verification (e.g. by SBTi) has not yet been applied here. The Company has not yet adopted actions aimed at neutralising residual gross emissions.

CEWE does not apply internal carbon pricing within the Group.

Pollution (ESRS E2)

Impact, risk and opportunity management

Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM 3)

Pollution in the value chain

The Company has identified a group of negative impacts relating to substances of concern and pollution in the value chain. These impacts relate predominantly to pollution along the value chain as a whole. In particular, this encompasses the use and production of substances of concern in both upstream and downstream processes:

- Upstream value chain: use of a wide variety of hazardous substances and dangerous chemicals
- Downstream value chain: creation of hazardous and contaminated production waste
- Own operations: direct use of hazardous substances within business operations

The CEWE Group prioritises the avoidance of these negative impacts. Corresponding actions have been established processes and are implemented by specific guidance and strategies.



The CEWE Group chemicals policy includes the following basic principles:

- Ensuring the responsible use of chemicals
- Preference for alternatives with few to no pollutants
- Protection of employees against unnecessary hazards
- Use of strict controls to avoid environmental impacts
- Development of safe products while taking environmental and health aspects into account

These actions help to minimise environmental risks while ensuring safe and sustainable processes throughout the value chain.

Use of innovative processes to minimise pollution

The CEWE Group makes use of innovations to reduce environmental impacts throughout the value chain. These include:

- Optimising risk management
- Promoting environmentally friendly production methods
- Reducing substances of concern in the supply chain and own business processes

These approaches help to minimise harmful emissions and contaminated waste.

Responsible handling of hazardous substances

The CEWE Group has not identified any material soil, water or air pollution. Certain substances of concern are indispensable in printing activities. Negative impacts and risks are created in particular by the use and/or production of these substances, both within the Company's own operations and in the upstream supply chain. This is especially relevant for substances used in colour printing that are not wholly avoidable. However, the printing process is conducted under strict controls to avoid the accidental influx of substances of concern into the environment (see topical standard E2-2, [page 137](#)).

Long-term prospects for reducing environmental risks

The CEWE Group works continuously to achieve further reductions in the use of hazardous substances. Although the Company has not identified any potential new impacts, it assumes that existing challenges could remain relevant into the long term.

Policies related to pollution (E2-1)

Environmental policy at the CEWE Group establishes a framework for environmental protection and resource conservation in the Company. The CEWE Group is committed to complying with all applicable laws and regulations, aligning its activities here with its own internal rules as well as stakeholder requirements. Environmental protection and the avoidance of environmental impacts form part of a continuous improvement process. To support this process, the Company has incorporated the topic into the relevant standard operating procedures (SOPs) and the manual for the CEWE Group environmental management system.

Management Manual

In its Management Manual, the CEWE Group has included all of the information that is relevant for explaining how the Company avoids or curbs pollution. The document consolidates the manuals for the DIN EN ISO 14001:2015 environmental management standard and the DIN EN ISO 50001:2018 energy management standard as required by an integrated management system. The Management Manual defines procedures for ensuring the fulfilment of management system requirements while focusing on environmental aspects and risk management.

It also helps to assure compliance with environmental standards and minimise environmental impacts. Contents:

- Identification and assessment of environmental aspects
- Specification of actions to reduce negative environmental impacts
- Integration of emergency analyses and assessment of potential risks into company planning

High-priority environmental aspects at the CEWE Group include the following:

- Carbon emissions
- Energy and energy efficiency
- Wastewater
- Water balance
- Waste
- Packaging
- Environmentally friendly materials
- Scrap and material efficiency



The Company defines key action areas under the guiding principle of “Preserving nature” and implements these in all business processes:

- Saving energy and driving climate change mitigation
- Protecting water
- Keeping air and soils clean
- Responsible use of materials
- Reducing waste and optimising recycling processes

These action areas create the framework for the identification, assessment and control of material environmental aspects, including pollution. In the context of ESRS 2, these action areas represent specific policies for identifying and managing potential impacts, risks and opportunities related to pollution. The Management Manual applies to all areas of the Company with the exception of Retail, OSF and the sales offices. The document refers only to the CEWE Group itself and not to the upstream or downstream value chain, and encompasses direct and indirect environmental impacts, including emergency situations. Production facilities at the following locations are included: Oldenburg, Mönchengladbach, Munich, Freiburg, Dresden, Montpellier, Warwick, Prague, Budapest, Koźle, Rennes, Bad Kreuznach, Frechen and Paris. Responsibility for implementation is assigned to the executive management members responsible for Chemicals, Quality and the Environment. The annual review is conducted jointly with the Executive Board member responsible for R&D.

Standard operating procedure: Handling of hazardous substances

The requirements of applicable legislation governing the handling of hazardous substances are authoritative for the internal handling of hazardous substances in the CEWE Group. This legislation includes the German Hazardous Substances Ordinance, the EU Regulation concerning the Registration, Evaluation, Authorisation and Restriction of chemicals (REACH), and the EU Regulation on the Classification, Labelling and Packaging of Substances and mixtures (CLP).

The Company has codified the procedure for handling hazardous substances in the internal standard operating procedure “SOP 812 Handling of hazardous substances”. This SOP applies throughout the Company. The Company has assigned high-level responsibility for the comprehensive observation and application of this SOP to the executive management members responsible for Chemicals, Quality and the Environment.

New hazardous substances that are needed but which have not been used before must be properly assessed before being approved for use in the CEWE Group. The approval procedure is documented by the completion of hazard assessments for these substances and their inclusion in the register of hazardous substances. As required by the Hazardous Substances Ordinance, the Company performs regular substitution evaluations as part of hazard assessments for all of the hazardous substances used.

Avoidance and substitution

As a first step towards substitution, the Company evaluates whether non-hazardous substitute substances can be used for the required purpose. Suppliers, process owners, company doctors and safety specialists all contribute to this evaluation process. As a fundamental principle, the CEWE Group does not permit the use of any substances of very high concern (SVHCs) included in the SVHC Candidate List maintained by the European Chemicals Agency (ECHA). Nor does the Company make use of CMR category 1A/1B substances, which are substances that are carcinogenic (C), mutagenic (M) or toxic to reproduction (R). Exceptions are made only in special and unavoidable cases. Hazardous substances are evaluated and avoided by applying the STOP principle: (S)ubstitution check, followed by (T)echnical actions, then (O)rganisational actions and lastly actions involving (P)ersonnel, such as PPE (personal protective equipment). This principle is applied with the help of suppliers, process owners (process: operations, work type and workplace, machine) and, where necessary, company doctors and safety specialists.

Use of chemicals

The chemicals policy aims to ensure the use of the safest chemicals as well as the safe use of chemicals at all times. Equally, this policy also aims to avoid work-related accidents and/or illness as caused by the Company’s business activities in the value chain (as a result of the production process, for example). The CEWE Group takes into account both the operational requirements for occupational safety and health as well as requirements in relation to hygiene and the environment. In its Management Manual, the CEWE Group defines procedures that safeguard the fulfilment of the requirements made by the management system. This is completed in alignment with the specified application scenario and while accounting for the business context and expectations of interested parties, such as



employees, suppliers, neighbours and end-customers. Procedures are also developed by determining applicable risks and opportunities, which may be derived from environmental aspects and binding obligations or may result from entirely separate topics. The Company uses an assessment matrix to identify and record these risks and opportunities.

Standard operating procedure: Environmental aspects

In the internal standard operating procedure “SOP 612 Environmental aspects”, the Company sets out the applicable procedure for assessing environmental aspects and deriving actions to reduce environmental impacts. A particular point of focus here comprises the aspects that can be directly or indirectly influenced, how these aspects present themselves while accounting for the product life cycle, and how – aside from normal operating conditions – unintended circumstances and unforeseeable emergency situations could have an impact. To identify and assess environmental impacts, the CEWE Group uses an assessment matrix included in the above-mentioned standard operating procedure. This matrix automatically calculates environmental relevance, risks or opportunities based on

certain criteria. The assessment is updated regularly, at least once a year or in the event of changes to relevant processes. It looks at the relevance (risk or opportunity) that an environmental impact has in the following evaluation areas:

- Environmental relevance (site susceptibility)
- Compliance with legal requirements
- Company-internal or Group-level standards
- Societal relevance

Process owners are responsible for assessing the environmental aspects. The results of the assessment of environmental aspects are documented and serve as a basis for the definition of environmental targets. This forms part of the annual report from the Environmental Management Officer. The annual review is conducted jointly with the Executive Board member responsible for R&D.

In addition, the CEWE Group has also implemented a comprehensive policy for the avoidance of incidents and emergency situations. This policy aims to monitor and limit impacts on human health and the environment. The standard operating procedure “SOP 612 Environmental aspects” describes the assessment of environmental aspects under various operating conditions (normal, abnormal, incident). A risk assessment is used to assign environmental relevance here.

Standard operating procedure: Hazard assessment

The CEWE Group has set itself the goal of promoting the health and productivity of all employees while also ensuring the protection of the environment. This goal is achieved by making continuous improvements to workplace safety as well as improving health protection and environmental protection alike, described in more detail in the Management Manual and the standard operating procedure “SOP 813 Hazard assessment”. The Company’s executive management carries out hazard assessments with the aim of determining the nature of the hazards that employees are exposed to during work activities.



The hazards so identified form the basis for selecting suitable technical and organisational protective measures capable of avoiding or reducing hazards and environmental impacts. The hazard assessment is reviewed and updated when a new workplace is established, at regular intervals or in the event of changes to the circumstances in the workplace. The Company has assigned high-level responsibility for the comprehensive observation and application of this SOP to the executive management members responsible for Chemicals, Quality and the Environment.

The description of the policies includes information about the pollutant(s) or substance(s) covered (see section “Avoidance and substitution”, [page 135](#)).

Actions and resources related to pollution (E2-2)

With reference to ESRS E2, the CEWE Group utilises various actions to protect the environment. In the process, the Company attempts to avoid polluting the environment along the entire value chain. The assessment of environmental impacts and the actions decided on are monitored regularly, and form part of the annual report by the Environmental Management Officer.

Actions for the handling of hazardous substances

Some of the chemicals utilised in manufacturing activities have an impact on air and soils if released accidentally, and are able to affect employees in their workplaces. The CEWE Group has taken appropriate precautions and reduced the concentration of hazardous substances wherever technically possible. Throughout the production process, modern and safe technologies are used, so that values measured for hazardous substances (pursuant to the

German Hazardous Substances Ordinance) are well below occupational exposure limits (OELs). Most of the digital printing machines that print the CEWE PHOTOBOOK work with very small toner particles, which is optimal for image quality. Because the toner’s liquid carrier system binds these toner particles with imaging oil, this prevents employees from being exposed to air pollution. Water-based inks are used for selected large-format digital print products. Other products require the use of UV inkjet processes. Neither process involves the use of solvents. The offset printing methods used are also mineral oil- and alcohol-free. This means that the offset inks used are based either on vegetable fats or UV-cured systems and the use of isopropanol in the washing solution is avoided wherever possible.

The CEWE Group chemicals policy provides more detail about actions, based on the management principles adopted for handling hazardous substances. When chemical products are chosen for deployment, the CEWE Group makes sure that the substances used are safe at the purchasing stage. Before procurement, the safety data sheet is requested and reviewed by qualified industrial chemists working in the central Chemistry department. This process applies to all business premises in the CEWE Group, including all subsidiaries.

Actions to protect against hazards

The Company defines the required protective actions in the hazard assessments, and introduces these with employee briefings (pursuant to GefStoffV) and corresponding standard operating procedures (also pursuant to GefStoffV in Germany and equivalent legislation in other CEWE Group countries). Toxicological data and OELs, explosive limits and other characteristics are also accounted for by these assessments.

Actions to avoid pollution

The CEWE Group makes every effort to introduce actions to avoid pollution, with the scope of these actions extending to both the upstream and downstream value chain. The CEWE Group includes a section in its sustainability questionnaire that evaluates the management approach of business partners concerning sustainability and compliance. The sustainability questionnaire for suppliers includes numerous questions that are directly related to the topic of pollution. This includes the existence of management systems for the environment, energy and workplace safety, environmental certificates, the auditing of environmental aspects at upstream suppliers, and other environmental targets and actions. All of these topics also include the handling of hazardous substances. The questionnaire also accounts for duties related to the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG), and is aimed at all direct and indirect business partners of the CEWE Group that are active in the supply chain. Such partners include both manufacturing companies and service providers. The questionnaire responses are evaluated, and interviews and actions (as necessary) are planned according to the results. With these actions, the CEWE Group ensures that environmental aspects are accounted for along the entire value chain and are subject to a continuous improvement process.



Actions for compliance with non-negotiable minimum standards

The CEWE Group maintains a Supplier Code of Conduct that defines non-negotiable minimum standards for all business processes that arise as a result of working together with the CEWE Group. A minimum standard exists that requires partners to observe all applicable environmental standards, and to deploy a modern and sustainable environmental management system. Compliance with the standard is verified by means of audits. In the event of repeated breaches or a single major breach of the Supplier Code of Conduct, the Company has the right to terminate the contract without notice. The Supplier Code of Conduct forms part of the contract award process and contracts with external service providers.

Metrics and targets

Targets related to pollution (E2-3)

The CEWE Group has yet to adopt any Group-wide targets for pollution control. Audits of targets for specific sites are organised as part of the Environmental Management System (EMS). Projects exist as part of the management approach: these are being pursued actively in practice and count towards an IRO. Specific actions are envisaged for next year to ensure the targeted steering of these projects. These actions correspond to the continuous improvement process method from the DIN EN ISO 14001:2015 environmental management standard, as incorporated into the

Management Manual. The CEWE Group makes use of the following targets and qualitative indicators to track the effectiveness of its policies and actions to avoid pollution:

- No use of SVHCs (substances of very high concern, as included in the ECHA SVHC Candidate List)
- No use of CMR Category 1A and 1B substances wherever possible
- Reduction in use of SoC substances (defined similarly to Annex II of the CSRD)
- Consistent application of the STOP principle to ensure safe use of chemicals in the CEWE Group companies
- Continuous pursuit of the goal of zero emissions, also ideally to be achieved with technical actions.

Metrics related to pollution (E2-5)

The CEWE Group companies do not use any substances of very high concern. Nor are these substances therefore released into the environment. Furthermore, no financial effects from pollution-related risks and opportunities have been registered.

The CEWE Group does not report on substances of concern (SoCs) as part of the E2-5 metrics.

Biodiversity and ecosystems (ESRS E4)

Strategy

Transition plan and consideration of biodiversity and ecosystems in strategy and business model (E4-1)

After performing its double materiality assessment, the CEWE Group identified material impacts that imply a potential contribution to the loss of biodiversity and to the impairment of ecosystems. However, these results have not produced any physical, transition or systemic risks that could impair the resilience of the business model or the strategy of the CEWE Group.

Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

The CEWE Group has not identified any activities that negatively affect endangered species.

The Company has reviewed its sites with regard to potential negative impacts on biodiversity and has not identified any direct negative effects. The Company does not operate any sites in biodiversity-sensitive areas, such as forest, water or landscape conservation areas. The results from the DMA have also identified impacts from soil sealing and use of land in the course of business activities. Nor can these effects be fully excluded within the upstream and downstream value chain. However, the Company operates exclusively in areas specially designated for industrial and



urban use, which were sealed beforehand or were designated for this purpose. Production facilities and the associated infrastructure contribute to use of land, both within the Company's own operations, and within the upstream and downstream value chain.

No material entrepreneurial risks were identified in connection with biodiversity. As a result, the Company conducted no separate assessment of the resilience of its business model and strategy vis-à-vis these risks. At the same time, however, a group of potential negative impacts on biodiversity have been identified, particularly in connection with the use of wood by the CEWE Group. Wood is an important raw material for the Company's products.


The upstream value chain of the CEWE Group incorporates a significant demand for wood as a raw material for paper production, which is sourced from managed forests. The use of wood can result in biodiversity losses, particularly as a result of logging and deforestation. The Company mostly uses FSC®-certified wood in order to counter these negative impacts. The traceability of paper-based products back to the wood-based raw material helps to minimise biodiversity risks. While FSC® certification guarantees sustainable management practices, it is not a substitute for the preservation of untouched ecosystems.

With its procurement of FSC®-certified wood, the CEWE Group promotes the responsible use of this essential raw material. Internal guidance includes specifications for risk identification and minimisation at all Company sites, whether or not these sites operate within conservation areas.

Potential environmental impacts can result from both the upstream and downstream value chain as well as the Company's own operations. Such impacts can include impairments to air, water, soils and microorganisms, which may be caused by raw material extraction, the production and use of chemicals, transportation, distribution, and the disposal of production and end product waste.

Impact, risk and opportunity management

Policies related to biodiversity and ecosystems (E4-2)

The CEWE Group has developed various policies and guidance with the aim of identifying and controlling the impacts, risks and opportunities related to biodiversity and ecosystems. These are set down in the Management Manual and standard operating procedure SOP 612 (see [E2-1](#)  [page 136](#)).

The impacts, risks and opportunities identified in conjunction with biodiversity and ecosystems focus in particular on the procurement of paper (wood) and the extraction of fossil fuels (such as oil or natural gas) – and therefore on the upstream supply chains of the CEWE Group. In the course of the materiality assessment, a high materiality was assigned to the procurement of wood/paper and the procurement of fossil resources.

Accordingly, the policies related to biodiversity and ecosystems work to target the responsible procurement of material in particular. When purchasing paper, the CEWE Group insists on FSC® certification. Accordingly, the use of paper conforms to FSC® (Forest Stewardship Council®) codes of practice for all CEWE PHOTOBOOKS. FSC® is a global NGO that audits and certifies responsible forest management. FSC® certification had been obtained for all German companies by September 2010, with European companies following in 2011. FSC® stands for forest management that avoids exploitation. Clear cutting is forbidden during regular wood harvesting and pesticides must only be used in cases where this is required by law. FSC® works to promote the expansion of mixed forests, the preservation of the forest floor, and the protection of rare species and ecosystems. Principle 6, whose criteria must be met for certification, requires the maintenance or restoration of ecosystem services and the forest's environmental assets. FSC® certification ensures that paper-based products can be traced back to the wood-based raw material.



The stated policies explicitly address the promotion of climate change mitigation and the avoidance of pollution. The Company has set out its approaches to assessing environmental aspects and deriving actions to reduce environmental impacts in the internal standard operating procedure SOP 612 “Environmental aspects”.

The CEWE Group itself does not use its policies to explicitly address the social implications of impacts on biodiversity and ecosystems. However, the choice and assessment of environmental aspects does take into account the impact on biodiversity. FSC® certification is integrated into the Management Manual, and therefore ensures that social and economic aspects are also considered. Such aspects include the protection of labour rights and working conditions, the rights of indigenous peoples and relationships to local populations. The certification principles also help to minimise negative impacts on ecosystems while promoting sustainable forms of use.

In its policies related to biodiversity and ecosystems, the Company does not address any material dependencies, nor any material physical risks and transition risks or opportunities. The company-internal policies contain standard operating procedures and risk identification guidelines for each Company site. These form part of the CEWE Group’s overall approach to conserving biodiversity and ecosystems, with a focus on climate change mitigation, the avoidance of pollution and resource conservation. In terms of environmental policy, environmental protection and resource conservation are key aspects of the CEWE Group’s sustainability strategy.

Actions and resources related to biodiversity and ecosystems (E4-3)

The CEWE Group does not currently pursue company-internal actions related to biodiversity and ecosystems, and has not allocated any separate resources for this purpose.

The Company has not defined any actions that apply the mitigation hierarchy (avoidance, minimisation, restoration/rehabilitation and offsets). The Company’s action plans do not make use of biodiversity offsets, nor does it incorporate local or indigenous knowledge or nature-based solutions into its biodiversity and ecosystems-related actions.

Metrics and targets

Targets related to biodiversity and ecosystems (E4-4)

The Company has not set any specific targets for controlling biodiversity. The CEWE Group has defined projects, such as expanding the procurement of FSC®-certified materials. The Company plans to discuss specific targets based on these projects in 2025.



The metrics relate to the use of certified materials and the reduction of packaging materials.

Negative impacts on biodiversity as a result of the contribution to climate change are being addressed by the policies stated in E1 (cf. [page 125](#)).

Circular economy (ESRS E5)

Strategy and business model

Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

Impacts, risks and potential of the circular economy for resource use

The circular economy offers opportunities to make resource use at the CEWE Group more efficient and more sustainable. Four material topic areas can be identified in this context:

- Resource availability and substitution: While long-term resource security remains a challenge, the increased usage of renewable materials and innovative recycling technologies offers new opportunities. At the same time, risks arise from the use of non-renewable resources and price fluctuations with raw materials.
- Resource efficiency: The targeted optimisation of resource use can boost overall efficiency throughout the value chain. This constitutes a material opportunity.
- Reduction and substitution of resource outflows: Longer usage cycles for product components and improved recyclability help to reduce material consumption. At the same time, risks arise in relation to the technical and economic practicability of these actions.
- Waste management: Hazardous waste components constitute a negative impact. Problematic types of waste occur in particular in the upstream value chain, such as are created by the processing of raw materials or the use of chemicals.
- Waste management in own operations: A negative impact is created primarily by non-reusable waste from chemical processes (e.g. residual waste from photo production)

Resource use optimisation by the circular economy

The CEWE Group uses targeted circular economy strategies that aim to make resource use more sustainable. Valuable raw materials are conserved and waste volumes are reduced by extending the product lifetime and reusing components. The Company's own resource outflow is further minimised by in-sourcing servicing activities such as maintenance and repairs, and by recycling product components. Development potential is offered by the future optimisation of these processes.



Relationship between business model, strategy and resource use

The CEWE Group makes use of various raw materials in its value chain, including plastics, chemicals and metals. The purposeful and efficient use of these resources forms an integral part of Company strategy.

Resource consumption is reduced with targeted actions such as recycling, and the maintenance and repair of production machinery and OSF terminals. At the same time, innovative solutions for the safe disposal and reuse of materials are being developed with the aim of further minimising environmental impacts. The use of non-renewable resources, particularly fossil fuels, remains a challenge that the Company is reducing step by step with long-term strategies.

Future prospects for resource use

The CEWE Group remains focused on further improving its resource use. Although a full phase-out of fossil raw materials remains a long-term challenge, a process of systematic innovation is achieving stepwise reductions in the Company's dependency on non-renewable materials.

The integration of servicing activities to extend product lifetime has borne fruit and therefore provides a solid foundation for sustainable business development. The analysis was completed while accounting for short-, medium- and long-term time horizons according to ESRS 1.

Policies related to resource use and circular economy (E5-1)

In relation to resource use and the circular economy, the CEWE Group has identified various impacts, risks and opportunities, and grouped these into five clusters.

The Management Manual and standard operating procedure 612 set out various policies, actions and targets in relation to an integrated management system (according to ISO 14001 and ISO 50001) and the associated environmental policy of the CEWE Group.

This already established procedure corresponds to the stated ISO standards but is not entirely correspondent with the policy requirements as prescribed by the ESRS. This may therefore result in gaps when considering the policies. The clusters resulting from the DMA are also not entirely congruent with the environmental aspects as identified in the CEWE Group environmental policy. The CEWE Group has committed to successively rectifying these irregularities over the next few years.

Regarding the CEWE Group environmental and energy policy, the Management Manual focuses on environmental aspects and associated risk management, without Retail, On-Site Finishing or sales offices. The scope of application encompasses the production sites in Oldenburg, Mönchengladbach, Munich, Freiburg, Dresden, Montpellier, Warwick, Prague, Budapest, Kožle, Rennes, Bad Kreuznach, Frechen and Paris, excluding the upstream/downstream value chain. The policies define direct and indirect environmental impacts, and describe the handling

of these impacts, including potential emergency situations. The Management Manual addresses the following aspects related to sustainability: waste, packaging, materials, scrap and material efficiency.

The review, documentation and assessment of environmental aspects (also in light of stakeholder interests) as well as associated risks and opportunities is performed regularly (at least annually) and ad hoc if general conditions change. Responsibility is assigned to the executive management member responsible for Environment. The annual review is conducted jointly with the Executive Board member responsible for R&D.

Based on the Management Manual, the standard operating procedure "SOP 612 Environmental aspects" defines methods and processes for the identification and assessment of environmental risks, and the continuous improvement of environmental performance, and specifies environmental targets and actions. The standard operating procedure is binding on all Group companies, but it does not reference the upstream and downstream value chain. While the CEWE Group Executive Board and environmental management team bear overall responsibility, operational responsibility is assigned to the respective teams who are tasked with implementing the actions related to resource use and the circular economy. The Group's Supplier Code of Conduct and supplier questionnaire reference the upstream value chain, and address key aspects such as environmental management and waste management. During on-site audits of suppliers, particular attention is paid to waste management and resource use.

*Cluster #1: Resource availability and substitution*

Environmental policy at the CEWE Group comprises environmental protection and resource conservation as key aspects of its sustainability strategy. One action area defined according to the guiding principle of “Preserving nature” is “Responsible use of materials”.

With the annual collection and analysis of data on environmental aspects relevant for the Company, the CEWE Group establishes a reliable basis for steering the specification of company targets and programmes as part of a continuous process. During the annual internal audits, the Company also checks whether these findings are up to date. The following environmental aspects are considered in particular:

- Packaging: reduction of plastic proportion, use of recycled packaging materials
- Substitution options for materials
- Scrap and material efficiency

Cluster #2: Resource efficiency

Applying the principle of resource efficiency, the CEWE Group implements a policy for scrap and material efficiency that is based on the routine determination of material use and production waste. In so doing, the Company identifies and implements targeted actions for reducing scrap to guarantee continuous improvements in the use of resources. When specifying such actions, financial, operational and business-related requirements are also accounted for, along with technical options.

In so doing, the Company – as in its standard operating procedure “SOP 612 Environmental aspects” – follows a systematic approach to increasing resource efficiency by determining and evaluating environmental aspects, such as the use of material and energy. A specific assessment matrix is used to collect data on relevant processes, substances and operating conditions, and to analyse these with regard to their ecological importance. In this way, the Company can clearly prioritise resource-intensive areas in particular and specify targeted actions for the reduction of scrap or the optimisation of material usage.

The results of this assessment form the basis for deriving specific environmental targets and action programmes, which are reviewed and brought up to date in the course of an annual update. Clear responsibilities are also assigned to process owners and the Environmental Management Officer, who monitor progress in resource efficiency on a continuous basis and document it in regular reports. This structured approach ensures the transparent and continuous improvement of the sustainable use of resources within the CEWE Group.

Cluster #3: Resource outflow reduction/substitution

As part of environmental management, material environmental aspects are regularly determined and assessed, also with regard to resource outflow. The development of suitable policies that address this aspect are based on an understanding of the specific resource outflows of the CEWE Group. Before taking action to reduce the Company’s own environmental impacts, it is extremely important to account for all knock-on effects and consequences to

avoid simply shifting environmental impacts elsewhere. A suitable instrument for this purpose is life cycle analysis, which involves a full assessment of environmental impacts that occur in the product life cycle. Life-cycle analysis enables the identification and evaluation of the sum total of environmental impacts rather than isolated cases, by including energy and material flows throughout all relevant phases – from raw material procurement and manufacturing to transportation and delivery, followed by use and disposal.

A life cycle analysis provides a systematic assessment and evaluation of the environmental impact of the products and services of the CEWE Group over their entire life cycle. The aim is to identify significant environmental impacts and to derive actions for optimisation. The results of such an assessment are used as input for the development of procedures and processes (which are set down in the Management Manual and standard operating procedure) for the handling and reduction of resource outflows, and the potential substitution of primary raw materials by recycled and renewable resources.

*Cluster #4: Supply chain waste management*

The CEWE Group specifies appropriate procedures for environmental- and energy-relevant actions and activities as part of its business activities. The adequacy of these procedures is determined within the environmental management system/energy management system. The Company uses an internal assessment matrix, and the factors of weighting, frequency and risk, to identify relevant environmental aspects. Standard operating procedures are prepared for these environmental aspects that describe the handling of these topics. Appropriate actions are characterised by a positive benefit-cost ratio, although mandatory actions are always implemented. Such actions include waste disposal, the handling of hazardous substances, occupational safety, contractor management, outsourced processes, and the operation and maintenance of systems. When formulating environmental requirements, products are examined in terms of their entire life cycle. This encompasses the provision of data from raw material extraction through to purchasing, production and sales, and as far as waste management. Operational changes and their potential consequences for environmental protection are also monitored.

By agreeing to be bound by the CEWE Supplier Code of Conduct, suppliers to the CEWE Group must comply with all applicable environmental standards and practice sustainable environmental management. All suppliers are also

informed about company policy during the contract award process by the central Purchasing department or by senior management. The topic is also addressed in the sustainability questionnaire from the CEWE Group that suppliers complete on a voluntary basis, which includes specific questions about environmental management certification and waste management actions. If the topic appears critical for a particular supplier, it is also addressed by on-site audits.

Cluster #5: Own operations waste management

Environmental policy at the CEWE Group comprises environmental protection and resource conservation as key components of its sustainability strategy. The guiding principle of “Preserving nature” has been applied to define the “Reducing waste and optimising recycling processes” action area and integrate this into the course of business. Waste materials generated during production are collected – with a focus on unmixed fractions – by a pan-European waste management system and recycled where possible.

The CEWE Group identifies all of the environmental aspects relevant for the Company at regular intervals (at least once a year). These records form the basis for the Company’s specification of targets and programmes. During the annual internal audit, it is checked whether these data are current, with particular attention being paid to the topic of waste.

Procedures according to the Management Manual

As already stated in cluster #4, “Supply chain waste management”, the CEWE Group has specified standard operating procedures for environment- and energy-relevant actions. For the Company’s own sites, all wastes produced must also be treated according to the European waste hierarchy (Directive 2008/98/EC, transposed into law in Germany as section 6 of the Circular Economy Act (Kreislaufwirtschaftsgesetz – KrWG), and in the following order:

- Avoidance
- Preparation for reuse
- Recycling
- Other recovery (especially energy recovery and backfilling)
- Disposal


All wastes produced are professionally treated or disposed of in accordance with this hierarchy. The feasibility of implementing further reductions to waste is reviewed as part of the regular management and environment assessment. Specific actions are introduced as and when necessary.



All waste is collected, separated by fraction, in the containers provided and is then picked up by authorised waste management companies. All containers used on company premises have passed quality testing. Full records are kept of waste material recycling and disposal. Details of the disposal process are set out in the standard operating procedure “SOP 811 Disposal of waste”.

Summary of actions to transition away from the use of primary resources, including relative increases in use of secondary resources

Actions and resources related to resource use and circular economy (E5-2)

In the standard operating procedure “SOP 612 Environmental aspects”  page 136, the Company sets out the applicable procedure for assessing environmental aspects and deriving actions to reduce environmental impacts. The CEWE Group utilises its environmental and energy targets to plan actions at a strategic level. When specifying such actions, financial, operational and business-related requirements are also accounted for, along with technical options.

The CEWE Group has yet to define any actions at a strategic level whose results specifically accrue to clusters #1 to #5 and whose effectiveness can be audited. While smaller-scale actions take place during normal operations to optimise the use of resources, these are not to be identified as key actions as of this writing. For implementation actions of this kind, no financial or personnel resources have been allocated in order to prioritise other topics.

These individual operational actions are listed briefly below and are to be assigned exclusively to cluster #1.

The CEWE Group has implemented guidance that promotes sustainable procurement and the use of renewable resources. Wood – in the form of paper – is one of the primary materials for CEWE Group products. For procurement, the Company makes every effort to source this wood from sustainably managed forests. The CEWE Group purchases FSC®-certified photo paper and digital print paper for the production of all CEWE PHOTOBOOKS. The sole exceptions here are On-Site Finishing, WhiteWall, Cheerz and Saxoprint. The Company established the procurement of FSC®-certified materials in 2010 and this process has continued unbroken since then.

For packaging, isolated individual actions have been used to reduce the proportion of plastic.

Actions concerning resource use in the upstream supply chain affect supplier management. Partnerships with suppliers to the CEWE Group are based on the Supplier Code of Conduct and the supplier questionnaire. These documents include specific requirements for established environmental standards, certification and actions related to waste management. If a suspicion arises that a supplier is failing to comply with the Code of Conduct or is not implementing required actions, or there are other discrepancies or indications of potential risks, then the supplier’s waste management processes are reviewed during on-site audits.

Metrics and targets

Targets related to resource use and circular economy (E5-3)

The CEWE Group has not defined specific targets for the control of resource inflows and outflows. Formal target planning neither includes circular economy-oriented product design nor the minimisation of the use of primary materials or sustainable procurement. Corresponding actions and programmes have not been implemented to date.



However, the Company is pursuing approaches to promote the circular economy. From 2026 onwards, a take-back system for direct prints, phone cases and photo paper products will be trialled with the aim of enabling targeted material disposal. A systematic success control for this action is not currently in place.

Group-level company strategy also envisages reducing production scrap, the rollout of a take-back system and reductions to the proportion of plastic in packaging. In addition, the Company is seeking to source all wood- and wood fibre-based materials from FSC®-certified sources. Most materials currently procured by the Company already have FSC® certification.

With regard to waste management, the CEWE Group is pursuing reductions to the waste ratio and production scrap by 2025. However, this target has been set without formalised agreements or rules delivering measurable results.

Resource inflows (E5-4)

Cluster #1: Resource availability and substitution

Material resource inflows are paper (photo paper, digital print paper /paperboard, end paper, other papers), packaging (paper, paperboard and cardboard (PPC), plastic, photo pouches, wood), process materials (chemicals, printer ink, metals, foils, glue/adhesive, other consumables) and other materials (aluminium composite panels, acrylic glass, ceramics, textiles, canvas, stretcher frames, rigid foam, chocolate, other photo gift materials).

Assignment of risks and opportunities results in the following: risks include the manufacturing processes for environmentally critical materials such as aluminium (as a result of red mud) and chemicals, and for resource-intensive materials like wood /paper, plastics and cotton. These are supplemented by oil-based materials like plastics, adhesives, toner and paints. However, opportunities are offered by on-demand production, in the renewability of paper and wood as primary resources, and in material certifications such as FSC®. Rubber and bauxite (for the production of aluminium) are among the raw materials that are defined as critical by the EU. Rare earths are relevant only for bought-in products with electronic components and have a negligible share of the product portfolio. Water plays a role in the upstream value chain for the production of materials such as paper, cotton and aluminium. Within the Company’s own operations, water is used for the development of photos but at a smaller scale when compared with other industries. In terms of property, plant and equipment, a machine pool should be noted in particular.

In early 2025, a full list of consumption figures for materials in financial year 2024 was prepared from the ERP system. These data were used to complete a corresponding classification of materials and the total weight was determined for the reporting period. Key materials are not subject to any relevant weight fluctuations and maintain their weight at a constant level. Data collection is based on direct measurements, as a result of which entering material weights is the responsibility of Purchasing, which has sole authorisation to make any changes. Any manipulation of data is therefore restricted to a single department. All changes to master data are also logged in the ERP system. The data collected consists of direct measurements. In individual cases, an estimate is used.

Resource inflows

	2024
Total weight of products, and technical and biological materials	47,466.5 t (of which 100% technical)
Biological materials (including biofuels for non-energetic purposes) as a percentage of total usage	0

Definition of biological and technical materials

The CEWE Group defines biological materials as those that originate from biological sources and which are not subjected to any industrial processing. After use, these materials can be returned to biological cycles for decomposition. Technical materials are defined by CEWE as industrially produced substances that can be reused or recycled in technical cycles.

Resource outflows (E5-5)

Critical products for resource outflows at the CEWE Group are photobooks, photo paper and printed products.

Goods outflows are recorded by the ERP system. Purchasing is responsible for maintaining the system and recording relevant metrics. Key materials are not subject to any relevant weight fluctuations and maintain their weight at a constant level during the production process. Metrics are not subject to external validation.



Product development does not follow any specific design methodology according to circular principles. However, the process of introducing new products does consider sustainability and aspects of product end-of-life – examples here include recyclability, longevity and second use. Recyclable products are printed products on digital printing papers without coating or foliation on both sides (waste paper cycle). Textiles are an example of reusable products (recycling as part of the second-hand clothes cycle). The CEWE PHOTOBOOK, photo prints and wall art are examples of long-lived products.

The CEWE Group has not identified any of its products as capable of being repaired, since these products include no individual components that can be replaced. Accordingly, this item is not accounted for in reporting.

The CEWE Group identifies and manages various primary waste streams as part of its waste management system. The most important waste streams include waste paper, especially printer paper and paper packaging (PPC), as well as mixed container waste for recycling, which includes photo paper.

Beyond this, there are other more specific categories of waste, including waste chemicals, coatings and paints, as well as waste containing metals, plastics and wood. These materials are collected according to applicable environmental regulations, sorted and sent for recycling or disposal as appropriate.

Waste management at the CEWE Group aims to use optimised processes and recycling actions to minimise environmental impacts and implement efficient models of resource use.

Cluster #3: Resource outflow reduction/substitution

Classification of recyclability here is based on material properties and handling within the production process. Separate collection and waste recovery is also applied within the framework of the European circular economy.

Cluster #5: Own operations waste management

The CEWE Group calculates and classifies waste volumes from own operations using records supplied by waste management companies and waste transfer documentation (by EWC code). The CEWE Group complies with the European Waste Framework Directive (and other directives

from the EU legislative package on the circular economy from 2018) and the resulting transpositions into national legislation.

For each production site, annual waste accounts are prepared that clearly list all of the waste produced, identified by its European Waste Catalogue code (EWC code). These account statements identify and classify the materials and individual waste streams. Among other aspects, this also permits the calculation of all hazardous waste based on direct measurements. To identify the recycling procedures used, details of specific waste treatment processes are requested from the waste management companies. These details are requested by each production site and can then be used for the consolidation of waste volumes.



Metrics

Product recyclability disclosures in %

	2024
Recyclable total output	66.0
of which products	49.3
of which product packaging	16.7

The creation of an analysis in the system produces a detailed listing of all products sold on the market, with details of both their quantities and their weights being given. This data is then consolidated by integrating the product recycling proportions into the product accounts. To calculate the total recyclable proportion of products sold on the market, the product weights are multiplied by the respective recycling proportions and the results are totalled. As a final step, the sum total is then divided by the total weight of the products. The data result from direct measurements.

Operational waste in t

	2024
Total operational waste volume produced	12,601.3
Non-recycled waste	2,772.3
as a percentage	22
Hazardous waste	833.4
Radioactive waste	0

The data result from direct measurements.

Waste recovery disclosures

	2024			
	non-hazardous		hazardous	
	Weight (t)	Percent (%)	Weight (t)	Percent (%)
Waste diverted from disposal				
Preparation for reuse	30.0	0.2	7.8	0.1
Recycling	9,767.5	77.5	61.6	0.5
other recovery methods	1,947.9	15.5	698.1	5.5
Waste directed to disposal				
Incineration	0.0	0.00	0.8	0.01
Landfill	22.5	0.18	0.0	0.00
other disposal methods	0.0	0.00	65.2	0.52

Waste volumes result from direct measurements by waste management companies. Categorisation by process is partially based on assumptions, however, as some waste management companies did not provide details of the associated process. Depending on the waste type, the most frequently stated process was therefore determined and used to categorise all volumes of this waste type.

The CEWE Group reserves the right to make no disclosures for E5-4-31c and E5-5-36a.

Metrics are not subject to external validation.



Reporting in accordance with the EU Taxonomy

The European Green Deal is a strategy developed by the European Commission intended to enable the transition towards a competitive, resource-efficient and climate-neutral European economy. To achieve this goal, the EU Commission defined different actions in areas such as energy supply, transport, trade, industry, agriculture and forestry, financial market regulation.

A component of the European Green Deal, the EU Taxonomy Regulation (EU Taxonomy) is aimed at promoting sustainable investments by establishing a common classification system of environmentally sustainable economic activities across all sectors. Article 8 of the Taxonomy Regulation requires any undertaking which is subject to an obligation to publish non-financial information pursuant to Article 19a or Article 29a of Directive 2013/34/EU to disclose in its non-financial statement or consolidated non-financial statement how and to what extent its activities are associated with economic activities that qualify as environmentally sustainable under Articles 3 and 9 of this Regulation. The reporting obligations introduced in this context for publicly traded entities are intended to provide transparent and standard information, enabling users of such reports to compare the sustainability of business models.

Article 9 of the EU Taxonomy Regulation specifies six environmental objectives of the European Union:

- Climate change mitigation
- Climate change adaptation
- The sustainable use and protection of water and marine resources
- The transition to a circular economy
- Pollution prevention and control
- The protection and restoration of biodiversity and ecosystems

Making use of the transitional relief granted by the EU, the disclosures for financial year 2021 focused on the first two objectives only, i.e. climate change mitigation and climate change adaptation, in relation to the proportion of taxonomy-eligible economic activities in overall turnover (revenue), capital expenditure and operating expenditure. After this transitional relief was discontinued for financial year 2022, reporting for financial year 2024 comprises not only taxonomy eligibility, but also the assessment of taxonomy alignment for all six environmental objectives.

Taxonomy-eligible economic activities are those defined and described in the Climate Delegated Act and Environmental Delegated Act. Economic activities identified as being taxonomy-eligible are considered to be taxonomy-aligned if they meet the so-called technical screening criteria, which basically consist of two components: (1) substantial contribution to one of the environmental objectives specified; and (2) do no significant harm to other environmental objectives.

Furthermore, it must be ensured that minimum social safeguards are met (in accordance with OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, the fundamental conventions of the ILO and the International Bill of Human Rights).

The individual key indicators are established by applying the International Financial Reporting Standards (IFRSs) used for the consolidated financial statements and take all fully consolidated Group companies into consideration. Total turnover corresponds with the figure shown for total revenue in the statement of profit or loss for the financial year concerned. Total capital expenditure (CapEx) is defined as the sum of gross additions to property, plant and equipment and intangible fixed assets during the year under review, excluding goodwill acquired. Total operating expenditure (OpEx) comprises all direct, non-capitalised costs in connection with research and development, renovation measures, short-term leases as well as upkeep and maintenance or repair. To determine the figures, the financial indicators of turnover (revenue), operating expenditure (OpEx) and capital expenditure (CapEx) were analysed in terms of their taxonomy eligibility. Data from the annual report and the consolidation system were evaluated in order to identify the proportion of turnover, CapEx and OpEx that can be attributable to taxonomy-eligible economic activities. The individual items can be clearly allocated to the respective category and environmental objectives, eliminating double counting.



The following disclosures and explanations reflect the assessment of the CEWE Group. The acts published so far on the EU Taxonomy Regulation only contain activities of particular relevance to climate change mitigation and climate change adaptation, and no activities for the other four environmental objectives.

Based on the current status of regulation, the CEWE Group has not allocated any turnover-relevant economic activities nor has it identified any turnover that is eligible under the taxonomy. Depending on the specific content of the Regulation, however, the CEWE Group might identify taxonomy-eligible turnover in the next financial years.

The analysis of economic activities regarding CapEx has shown that capital expenditure is being made in taxonomy-eligible economic activities relating to the purchase of products and services listed under Annex I (Substantial Contribution to Climate Change Mitigation) of the delegated act. This concerns the operation of personal mobility devices, cycle logistics (activity 6.4); transport by motorbikes, passenger cars and light commercial vehicles (activity 6.5); construction of new buildings (activity 7.1); renovation of existing buildings (activity 7.2); installation, maintenance and repair of energy efficiency equipment

(activity 7.3); installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings) (activity 7.4); installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings (activity 7.5); installation, maintenance and repair of renewable energy technologies (activity 7.6); data processing, hosting and related activities (activity 8.1); and professional services related to energy performance of buildings (activity 9.3).

Furthermore, OpEx have been identified that relate to the purchase of products and services from taxonomy-eligible economic activities listed under Annex I (Substantial Contribution to Climate Change Mitigation) of the delegated act. This concerns the operation of personal mobility devices, cycle logistics (activity 6.4); transport by motorbikes, passenger cars and light commercial vehicles (activity 6.5); installation, maintenance and repair of energy efficiency equipment (activity 7.3); installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings) (activity 7.4); installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings (activity 7.5); installation, maintenance and repair of renewable energy technologies (activity 7.6); data processing, hosting and

related activities (activity 8.1); and professional services related to energy performance of buildings (activity 9.3).

The analysis of the economic activities classified as taxonomy-eligible with regard to their taxonomy alignment has shown that feedback received from suppliers is not sufficient to draw the conclusion that the conditions required with regard to minimum social safeguards can be considered met in accordance with Article 3 and Article 18 of the Taxonomy Regulation. Therefore, none of the economic activities that are classified as taxonomy-eligible are also shown as taxonomy-aligned.

Since the CEWE Group does not have any activities in accordance with Delegated Regulation 2022/1214 relating to nuclear energy and fossil gas, it does not include them in the EU Taxonomy tables.



→ Combined non-financial statement
Reporting in accordance with the EU Taxonomy

CAPEX

Economic Activities (1)	Code(s) (2)	CapEx (3)	Proportion of CapEx, year 2024 (4)	Substantial contribution criteria						DNSH criteria ("Does not significantly harm") (h)							Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) CapEx, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)
				Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)			
	in euros	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)	0	0	N	N	N/EL	N/EL	N	N	N	N	N	N	N	N	N	N	N		
Of which enabling	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	E	
Of which transitional	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		T
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Operation of personal mobility devices, cycle logistics	CCM 6.4	365,049	0.50	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.34		
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	246,976	0.34	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.41		
Construction of new buildings	CCM 7.1	7,350,000	10.09	EL	N/EL	N/EL	N/EL	N/EL	N/EL								-		
Renovation of existing buildings	CCM 7.2	352,409	0.48	EL	N/EL	N/EL	N/EL	N/EL	N/EL								-		
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	283,271	0.39	EL	N/EL	N/EL	N/EL	N/EL	N/EL								-		
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	93,504	0.13	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0.09		
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	11,859	0.02	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	747,792	1.03	EL	N/EL	N/EL	N/EL	N/EL	N/EL								1.37		
Data processing, hosting and related activities	CCM 8.1	171,562	0.24	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
Professional services related to energy performance of buildings	CCM 9.3	26,775	0.04	EL	N/EL	N/EL	N/EL	N/EL	N/EL								0		
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)	9,649,198	13.24	%	-	-	-	-	-	-								2.21		
A. CapEx of Taxonomy eligible activities (A.1+A.2)	9,649,198	13.24	%	-	-	-	-	-	-								2.21		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
CapEx of Taxonomy-non-eligible activities	63,212,802	86.76	-	-	-	-	-	-	-										
Total	72,862,000	100	-	-	-	-	-	-	-										



→ Combined non-financial statement
Reporting in accordance with the EU Taxonomy

OPEX

Economic Activities (1)	Code(s) (2)	OpEx (3)	Proportion of OpEx, year 2024 (4)	Substantial contribution criteria						DNSH criteria ("Does not significantly harm") (h)							Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) OpEx, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)		
				Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)					
																				Y; N; N/EL	Y; N; N/EL
A. TAXONOMY-ELIGIBLE ACTIVITIES																					
A.1. Environmentally sustainable activities (Taxonomy-aligned)																					
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0	N	N	N/EL	N/EL	N	N	N	N	N	N	N	N	N	N				
Of which enabling		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	E			
Of which transitional		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		T		
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																					
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL												
Operation of personal mobility devices, cycle logistics	CCM 6.4	505,145	2.65	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	167,482	0.88	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	17,750	0.09	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	CCM 7.4	14,420	0.08	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	CCM 7.5	6,261	0.03	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	650	0.00	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Data processing, hosting and related activities	CCM 8.1	14,234	0.07	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
Professional services related to energy performance of buildings	CCM 9.3	40,577	0.21	EL	N/EL	N/EL	N/EL	N/EL	N/EL												
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		766,518	4.03	%	-	-	-	-	-												
A. OpEx of Taxonomy eligible activities (A.1+A.2)		766,518	4.03	%	-	-	-	-	-								1.07				



→ Combined non-financial statement
Reporting in accordance with the EU Taxonomy

Turnover

Economic Activities (1)	Code(s) (2)	Turnover (3)	Proportion of turnover, year 2024 (4)	Substantial contribution criteria						DNSH criteria (“Does not significantly harm”) (h)							Proportion of Taxonomy aligned (A.1.) or eligible (A.2.) turnover, year 2023 (18)	Category enabling activity (19)	Category transitional activity (20)	
				Climate change mitigation (5)	Climate change adaptation (6)	Water (7)	Pollution (8)	Circular economy (9)	Biodiversity (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water (13)	Pollution (14)	Circular economy (15)	Biodiversity (16)	Minimum safeguards (17)				
		in euros	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T	
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1. Environmentally sustainable activities (Taxonomy-aligned)																				
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0	N	N	N/EL	N/EL	N	N	N	N	N	N	N	N	N	N			
Of which enabling		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	E		
Of which transitional		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		T	
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																				
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL											
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0	0	%	-	-	-	-	-											0
A. Turnover of Taxonomy eligible activities (A.1+A.2)		0	0	%	-	-	-	-	-											0
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																				
Turnover of Taxonomy-non-eligible activities		832,792,071	100	-	-	-	-	-	-											
Total		832,792,071	100	-	-	-	-	-	-											



Social information

Own workforce (ESRS S1)

Strategy

Interests and views of stakeholders (ESRS 2 SBM-2)

The interests, views and rights of the CEWE Group's employees including respect for their human rights inform the Company's strategy and business model in a number of different ways. This includes employee representation, regulated by the Works Constitution Act (Betriebsverfassungsgesetz – BetrVG), which is provided by the Group Works Council and local Works Councils, as well as voluntary programmes for participating and airing views that include employee surveys and innovation days. Further details are provided in the section [Processes for engaging with own workforce and workers' representatives about impacts \(S1-2\)](#) [page 158](#). All employees are also given the opportunity to contact supervisors, the Works Council, the HR department or the ombudsman in the event of any suspected wrongdoing. More information about this form of engaging with and honouring worker rights is presented in the section G1 Business Conduct [page 178](#).

Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

Workforce engagement plays a leading role in the future viability of the CEWE Group. Business development and employee satisfaction are closely interlinked. As one example, the expertise possessed by the workforce has a direct effect on innovation as well as production quality and efficiency. As a result of this, business success is therefore crucially dependent on the CEWE Group acquiring motivated and well-qualified employees, and retaining these employees within the CEWE Group. Safeguarding employee welfare and development as part of a continuous process is a key pillar within the CEWE Group's long-term strategy. The CEWE Group requires a healthy and motivated workforce to be able to compete in the market.

As part of the materiality assessment, the CEWE Group has incorporated the interests and views of its own workforce by means of proxy stakeholders, and considered potential impacts, risks and opportunities in relation to these stakeholder groups.

Summary of positive impacts

The workforce of the CEWE Group comprises the following types of employees:

- Apprentices, dual-study students
- Bachelor's/Master's students
- Temporary employees
- Permanent employees

- Workers in marginal employment
- Temporary workers in marginal employment
- Interns
- Seasonal workers
- Trainees
- Work placement students

As part of the materiality assessment, particular attention was paid to employees who may be considered vulnerable on account of certain characteristics. These characteristics include ethnic origin, gender, sexual orientation, gender identity, disability, religion and social background.

Child labour and forced labour are not systemic in the context of the CEWE Group business model and are categorically rejected. The CEWE Group has no non-employees who are affected by material impacts. The CEWE Group does not do business nor does it maintain any material supplier relationships in countries with a widespread and systemic risk of child labour or forced labour.

The following information provided about impacts applies primarily to those employees of the CEWE Group who are covered by a collective bargaining agreement. This is approximately 53% of the European workforce. However, employees not covered by such agreements also benefit from these general conditions, as their employment contracts are modelled on existing collective bargaining agreements.



Identified impacts

The following areas were identified as impacts:

- Security for personal life planning: The CEWE Group offers its employees long-term contracts based on collective agreements with guaranteed working hours and benefits. This gives employees additional security for personal life planning as well as financial stability.
- Freedom of association: The CEWE Group supports the right to freedom of association, which gives employees the opportunity to organise themselves, establish worker representation bodies and/or become members of unions. This allows employees to actively lobby the Company with their interests and viewpoints.
- Adequate working conditions: The CEWE Group uses collective agreements to ensure that working conditions are fair for its workforce. This helps to create a positive working environment and promote employee satisfaction.
- Support for personal duties: The CEWE Group uses programmes like the company-internal crèche and holiday camps to provide help with childcare, and also runs programmes targeting specific needs like the “parent cafes”. This makes it easier for employees to achieve a good work-life balance.

- Equal treatment and equal opportunities: The CEWE Group promotes equal treatment and equal opportunities for all employees. Examples of this include its Equality Network and Equality Committee as well as training programmes. This creates an inclusive working environment that offers the same opportunities to all employees.
- Professional development: The CEWE Group operates a comprehensive range of training and qualification programmes, aimed at promoting the continuous professional development of its employees in terms of their skills and opportunities for employment. These programmes support career development as well as personal growth for all employees.
- Inclusion of persons with disabilities: The CEWE Group caters to the needs and requirements of people with disabilities. The Company takes steps to ensure that people with disabilities have easy access to communal facilities and are able to participate in company events. The CEWE Group also contributes to the inclusion of people with disabilities in the labour market, not only by employing people with disabilities but also by commissioning work from external workshops staffed by people with disabilities.

The following were identified as an opportunity for the Company in the course of the materiality assessment:

- By creating good working conditions that include attention to occupational safety and health, the CEWE Group can reduce the level of health-related absenteeism. Fewer absences as a result of health issues have a positive effect on Company productivity.
- The CEWE Group can also optimise work processes and deploy modern technologies to further enhance its production efficiency. More efficient workflows together with a well-organised working environment make it possible for employees to work more productively without increasing workloads to untenable levels. This leads to a higher overall production output.
- Good working conditions, secure jobs and fair pay, supplemented by good occupational safety and health standards, also help to ensure employee satisfaction and motivation.
- Satisfied and motivated employees are less likely to leave the Company, which has a positive effect on the staff turnover rate while safeguarding the continuity of business processes. Fewer interruptions and a stable workforce makes operational management more straightforward while reducing disruptions to day-to-day business.



Current and expected impacts

The CEWE Group formed two IRO groups (clusters) as part of assessing positive and negative impacts as well as opportunities. Cluster #1, “Working conditions and labour rights”, addresses issues such as compliance with labour laws and standards, actions to promote occupational safety and health, working conditions and ergonomics. Cluster #2, “Integrative and safe working environment”, covers the aspect of the integrative and safe working environment. This addresses the promotion of diversity and inclusion, the avoidance of discrimination, training and awareness-raising – such as accounting for the needs and requirements of people with disabilities.

The following current and future impacts can be allocated to these clusters:

Cluster #1 – Working conditions and labour rights

The CEWE Group implements a comprehensive set of preventive actions to promote health and safety in the workplace. However, this cannot entirely preclude the occurrence of cases of work-related sickness or accidents – especially in the production process. To minimise risks, actions to improve occupational safety and health in the workplace are implemented as a continuous process.

The CEWE Group business model requires the Company to employ seasonal workers in various areas of business, including production, customer services, materials management and on-site finishing. In so doing, the Company follows the principle of addressing working conditions directly wherever possible, and keeping the use of personnel leasing services to the necessary minimum.

In a few isolated cases, seasonal fluctuations in the order situation can impact planning reliability for the workforce. To meet this challenge, the CEWE Group makes use of transparent employment models, fair contractual conditions and measures to stabilise working conditions.

Employee working hours are generally logged. In areas that do not use time recording systems, mechanisms to ensure workloads are appropriate are reviewed and improved as necessary.

However, the CEWE Group does give its employees a high level of personal life planning security, thanks to its long-term contracts based on collective agreements with guaranteed working hours and benefits.

The CEWE Group allows employees to vouch for their interests and views within the Company by upholding their right to freedom of association. This gives employees the opportunity to organise themselves, to form groups such as trade unions and to become members of such representative associations.

The Company guarantees high-quality working conditions for employees by means of collective agreements.

The CEWE Group helps employees to fulfil their personal duties (examples include the CEWE Group’s own crèche and holiday camps) and runs programmes for specific needs (e.g. “parent cafes”).

Cluster #2 – Integrative and safe working environment

The CEWE Group promotes equal treatment and equal opportunities for all employees by means of its Equality Network and training programmes.

The CEWE Group promotes the continuous professional development of its employees in terms of their skills and opportunities for employment with a comprehensive range of training and qualification programmes.



The CEWE Group promotes the incorporation of the needs and requirements of people with disabilities, such as by providing accessible access to communal facilities or ensuring participation in company events. In addition, the Company supports the inclusion of people with disabilities wherever possible, both within its own operations and also by awarding orders to workshops for people with disabilities. Given the persistent skills shortage, these actions – quite apart from their ethical and moral aspects – are also well-advised investments in the Company that are in line with its overall strategy. On the one hand, they support a company climate based on respect, appreciation and equal treatment, and therefore contribute to employee satisfaction. On the other, they work to counter potential negative impacts like dissatisfaction, reputational damage and dips in productivity.

Impact, risk and opportunity management

Policies related to own workforce (S1-1)

The CEWE Group has developed comprehensive policies with the aim of managing material impacts, risks and opportunities in relation to its own workforce. Responsibility is assigned to the respective Executive Board member for Production, Purchasing, Logistics, HR and Customer Service. These policies apply both to specific groups within the workforce and to the overall workforce. They also explicitly cover the topics of forced labour and child labour (e.g. BME Code of Conduct). Specifically, these are the CEWE Code of Conduct, the CEWE Human Rights Policy Statement and the BME Code of Conduct. A detailed

explanation of these policies and underlying principles is given under G1-1 [page 178](#). Other internal documents govern the working conditions for the Company's own workforce:

General collective agreement

To ensure compliance with labour laws, a general collective agreement exists for all employees of CEWE Stiftung und Co. KgaA working in Photofinishing in Germany. Among other aspects, this agreement regulates and standardises working times, extra pay, holiday and educational allowances. The general collective agreement also coordinates and documents the rules applying to seasonal workers.

AuditorPlus

The CEWE Group pursues a comprehensive management approach to occupational safety, which it implements with the aid of the occupational safety management programme AuditorPlus. This programme helps to coordinate and document the occupational safety tasks at all German Photofinishing sites. The software includes modules for briefings, screenings, hazard assessments and work-related accidents. Regular hazard assessments are completed for all workplaces, and actions to minimise risks are drawn up according to the STOP principle. Accidents and near misses are documented and analysed with the aim of ensuring continuous improvements in occupational safety. If a task is not completed as it should be, an automated message is sent to the next-level supervisor and the occupational safety team is informed about the lapse.

Cluster #1 – Working conditions and labour rights

In this cluster, the CEWE Group applies the following policy documents for managing working conditions and worker rights:

- CEWE Code of Conduct
- CEWE Human Rights Policy Statement
- BME Code of Conduct
- Ombudsman
- CEWE Supplier Code of Conduct
- General collective agreement for Photofinishing

Cluster #2 – Integrative and safe working environment

The CEWE Group applies the following policy documents for managing an integrative and safe working environment:

- CEWE Code of Conduct
- CEWE Human Rights Policy Statement
- BME Code of Conduct
- Ombudsman
- CEWE Supplier Code of Conduct

These policy documents promote an integrative and safe working environment, in which all employees are respected and appreciated regardless of their gender, age, ethnic origin, religion or sexual orientation. By implementing these policies, the Company ensures that the CEWE Group employees can enjoy a workplace free from discrimination and harassment, where their health and safety is afforded the utmost priority.



Processes for engaging with own workforce and workers' representatives about impacts (S1-2)

Cluster #1 – Working conditions and labour rights

The CEWE Group has established a wide range of structures and processes designed to involve employees in company topics. Examples of such bodies include employee representatives on the CEWE Group Supervisory Board, and various works council committees at site and group level.

Regular employee meetings are held at the four Photofinishing sites operated by the CEWE Group in Germany – four times a year at the main Oldenburg site, for example. These meetings are used to inform employees about important topics and offer them the chance to make their voices heard. The CEWE Group also maintains various committees that have been set up to address specific topic areas. These committees are staffed by members of the works councils and individuals appointed by corporate management as well as employees with subject-matter expertise on a case-by-case basis.

The Group Works Council holds face-to-face meetings once a quarter while also meeting online for scheduled sessions at regular intervals of two weeks. At these sessions, members also address topics of relevance for the Group Works Council.

Various initiatives also exist for involving the workforce and ensuring their voices are heard. The Ship It Days and Innovation Days are also held annually at the CEWE Group. The two-day internal Ship It Days event offers all employees the chance to suggest their own ideas for CEWE, and then work together with their colleagues to develop these ideas further. In 2024, six teams worked on a wide variety of ideas. All employees are also invited to attend the Innovation Days. This event focuses on fostering dialogue between employees and the presentation of new products. An important part of the Innovation Days is the “Future Zone”, where all sites, subsidiaries and even individual departments are encouraged to showcase their work and introduce new projects. Employee opinion is also provided with a platform here, as workers are encouraged to provide feedback on individual projects and products.

Employee surveys are also carried out at irregular intervals with the aim of obtaining feedback from the workforce. Employee opinion also forms a key input for internal organisational development processes and also helps with their implementation. One example here is the development of the new cultural mindset “The WE in CEWE”, see [page 180](#). The most recent major employee survey, “Great Place to Work”, was conducted in 2022.

As these offerings are aimed at all employees, they promote equal treatment and equal opportunities within the CEWE Group. Initiatives such as Ship It Days or Innovation Days also help employees to develop their skills and expertise by disseminating and exchanging knowledge.

The employee survey gives all staff an opportunity to provide feedback on working conditions at CEWE and thus trigger improvement processes. All of these initiatives therefore help to motivate employees and create a positive working environment.

Employees are also free to approach their competent works councils with their concerns at any time. They can also participate in the Innovation Lounge, which is a Group-wide business innovation management system for suggesting new ideas for products, software and processes. Employees at the head office in Oldenburg can also use the company suggestion scheme. This not only helps to develop innovations but also recognises and cultivates the potential positive impacts as identified in the section entitled “Summary of positive impacts” on [page 154](#).

While the Executive Board shares overall responsibility for these processes, the respective Board members for Marketing, Sustainability and New Business have been assigned specific responsibility for organising the Innovation Days. The heads of HR and Organisational Development, together with HR management at the individual CEWE Group sites, have operational responsibility for ensuring that the interests of the workforce are consulted in decision-making processes.

*Cluster #2 – Integrative and safe working environment*

The processes for involving stakeholders in cluster #2 partially overlap with the processes already mentioned in cluster #1 (Ship It Days, Innovation Days, employee surveys and company suggestion scheme).

To better understand and account for the perspectives of employees who could be especially vulnerable or marginalised, the CEWE Group has established an Equality Committee and an Equality Network. Both of these initiatives are intended to facilitate dialogue on this topic within a safe and supportive atmosphere, and aim to promote equality within the CEWE Group. The CEWE Group also has an elected Disabled Persons' Delegation that functions as an advocacy group for all employees who are disabled or have an equal status under law.

To give employees the opportunity to submit information or complaints about compliance with the Human Rights Policy Statement, the Company has appointed an external ombudsman to whom employees can submit reports – also anonymously. The sporadic nature of such reports means that any remedial actions are examined on a case-by-case basis; the effectiveness of this process is not assessed separately.

Processes to remediate negative impacts and channels for its own workforce to raise concerns (S1-3)

The CEWE Group has established a complaint and reporting system, known as the “ombudsman”. This system and the associated procedure is described in detail in section G1 Business Conduct on [page 180](#). If a negative impact or rights infringement occurs despite the implementation of preventive actions, the CEWE Group will introduce appropriate countermeasures. Each case is handled and analysed individually by the corresponding business department. The effectiveness and appropriateness of the action to be taken is reviewed by the affected business department. If necessary, the Works Council also becomes involved in this process.

Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions (S1-4)

Actions are also determined at the CEWE Group by means of the risk management system. This system identifies and assesses risks, so as to allow the subsequent specification and implementation of suitable compensatory actions. The risk management system references potential risks that are documented and responded to with corresponding actions.

The following section describes the ongoing and planned actions per cluster.

Cluster #1 Working conditions and labour rights

Action 1: Occupational safety and health management programme AuditorPlus

In 2012, the CEWE Group rolled out the occupational safety and health management package AuditorPlus with the aim of coordinating and documenting occupational safety tasks at all German Photofinishing sites.

Designed for the effective management of occupational safety and health topics, the package offers support

- for coordinating and documenting the occupational safety tasks at all German Photofinishing sites;
- by providing modules for briefings, screenings, hazard assessments and work-related accidents;
- for regular hazard assessments of all workplaces;
- by specifying actions to minimise risks according to the STOP principle; and
- by documenting and analysing accidents and near misses to ensure the continuous improvement of workplace safety.



This action is not time-limited. The effectiveness of AuditorPlus is not systematically tracked or assessed.

Action 2: Promotion of health in the workplace

The CEWE Group views employee health as an asset, and is therefore proactive in ensuring the conservation and development of this resource. At its head office in Oldenburg, which employs a workforce of 1,200 people, the Company organises a variety of health promotion activities throughout the year. The overall intention here is to ensure that employees are protected from becoming ill (= prevention). All of the digital courses are also made available to the entire CEWE Group. Activities on offer include the following:

- Workshops on nutrition
- Back health course
- Stop smoking course
- Ergonomic workplace advice
- Mobile massage
- Psychosocial counselling
- Hansefit
- Breaktime exercise

Cluster #2 Integrative and safe working environment

The following actions can be allocated to cluster #2:

Action 1: Disabled Persons' Delegation

The CEWE Group has set up a Disabled Persons' Delegation at many of its sites, which acts as a central point of contact for more than 2,000 colleagues in the Company. There is also a General Disabled Persons' Delegation for the photofinishing locations, which assumes a higher-level function. This delegation actively represents the interests and rights of disabled employees, and helps them to integrate and participate fully in working life, with the aim of guaranteeing an inclusive and supportive working environment.

The Disabled Persons' Delegation is the elected advocacy group for disabled employees and persons of equal status under law:

- The delegation offers help and support to employees applying for a disabled or similarly impaired status.
- It puts together free downloadable information.
- The delegation provides support with links to agencies, associations and self-help groups.
- It provides advice about setting up and maintaining workplaces suitable for use by disabled persons.

This action will be maintained for an indefinite term: the organisation of an advocacy group for disabled persons helps to reduce the negative impacts identified while also offering support to affected employees. As two examples, the delegation can identify places in the Company where accessibility can be improved or where additional action is needed to prevent discrimination. The effectiveness of the Disabled Persons' Delegation is not systematically tracked or assessed.

Action 2: Equality Committee

The CEWE Group has established an Equality Network as well as an Equality Committee within the Works Council. Together with the Inclusion Officer at the Oldenburg site, these bodies work in close consultation with the HR departments. A biweekly update meeting is also held with the Inclusion Officer at the Oldenburg site and the Disabled Persons' Delegation. This meeting is used to discuss recent developments involving the topic of inclusion. The meetings are also used to share details of how often the Disabled Persons' Delegation is contacted for advice, for example.



The Equality Committee at the CEWE Group was established to promote the topic of equality within the Company, with a particular focus on equal opportunities for women in management positions. The committee also works to improve equality in general, regardless of gender, sexuality, age, social background, language, ethnic origin, belief or political convictions. The committee also implements targeted actions and initiatives with the aim of creating a diverse and fair working environment.

- The committee serves as a competent point of contact that can be reached and liaised with directly via the Works Council.
- The Works Council offers one-hour “open door” sessions in its office from Monday to Thursday every week. The office is always staffed at these times and employees are welcome to discuss their issues personally with the Works Council.
- A separate mailbox has been set up for the Works Council.
- The committee can be reached via Teams or e-mail, or its members approached personally.
- The Equality Committee can be contacted by any employees who have questions, information, suggestions or needs related to the topic of equality and equal treatment. After talking to the employee, the committee works with the individual to discuss next steps.

The action was implemented in the reporting year, affects the entire CEWE Group and has an indefinite term until further notice. The Equality Committee helps to ensure that support is provided to individuals who could be disadvantaged within the Company. The effectiveness of the Equality Committee is not systematically tracked or assessed.

Action 3: E-learning

Another component is the area of continuing education. Unconscious bias influences behaviour and has impacts on hiring as well as performance appraisals. For this reason, the CEWE Group has also decided to focus on the topic of awareness-raising and reflection. Since April 2024, all employees have been offered two separate e-learning formats, on the topic of the German General Equal Treatment Act (Allgemeines Gleichbehandlungsgesetz – AGG) as well as “Diversity, equity and inclusion”. The first of these e-learning formats constitutes a mandatory training course for all employees. Both of these courses can be taken in English or German.

These digital training courses help to reduce negative impacts, aiming to raise awareness about discrimination and encourage preventive action. This action improves the general working climate throughout the Group and thus counts against all identified negative impacts in relation to “Own workforce”.

Action 4:

Increasing the proportion of women in leadership positions
Businesses have a decisive role to play in promoting diversity and equal treatment in the workplace. The CEWE Group is aware of its responsibilities in this area and has specifically identified the topic of “Women in leadership positions” as a strategic action area. While 49% of the CEWE workforce is female, this proportion is not reflected within the various management tiers. To overcome this existing discrepancy, actions have been taken at various levels.

The internal junior management programme “GROW” performs an important role in relation to both career development and succession planning. GROW aims to provide employees taking on leadership positions within the Group in the short to medium term with the skills needed for these roles. The programme uses various methods – such as knowledge transfer, job shadowing and mentoring – to address key content areas related to leadership. GROW takes one year to complete, and is a comprehensive and thoroughgoing investment in high potentials at CEWE. In 2024, a total of 26 employees joined the programme, 65% of whom were women. Nine of these women have now assumed positions of responsibility as team or departmental leaders.



In 2025, priority will once again be given to the topic of women in leadership. For this reason, several Group-wide activities were approved for the coming year at the end of 2024. These include:

- Management while working part time: From 2025, all leadership positions will be advertised with the option to work part time on a near-full time basis (min. 80%). Exceptions may be made for specific positions.
- Recruitment process: For all management positions which are advertised externally at C-1 level (direct reporting to the Executive Board), the final round of the selection process must always include at least one woman.
- Mandatory training for executives and HR: Management staff and HR play a decisive role within personnel processes (hiring and promotion). Starting in 2025, training in “diversity and equality of opportunity” therefore becomes mandatory for both of these groups.
- Training opportunities for female employees: From 2025, CEWE will offer additional training courses for women to strengthen their leadership skills.

Various sites within Germany and other countries also implemented a wide variety of actions in 2024. A brief overview of these initiatives is presented below.

CEWE Norway has reworked its recruiting process to include gender-fair wording in employment ads to ensure that neither women nor men feel discriminated against by the ad language. If two equally qualified candidates apply for the same position, a new rule states that the person from an underrepresented group will be hired.

CEWE subsidiary CHEERZ has already achieved parity in terms of gender ratios in both upper and middle management. Flexible part-time models have been used here to help leaders achieve a good work-life balance. To further promote gender equality within the Company, a mandatory equality accounting process has been introduced, which regularly calculates the “Egapro index”.

At the CEWE Group head office and its largest production facility in Oldenburg, two company-internal crèche groups and regular childcare programmes during school holidays also help employees to balance their career and family responsibilities. The respective proportion of women is used to measure and assess the effectiveness of these actions.

Action 5: Diversity Week

In 2024, Diversity Week was held once again at many CEWE Group sites with the aim of promoting diversity and an international focus. Diversity Week features events, campaigns and presentations from guest speakers.

A significant proportion of the actions described are training courses and continuing education programmes. Participant numbers are a key metric for assessing the effectiveness of these actions. The CEWE Group collects and analyses data on participant numbers in the various training programmes on a regular basis, ensuring that the programmes have broad appeal and enjoy high levels of employee participation. Feedback mechanisms are also used to assess participant satisfaction and the relevance of course content.

The CEWE Group makes every effort to make sure that its own business practices do not produce any material negative impacts on the workforce. If tensions are created by attempting to reconcile efforts to avoid negative impacts with other business requirements, the CEWE Group always strives to achieve solutions that safeguard employee interests. In line with its overall philosophy, the CEWE Group aims to promote a responsible-minded and supportive working environment based on transparency and fairness.

The CEWE Group takes steps to ensure that sufficient resources are made available for the management of material impacts on the workforce. These steps include budgeting for regular training courses and continuing education programmes, with the aim of improving employee skillsets as well as guaranteeing a safe and supportive working environment. The Company also provides financial support for initiatives relating to occupational safety, equality and employee development. Thanks to these actions, the CEWE Group is able to manage material impacts effectively and ensure their continuous monitoring.



Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S1-5)

The CEWE Group has defined targets that address the IROs. These targets are performance-related and are to be achieved by 2027.

Cluster #1 – Working conditions and labour rights

The CEWE Group has yet to specify any measurable, performance-related targets that could be assigned to the “Working conditions and labour rights” cluster. Notwithstanding this, the CEWE Group does track the effectiveness of its policies and actions in relation to material sustainability-related impacts, risks and opportunities. This is achieved by means of regular reviews and assessments of the implemented actions.

Cluster #2 – Integrative and safe working environment

The CEWE Group has defined gender equality targets for the IRO group “Integrative and safe working environment”. The proportion of women on the Supervisory Board, in the first management tier and in the second management tier is to be 50%, 33% and 40%, respectively, by 2027 in all cases. Progress towards these targets is documented in this report by the corresponding metrics.

A specific base year has not been specified, as target achievement does not depend on a base value. Progress towards target achievement is measured against the current annual value every year. No interim targets or milestones have been specified.

Gender equality targets have been set by the Executive Board. In so doing, the CEWE Group takes legal requirements into account.

Affected stakeholders were consulted while specifying these targets.

The target tracking process is carried out in close consultation with the Supervisory Board. The Supervisory Board monitors progress on a regular basis to ensure that the specified targets are achieved. The Company did not consult its own workforce or employee representatives as part of the process of identifying insights or potential improvements.

Characteristics of the Company’s employees (S1-6)

The necessary data is recorded in a monthly Workday report. This report is used to carry out a comprehensive evaluation and analysis at the end of the year. Units that do not work with Workday use templates to submit their data directly. The central HR department calculates the metrics required. This approach applies to all of the following metrics.

Overall employee numbers¹ by gender

Number	2024
Male	2,386
Female	2,271
Other	1
Not reported	0
Total	4,658

¹ The employee figures show a slight deviation from the information provided in the notes to the consolidated financial statements on page 236. This is because the CSRD used headcounts instead of full-time equivalents (FTE).

Employees

Number	2024
Total employees as of 31 December	5,553
Average number of employees	4,658

The table below presents the number of employees as of the end of the reporting period and the average number of employees for countries in which the CEWE Group employs 50 or more persons whose numbers make up at least 10 % of the total number of employees at their company.

Total number of employees for sites with > 50 employees

Number	2024
Germany	3,886
Average number of employees	3,194



Information about employees by contract type and gender

31 December 2024				
Female	Male	Other	Not reported	Total
Number of employees (head count)				
2,731	2,820	2	0	5,553
Number of permanent employees (head count)				
1,752	1,762	0	0	3,514
Number of temporary employees (head count)				
979	1,058	2	0	2,039
Number of non-guaranteed hours employees (head count)				
0	0	0	0	0
Number of full-time employees (head count)				
1,952	2,470	2	0	4,424
Number of part-time employees (head count)				
779	350	0	0	1,129

Information about employees by contract type and country

31 December 2024			
DACH	Central Europe	Southeast Europe	Total
Number of employees (head count)			
3,914	756	883	5,553
Number of permanent employees (head count)			
2,294	556	664	3,514
Number of temporary employees (head count)			
1,620	200	219	2,039
Number of non-guaranteed hours employees (head count)			
0	0	0	0
Number of full-time employees (head count)			
3,178	527	719	4,424
Number of part-time employees (head count)			
736	229	164	1,129



Average number of employees by head count

31 December 2024			
DACH	Central Europe	Southeast Europe	Total
Number of employees (head count)			
3,220	662	776	4,658
Number of permanent employees (head count)			
2,280	511	667	3,458
Number of temporary employees (head count)			
939	151	109	1,199
Number of non-guaranteed hours employees (head count)			
0	0	0	0
Number of full-time employees (head count)			
2,465	454	673	3,592
Number of part-time employees (head count)			
755	208	104	1,066

A total of 2,049 employees left the Company during the reporting period. The staff turnover rate therefore amounted to 43.99%. This figure includes all employees, including seasonal workers, who generally have a high turnover rate.

The CEWE Group used the BDA formula propagated by the Confederation of German Employers' Associations to calculate the employee turnover rate. This formula is calculated by dividing the voluntary departures by the average headcount, multiplied by 100..

Collective bargaining coverage and social dialogue (S1-8)

Coverage rate	Collective bargaining coverage		Social dialogue
	Employees – EEA (for countries with > 50 empl. representing > 10% total empl.)	Employees – non EEA (estimate for regions with > 50 empl. representing > 10% total empl.)	Workplace representation (EEA only) (for countries with > 50 empl. representing > 10% total empl.)
0–19%	–	–	–
20–39%	–	–	–
40–59%	–	–	–
60–79%	Germany (67%)	–	–
80–100%	–	–	Germany (91%)

Group-wide, 50% of employees are covered by collective bargaining agreements.

The diversity metrics refer to the gender distribution at the top management level (C1 and C2).

Diversity metrics (S1-9)

Gender distribution at top management level

Gender	FTE	in %
Male	135	71
Female	55	29
Other	0	0
Not reported	0	0
Total	190	100

Age distribution in own workforce

Number of employees	2024
Under 30	1,943
Between 30–50	2,313
Over 50	1,297

Adequate wages (S1-10)

All employees at the CEWE Group receive fair compensation for their job role, based on the applicable reference values.

Health and safety metrics (S1-14)

A full 100% of individuals in the Company's own workforce are covered by the CEWE Group health and safety management system, whether as a result of applicable legal requirements and/or recognised standards and guidelines. There were also no deaths registered during the reporting period as a result of a work-related injury or work-related illness.

However, a total of 60 work-related accidents were registered in the reporting period, which is a ratio of 7.4%. To calculate the rate of work-related injuries, CEWE divides the respective number of cases by the number of total hours worked by people in its own workforce and multiplies it by 1,000,000. The units report workplace accidents



to the central HR department on a monthly basis. To calculate the number of hours worked per year, the weekly working hours recorded by employees in the system each month is multiplied by the number of weeks in the respective month and added together for all months of the year and all employees.

Remuneration metrics (pay gap and total remuneration) (S1-16)

The difference between the average income of female and male employees of the CEWE Group, expressed as a percentage of the average income of male employees (known as the gender pay gap), was 18.6% in the reporting period.

To calculate the gender pay gap, the average hourly wage per month is recorded for each gender. Wages are recorded based on the respective salary tools used by HR employees. The gender pay gap is reported on an unadjusted basis across all CEWE Group employees in line with statutory requirements. This approach allows gender-specific salary differences within the Company to be presented comprehensively and transparently.

The median annual total remuneration for the workforce (excluding the highest-paid individual) as a percentage of the annual total remuneration for the highest-paid individual was 14.8%.

The following formula is used to calculate the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees: The total remuneration of the highest paid individual for 2024 is divided by the median gross earnings of all employees for 2024 excluding the highest paid individual.

Incidents, complaints and severe human rights impacts (S1-17)

In the 2024 reporting period, there were three complaints and two cases of reported discrimination and harassment. Of these, one incident was reported via the ombudsman. All incidents were investigated and assessed, and corresponding actions were introduced.

No complaints were submitted to the National Contact Point for OECD Multinational Enterprises during the reporting period.

Similarly, no fines, penalties or compensation for damages were imposed in the same period for incidents of discrimination, including harassment and complaints filed.

Workers in the value chain (ESRS S2)

Strategy

Interests and views of stakeholders (ESRS 2 SBM-2)

For the production of its photo products and the implementation of its business model, the CEWE Group is reliant on bought-in raw materials and intermediate products. As part of this interrelationship, the Company's strategy and business models can influence the interests, views and rights of workers in the upstream and downstream value chain in a number of ways.

To counter these risks, the CEWE Group has integrated a Supplier Code of Conduct into its business activities. This Code of Conduct defines non-negotiable minimum standards to be met within all business processes that arise as a result of working together with the CEWE Group and its affiliated companies.

These minimum standards include specific requirements for business partners, particularly in relation to:

- Working conditions and worker safety
- Health
- Fair treatment of workers
- Upholding basic rights

Business partners must agree to comply with these requirements and to audit their compliance with due care.

Impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

As described in IRO-1 in ESRS 2, the CEWE Group has used the materiality assessment as a first step to identify the scope of activities within its own operations and value chain, as well as the affected stakeholders. As a result of this process, all workers within the value chain identified as being material form a direct or indirect (represented by proxy stakeholders) part of the double materiality assessment. No additional checks were made with the purpose of verifying the inclusion of all workers in the value chain.

This section deals exclusively with the workers in the value chain in accordance with ESRS S2. Information on the CEWE Group's own workforce can be found in the ESRS S1 section.



The following types of workers were identified in the value chain:

- Workers at the CEWE Group sites who are not part of the Company's own workforce: These workers may be provided by third party undertakings that are not primarily engaged in employment activities. These include cleaning services, security services or technical maintenance services, for example. These workers are typically employees of the respective service company and perform work at CEWE Group sites on a contractual basis.
- Workers in the upstream value chain: These workers are involved in the extraction of raw materials, in refining, in manufacturing or in other forms of processing. They include the workers in paper mills who produce the paper for CEWE Group photo products, and the employees in the print supply chain who produce printing inks and other materials. These individuals work in a wide range of countries, and are therefore subject to the working conditions and legal situations in these countries.
- Workers in the downstream value chain: These workers work for logistics or sales services, franchisees and retailers. These include the warehouse workers who pack and ship products from the CEWE Group, and employees retail stores who sell these same photo products to consumers. These individuals are typically employees of the respective logistics or sales company.

The Company has not conducted an analysis to determine which workers are especially susceptible to material negative impacts in the supply chain. Nor has the CEWE Group conducted an analysis to determine the extent to which workers with certain characteristics (e.g. skin colour) and workers who work in a certain environment or perform certain duties could be more susceptible to such impacts.

The CEWE Group purchases raw materials in Europe and worldwide. Each of the identified material negative impacts could occur in the context of procurement and business relationships. However, no systemic risks of child and forced labour were identified in the value chain.

Within the scope of its materiality assessment, the CEWE Group has identified the following potential negative impacts:

- Potential work-related accidents and/or illness as caused by the business activities of companies in the value chain (as a result of the production process, for example).

This impact is relevant for all types of worker (as defined in ESRS S2) throughout the entire global value chain, and has been defined as the cluster "[Working conditions and worker safety for workers in the value chain](#)".

These impacts are listed in the table "Material IROs for the CEWE Group", under "S2.3 Other work-related rights", on [page 107](#).

Impact, risk and opportunity management

Policies related to value chain workers (S2-1)

The CEWE Group has developed various policies in relation to value chain workers, which are supported by corresponding management systems. The Supplier Management System forms an important basis for ethical and fair behaviour in the CEWE Group value chain. The system is modelled on various basic principles and guidelines, which are described in section G1 Business Conduct (G1-1 and G1-2) starting on [page 178](#). Specifically, these are the BME Code of Conduct, the CEWE Code of Conduct, the CEWE Human Rights Policy Statement and the CEWE Group Supplier Code of Conduct.

In addition to the policies described above, the CEWE Group cultivates long-term collaboration with suppliers. This collaboration contributes to a stable and crisis-proof partnership, which can prove beneficial, for example, during supply bottlenecks such as those experienced during the global Covid pandemic. As part of procurement, the Company also works with partners to address socio-environmental aspects alongside low costs, geographical proximity and proven process expertise.

Suppliers from regions classified according to the internationally recognised amfori BSCI guidelines as "critical" (in Asia, for example) are evaluated with particular care and attention. The CEWE Group prefers suppliers from these regions who are members of the Business Social Compliance Initiative (BSCI). This initiative focuses on promoting compliance with social standards in the value chain – and therefore at upstream suppliers – which it verifies by means of BSCI audits.



Supplier evaluation is conducted by means of an internal audit document, which ensures that supplier visits are fully documented and details from factory tours are properly recorded. Supplies from China are evaluated roughly every two years.

The principles and policies stated can be allocated to the IRO clusters defined previously as follows:

Cluster "Working conditions and worker safety for workers in the value chain"

- CEWE Human Rights Policy Statement: Application of a standard assessment and correction procedure if there is a risk that own operations or suppliers' operations will have negative impacts on human rights.
- BME Code of Conduct: Compliance with local regulations on whistleblower protection. All employees are encouraged to report any behaviour that violates this code of conduct to their supervisor and/or a whistleblower system. The code explicitly rejects all forms of forced labour, human trafficking and child labour.
- CEWE Supplier Code of Conduct: Performance of audit actions; the Supplier Code of Conduct also states that the contractual relationship will be terminated following a repeat violation or a single gross violation of the Code.

Cluster "Forced labour and child labour"

- CEWE Human Rights Policy Statement: Application of a standard assessment and correction procedure if there is a risk that own operations or the suppliers' operations will have negative impacts on human rights.
- BME Code of Conduct: Compliance with local regulations on whistleblower protection. All employees are encouraged to report any behaviour that violates this code of conduct to their supervisor and/or a whistleblower system. The code explicitly rejects all forms of forced labour, human trafficking and child labour.
- CEWE Supplier Code of Conduct: Performance of audit actions; the Supplier Code of Conduct also states that the contractual relationship will be terminated following a repeat violation or a single gross violation of the Code. The Supplier Code of Conduct explicitly rejects all forms of forced and child labour.

Commitments to international standards

The upholding and promotion of human rights along the entire value chain is safeguarded by the Human Rights Policy Statement, the BME Code of Conduct and the Supplier Code of Conduct. The Supplier Code of Conduct makes explicit mention of working conditions and worker safety (remuneration, working hours, health and safety) as well as the prohibition of child labour and forced labour.

The CEWE Group is fully committed to upholding international standards throughout the value chain. This includes strict compliance with the UN Guiding Principles on Business and Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work. The CEWE Group carries out regular audits of its partners for monitoring and compliance purposes.

The CEWE Group has implemented processes and mechanisms to monitor compliance with these international standards on a continuous basis. These include regular audits at partner companies and employee training as well as the deployment of complaint mechanisms that provide workers throughout the value chain with the opportunity to report violations of human rights safely and anonymously. Furthermore, the CEWE Group reserves the right to terminate contractual relationships following repeat offences or a single serious offence, such as a human rights violation.

No incidents

During the reporting period, no incidents were registered concerning non-compliance with internationally recognised standards relating to working conditions and worker safety for workers in the value chain, nor concerning forced labour or child labour.

Processes for engaging with workers about impacts (S2-2)

The Company does not currently have a structured process for integrating opinions from workers in the value chain to be used as input and guidance during decision-making about policies. The interests of value chain workers are discussed only within the Company and are accounted for to the extent that the subject-matter experts at the CEWE Group are able to assess their needs. Potentially



negative impacts can be communicated through the complaint and reporting system set up within the ombudsman system, which is described in more detail under G1-1

[page 178](#).

Processes to remediate negative impacts and channels for workers in the value chain to raise concerns (S2-3)

The CEWE Group pursues a comprehensive approach to providing or supporting remedial actions in the event that a material negative impact has been caused – whether directly or indirectly – that affects workers in the value chain. To prevent and/or counter systematic infringements, the CEWE Group has established a reporting channel in the form of the Ombudsman that can be used by customers, business partners and value chain workers (as well as all other stakeholder groups) to report anomalous behaviour, problematic situations, suspicions or any other concerns.

The CEWE Group makes every effort to implement or facilitate the implementation of remedial actions in the event of actual material negative impacts on value chain workers. If a potentially negative impact on workers has been identified, the Company initiates a procedure for assessment and correction, and activates the CEWE Group reporting chain so that any countermeasures can also be implemented as necessary. The CEWE Group reporting chain established for compliance and other topics (report to ombudsman, then to Compliance Officer, etc.) is then activated, and countermeasures are implemented as necessary.

The CEWE Group performs preventive and control actions on a regular basis with the aim of avoiding violations of its duties concerning human rights. As soon as it becomes clear that CEWE Group business activities or suppliers have given rise to a risk of (potentially) negative impacts on human rights or the environment, the Company carries out a standard procedure for assessing and controlling this potential risk. In this way, individual actions can then be derived as appropriate for the specific impact. The reporting chain established for compliance and other topics is also brought into play here. Furthermore, the CEWE Group also stipulates the regular completion of audit actions in its Supplier Code of Conduct. Specifically, this means that the Company's own employees must complete a digital training course on compliance once a year. This course describes the reporting process and explains how it is used. Checklist templates are also provided for supplier visits, particularly for suppliers in high-risk countries. These templates are used to record details of visits by the persons responsible in the CEWE Group.

The effectiveness of these actions is determined with reference to the LkSG. Each year, the EcoVadis sustainability platform is used to review the control actions/remedies for effectiveness and implementation, both in relation to worker/human rights and to other topic areas. Suppliers were contacted in 2024, with annual questionnaires ensuring that the measures are implemented. A complete review of the implementation of measures can only be carried out based on the new surveys in 2025.

The channel for workers in the value chain is set up as a central function, and makes no distinction between the two clusters “Working conditions and worker safety” and “Forced labour and child labour”.

Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions (S2-4)

The CEWE Group has taken the following actions in the cluster “[Working conditions and worker safety](#)”:

- Cooperation and consulting from the EcoVadis sustainability platform for the identification of (potentially) negative impacts and corresponding countermeasures
- Regular and ongoing performance of audit actions to prevent negative impacts on value chain workers: The Supplier Code of Conduct specifies the regular performance of audit actions. These audit actions review compliance with policies (including worker safety and working conditions)
- Annual distribution of the sustainability questionnaire to suppliers and service providers, and analysis of submissions
- Evaluation of new production material suppliers

The CEWE Group has taken the following actions in the cluster “[Forced labour and child labour](#)” in the value chain:

- Cooperation and consulting from the EcoVadis sustainability platform for the identification of risks and corresponding countermeasures
- Regular and ongoing performance of audit actions to prevent negative impacts on value chain workers:



- Ongoing action to prevent negative impacts: Evaluation of new production material suppliers. The fundamental conventions of the ILO are also applied in audit actions to verify compliance at local level with human rights aspects. This explicitly includes a zero-tolerance approach to forced labour and child labour. The audit process also requests certification (e.g. GOTS) to confirm that the supply chain is free from all forms of forced labour and child labour.
- Annual distribution of the sustainability questionnaire to suppliers and service providers, and analysis of submissions

Action 1: Cooperation with EcoVadis

The CEWE Group is implementing an action plan to protect value chain workers against potential risks and dependencies. As an initial step in this plan, the Company is working with the globally recognised sustainability platform EcoVadis. EcoVadis is assisting the CEWE Group with the identification and documentation of risks along the overall value chain. In addition, EcoVadis also proposes specific countermeasures. The analyses help to better identify areas for development and indirectly contribute to identifying further actions or goals. In the next step, each risk is individually assessed to determine which of the identified actions can be implemented. A detailed evaluation of the twelve suppliers identified as especially high-risk thanks to the cooperation with EcoVadis is still ongoing and was not completed in the reporting year.

Questionnaires are sent out to suppliers at regular intervals as part of the Company's cooperation with the EcoVadis sustainability platform. Some of the actions taken by the CEWE Group are derived from these insights. Alongside the identification of current actions, the questionnaires can also be used to assess the effectiveness of actions from previous years. The effectiveness of actions can be tracked by the trends in supplier scoring.

Action 2: Performance of audit actions

The CEWE Group completes supplier audits every two years. This also includes new suppliers and those located in critical regions such as Asia. These audit actions review compliance with the Supplier Code of Conduct, including the two clusters "Worker safety and working conditions" and "Forced labour and child labour". In cases of suspected non-compliance or if potential risks are identified, additional audits are conducted at the respective supplier.

The audits verify compliance with standards that have been specifically agreed on and set out in the Supplier Code of Conduct, with the aim of reducing the probability of negative impacts on value chain workers.

Action 3: Evaluation of new production material suppliers

Before conducting business with a production material supplier, the Company requires an evaluation process to be completed. In the reporting year, the CEWE Group did not acquire any new relevant production material suppliers. This evaluation also accounts for human rights aspects in line with the fundamental conventions of the ILO, and requires suppliers to commit to environmental protection and reject all forms of forced and child labour.

Action 4: Annual distribution of sustainability questionnaire

The annual sustainability questionnaire for suppliers and service providers includes disclosures on certification, supplier audits (explicit confirmation of audits of working conditions and worker safety) and general goals for suppliers in relation to social targets. Typically, this involves an individual from the business partner's sustainability department being questioned explicitly about working conditions (such as the work-life balance, for example) and worker safety. The questionnaire is both a control instrument for assessing commitment as well as an analytical tool for estimating the business partner's social and ecological responsibility. The questionnaire also forms part of an award process, in which supplier questionnaires are assessed by a committee of internal and external experts in several rounds, ultimately producing two winners. If the questionnaire reveals problem areas, these are marked in red as part of the analysis process (involving multiple reviewers) and brought up with the supplier. Lastly, the CEWE Group also uses the responses from suppliers and business partners to generate ideas for its own sustainability activities. The sustainability questionnaire also includes questions on certification capable of verifying the value chain as being free from forced labour and child labour (e.g. the Global Organic Textile Standard (GOTS), an independent non-profit organisation that focuses on socio-environmental criteria and the transparent certification of the overall textile supply chain) and whether the LkSG is applicable to the respective supplier.



The CEWE Group makes every effort to implement or facilitate the implementation of remedial actions in the event of actual material negative impacts on value chain workers. If a potentially negative impact on workers has been identified, the Company initiates a procedure for assessment and correction, and activates the CEWE Group reporting chain so that any countermeasures can also be implemented as necessary. The CEWE Group reporting chain established for compliance and other topics (report to ombudsman, then to Compliance Officer, etc.) is then activated, and countermeasures are implemented as necessary.

Compliance with the process is ensured by the enforcement of the [Human Rights Policy Statement](#) which applies to all employees worldwide. This is communicated to [employees, the Works Council, direct suppliers and the general public](#) via channels such as the Company's website.

The risk [analysis supported by EcoVadis](#) is used for the identification and management of potential risks. The remedial actions resulting from this analysis serve as a central starting-point for handling negative impacts. The systematic implementation of these measures ensures that appropriate procedures are in place to implement and continuously review their effectiveness. This ensures that significant negative impacts are identified early and addressed in a targeted manner.

No actions exist that have been designed to avoid material negative impacts from own operations on value chain workers.

No serious human rights violations in the value chain were registered during the reporting period.

To control negative impacts on value chain workers, the CEWE Group has provided resources in the form of both personnel and [funding](#). In particular, these include Central Purchasing, which is responsible for implementing and verifying due diligence requirements in consultation with the Sustainability department and the Compliance Officer.

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S2-5)

The CEWE Group has not defined any targets for the management of impacts, risks and opportunities relating to forced labour and child labour in the value chain, nor does it have any plans to introduce such a target. Accordingly, the effectiveness of policies and actions in this connection is not tracked.

Consumers and end-users (ESRS S4)

Strategy

Interests and views of stakeholders (ESRS 2 SBM-2)

Consumer focus is strategically anchored in the CEWE Group's business model of both the B2B and B2C/B2B2C brands. This is clearly demonstrated by the attention to customer needs shown in the core presentation of the Company, whether for public consumption, such as in the publication of quarterly figures, or in the context of presentations made by the Executive Board at internal events like the Innovation Days. The CEWE Group has also defined the protection of personal data from end-customers as a strategic target and included this as a core value in its Customer Charter <https://www.cewe-group.com/en/about-us/responsibility/customer-charter-and-advisory-council.html>

This approach works to address the basic risks and impacts inherent in the CEWE Group's business model, particularly the processing of personal image data. In addition, the business model and corporate strategy is restricted to the extent that the sale of customer data is explicitly prohibited (see article 1 of the Customer Charter).

Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

The CEWE Group seeks to ensure the responsible and customer-focused use of technologies. The Company neither sells customer data nor is such data shared with third parties without customer consent. Consolidated data analysis



is carried out only with anonymised data or with the express consent of the customer. The CEWE Group's business is materially dependent on its IT service systems, their data and their communications channels being protected from criminal or unauthorised activities. These activities include cybercrime and cyberattacks, such as unauthorised access, data loss and the misuse of data or systems.

In the course of providing products and services, there is a potential risk to privacy, even if appropriate precautionary measures are taken. Data leaks could lead to personal information from end consumers (uploaded personal photos, user data, account data) ending up in the possession of third parties. Potential data leaks could have material impacts on data subjects, as could mix-ups and mistakes made concerning customer identities when processing and delivering photo products.

These customer risks give rise to entrepreneurial risks for the CEWE Group, particularly as posed by potential fines, penalties or sanctions in the event of breaches of laws protecting the privacy of consumers and end-users. Loss of customer confidence would be a further risk for the Company. In addition, the need to modify the existing IT infrastructure to meet regulatory requirements could also result in significant costs. At the same time, effective and high-quality data safeguards could offer the CEWE Group a chance to improve its market standing and position itself as a secure and trustworthy provider. This focus on data protection – especially in relation to highly sensitive data like personal photos – could improve the Company's reputation and open up new market opportunities. Both the opportunities and risk are fundamentally dependent on the negative impact of potential data leaks.

In the course of its business activities, the CEWE Group processes a wide range of data, including personal photos from its customers. Even before the enactment of the EU General Data Protection Regulation (GDPR), business processes were designed to ensure the protection of this sensitive data, which forms a core component of Company strategy. Long before compliance with the GDPR became mandatory, comprehensive action was taken towards data protection, with the aim of ensuring the secure and legally watertight handling of personal data.

With the entry into force of the GDPR, the Company not only adjusted these measures to meet regulatory requirements but has continued to improve and expand them. Accordingly, data protection within the CEWE Group far exceeds the minimum legal requirements and is a general, process-neutral principle that applies to all company activities.

A core aspect of the actions taken is the secure processing and storage of data. Servers in Oldenburg are exclusively used for the temporary storage of personal customer data, which is then erased under the strict internal supervision of the CEWE Group. Data protection actions are not implemented with a fixed time horizon but as a continuous process that is adjusted to reflect current developments and requirements.

As described in the general disclosures, the CEWE Group has used the materiality assessment as a first step to identify the scope of activities within its own operations and value chain, as well as the affected stakeholders. As a result of this process, all customer groups form an indirect part of the double materiality assessment. No additional

checks were made with the purpose of verifying the inclusion of all consumers in the value chain. These strategies, actions and targets mentioned here relate to all customers, and no customer groups have been actively excluded.

Customer groups

Customers of the CEWE Group include all individuals who wish to have their photos printed professionally – whether for photobooks, wall art, calendars or personalised photo gifts. In ordering photobooks or framed pictures, customers are looking to preserve memories of occasions such as weddings, birthdays or holiday trips for themselves or others. Business customers use the providers in the CEWE Group for corporate products such as promotional items, calendars and marketing materials.

Thanks to the products' low level of complexity, anyone can use products from the CEWE Group without the need for detailed instructions. Accordingly, a lack of information does not constitute a risk for customers. Additional information is nonetheless provided online.

No material impacts, risks or opportunities have been identified that result from the impacts and dependencies of consumers and end-users, and exclusively affect certain groups.



The occurrence of material negative impacts on consumers and end-users in the form of potential data leaks is a fundamental risk that arises from the business model of the CEWE Group. However, no fundamental systemic risks exist because the risks concerned are isolated cases.

The risks and potential negative impacts identified in the course of the materiality assessment relate directly to the business model, because personal customer data is required for the production of personalised photo products. The CEWE Group recognises its responsibilities in relation to the handling of customer data. The handling of personal customer data is a key aspect of the business model of the CEWE Group. For this reason, protecting this data is not merely a core component of company strategy but is also reflected in the IROs. This is enshrined in the Customer Charter of the CEWE Group and therefore also explicitly excludes other business models that would involve the marketing or sale of customer data.

Impact, risk and opportunity management

Policies related to consumers and end-users (S4-1)

The CEWE Group has over 60 years of experience in the development and production of personal photo products. This awareness of the proper handling of personal data is anchored deeply within company culture and is very familiar to each and every employee. This same level of diligence is maintained for all customer groups, which are treated in the same way by the Company. All control mechanisms are applied in the same way for all consumers and

end-users in order to prevent data leaks involving customer information, and to avoid the resulting sanctions and loss of customer confidence. All of these mechanisms apply Group-wide. No distinction has been made regarding the degree (if any) to which consumers and end-users with specific attributes or persons who use certain products or services are – or could be – exposed to a greater risk of loss or damage. The exact scope of each individual policy is defined in the minimum disclosures on a per-policy basis. All policies mentioned below are part of the CEWE Group's data protection strategy.

1. CEWE Group IT security policy

- Compliance with the German Federal Data Protection Act (Bundesdatenschutzgesetz – BDSG) and other relevant legal requirements.
- Clarification of the topics of data protection and data security.
- Use of secure IT processes to protect customer, employee and third-party data.

2. CEWE Group Human Rights Policy Statement

- Human Rights Policy Statement valid worldwide for all employees of the CEWE Group in all divisions of the Company.
- Business partners must commit to ethical business at all times and must obtain assurances from their own partners regarding the respecting of human rights.

3. BME Code of Conduct

- Basic principles regarding legal, ethical, social and environmental responsibilities.
- The signatory or member company commits to fulfilling its social responsibilities in all of its business activities.
- Properly accounting for human rights and working conditions for all employees and suppliers.

4. Data Protection Policy

The CEWE Group complies with all applicable data protection legislation. In compliance with Article 13 of the EU GDPR, the Company's privacy policy explains which data is collected when using the CEWE Community, by attending webinars, by registering with the CRM system (newsletter) and when placing orders. The privacy policy also explains how this data is used. However, the privacy policy does not apply to websites of other companies that link to this website or which are linked to themselves by the CEWE Group websites.

5. Forum terms of service (new) (with Digital Service Act) S4-1.13

The CEWE brand uses the CEWE Forum's terms of service, the CEWE customer examples and CEWE webinars to ensure that the content uploaded to its platforms does not infringe third-party rights and is fully compliant with applicable law. In accordance with recognised ethical principles, the terms of use supplement the Data Protection Policy with specific provisions on the use of the channels mentioned above and are part of the policy of risk minimisation in relation to consumers and end-users. They apply to all user groups.



Preventive data protection actions constitute the core strategy of the CEWE Group for avoiding negative impacts on customers and business partners. The Company has implemented binding procedures throughout the Group to control the associated risks and opportunities.

As is the case for any company that processes customer data, ensuring protection for personal data is a key challenge for the CEWE Group. Material risks exist in the form of potential data leaks, unauthorised access and regulatory infringements. To mitigate these risks, the CEWE Group deploys technical security measures as well as comprehensive training for both permanent employees and seasonal staff. In 2004, the Company used a works agreement to introduce a ban on camera phones at all German production sites with the aim of preventing misuse. New employees are given a data protection briefing in their Welcome Pack, while signs posted in production facilities remind staff about company rules.

The data protection strategy comprises:

- All areas of business, including production, sales and the digital platforms
- External service providers within the value chain
- Sites within the European Union, in compliance with the EU GDPR
- Employees, customers and business partners who work with personal data

The Executive Board has overall responsibility for implementation, with operational responsibility assigned to the Data Protection & Compliance department. Data protection officers at several sites work to ensure compliance with policies.

The CEWE Group strictly observes applicable laws on the protection and security of personal information and personal data. The Company has also developed Group-wide policies that cover topics such as data protection, information security and cybersecurity. A uniform set of internal rules, applicable across the Group, ensures that data protection actions are applied systematically in all areas of business. Compliance is ensured by means of clear-cut responsibilities and data protection officers at several sites. The Company aligns its policies with the EU GDPR and with internal data protection agreements, whose provisions exceed the minimum legal requirements.

Stakeholder involvement in strategy development is achieved with tools such as employee surveys and customer feedback forms. The Company privacy policy is available from <https://www.cewe.de/datenschutz.html>. Mandatory training courses are also held on a regular basis for permanent employees and seasonal staff.

Strict codes of practice

Violating the human rights of consumers or end-users is incompatible with these fundamental principles. The basic principles for respecting human rights are based on the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the fundamental conventions of the ILO and the International Bill of Human Rights. The Company has not established processes and mechanisms for monitoring compliance with these policies.

References to external regulation of the policies used

1. *CEWE Group Human Rights Policy Statement (applies worldwide to employees throughout the Group)*

- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- Fundamental conventions of the ILO
- International Bill of Human Rights
- BME2 industry initiative

2. *BME Code of Conduct*

- UN Global Compact
- ILO conventions
- United Nations Universal Declaration of Human Rights
- United Nations conventions on the Rights of the Child and Elimination of All Forms of Discrimination Against Women
- OECD Guidelines for Multinational Enterprises

Data protection officers

Data protection is a complex field in terms of compliance. To ensure that the Company meets all of the requirements in this area, numerous data protection officers have been appointed and tasked with observing all legal and practical aspects at their sites to minimise the risk of data breaches. The Data Protection Officer at CEWE Stiftung & Co. KGaA is part of the legal team and reports directly to the Chief Compliance Officer and General Counsel.

In the reporting period, the CEWE Group was not aware of any cases of human rights violations involving consumers and/or end-users within the downstream value chain. If



such a case became known, then the above-mentioned procedure would be used to remedy the situation (see CEWE Group Human Rights Policy Statement).

Processes for engaging with consumers and end-users about impacts (S4-2)

The CEWE Group sells its products directly to consumers and end-users, and also via business partners such as health and beauty chains and supermarkets. Customers have several options for contacting the Company. Personal contact can be made by phone, email or social media channels and an anonymous reporting procedure is also available. To date, however, the Company has not established a structured process for contacting consumers and end-users or individuals representing these groups. In its decisions and policies that define interaction with consumers and end-users, the CEWE Group nonetheless makes every effort to account for the interests of data subjects by means of the insights that its current decision-makers/business departments have into the interests of consumers and end-users.

Processes to remediate negative impacts and channels for consumers and end-users to raise concerns (S4-3)

Ombudsman

The CEWE Group provides its consumers and end-users with several ways in which they can report their concerns and problems. The Company has appointed an external ombudsman as its most important reporting instance. Employees, business partners and other stakeholders of any company in the Group can contact this ombudsman anonymously to provide confidential information about suspected cases of corruption, fraud, breach of trust or other serious irregularities. Apart from the ombudsman, the CEWE Group also gives its customers several options for contacting the Company directly, whether by email, phone or post.

Reporting system

If the CEWE Group identifies a material negative effect on human rights (such as a breach of privacy) despite the precautionary measures available, the Company initiates standard proceedings to assess and rectify the damage and introduces appropriate countermeasures. Separate arrangements are in place for negative impacts that do not violate human rights. As one example, posts made on the CEWE Forum can be reported and deleted if this proves necessary, as determined by the Customer Service process.

This process does not envisage any compensation being made to individuals who were exposed to the reported forum posts and/or whose right to privacy was thereby infringed. With its ombudsman system, the CEWE Group ensures full anonymity can be maintained when submitting a report, thereby preventing the reporting individual from suffering any loss or damage. Apart from guaranteeing anonymity, the CEWE Group is also committed to complying with local regulations concerning whistleblower protection (see BME Code of Conduct). The CEWE Group invites all customers to use the reporting systems whether they purchase directly from the Company or its business partners. This option is thus independent of the point of sale. The CEWE Group documents all identified data breaches and violations of human rights. The general disclosures for the Customer Service process provide precise details of the process for complaints and mix-ups. Particulars are given of the various types of information recorded when product mix-ups occur. Reports pursuant to the Digital Service Act are also recorded automatically when an electronic report is made in the forum. The channels are intended to strengthen stakeholder confidence, and are both known and accessible to these stakeholders. The Company does not currently use a structured policy to monitor the effectiveness and efficacy of reporting procedures, nor to assess the level of customer awareness of these reporting procedures and their confidence in them.



Taking action on material impacts on consumers and end- users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions (S4-4)

The core instrument used by the CEWE Group to avoid negative impacts in relation to data is prevention – and therefore the associated internal rules for handling customer data (see S4-1, [page 173](#)).

Mix-ups

In the case of mix-ups, which constitute another core data protection risk for the CEWE Group, a structured process is in place that governs how the Company responds to these incidents. Mix-ups are a particularly serious type of incident, as these involve personal information (personal photos) being disclosed to individuals who should have no access to this information. The internal Customer Service Processes document, applicable across the Group, defines a multi-stage response to mix-ups and is aimed at providing a comprehensive approach to handling these incidents. Instructions for responding to complaints are also provided. This procedure is the result of more than 60 years of experience in shipping out personalised photo products.

Training

The Company is currently implementing a large-scale training programme for all CEWE Group employees to ensure that they are familiar with and understand the rules for handling sensitive data. Data protection and data security, together with cybersecurity and IT security, are part of onboarding for all new employees. Regular training is also provided for employees on the topics mentioned. Regular communications (e.g. emails from IT, CARL app) raise employee awareness about current data protection and cybersecurity topics, and remind them of the Company's clear codes of conduct. CARL is the mobile communication app for news, information and interactions around the CEWE Group.

Funding for specialised training on data protection and data security is provided as part of the overall CEWE Group training budget. Accordingly, an itemised breakdown of costs is therefore not possible. The estimated outlay for training in relation to data protection is between 5,000 and 10,000 euros.

Reporting procedure

As described in S4-3 [page 175](#) and G1-1 [page 178](#), the CEWE Group has established a comprehensive reporting system. A standard procedure permits an individual approach to remedying a situation that has been reported via the ombudsman (see CEWE Group Human Rights Policy Statement). Beyond this, the Privacy Policy sets out the rights that are granted to individuals who believe that their personal data has been misused. These include rights to

access, rectification, erasure and restriction of processing. Potential infringements of this policy are addressed by an established, well-documented and Group-wide procedure. Communications with data protection authorities and data subjects (as necessary) are coordinated with the Group Data Protection Officer of CEWE Stiftung und Co. KGaA.

Corporate risks

The corporate risk identified for the CEWE Group from data breaches primarily relates to the penalties levied by the authorities for such breaches. In this case, the same actions that prevent negative impacts on consumers and end-users also provide a remedy in this context. The CEWE Group implements strict data protection rules, has appointed a Data Protection Officer and conducts regular training for employees to prevent data protection breaches. If no data breaches occur, this also minimises the risk of having to pay related penalties. The Company does not currently document or assess the effectiveness of actions taken to reduce the risk of penalty payments. The material risks associated with consumers and/or end-users are integrated into the existing risk management system.



All of these actions are exclusively company-internal arrangements that do not depend on any cooperation with other parties. They are not inconsistent with other company targets.

To ensure that these remedial actions are available when required and that they achieve the desired outcome, they have been included as core elements of the CEWE Group Human Rights Policy Statement. The documented standard procedure is available at all times. Despite the existence of actions for prevention and control, violations of human rights or failures to fulfil environmental duties still remain a possibility. As soon as it becomes clear that the CEWE Group's business activities or those of its suppliers entail a risk of negative impacts on human rights or the environment, the CEWE Group initiates a standardised procedure for assessment and correction. This also involves the use of the reporting chain set up within the CEWE Group for compliance and other relevant topics, which permits the introduction of suitable countermeasures as necessary. The Company does not currently keep records or assess the effectiveness of the individual actions.

No breaches

The CEWE Group is not aware of any serious violations of human rights in relation to consumers or end-users in the reporting period. No fines were incurred.

Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (S4-5)

The CEWE Group does not currently have any targets for improving data protection for end-consumers. In addition, the Company does not plan to introduce such a target at this time. The Company tracks the effectiveness of strategies for managing material impacts and risks, and audits these regularly in terms of their effectiveness. As one example, the Company has set up the Emergency Group and tasked this working group with investigating the occurrence of mix-ups and improving processes as necessary to prevent their occurrence. Corresponding reports that document such incidents are available and are being subjected to an internal review process. While the Company has not set specific targets, it makes every effort to prevent any such incident from occurring.



Governance information

Business conduct (ESRS G1)

Governance

Material impacts, risks and opportunities and their interaction with strategy and business model (ESRS 2 SBM-3)

Opportunities and impacts

Two groups of positive impacts and opportunities have been identified. The first group (positive impact, opportunities) addresses supplier relationships and management, such as the selection and evaluation of suppliers, contract negotiations, risk management and performance monitoring. The other group (opportunities) addresses corporate culture, including company values and employee retention.

Fair, transparent and forward-looking for successful supply chain collaboration

Long-term supplier relationships, particularly those fostered by the CEWE Group's active supplier management and compliance with fair payment terms, contribute to lower transaction costs and improved terms and conditions. A supplier code of conduct guaranteeing timely payments for small and medium-sized companies can improve their liquidity and allow them to plan with greater certainty. The CEWE Group also sets out binding minimum standards for collaboration with business partners in its own Supplier Code of Conduct (see the section CEWE Supplier Code of Conduct [page 181](#)). This means investing in reliable trade relationships along the value chain, from

which all parties benefit and which – according to the approach – also survive crises.

Ethical and sustainable business practices

Well-informed, motivated employees who identify with the CEWE Group and its fundamental values make a decisive contribution to quality, efficiency, innovation and growth. The Company's understanding of leadership is based on mutual trust, respect and the delegation of responsibility. Its operating units are headed up by managing directors and responsible individuals who think and act in the interests of the Company and have wide-ranging decision-making powers. They are responsible for strategic and operational implementation in their respective areas. To strengthen its corporate culture, the CEWE Group focuses on conveying and exemplifying its fundamental values, which are described in detail in the following sections entitled "CEWE Group Mission statement" and "The WE in CEWE".

The CEWE Group has signed the BME Code of Conduct to ensure fair, sustainable and responsible operational principles in procurement. This voluntary commitment to the Bundesverbandes Materialwirtschaft, Einkauf und Logistik e. V. (German Association for Supply Chain Management, Procurement and Logistics – BME) reinforces the Company's responsibility to maintain a sustainable supply chain and ethical business.

Business conduct policies and corporate culture (G1-1)

The CEWE Group has historically conducted its business in accordance with German and international law as well as generally accepted ethical principles. These are set out in writing for the CEWE Group in various guidelines and prin-

ciples and provide its respective stakeholders with fundamental guidance on the Company's corporate culture and understanding of compliance:

CEWE Code of Conduct

The CEWE Group's Code of Conduct holds its entire workforce to ethical principles and minimum standards. Each and every employee is responsible for complying with the regulations set out in the Code of Conduct while carrying out their day-to-day work. Management also has the special responsibility of setting a good example when adhering to these principles. The CEWE Group's aim is to treat all of its employees, customers and business partners fairly and respect their rights and privacy. It does not tolerate treating people differently based on gender, race, disability, origin, religion, age or sexual identity, nor does it tolerate sexual harassment or any form of bullying. Employees are encouraged to clarify any issues or uncertainties directly with their superior, HR department, employee representatives or ombudsman. Management is responsible for implementing and initiating consequences in the event of potential violations.

CEWE Group Human Rights Policy Statement

In 2022, the CEWE Group began dealing with the requirements of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz – LkSG). A Policy Statement reflecting management's commitment to respect for human rights was adopted and integrated into the organisation. All employees worldwide were required by the Policy Statement to behave appropriately and lawfully towards their colleagues and partners as part of human rights due diligence. The CEWE Group expects its partners to observe recognised ethical principles, for example on



environmental and health protection, compliance and human rights, to act with integrity and to implement human rights standards in their own supply chains. The CEWE Policy Statement is based on internationally accepted standards and principles, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. Together with other mechanisms within the organisation (e.g. the Code of Conduct, risk management, evaluation of suppliers, environmental management), the CEWE Group has had reliable structures and processes in place for several years to encourage responsible conduct within the organisation. To maintain international human rights standards, the CEWE Group conducts an appropriate risk assessment and due diligence check each year to identify, assess and address any potential and actual negative human rights impacts in its own business activities and those of its supply chain. The Company also defines processes for determining mitigation measures. The relevant action areas here are most apparent in the review of the main supply chain and in procurement from regions with a risk status (e.g. Asia). As the CEWE Group only has limited opportunities to influence the supply chain due to its complexity, it collaborates with EcoVadis to review the supply chain. If a risk is identified, the Company initiates standard assessment and rectification proceedings and uses its established compliance reporting chain. The ombudsman also accepts confidential and anonymous reports of suspicious cases. Management, especially the CEO and Executive Board members responsible for Production, Purchasing, Logistics, Human Resources and Customer Service, are responsible for implementing human rights due diligence. The central Purchasing department is responsible

for implementation and verification. Management is kept informed of implementation and verification on a regular basis and at least once a year. Employees regularly receive training on the content of this due diligence, and business partners are kept informed. Compliance with defined due diligence procedures and human rights standards is compulsory. The Policy Statement is communicated directly to employees and direct suppliers. Members of the public can read the Policy Statement on the Company's website.

BME Code of Conduct

The CEWE Group has signed the BME Code of Conduct and is bound to comply with it. The BME Code of Conduct is a voluntary code designed to reinforce the interest of the BME and its members in upholding fair, sustainable, responsible and ethical operational principles. The main aims of this Code of Conduct are not only to comply with laws and regulations but also to promote human rights, fight corruption, ensure fair working conditions, protect occupational health and promote environmental protection, product safety and supply chain responsibility. The Code also refers to international standards such as the UN Global Compact, the ILO Conventions, the United Nations Universal Declaration of Human Rights, UN Conventions on the Rights of the Child and on the Elimination of All Forms of Discrimination Against Women, OECD Guidelines for Multinational Enterprises and the German Supply Chain Due Diligence Act. The CEWE Group has been affiliated with the BME since 2010. In doing so, it acts in the interests of its stakeholders and addresses issues such as equal treatment, human rights, fair working conditions and environmental protection in relation to its employees, suppliers and customers. The Company's management is responsible for implementing this policy and complying

with it. By signing the BME Code of Conduct, the CEWE Group has also committed to establish and maintain control mechanisms, regularly adapt its policies and processes, establish a reporting system for violations and train its employees and business partners on the Code's content. The Code applies to the entire organisation, including all employees and management across all regions as well as direct suppliers and business partners, and forms the basis for all supplier agreements. It can be viewed on the CEWE website together with the Terms and Conditions of Purchase and is accessible free of charge. This transparent communication and regular training sessions ensure that all employees and business partners are fully informed about the Code of Conduct and can comply with the contents of the policy. The CEWE Group completed an annual self-assessment for the BME during the reporting period.

CEWE Group mission statement

The CEWE Group mission statement defines the Company's core values and principles, based on integrity, trustworthiness and responsibility and compliance with German and international laws as well as generally accepted ethical principles. The main contents and associated aims are:

- Honest and fair conduct: Focus on honesty, integrity, loyalty, fairness, tolerance and openness in all business activities.
- Economic viability: Pursuit of quality, efficiency, innovation and growth through partnership and respect for each and every individual.



- Environmental protection and resource conservation: Obligation to protect the environment and comply with sustainability principles, including the rejection of products manufactured using child labour.
- Responsibility for employees: Promoting employee loyalty, work-life balance and employee development by fostering a corporate culture based on partnership.
- Community engagement: Viewing property as a commitment to society, with a focus on making a social and societal contribution.

The mission statement also emphasises the importance of communicating its content to all employees and business partners to ensure that the Company's values are embedded in all business processes. It is published and publicly available on the Company's website, with its core values and principles providing a formal basis for the conduct of the CEWE Group's employees and management. It applies to the entire CEWE Group and encompasses all employees, business partners and the Company's relationship with society. The mission statement is critically reviewed and refined as part of a continuous monitoring and improvement process. The preparation of the mission statement was discussed extensively at Executive Board-level.

„The WE in CEWE“

Building on the CEWE Group's mission statement, “The WE in CEWE” defines the Company's values and was led and determined by the Executive Board. It includes and describes the cultural mindset of the entire CEWE Group, namely a corporate culture founded on respect and openness. Understanding the sense of togetherness within the Company also plays a key role, with integrity, equality and

diversity considered core values. “The WE in CEWE” describes the following aspects of the Company's corporate culture:

- Sustainability and long-term focus: “WE act responsibly. Our long-term commercial focus is based on sincere partnerships – with our employees, customers and business partners as well as the environment in which we live and work.”
- Products and services: “WE firmly believe that every little detail counts. We have a passion for offering exceptional customer experiences with products and services of the highest quality – both now and in the future.”
- Customer focus: “WE love to delight our customers. We put them at the heart of everything we do and build long-term relationships founded on quality, trust, transparency and reliability.”
- Innovation and transformation: “WE are all innovators. We are confident that change opens up opportunities for commercial success. Refining our products and services and adapting to changing conditions allows us to grow and get ahead of the market.”
- Entrepreneurship and ownership: “WE have an entrepreneurial spirit. We make responsible decisions to drive our company forward and all contribute to our commercial success.”
- Community and collaboration: “WE are a team. We are deeply committed to standing up for each other and the Company.”

Ombudsman

The concept of an ombudsman was established within the CEWE Group in response to internal compliance principles and policies such as the CEWE Code of Conduct, the BME Code of Conduct and the CEWE Policy Statement. Its aim is to prevent economic crime and protect the Company from misconduct that could result in damage and loss of

reputation. The term and role of ombudsman refers to a complaint and reporting system enabling employees, business partners and third parties to report suspected cases confidentially. This availability is not limited to particular geographical areas or specialist units within the Group. The Company applies this approach to the entire value chain. This complaint and reporting system enables the CEWE Group to promote a safe working environment and bolster employee and stakeholder confidence in the integrity of the Company.

The CEWE Group's own Compliance Officer was selected, proposed and appointed as the ombudsman by and for the entire CEWE Group. They act as an independent confidant and are bound to professional secrecy. In accordance with the German Whistleblower Protection Act (Hinweisgeberschutzgesetz – HinSchG), the CEWE Group has established internal reporting channels that enable employees to report legal violations anonymously, safely and confidentially. These reporting channels are designed to facilitate both internal and external reporting and ensure that whistleblowers are protected against retaliatory measures.

Employees and workers along the value chain as well as customers, consumers and end-users can report their concerns and needs anonymously and confidentially via email, telephone and fax. A link to the ombudsman is provided on the CEWE Group website, together with information about available communication channels. The established system ensures that all reports are reviewed carefully and dealt with appropriately without disclosing the identity of the whistleblower. Employees and third parties may use the ombudsman free of charge.



The CEWE Group has implemented processes to record reports in detail and take appropriate action. If the CEWE Group identifies a material negative effect on human rights (such as discrimination or a breach of privacy) despite the precautionary measures available, the Company initiates standard proceedings to assess and rectify the incident and introduces appropriate countermeasures. All violations are appropriately documented by the CEWE Group and used to continually improve existing processes.

The CEWE Group holds regular training sessions to ensure that all employees are informed about and trust the existing structures and processes for expressing their concerns and needs. These structures and processes are communicated via channels such as the Policy Statement, the Company's website and the Intranet. Employees are also kept informed via initiatives such as compliance training held online and in person, including the Welcome Days events for new staff.

The Company regularly assesses the effectiveness of these initiatives, and includes the Works Council where necessary. The CEWE Group also reviews and improves its communication channels to ensure that they meet stakeholder requirements. To date, the CEWE Group has not assessed whether individual workers in the upstream value chain are aware of the reporting channels and whether they are seen as trustworthy by workers in the value chain. There is no generalised process for monitoring the reporting process and assessing its effectiveness. Instead, there are only individual procedures.

The CEWE Group requires all of its employees to complete compulsory training on corporate culture each year.

CEWE Supplier Code of Conduct

The CEWE Supplier Code of Conduct defines the non-negotiable minimum standards that must be observed when collaborating on commercial transactions. The Supplier Code of Conduct contains principles on anti-discrimination (as part of the General Equal Treatment Act), compliance with occupational health and safety standards, the prohibition of forced or child labour and entitlement to appropriate remuneration as well as compliance with applicable environmental standards and product safety. These principles were developed with the various business units. The Supplier Code of Conduct is a prerequisite for awarding contracts to external service providers. It applies to all of the CEWE Group's business partners as well as their affiliated companies and employees. The business partners are responsible for passing on the Code and complying with it. The CEWE Group carries out regular audits of its partners for monitoring and compliance purposes, with these audits conducted by a authorised third party where appropriate. As part of these audits, business partners must provide the necessary documentation and grant access to relevant areas of their own business as well as to their subcontractors and suppliers. Suppliers from regions classified according to the internationally recognised amfori BSCI guidelines as "critical" (in Asia, for example) are evaluated with particular care and attention. The Amfori BSCI Code of Conduct is a mandatory document that helps Amfori members and their business partners to fulfil human rights due diligence obligations in their global supply chains. Supplier evaluation is conducted by means of an internal audit document, which

ensures that supplier visits are fully documented and details from factory tours are properly recorded. Supplies from China are evaluated roughly every two years. In the event of violations, the CEWE Group reserves the right to extraordinary termination of the main contract. The Executive Board is responsible for implementation. Business processes and any shortcomings identified are regularly coordinated and communicated.

Supplier Handbook

The CEWE Group's Supplier Handbook describes and formalises procedures for procurement and ensuring supplier responsibility. It includes guidelines for supplier assessments and complying with standards. Its aim is to ensure transparency and compliance in the supply chain and promote sustainable procurement practices and supplier management. However, there is no obligation with regard to external standards. The Supplier Handbook includes internal procurement processes, including supplier selection and assessment. It applies to all suppliers who provide products and services to the CEWE Group. No stakeholders were involved in the preparation of this policy. The Purchasing team is responsible for complying with procurement guidelines. Regular reports on the performance of suppliers are provided to management. Purchasing guidelines and processes are regularly communicated within the CEWE Group to ensure transparency.

Management of relationships with suppliers (G1-2)

Solid ethical principles are required to strike an effective balance between social and environmental challenges on the one hand and successful business on the other. At the CEWE Group, "honest and fair conduct" includes values



such as reliability, honesty, a long-term perspective, decency, integrity and trustworthiness. The Company is a reliable partner and expects applicable laws and regulations to be observed in all aspects of its business. As a result, the CEWE Group does not tolerate any conduct that calls into question or jeopardises its integrity.

The Company is committed to fair competition and focused on innovative quality and performance. The CEWE Group rejects any unlawful agreements or false bids. This means that orders should not be obtained by granting or offering improper advantages.

The CEWE Group strives for long-term collaboration with its partners. Trusting, open and transparent relationships that take the rights, legally protected interests and other interests of the other party into account are essential in this regard. These trust-based, long-term relationships with suppliers and trading partners have proven commercially successful – particularly in times of global crisis with significant price volatility and disruption in established supply chains. The minimum social and environmental requirements that must be fulfilled when collaborating with the CEWE Group are set out in the Supplier Code of Conduct. Regulations governing contact with suppliers are set out in the Company's Purchasing Policy. To avoid a build-up of payment arrears, these guidelines ensure timely processing of incoming invoices, ideally within the stated payment period.

Invoices are processed via an electronic tool that supports the Company's efforts to meet payment deadlines. It does this by:

- giving the Accounting team constant access to the current processing status of invoices, enabling them to actively request any approvals required when late payment is imminent; and
- sending automatic reminders to all individuals required to approve an invoice as soon as late payment is imminent. These reminders are based on escalation periods defined when customising the invoicing checking tool as well as the payment terms defined in the system. The tool informs the current processors at a specified time in advance of the payment due date. If there is no response, the invoice is forwarded to the respective superior to ensure that it is processed.

The German Supply Chain Due Diligence Act came into force in Germany on 1 January 2023. The Act requires companies based in Germany with at least 3,000 employees to conduct human rights due diligence within their own scope of business as well as in their supply chains. At this point in time, the CEWE Group has exceeded 3,000 employees in Germany and has been compliant with the LkSG since 1 January 2023. (<https://www.cewe-group.com/de/nachhaltigkeit/unternehmen/nachhaltigkeitsmanagement/lieferkette.html>) Regulations governing contact with suppliers are set out in the Company's Purchasing Policy.

Prevention and detection of corruption and bribery (G1-3)

As part of the double materiality assessment under the CSRD, the topic "Incidents of corruption or bribery" is classified as immaterial. As a result, the Company does not report on any specific anti-corruption or anti-bribery policies.

Metrics and targets

At present, the Company has not set any governance and compliance targets, and does not currently plan to introduce any such targets. The Company does not track the effectiveness of its policies and actions in relation to the material sustainability-related impact, risk and opportunity, and accordingly has not set any targets and qualitative or quantitative metrics to assess progress.

Incidents of corruption or bribery (G1-4)

The CEWE Group was not notified of any incidents of corruption or bribery during the reporting period.

Payment practices (G1-6)

The most frequently used payment term is 14 days, with 24.5% of payments being made under these standard payment terms. There were no outstanding legal proceedings for late payments during the period under review. Payment practices are set out in the CEWE Group's Purchasing Policy.

In the context of its partial application of ESRS, the CEWE Group reserves the right not to report on datapoint G1-6-33a.



ESRS Index

ESRS	Contents	Page	Notes
General disclosures			
Basis for preparation			
BP-1	General basis for preparation of the combined non-financial statement	Page 96	
BP-2	Disclosures in relation to specific circumstances	Page 97	
Governance			
GOV-1	The role of the administrative, management and supervisory bodies	Page 98	
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Page 102	
GOV-3	Integration of sustainability-related performance in incentive schemes	Page 108	
GOV-4	Statement on due diligence	Page 108	
GOV-5	Risk management and internal controls over sustainability reporting	Page 108	
Strategy			
SBM-1	Strategy, business model and value chain	Page 109	
SBM-2	Interests and views of stakeholders	Page 113	
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model		Reported in the topical standards
Impact, risk and opportunity management			
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	Page 116	
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	Page 122	
Topical ESRS			
Environmental information			
E1 – Climate change			
E1 GOV-3	Integration of sustainability-related performance in incentive schemes		n/a
E1-1	Transition plan for climate change mitigation	Page 123	
E1 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Page 123	
E1 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	Page 120	
E1-2	Policies related to climate change mitigation and adaptation	Page 125	
E1-3	Actions and resources in relation to climate change strategies	Page 127	



ESRS	Contents	Page	Notes
E1-4	Targets related to climate change mitigation and adaptation	Page 128	
E1-5	Energy consumption and mix	Page 129	
E1-6	Gross Scope 1, 2, 3 and Total GHG emissions	Page 130	
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	Page 133	
E1-8	Internal carbon pricing		Not a material topic
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities		Material topic, phase-in
E2 – Pollution			
E2 IRO-1	Description of the processes to identify and assess material business pollution-related impacts, risks and opportunities	Page 121	
E2-1	Policies related to pollution	Page 124	
E2-2	Actions and resources related to pollution	Page 137	
E2-3	Targets related to pollution	Page 138	
E2-4	Pollution of air, water and soil		Not a material topic
E2-5	Substances of concern and substances of very high concern	Page 138	
E2-6	Anticipated financial effects from pollution-related risks and opportunities		Material topic, phase-in
E4 – Biodiversity and ecosystems			
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	Page 138	
E4 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Page 138	
E4 IRO-1	Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks, dependencies and opportunities	Page 121	
E4-2	Policies related to biodiversity and ecosystems	Page 139	
E4-3	Actions and resources related to biodiversity and ecosystems	Page 140	
E4-4	Targets related to biodiversity and ecosystems	Page 140	
E4-5	Impact metrics related to biodiversity and ecosystems change		Not a material topic
E4-6	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities		Material topic, phase-in
E5 – Resource use and circular economy			
E5 IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	Page 122	
E5-1	Policies related to resource use and circular economy	Page 142	
E5-2	Actions and resources related to resource use and circular economy	Page 145	
E5-3	Targets related to resource use and circular economy	Page 145	



ESRS	Contents	Page	Notes
E5-4	Resource inflows	Page 146	
E5-5	Resource outflows	Page 148	
E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities		Material topic, phase-in
Social information			
S1 Own workforce			
S1 SBM-2	Interests and views of stakeholders	Page 154	
S1 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	Page 154	
S1-1	Policies related to own workforce	Page 157	
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	Page 158	
S1-3	Processes to remediate negative impacts and channels for its own workforce to raise concerns	Page 159	
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Page 159	
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Page 163	
S1-6	Characteristics of the undertaking's employees	Page 163	
S1-7	Characteristics of non-employee workers in the undertaking's own workforce		Not a material topic
S1-8	Collective bargaining coverage and social dialogue	Page 165	
S1-9	Diversity metrics	Page 165	
S1-10	Adequate wages	Page 165	
S1-11	Social protection		Not a material topic
S1-12	Persons with disabilities	Page 96	Material topic, metrics phase-in
S1-13	Training and skills development	Page 161 f.	Material topic, metrics phase-in
S1-14	Health and safety metrics	Page 165	
S1-15	Work-life balance	Page 155, 162	Material topic, metrics phase-in
S1-16	Remuneration metrics (pay gap and total remuneration)	Page 166	
S1-17	Incidents, complaints and severe human rights impacts	Page 166	
S2 – Workers in the value chain			
S2 SBM-2	Interests and views of stakeholders	Page 166	
S2 SBM-3	Impacts, risks and opportunities and their interaction with strategy and business model	Page 166	



ESRS	Contents	Page	Notes
S2-1	Policies related to value chain workers	Page 167	
S2-2	Processes for engaging with value chain workers about impacts	Page 168	
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	Page 169	
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action	Page 169	
S2-5	Targets related to managing negative impacts, advancing positive impacts, and managing material risks and opportunities	Page 171	
S4 – Consumers and end-users			
S4 SBM-2	Interests and views of stakeholders	Page 171	
S4 SBM-3	Impacts, risks and opportunities and their interaction with strategy and business model	Page 171	
S4-1	Policies related to consumers and end-users	Page 173	
S4-2	Processes for engaging with consumers and end-users about impacts	Page 175	
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Page 175	
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	Page 176	
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Page 177	
Governance information			
G1 – Business conduct			
G1 GOV-1	The role of the administrative, management and supervisory bodies	Page 98	
G1 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	Page 121	
G1-1	Business conduct policies and corporate culture	Page 178	
G1-2	Management of relationships with suppliers	Page 181	
G1-3	Prevention and detection of corruption and bribery	Page 182	
G1-4	Incidents of corruption or bribery	Page 182	
G1-5	Political influence and lobbying activities		Not a material topic
G1-6	Payment practices	Page 182	

Datapoints omitted: ESRS 2 GOV-5-36c, E2-5-34, E3 IRO-1, E5 ESRS 2 SBM-3-48-ci, E5-4-31c, E5-5-36a, S1 ESRS 2 SBM-3-14b, G1 ESRS 2 MDR-A-68, G1-6-33a


ESRS Index: Disclosure requirements under other EU legislation

ESRS Standard	Disclosure	Other source ^{1, 2, 3, 4}	Material	Page(s)
ESRS 2 GOV-1	Board's gender diversity	1, 3	x	Page 100
ESRS 2 GOV-1	Percentage of board members who are independent	3	x	Page 100
ESRS 2 GOV-4	Statement on due diligence	1	x	Page 108
ESRS 2 SBM-1	Involvement in activities related to fossil fuel activities	1, 2, 3		n/a
ESRS 2 SBM-1	Involvement in activities related to chemical production	1, 3		n/a
ESRS 2 SBM-1	Involvement in activities related to controversial weapons	1, 3		n/a
ESRS 2 SBM-1	Involvement in activities related to cultivation and production of tobacco	3		n/a
ESRS E1-1	Transition plan to reach climate neutrality by 2050	4	x	Page 123
ESRS E1-1	Undertakings excluded from Paris-aligned Benchmarks	2, 3		n/a
ESRS E1-4	GHG emission reduction targets	1, 2, 3	x	Page 128
ESRS E1-5	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	1	x	Page 129
ESRS E1-5	Energy consumption and mix	1	x	Page 129
ESRS E1-5	Energy intensity associated with activities in high climate impact sectors	1	x	Page 129
ESRS E1-6	Gross Scope 1, 2, 3 and Total GHG emissions	1, 2, 3	x	Page 130
ESRS E1-6	Gross GHG emissions intensity	1, 2, 3	x	Page 131
ESRS E1-7	GHG removals and carbon credits	4	x	Page 133
ESRS E1-9	Exposure of the benchmark portfolio to climate-related physical risks	3		n/a
ESRS E1-9	Disaggregation of monetary amounts by acute and chronic physical risk	2		n/a

ESRS Standard	Disclosure	Other source ^{1, 2, 3, 4}	Material	Page(s)
ESRS E1-9	Location of significant assets at material physical risk	2		n/a
ESRS E1-9	Breakdown of the carrying value of its real estate assets by energy-efficiency classes	2		n/a
ESRS E1-9	Degree of exposure of the portfolio to climate-related opportunities	3		n/a
ESRS E2-4	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	1		n/a
ESRS E3-1	Water and marine resources	1		n/a
ESRS E3-1	Dedicated policy	1		n/a
ESRS E3-1	Sustainable oceans and seas	1		n/a
ESRS E3-4	Total water recycled and reused	1		n/a
ESRS E3-4	Total water consumption in m3 per net revenue on own operations	1		n/a
ESRS 2 – SBM-3 – E4	16 a i	1	x	Page 138
ESRS 2 – SBM-3 – E4	16 b	1	x	Page 139
ESRS 2 – SBM-3 – E4	16 c	1	x	Page 138
ESRS E4-2	Sustainable land / agriculture practices or policies	1	x	Page 138
ESRS E4-2	Sustainable oceans / seas practices or policies	1		n/a
ESRS E4-2	Policies to address deforestation	1		n/a
ESRS E5-5	Non-recycled waste	1	x	Page 146
ESRS E5-5	Hazardous waste and radioactive waste	1	x	Page 148
ESRS 2 SBM3 – S1	Risk of incidents of forced labour	1	x	Page 154
ESRS 2 SBM3 – S1	Risk of incidents of child labour	1	x	Page 154
ESRS S1-1	Human rights policy commitments	1	x	Page 157



→ Combined non-financial statement
ESRS Index

ESRS Standard	Disclosure	Other source ^{1, 2, 3, 4}	Material	Page(s)
ESRS S1-1	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	3	x	Page 157
ESRS S1-1	Processes and measures for preventing trafficking in human beings	1	x	Page 157
ESRS S1-1	Workplace accident prevention policy or management system	1	x	Page 157
ESRS S1-3	Grievance/complaints handling mechanisms	1	x	Page 159
ESRS S1-14	Number of fatalities and number and rate of work-related accidents	1, 3	x	Page 165
ESRS S1-14	Number of days lost to injuries, accidents, fatalities or illness	1	x	Page 165
ESRS S1-16	Unadjusted gender pay gap	1, 3	x	Page 166
ESRS S1-16	Excessive CEO pay ratio	1	x	Page 166
ESRS S1-17	Incidents of discrimination	1	x	Page 166
ESRS S1-17	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	1, 3	x	Page 166
ESRS 2 SBM3 – S2	Significant risk of child labour or forced labour in the value chain	1	x	Page 166
ESRS S2-1	Human rights policy commitments	1	x	Page 168
ESRS S2-1	Policies related to value chain workers	1	x	Page 167
ESRS S2-1	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	1, 3	x	Page 168
ESRS S2-1	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	3	x	Page 168

ESRS Standard	Disclosure	Other source ^{1, 2, 3, 4}	Material	Page(s)
ESRS S2-4	Human rights issues and incidents connected to its upstream and downstream value chain	1	x	Page 169
ESRS S3-1	Human rights policy commitments	1		n/a
ESRS S3-1	Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines	1, 3		n/a
ESRS S3-4	Human rights issues and incidents	1		n/a
ESRS S4-1	Policies related to consumers and end-users	1	x	Page 173
ESRS S4-1	Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	1, 3	x	Page 174
ESRS S4-4	Human rights issues and incidents	1	x	Page 176
ESRS G1-1	United Nations Convention against Corruption	1		n/a
ESRS G1-1	Protection of whistleblowers	1		n/a
ESRS G1-4	Fines for violation of anti-corruption and anti-bribery laws	1, 3	x	Page 182
ESRS G1-4	Standards of anti-corruption and anti-bribery	1		n/a

¹ SFDR reference.

² Pillar 3 reference.

³ Benchmark Regulation reference.

⁴ EU Climate Law reference.



Oldenburg, 25 March 2025

CEWE Stiftung & Co. KGaA
For the general partner Neumüller CEWE COLOR Stiftung
– The Executive Board –

Yvonne Rostock
(Chairwoman of the
Executive Board)

Patrick Berkhouwer

Dr Reiner Fageth

Carsten Heitkamp

Dr Olaf Holzkämper

Thomas Mehls



Assurance Report of the Independent German Public Auditor on a Limited Assurance Engagement in Relation to the Combined Non-Financial Statement Included in a Combined Management Report

To CEWE Stiftung & Co. KGaA, Oldenburg/Germany

Assurance Conclusion

We have conducted a limited assurance engagement on the Combined Non-Financial Statement of CEWE Stiftung & Co. KGaA, Oldenburg/Germany, combining the management report of the parent and the group management report, included in section Combined non-financial statement of the group management report, for the financial year from January 1 to December 31, 2024. The Combined Non-Financial Statement includes the consolidated non-financial statement and the non-financial statement of the parent company and was prepared to fulfill the requirements of Sections 289b to 289e, 315b and 315c German Commercial Code (HGB) including the disclosures for complying with the requirements under Article 8 of Regulation (EU) 2020/852 included in this combined non-financial statement.

Not subject to our assurance engagement are the prior-year's disclosures included in the Combined Non-Financial Statement and the references to information of the Company outside of the combined management report marked unassured.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the attached Combined Non-Financial Statement for the financial year from January 1 to December 31, 2024 is not prepared, in all material respects, in accordance with the requirements of Sections 289b to 289e, 315b and 315c HGB and of Article 8 of Regulation (EU) 2020/852 and the specifying criteria presented by the executive directors of the Company.

We do not express an assurance conclusion on the parts of the Combined Non-Financial Statement that were not covered by our assurance engagement.

Basis for the Assurance Conclusion

We conducted our assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised): "Assurance Engagements Other Than Audits or Reviews of Historical Financial Information", issued by the International Auditing and Assurance Standards Board (IAASB).

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under ISAE 3000 (Revised) are further described in section "German Public Auditor's Responsibilities for the Assurance Engagement on the Combined Non-Financial Statement".

We are independent of the entity in accordance with the requirements of European law and German commercial and professional law, and we have fulfilled our other German professional responsibilities in accordance with these requirements. Our audit firm has applied the requirements of the IDW Quality Management Standards. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our assurance conclusion.

Emphasis of Matter – Principles of Preparation of the Combined Non-Financial Statement

Without modifying our conclusion, we draw attention to the details provided in the Combined Non-Financial Statement, which describe the principles of preparation of the combined non-financial reporting. According to these principles, the Company has applied the European Sustainability Reporting Standards (ESRS) to the extent described in section General information of the Combined Non-Financial Statement.



Responsibilities of the Executive Directors and the Supervisory Board for the Combined Non-Financial Statement

The executive directors are responsible for the preparation of the Combined Non-Financial Statement in accordance with the requirements of the applicable German legal and other European requirements as well as with the specifying criteria presented by the executive directors of the Company and for designing, implementing and maintaining such internal control as they have considered necessary to enable the preparation of a combined non-financial statement in accordance with these requirements that is free from material misstatement, whether due to fraud (i.e. fraudulent reporting in the Combined Non-Financial Statement) or error. This responsibility of the executive directors includes establishing and maintaining of the materiality assessment process, selecting and applying of appropriate reporting policies for preparing the Combined Non-Financial Statement as well as making assumptions and estimates and ascertaining forward-looking information for individual sustainability-related disclosures.

The supervisory board is responsible for overseeing the process for the preparation of the Combined Non-Financial Statement.

Inherent Limitations in Preparing the Combined Non-Financial Statement

The applicable German legal and other European requirements contain wording and terms that are subject to considerable interpretation uncertainties and for which no authoritative comprehensive interpretations have yet been published. The executive directors made their interpretations of such wording and terms in the Combined Non-Financial Statement. The executive directors are responsible for the reasonableness of these interpretations. As such wording and terms may be interpreted differently by regulators or courts, the legality of measurements or evaluations of the sustainability matters based on these interpretations is uncertain. The quantification of non-financial performance indicators disclosed in the Combined Non-Financial Statement is also subject to inherent uncertainties. These inherent limitations also affect the assurance engagement on the Combined Non-Financial Statement.

German Public Auditor's Responsibilities for the Assurance Engagement on the Combined Non-Financial Statement

Our objective is to express a limited assurance conclusion based on the assurance engagement we have conducted, on whether any matters have come to our attention that cause us to believe that the Combined Non-Financial Statement has not been prepared, in all material respects, in accordance with the applicable German legal and European requirements and the specifying criteria presented by the executive directors of the Company and to issue an assurance report that includes our assurance conclusion on the Combined Non-Financial Statement.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), we exercise professional judgment and maintain professional skepticism. We also

- obtain an understanding of the process used to prepare the Combined Non-Financial Statement, including the materiality assessment process carried out by the entity to identify the disclosures to be reported in the Combined Non-Financial Statement
- identify disclosures where a material misstatement due to fraud or error is likely to arise, design and perform procedures to address these disclosures and obtain limited assurance to support the assurance conclusion. The risk of not detecting a material misstatement resulting from fraud is higher than the risk of not detecting a material misstatement resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control. In addition, the risk of not detecting a material misstatement in information obtained from sources not within the entity's control (value chain information) is ordinarily higher than the risk of not detecting a material misstatement in information obtained from sources within the entity's control, as both the entity's executive directors and we as practitioners are ordinarily subject to restrictions on direct access to the sources of the value chain information.



- Consider the forward-looking information, including the appropriateness of the underlying assumptions. There is a substantial unavoidable risk that future events will differ materially from the forward-looking information.

Summary of the Procedures Performed by the German Public Auditor

A limited assurance engagement involves the performance of procedures to obtain evidence about the sustainability information. The nature, timing and extent of the selected procedures are subject to our professional judgement.

In performing our limited assurance engagement, we:

- Evaluated the suitability of the criteria as a whole presented by the executive directors in the Combined Non-Financial Statement
- Inquired of the executive directors and relevant employees involved in the preparation of the Combined Non-Financial Statement about the preparation process, including the materiality assessment processes carried out by the entity to identify the disclosures to be reported in the Combined Non-Financial Statement, and about the internal controls related to this process
- Evaluated the reporting policies used by the executive directors to prepare the Combined Non-Financial Statement
- Evaluated the reasonableness of the estimates and related information provided by the executive directors. If, in accordance with the ESRS, the executive directors estimate the value chain information to be reported for a case in which the executive directors are unable to obtain the information from the value chain despite making reasonable efforts, our assurance engagement is limited to evaluating whether the executive directors have undertaken these estimates in accordance with the ESRS and assessing the reasonableness of these estimates, but does not include identifying information in the value chain that the executive directors were unable to obtain.

- Performed analytical procedures or tests of details and made inquiries in relation to selected information in the Combined Non-Financial Statement
- Conducted site visits
- Considered the presentation of the information in the Combined Non-Financial Statement
- Considered the process for identifying taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Combined Non-Financial Statement.

Restriction of Use

We issue this report as stipulated in the engagement letter agreed with the Company (including the “General Engagement Terms for Wirtschaftsprüferinnen, Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften (German Public Auditors and Public Audit Firms)” dated January 1, 2024 of the Institut der Wirtschaftsprüfer (IDW)). We draw attention to the fact that the assurance engagement was conducted for the Company’s purposes and that the report is intended solely to inform the Company about the result of the assurance engagement. Consequently, it may not be suitable for any other than the aforementioned purpose. Accordingly, the report is not intended to be used by third parties as a basis for making (financial) decisions based on it.

Our responsibility is to the Company alone. We do not accept any responsibility to third parties. Our assurance conclusion is not modified in this respect.

Hamburg/Germany, March 20, 2025

Deloitte GmbH
Wirtschaftsprüfungsgesellschaft

Daniel Oehlmann	Georg von Behr
Wirtschaftsprüfer	Wirtschaftsprüfer
(German Public Auditor)	(German Public Auditor)