

# Declaration of conformity 2021

for use as non-financial declaration in accordance with  
the CSR Directive Implementation Act

---

## Bundesdruckerei-Gruppe

---

Indicator set

GRI SRS

Contact

Bundesdruckerei  
Unternehmensgruppe

Mareike Ahrens Head of Corporate  
Sustainability

Kommandantenstr. 18  
10969 Berlin  
Germany

+ 49 (0) 151 – 4414 6829  
mareike.ahrens@bdr.de



prepared according to  
CSR Directive  
Implementation Act

This declaration of conformity has been reviewed  
by the Sustainability Code Office and verified as  
complete in accordance with the CSR Directive  
Implementation Act.

## Indicator set

The declaration was drawn up in accordance with the following reporting standards:

GRI SRS

### Reporting obligation:



prepared according to  
CSR Directive  
Implementation Act

This declaration of conformity has been reviewed by the Sustainability Code Office and verified as complete in accordance with the CSR Directive Implementation Act.

# Table of contents

## General

General Information

## CRITERIA 1–10: SUSTAINABILITY POLICY

### Strategy

1. Strategic Analysis and Action
2. Materiality
3. Objectives
4. Depth of the Value Chain

### Process Management

5. Responsibility
6. Rules and Processes
7. Control
  - Key Performance Indicators (5-7)
8. Incentive Systems
  - Key Performance Indicators (8)
9. Stakeholder Engagement
  - Key Performance Indicators (9)
10. Innovation and Product Management
  - Key Performance Indicators (10)

## CRITERIA 11–20: SUSTAINABILITY ASPECTS

### Environment

11. Usage of Natural Resources
12. Resource Management
  - Key Performance Indicators (11-12)
13. Climate-Relevant Emissions
  - Key Performance Indicators (13)

### Society

14. Employment Rights
15. Equal Opportunities
16. Qualifications
  - Key Performance Indicators (14-16)
17. Human Rights
  - Key Performance Indicators (17)
18. Corporate Citizenship
  - Key Performance Indicators (18)
19. Political Influence
  - Key Performance Indicators (19)
20. Conduct that Complies with the Law and Policy
  - Key Performance Indicators (20)

Date: 2021, source: company data.  
The reporting company is responsible  
for the information provided.

The data is provided for information  
purposes only. Please also note the  
disclaimer at  
[www.nachhaltigkeitsrat.de/  
impressum-und-datenschutzerklaerung](http://www.nachhaltigkeitsrat.de/impressum-und-datenschutzerklaerung)

Downloaded from  
[www.nachhaltigkeitsrat.de](http://www.nachhaltigkeitsrat.de)

# General

## General Information

Describe your business model (including type of company, products / services)

The Bundesdruckerei Group offers "Made in Germany" solutions and products for secure identities, data and infrastructures. As a federal IT security company, we want to use these to create trust in the analogue and digital worlds, facilitate the sovereign actions of the state, companies and citizens, and thereby shoulder our responsibility to society. To this end, we offer products and solutions focusing on secure identities, secure data and secure infrastructure for the public sector and particularly vulnerable areas of society and the economy.

Bundesdruckerei GmbH collects, manages and encrypts data, produces ID and security documents such as the German passport and ID card as well as verification devices and associated system infrastructures. We also develop products for high-security infrastructures and for eIDAS<sup>[1]</sup> trust services, and assist our clients with secure digitisation. When it comes to these topics, the Bundesdruckerei Group relies on a focused research and development strategy in order to fulfil the technological and market requirements for digitisation and information security.

As digitisation has progressed, the demand of public authorities and companies for secure and compliant solutions has risen steadily in recent years. The COVID-19 pandemic provided and continues to provide further impetus. Digital transformation is the economic, social and technological driver of the near future. It is changing almost every aspect of life. This has opened up new business areas for the Bundesdruckerei Group, meaning that it offers, among other things, system solutions for the secure management of identities and data throughout their entire life cycle.

Furthermore, the printing of banknotes is part of the Bundesdruckerei Group's business portfolio, including the development and marketing of new security features and related system components. We also offer our customers authorisation documents and systems such as postage stamps, tax stamps and track-and-trace systems.

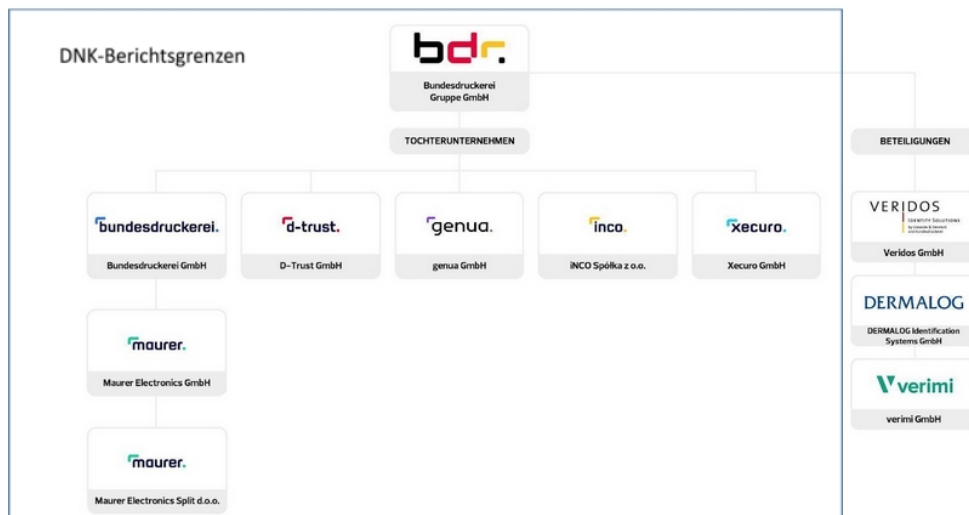
The Bundesdruckerei Group divides its activities into five business units:

- German ID Systems

- Credential Management Systems
- Secure Digitalisation Solutions
- Value Printing
- Infrastructure & Service

On December 1st, 2020, the Bundesdruckerei Group adopted a new organisational structure in which Bundesdruckerei Gruppe GmbH acts as the parent company for its subsidiaries (see reporting boundaries) and is also responsible for managing the minority shareholdings.

<sup>[1]</sup> eIDAS is the EU regulation on electronic identification and trust services for electronic transactions in the internal market and has been in effect since July 1st,, 2016.



### Reporting boundaries:

The following declaration and all information included there refer to the Bundesdruckerei Group. The term 'Bundesdruckerei Group' does represent a specific legal entity; it is primarily used for linguistic simplification and to distinguish it from the parent company Bundesdruckerei Gruppe GmbH, Berlin. It therefore covers all the legally independent, majority-owned companies within the group: namely the parent company Bundesdruckerei Gruppe GmbH, Berlin, as well as the subsidiaries Bundesdruckerei GmbH, Berlin, (including its subsidiaries Maurer Electronics GmbH, Munich, and Maurer Electronics Split d.o.o, Split, Croatia), D-Trust GmbH, Berlin, genua GmbH, Kirchheim bei München, INCO Sp. z o. o., Wawrów, Poland, and Xecuro GmbH, Berlin. If any piece of information does not apply to the entire Group, the respective companies are explicitly named.

In accordance with Section 8.1.3 of the Public Corporate Governance Code of the Federal Government in conjunction with Sections 315b et seq. of the German Commercial Code (HGB), Bundesdruckerei Gruppe GmbH is required to submit a non-financial group declaration in compliance with the CSR Directive Implementation Act. This takes the form of the following declaration

---

of compliance with the German Sustainability Code.

**Reporting year:**

Unless otherwise stated, the data and reported content refer to the year 2021.

# CRITERIA 1–10: SUSTAINABILITY POLICY

## Criteria 1–4 concerning STRATEGY

### 1. Strategic Analysis and Action

The company declares whether or not it pursues a sustainability strategy. It explains what concrete measures it is undertaking to operate in compliance with key recognised sector-specific, national and international standards.

As a federal IT security company with a history stretching back more than 250 years, we are particularly committed to the interests of the state, citizens and society: the Bundesdruckerei Group's core competences are secure identities, data and IT infrastructures. The group companies protect sensitive data, communication and infrastructures in different sectors, for instance in the health sector, with "Made in Germany" technologies and services. Our solutions are based on providing secure means of identification for citizens, customers, employees and systems in both the analogue and digital worlds.

The Bundesdruckerei Group's business model is geared towards the long term and follows the principle of sustainable and forward-looking business. This is why we take a holistic approach to reconciling environmental, social and economic interests.

#### **Our perspective on sustainability: strategic and holistic**

In 2018, the Bundesdruckerei Group devised an independent sustainability strategy based on a holistic analysis process, which was last reviewed in detail in 2020 (see criterion 2). The strategic priorities confirmed by senior management identify the key potential for the Bundesdruckerei Group to expand its sustainable business activities in all of its relevant divisions. We have defined five fields of action for our sustainability strategy:

- Economic efficiency and good corporate governance (see criterion 20)
- Innovative and secure products (see criterion 10)
- Sustainable employer (see criteria 14-16)
- Climate protection and resource efficiency (see criteria 11-13)
- Social responsibility and transparency (see criterion 18)

In line with our management systems, we have identified initial strategic goals for these fields of action and developed indicators to measure the achievement

of the goals (see criterion 7) as well as guiding principles (see performance indicators 5-7). The five fields of action and the respective goals were confirmed in 2021.

Sustainability in all its facets is an important strategic anchor for the Bundesdruckerei Group, which is also reflected in the Group's strategy. Due to the new Group structure (introduced December 1st, 2020), all the subsidiaries are already pursuing the overarching Group strategy, which the greenhouse gas reduction target was specifically added to in 2021. Further systematic integration of strategic sustainability aspects into the Group's strategy is planned for 2022.

### **Sustainability standards provide guidance**

When it comes to sustainability, we are guided by the globally recognized Sustainable Development Goals of the United Nations (SDGs). These are taken into account in various national and international standards, including several ISO standards (e.g., 14001) and the German Sustainability Code (DNK). The Bundesdruckerei Group has been a member of the UN Global Compact since December 2021, thereby reaffirming its ambition to anchor sustainability in its strategies, and in doing so make an active contribution to implementing the SDGs (see criterion 3).

We systematically translate the requirements defined in the standards into our operations through our integrated management approach for occupational health and safety, energy and the environment (see criterion 12), which enables us to continuously improve our sustainability performance. Our annual Declaration of Compliance with the German Sustainability Code provides a transparent report on our progress.

## 2. Materiality

The company discloses the aspects of its business operations that have a significant impact on sustainability issues and what material impact sustainability issues have on its operations. It analyses the positive and negative effects and provides information as to how these insights are integrated into the company's processes.

### **The complex environment of the Bundesdruckerei Group**

Digital transformation is the economic, social and technological driver of the future. This transformation is to a large extent also shaping and will continue to shape the business pursued by the Bundesdruckerei Group and the environment in which it operates. As digitisation progresses, it becomes particularly important to protect identities in a digital, mobile and globally networked world. As a federal IT security company, we support the federal



government with our expertise, providing concrete input for the secure digitisation of the state, companies and society.

The Bundesdruckerei Group is also concerned about climate change as a challenge for society as a whole. Digital processes can conserve resources, but at the same time consume vast amounts of energy and generate a significant carbon footprint. This is why we consider being eco-friendly or carbon-neutral as a unique entrepreneurial challenge and opportunity at the same time.

What's more, demographic change and the resulting shortage of skilled workers pose a particular risk for the entrepreneurial activities of the Bundesdruckerei Group. Our success relies heavily on highly qualified employees. We are therefore meeting this challenge with comprehensive measures to attract employees and to increase their satisfaction and loyalty to the Bundesdruckerei Group. This reinforces our appeal as an employer.

### Key aspects of our business activities

In 2018, we identified the material sustainability aspects of our business activities for the first time by conducting a materiality analysis. In 2020, we joined forces with specialists and managers of the Bundesdruckerei Group as well as external stakeholders (including political representatives, research institutes, partners and customers) to reassess our focus topics. We identified 16 topics as material and assigned them to our five strategic fields of action:



### Explanation:

IT- und Datensicherheit	IT and data security
Besondere Verantwortung als Bundesunternehmen	Special responsibility as a federal government company
Digitale Identitäten, sichere Daten und Infrastrukturen	Digital identities, secure data and infrastructures
Innovation durch Forschung und Kooperation	Innovation through research and collaboration
Kundendialog	Customer dialogue
Beratung von Politik und Verwaltung	Advising policymakers and the public administration
Attraktive Arbeitgebermarke	Attractive employer brand
Wirtschaftliche Leistungsfähigkeit und Effizienz	Economic performance and efficiency
Umweltfreundliche Produkte und Prozesse	Eco-friendly products and processes
Digitale Arbeitswelt	Digital working world
Demographie-Management	Demographic management
Energieeffizienz und Klimaschutz	Energy efficiency and climate protection
Nachhaltige Beschaffung	Sustainable procurement
Ressourceneffizienz und Abfallentsorgung	Resource efficiency and waste disposal
Arbeitssicherheit	Occupational health and safety
Gesellschaftliches Engagement	Social commitment
Wirtschaftlichkeit und Unternehmensführung	Economic efficiency and good corporate governance
Innovative und sichere Produkte	Innovative and secure products
Zukunftsfähiger Arbeitgeber	Sustainable employer
Klimaschutz und Ressourceneffizienz	Climate protection and resource efficiency
Gesellschaftliche Verantwortung und Transparenz	Social responsibility and transparency
Hoch	High
Sehr hoch	Very high

We have prioritized those topics as material that were assessed as extremely relevant to our business from the perspective of both the Bundesdruckerei Group and our external stakeholders (outside-in perspective). The most important topics assessed are primarily related to activities in the Bundesdruckerei Group's core business, for instance, IT and data security or digital identities, secure data and infrastructures, but also advisory services for politicians and public administration.

We were unable to conduct a so called "double materiality" assessment in 2021 of the aforementioned sustainability issues in relation to the business of the Bundesdruckerei Group (outside-in perspective), supplemented by the impact perspective of the Bundesdruckerei Group on the market, people and the environment (inside-out perspective). However, a double materiality analysis for the entire Bundesdruckerei Group is planned for 2022.

Nevertheless, in 2021 core sustainability activities of the Bundesdruckerei Group were combined into a sustainability program called "C2IRCLE" (see criterion 3). This was accompanied by the management's decision to invest an additional fixed share of revenue in implementing the defined sustainability measures of the Bundesdruckerei Group from 2022 onwards.

### 3. Objectives

The company discloses what qualitative and/or quantitative as well as temporally defined sustainability goals have been set and operationalised and how their level of achievement is monitored.

The Bundesdruckerei Group has developed an internal set of goals that will define us as an IT security company in the future. The strong social relevance of the Bundesdruckerei Group's range of products and services is firmly anchored in this set of objectives. Responsible, forward-looking and reliable entrepreneurial action to safeguard and increase the value of the company in the long term is also defined.

In 2020, the Bundesdruckerei Group defined medium- and long-term strategic Group targets based on this set of goals, the Group strategy, analyses of the global financial environment and stakeholder expectations as well as a comprehensive benchmark analysis. These inputs specify the objectives in the five fields of action of our sustainability strategy:

- **Economic efficiency and good corporate governance:**
  - Ensuring financial stability
  - Long-term and sustainable increase in the value of the company
  - Fulfilment of federal government interests
  - Strengthening core expertise and key technologies
- **Innovative and secure products:**
  - Expansion of innovative capacity and technology leadership for innovative and secure products
  - Increasing digital competence and expanding partnerships/collaboration with academia and the private sector
  - Creating a cultural environment for change and innovation
- **Sustainable employer:**
  - Safeguarding the ability to work and the health of all employees
  - Strengthening employer perception as a fair, social and inclusive employer
  - Introduction of modern working models and content (for instance, to promote work-life balance)
  - Strengthening performance by promoting agile and cross-functional cooperation as well as anchoring corporate values
- **Climate protection and resource efficiency:**

- Maintaining climate neutrality and supporting the EU's climate protection goals
- Expansion of strategic measures to reduce energy consumption
- Use of AI and digitisation to save resources
- **Social responsibility and transparency:**
  - Strengthening the role as a digitisation partner to empower society and politics for digital transformation
  - Expansion of social commitment (especially in educational projects)

All of the listed objectives are of equal importance in securing the future viability of the Bundesdruckerei Group and are therefore not prioritized any further in relation to each other.

### **Monitoring of objectives**

Given that sustainability is a high priority for us, the ultimate responsibility for this issue lies with our CFO. He is supported by the Sustainability Council, which was founded in 2018 and meets once a month (see criterion 5). The achievement of objectives is monitored through indicators, which are explained under criterion 7.

### **C2IRCLE sustainability program**

In 2021, the "C2IRCLE" program also focused on goals with a clear link to sustainability (see criterion 2) as part of medium-term planning. The respective divisions and departments will drive the achievement of these goals:

- **Corporate sustainability team and management:** creation of a sustainability department to anchor sustainability more firmly in the Bundesdruckerei Group's strategy
- **Compliant supply chain:** comprehensive implementation of aspects of sustainability in our supply chain
- **Inclusion, equity and diversity:** continued development of a diverse and inclusive corporate culture
- **Responsible investment:** alignment of our entire investment portfolio with ESG criteria (ESG stands for Environment, Social and Governance)
- **CO<sub>2</sub> reduction through energy efficiency and green mobility:** introduction of a sustainable mobility concept for the Bundesdruckerei Group
- **Local and green energy:** increase in the share of renewable energy in total energy use with simultaneous reduction of primary energy consumption
- **Employee safety by decreasing hazardous substances:** Use of innovative technologies to ensure safe workplace conditions and sustainable use of resources

### **Our contribution to the global Sustainable Development Goals (SDGs)**

As a federal enterprise, we consider it our responsibility to support the federal government in implementing the 2030 Agenda on a national level within the framework of the German Sustainability Strategy and in achieving the Sustainable Development Goals (SDGs) of the United Nations. After all, a

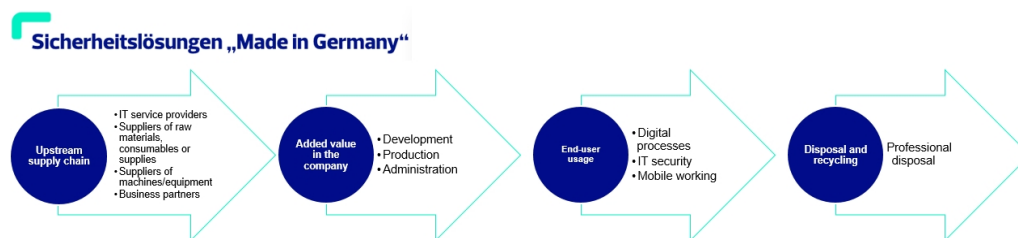
secure and legal identity for every individual is one of the key sub-goals of SDG 16 "Peace, justice and strong institutions" (sub-goal 16.9), which we are working towards with our core business. Back in the beginning of 2020, we defined our extended contribution to achieving the SDGs (at the upper target level) through our core business and our sustainability strategy at a workshop attended by specialists and managers. The following seven goals are of particular relevance to us:

- **4 - Quality Education:** As the principal digital partner of the federal government, we see ourselves as a provider of expertise that advises and empowers the Federal Government with specialist knowledge, particularly on secure digitization, digital sovereignty and cyber security.
- **8 - Decent Work and Economic Growth:** As a major employer with sites in Germany and across Europe, and as a federal IT security company, we contribute to safeguarding attractive jobs and innovative economic growth in the field of digitization and sustainability.
- **9 - Industry, Innovation and Infrastructure:** We promote the secure digitization of social and economic infrastructures (e.g. in administration) with our innovative product portfolio and contribute to the protection of digital identities. This is also an important contribution to creating safe spaces for innovation.
- **12 - Responsible Consumption and Production:** Working with experts from a wide range of scientific disciplines, we explore new topics pertaining to our digital society. We also address issues of social, economic and ecological sustainability, e.g. developments towards Industry 4.0 or use of sustainable or recyclable materials for production structures.
- **13 - Climate Action:** In addition to digitizing society and the economy through our products, we are also contributing towards achieving carbon neutrality in Europe by continuously reducing our carbon footprint and energy consumption and offsetting unavoidable emissions.
- **16 - Peace, Justice and Strong Institutions:** As the main IT security company working with the federal government, our solutions for secure identities and infrastructures are a key contribution to cyber and information security as well as the digital sovereignty of the federal government and its citizens. After all, the question of identity is a pivotal one for social and global cohesion.
- **17 - Partnerships for the Goals:** The Bundesdruckerei Group maintains strategic partnerships with science and industry. We also support politicians and administrators with our technical expertise in implementing the "Digital Agenda" in accordance with the coalition agreement, thereby contributing to sustainable development.

## 4. Depth of the Value Chain

The company states what significance aspects of sustainability have for added value and how deep in the value chain the sustainability criteria are verified.

As a manufacturing company and public contracting entity, our value chain comprises four stages: Our own procurement (supply chain); development, production and administration (value creation within the company); use by the end consumer as well as disposal of material products after use:



### Upstream supply chain

As a public contracting entity, we abide by applicable European public procurement law and treat all business partners equally. In procurement, we thus consistently build on the principles of transparency, non-discrimination and fair competition.

The main challenges in our upstream supply chain are primarily to be found in the potentially (socially) precarious and environmentally harmful manufacturing processes of our raw and auxiliary materials. In order to prevent such impacts, we require our suppliers to meet minimum socio-ecological standards in addition to economic, qualitative and technical standards through our purchasing guidelines, award conditions and, in the future, our Supplier Code of Conduct. For example, the procurement of hazardous substances and substances hazardous to water is subject to a strictly regulated process. Selected suppliers must also provide information on how they have implemented management systems in the fields of occupational health and safety, the environment and energy management, all of which are checked in regular supplier audits. This has also applied to IT service providers since 2019. When procuring IT products, the Bundesdruckerei Group checks energy efficiency, environmental compatibility and ergonomics. In the case of machinery and equipment, the applicable legal provisions for occupational safety and environmental protection are also assessed. Appropriate compliance checks are carried out before agents and commercial representatives are deployed (see criterion 20). In 2021, we at the Bundesdruckerei Group began to address the requirements of the German Supply Chain Due Diligence Act (LkSG) systematically in order to integrate key aspects into existing procurement processes in the short term. In the process, the key opportunities

and risks (hot-spot analysis) along our value chain will be assessed in more detail once again (see criterion 17). Relevant internal specialists (including those in Purchasing, Finance, Internal Audit, Corporate Sustainability, Compliance) of the Bundesdruckerei Group are involved in this process.

### Value creation in the company

- **Development:** Innovation is a core element of our business (see criterion 10). Working with experts from a wide range of scientific disciplines, we explore new topics with the aim of advancing technological development and building trust in our digital society. We also address environmental, social and economic sustainability issues, such as developments towards Industry 4.0, accessibility or the sustainable or recyclable use of materials for maximum product lifespan. In the medium term, we want to incorporate aspects of sustainability into product design from the outset and make products environmentally and climate friendly throughout their life cycle.
- **Production:** In order to manufacture our products, we consume considerable resources and energy while generating waste and emissions. The use of hazardous chemicals is unavoidable for some of our products. For this reason, the Bundesdruckerei Group relies on the highest occupational safety standards and environmentally friendly technologies in production. We identify, assess and monitor the environmental and social impacts of production as part of our occupational health and safety, environment and energy (AEU) management systems (see criteria 12 to 14). We are also continuously optimizing the necessary packaging with regard to ecological and economic criteria in order to ensure correct transport.
- **Administration:** Sustainability topics are also addressed in our administrative areas. In addition to the most resource-efficient office operation possible (e.g. FSC or Blue Angel certified printer paper or envelopes), video conference rooms and communication solutions are available that, among other things, reduce the need for business trips. We also promote particularly low-emission vehicles in our fleet.
- **Use by end consumers:** Thanks to our particularly long-lasting products (e.g. electronic ID cards), we enable our customers to design digital processes efficiently to meet the highest security standards and thus reduce their resource consumption and emissions. By promoting IT security, secure machine communication or by providing certificates and services for secure mobile working, we minimize both the economic and socio-ecological risks faced by public authorities and organizations.
- **Disposal and recycling:** The Bundesdruckerei Group is aware that the fast-moving nature of technologies and tools is creating more and more 'electronic waste'. The group is therefore committed to developing and producing long-lasting products. After use, a large part of the material

---

products are returned to us so that we can ideally recycle them professionally or destroy them properly.



## Criteria 5–10 concerning PROCESS MANAGEMENT

### 5. Responsibility

Accountability within the company's management with regard to sustainability is disclosed.

As a federal enterprise, we have a role model function. Responsibility for all matters relating to sustainability, including goals, targets, measures and monitoring, at the Bundesdruckerei Group lies with senior management. It advocates for the social importance of the issue and communicates this both internally and externally. Christian Helfrich (CFO) is the managing director responsible for the 'Infrastructure Management' business unit where this topic is positioned from an organizational perspective and implemented as a cross-sectional strategy.

Our senior management attaches great importance to the responsibility of the executive bodies to act as multipliers for sustainability. We have an internal Group-wide strategy process that is driven and developed annually by our management committee. Individual sustainability requirements are also incorporated in the process – such as the target for reducing greenhouse gas emissions. The Supervisory Board of the Bundesdruckerei Group is also heavily involved in this process, in that it regularly provides impetus for the Group's strategic direction and gives final approval to its strategies.

#### **Governance for sustainability**

The strategic orientation of the Bundesdruckerei Group's sustainability activities is managed by the **Sustainability Council**. This panel was formed in 2018 and is responsible for setting goals and deriving key measures as well as for operational prioritization and implementation in co-operation with other departments. It also supports our annual sustainability reporting. The Council meets once a month to discuss current issues and reports regularly to the Executive Board.

The interdisciplinary and non-hierarchical body is designed to enable and promote the anchoring of sustainability aspects in the Group. In 2021, we added new divisions and business areas to the Council in order to ensure a holistic view of the entire value chain. This also includes members of our two subsidiaries D-Trust GmbH and genua GmbH.

The following divisions are currently represented on the Sustainability Council: Infrastructure Management, Communications & Public Affairs, Internal Audit,

Compliance & Data Privacy Protection and Corporate Governance & Strategy. From 2022 onwards, members of the Finance and Purchasing departments as well as HSE (Health, Safety, Environment) specialists will also be invited to the monthly meetings.

In order to push forward sustainability aspects both strategically and operationally, the Bundesdruckerei Group also established a sustainability department (**Corporate Sustainability**) at the end of 2021. In the future, the department will steer the Sustainability Council meetings and coordinate sustainability management activities throughout the Group.

There are plans to expand this department as well as to continue to further develop sustainability-related management in the Group. As part of these activities, the Sustainability Department has been represented in the cross-divisional Strategy working group since 2021, in which sustainability is considered a key issue.

## 6. Rules and Processes

The company discloses how the sustainability strategy is implemented in the operational business by way of rules and processes.

The Public Corporate Governance Code serves as a framework for responsible corporate governance and good investment management for all business activities pursued by the Bundesdruckerei Group. In addition, we use specific standards of conduct based on our values and principles. For example, we have in place corporate, leadership, work and safety principles as well as a 'Staff Code of Conduct'. In addition to various guidelines (for instance, on purchasing, compliance, risk and opportunity management) – this code is applied in everyday business to implement the sustainability strategy, which is relevant for all employees.

### **Management systems at the Bundesdruckerei Group**

We use a variety of management systems for different aspects of sustainability (see illustration) to implement the Group's strategic goals and develop suitable measures and indicators for monitoring. We check the effectiveness of the measures through regular management reviews as well as internal and external audits (certifications) and adjust them as necessary. While some of the management systems in the Bundesdruckerei Group are implemented and certified within the Group, others are only relevant for certain subsidiaries. In general, we will strive in the future – where possible – to integrate all companies into the existing structures and processes.

The Bundesdruckerei Group has established management systems in the

following areas:

	<b>Management systems</b>	<b>Standard:</b>	<b>Year introduced</b>	<b>Audit</b>
	<b>Management systems</b>	<b>Standard:</b>	<b>Year introduced</b>	<b>Audit</b>
	Environmental management	ISO 14001	1998	external
	Occupational health and safety management	ISO 45001	2010	external
	Energy management	ISO 50001	2013	external
	Quality management	ISO 9001	1996	external
	Risk/opportunity management	in accordance with ISO 31000	1998	internal
	Compliance management	IDW PS 980	2012	external
	IT security	ISO 27001	2006	external
	Data center security	TSI (Level 3)	2003	external
	IT security, sovereign ID documents incl. passport	ISO 15408	2005	external
	High security printing	ISO 14298	2008	external

Zertifikate-Matrix											
	Qualität ISO 9001	Arbeitssicherheit und Gesundheit Energie ISO 39001 Umwelt ISO 14001	Informationssicherheit ISO 27001	Hochleistungsdruckprozesse ISO 14298	Sicherheit von Informationstechnologien* ISO 15408	Prüf- und Kalibrierlaboratorien ISO 17025	Sicherheit IT-Infrastruktur TSI EN 50600	Anti-Korruption ISO 37001	Personal Audit berufundfamilie	Call Center ISO 18295	Verantwortungsvolle Waldwirtschaft FSC
Bundesdruckerei Gruppe GmbH											
Bundesdruckerei GmbH											
Maurer Electronics GmbH											
Maurer Electronics Split d.o.o.											
D-Trust GmbH											
genua GmbH											
iNCO Sp. z o.o.											

\* Bdr Berlin ist für Services nach EAL3 (Terminals) und EAL5+ (hoheitliche Dokumente) zertifiziert.  
Hannover ist für Services nach EAL3 (Terminals) zertifiziert.

Die Xecuro GmbH wurde Ende 2021 gegründet und wird in der Übersicht noch nicht berücksichtigt.

Zertifiziert  
 in Planung

## Explanation:

Certificate matrix <a href="#">[F1]</a>	Zertifikate-Matrix <a href="#">[F2]</a>
QualityISO 9001	QualitätISO 9001
Occupational health and safetyISO 45001EnergyISO 50001EnvironmentISO 14001	Arbeitssicherheit und GesundheitISO 45001EnergieISO 50001UmweltISO 14001
Information securityISO 27001	InformationssicherheitISO 27001
High-security printing processesISO 14298	HochsicherheitsdruckprozesseISO 14298
Security of information technologies*ISO 15408	Sicherheit vom Informationstechnologien*ISO 15408
Testing and calibration laboratories	Prüf- und Kalibrierlaboratorien
ISO 17025	ISO 17025
Security and IT infrastructureTSI.EN5060 0	Sicherheit und IT-InfrastrukturTSI.EN5060 0
Anti-corruptionISO 37001	Anti-KorruptionISO 37001
Personnelberufundfamilie audit	PersonalAudit berufundfamilie
Call centerISO 18295	Call CenterISO 18295
Responsible forestryFSC	Verantwortungsvolle WaldwirtschaftFSC
Bundesdruckerei Gruppe GmbH	Bundesdruckerei Gruppe GmbH
Bundesdruckerei GmbH	Bundesdruckerei GmbH
Maurer Electronics GmbH	Maurer Electronics GmbH
Maurer Electronics Split d.o.o	Maurer Electronics Split d.o.o.
D-Trust GmbH	D-Trust GmbH
genua GmbH	genua GmbH
iNCO Sp.z o.o.	iNCO Sp.z o.o.
* Bdr Berlin is certified to provide services pursuant to EAL3 (terminals) and EAL5+ (sovereign documents).Hanover is certified for services in accordance with EAL3 (terminals).Xecuro GmbH was founded at the end of 2021 and is not yet included in the overview.	* Bdr Berlin ist für Services nach EAL3 (Terminals) und EAL5+ (hoheitliche Dokumente) zertifiziert.Hannover ist für Services nach EAL3 (Terminals) zertifiziert.Die Xecuro GmbH wurde Ende 2021 gegründet und wird in der Übersicht noch nicht berücksichtigt.
Certified	Zertifiziert
In the planning stage	in Planung

## 7. Control

The company states how and what performance indicators related to sustainability are used in its regular internal planning and control processes. It discloses how suitable processes ensure reliability, comparability and consistency of the data used for internal management and external communication.

The Bundesdruckerei Group always tries to identify key figures that are as precise and clear as possible in order to manage our sustainability activities. Controlling of the individual key figures, which are predominantly linked to targets from our management systems and are therefore collected on a regular basis, is checked in annual reviews. Defined responsibilities and clear processes in the management systems ensure high data quality. An overview of the key figures:

Sustainability fields of action	Indicators
<b>Field of action 1:</b> Economic efficiency and good corporate governance	<ul style="list-style-type: none"> <li>- Financial indicator system (e.g. EBIT, cash flow)</li> <li>- Funding ratio for pension obligations</li> <li>- Turnover / sales in the various segments</li> <li>- Supplier evaluation system</li> </ul>
<b>Field of action 2:</b> Innovative and secure products	<ul style="list-style-type: none"> <li>- Number of patents</li> <li>- Expenditure on research and development</li> <li>- Number of suggestions and rate of implemented suggestions in the company suggestion system</li> <li>- Number of answered customer queries about products and response rate in the call center or customer portal</li> </ul>
<b>Field of action 3:</b> Sustainable employer	<ul style="list-style-type: none"> <li>- <b>Occupational safety:</b> Accident rate; reportable and fatal workplace accidents; reportable commuting accidents; medical emergencies; near misses</li> <li>- Absence due to illness / absence rate</li> <li>- <b>Hazardous substances:</b> Entries of hazards in the handling of hazardous substances; number of entries in the register for hazardous substances and paints</li> <li>- <b>Diversity:</b> Proportion of women in the first and second tiers of management; age structure; number of different nationalities</li> <li>- Incidents of discrimination</li> <li>- Average length of employment at the company</li> <li>- Average number of days for vocational and continuing professional development per year</li> </ul>
<b>Field of action 4:</b> Climate protection and resource efficiency	<ul style="list-style-type: none"> <li>- Direct and indirect greenhouse gas emissions (Scope 1, 2 and 3*)</li> <li>- Greenhouse gas intensity (GHG emissions / turnover)</li> <li>- Energy consumption: electricity, natural gas, district heating, heating oil, diesel, gasoline</li> <li>- Waste generation: municipal waste, hazardous and non-hazardous waste</li> <li>- Material consumption (e.g. isopropanol)</li> <li>- Water withdrawal</li> </ul>
<b>Field of action 5:</b> Social responsibility and transparency	<ul style="list-style-type: none"> <li>- Number of studies published per year</li> <li>- Number of public events organized</li> <li>- Number of guests in the show pavilion</li> <li>- Number of endowed professorships</li> </ul>

## Key Performance Indicators to criteria 5 to 7

### Key Performance Indicator GRI SRS-102-16: Values

The reporting organization shall report the following information:

**a.** A description of the organization's values, principles, standards, and norms of behavior.

In our role as a federal enterprise, our goal is to create trust in the digital economy and society. The activities of the Bundesdruckerei Group are based on fundamental principles and values. From these, we derive specific guidelines, principles of conduct and corporate policies.

The **guidelines** serve as a compass for navigating day-to-day work and are binding for all of the Group's employees. They are the guiding principles for all further regulations. A good example of this is our guideline "Conduct in the Company - Code of Conduct".

These **fundamental principles** define the operating codes of practice within the Bundesdruckerei Group. They are geared towards the Group's corporate values and describe the non-process-specific voluntary commitment to strategically important issues. We have, for example, principles for occupational health and safety, energy and the environment.

The **Group policies** provide a framework and objectives, are formulated with a focus on target groups and are applied in the respective context. Group policies contain minimum requirements, specifications and defined targets.

#### **Our corporate values**

Back in 2019, the Bundesdruckerei Group defined five values in a series of workshops lasting several months with broad employee participation: **trust, respect, commitment, openness and courage**. A digital tool was used to communicate these values to all employees and to explain what they mean for their day-to-day work. During the past year, employees and their teams were able to engage with the values in three short (digital) workshops (see criterion 14).

We have moreover developed **sustainability guidelines** for the individual fields of action of our Group strategy:

- The Bundesdruckerei Group excels through its commercial performance, corporate governance with integrity and the highest internal security standards. The interests of the state, citizens, customers and employees are important for all our actions (field of action 1: Economic efficiency

and good corporate governance).

- Our digital solutions and 'Made in Germany' products are based on the highest safety and quality standards and are the result of our long-term innovation strategy. With our end-to-end solutions, we are making a huge contribution towards protecting digital identities and data (field of action 2: Innovative and secure products).
- The Bundesdruckerei Group is a major employer in Germany. We offer attractive and secure long-term jobs in a modern and forward-looking environment (Field of action 3: Sustainable employer).
- The Bundesdruckerei Group is committed to environmental protection and the economical use of resources in all its business activities. All of our staff feel committed to protecting people and the environment in their sphere of work (field of action 4: Climate protection and resource efficiency).
- With our expertise, we advise policymakers and seek sector-specific and cross-sectoral exchange. We also assume social responsibility through our involvement in social education projects (field of action 5: Social responsibility and transparency).

We will review these sustainability guidelines again to ensure their validity and completeness as part of the ongoing development of the Bundesdruckerei Group's sustainability strategy planned for 2022 and adjust them if necessary.

## 8. Incentive Systems

The company discloses how target agreements and remuneration schemes for executives and employees are also geared towards the achievement of sustainability goals and how they are aligned with long-term value creation. It discloses the extent to which the achievement of these goals forms part of the evaluation of the top managerial level (board/managing directors) conducted by the monitoring body (supervisory board/advisory board).

The total remuneration of employees of the Bundesdruckerei Group, regarding both those covered by collective bargaining agreements and those who are not, consists of a fixed and an additional variable remuneration component. The variable remuneration component depends on the extent to which the Group's commercial targets have been achieved. Participation in the company's success has created an important incentive system that contributes to the company's success through employee loyalty and engagement, and thereby also creates greater financial scope for sustainability.

For senior executives and the management of Bundesdruckerei GmbH, D-Trust GmbH and Maurer Electronics GmbH, the annual target remuneration also



consists of a fixed salary and a variable salary component. The variable component is paid in relation to the degree to which annual targets are achieved. Social and environmental corporate goals are not included in the remuneration system for management, executives and employees and are not currently planned to be included.

The goals are first presented to the Supervisory Board at the beginning of the respective business year and then adopted by management. In 2021, the same target system applied to all employees of the Bundesdruckerei Group.

Incentives for sustainable improvements in the company are provided by the company suggestion or ideas management scheme. In this way, Bundesdruckerei GmbH rewards technical, organizational or other ideas submitted by employees that bring about a noticeable improvement compared to the status quo. In the reporting year 2021, 465 suggestions for improvement were submitted to Ideas Management, resulting in savings of approximately €1 million. More than €200,000 of this amount was distributed as bonuses to the participating employees (see criterion 14).

Other subsidiaries of the Bundesdruckerei Group also create incentives for employees to act responsibly, e.g. in the field of sustainable consumption and mobility (see criterion 13). For example, genua GmbH has launched an urban gardening initiative at its main site in Kirchheim.

## Key Performance Indicators to criteria 8

Key Performance Indicator GRI SRS-102-35: Remuneration policies

The reporting organization shall report the following information:

- a.** Remuneration policies for the highest governance body and senior executives for the following types of remuneration:
  - i.** Fixed pay and variable pay, including performance-based pay, equity-based pay, bonuses, and deferred or vested shares;
  - ii.** Sign-on bonuses or recruitment incentive payments;
  - iii.** Termination payments;
  - iv.** Clawbacks;
  - v.** Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees.
- b.** How performance criteria in the remuneration policies relate to the highest governance body's and senior executives' objectives for economic, environmental, and social topics.

CEO of the Bundesdruckerei Group:

- Dr. Stefan Hofschien, Iffeldorf, Chief Executive Officer (CEO)
- Christian Helfrich, Munich, Chief Financial Officer (CFO)

The total remuneration of the members of the Management Board in 2021 was as follows:

Total emoluments (in €)	Dr. Stefan Hofschien (CEO)	Christian Helfrich (CFO)
Fixed salary	310.000	238.000
Other emoluments	61.009	12.917
Variable remuneration	402.000	260.000
Variable long-term remuneration	90.000	55.000
<b>Total</b>	<b>863.009</b>	<b>565.917</b>
Pension expense	85.000	70.000

Key Performance Indicator GRI SRS-102-38: Annual total compensation ratio

The reporting organization shall report the following information:

**a.** Ratio of the annual total compensation for the organization's highest-paid individual in each country of significant operations to the median annual total compensation for all employees (excluding the highest-paid individual) in the same country.

The ratio of the annual remuneration of the highest paid employee (management) to the median (€59,034) annual remuneration of all other employees of our German subsidiaries was approximately 14.2 to 1 in 2021 (as of March 2022).

## 9. Stakeholder Engagement

The company discloses how the socially and economically relevant stakeholders are identified and integrated into the sustainability process. It states whether and how an ongoing dialogue takes place with them and how the results are integrated into the sustainability process.

As a federal enterprise, the Bundesdruckerei Group interacts with a wide range of stakeholders. We identify our relevant stakeholder groups based on our business activities and the requirements of our management systems. We

regard as stakeholders all individuals or groups from the company's environment who either have an influence on the business activity or are influenced by the business activity.

Important stakeholder groups for the Bundesdruckerei Group therefore include:

- Customers (governments, public authorities, citizens and companies)
- Employees
- The federal government or the Bundesdruckerei Group's shareholder
- The Supervisory Board
- Managing directors
- Works council, workers' union
- Suppliers and service providers
- Partners from business and academia
- Representatives of politics and the public administration
- Representatives of associations, media and non-profit organizations
- Residents near the company's premises

The most important issues and concerns from the dialogs are discussed in the Sustainability Council. The newly established sustainability department (see criterion 5) is responsible for systematically steering and incorporating these topics into sustainability management.

### **Customer dialog**

The Bundesdruckerei Group relies on cooperation with the best experts available, i.e., its own customers. In order to develop beneficial and user-friendly solutions, we involve partners and customers in the product development process at a very early stage. One positive development is the partnership with Sozialhelden e. V., with whom we are developing accessible products and services in response to increasing customer demand (see criterion 10).

We also foster close contacts through extensive customer support, complaints management and direct discussions in everyday business as well as special events, such as the 'User Lab'. We regularly invite representatives from public authorities to a customer dialog in order to further improve our products.

### **Staff dialog**

To further develop the human resources strategy and improve working conditions, the Bundesdruckerei Group conducts surveys among its employees. A staff survey was also conducted in 2021 (see criterion 14).

The mainstays of open dialog with employees are discussions with supervisors in day-to-day operations, contact with the local works council and development reviews regulated by a company agreement. Furthermore, the Bundesdruckerei Group offers various event formats that afford opportunities for discussions

with the management and the divisional managers. Formats such as the annual 'Campus Week' were continued in digital form in 2021. The senior management also presented new developments in the company to divisional managers in regular townhall meetings.

### **Dialog with policymakers and the general public**

The Bundesdruckerei Group engages in close dialog with politicians. The Group provides expert support in order to create the basis for secure digitization of the private sector and the public administration. Important contacts in the political sphere (e.g., ministries, federal parliament or representatives at federal-state level) are addressed through events and bilateral talks. Since many political and regulatory decisions are made at European level, we are also in contact with representatives of the European Commission and the European Parliament.

In 2021, we organized two online discussions in collaboration with the Tagesspiegel newspaper under the heading "cybersec.lunch". They focused on the topics of data intermediaries and data trustees (March 2021) and digital identities (June 2021) (see criterion 19).

In 2017, we also opened our Show Pavilion where we present information on digitization and solutions from the Bundesdruckerei Group to the public. Due to the Covid-19 pandemic, only very few tours in the Show Pavilion took place in 2021, each of which was conducted in compliance with the strictest hygiene measures.

### **Dialog with associations**

As a member of various expert committees and associations, the Bundesdruckerei Group actively promotes industry-specific and cross-industry exchange on the key topics of secure identities, data and infrastructures (see criterion 19). The second round of dialog between European political stakeholders, trust service providers and companies took place in hybrid form in 2021 as part of the "European Digital Identity Roundtable" format jointly organized by the Bundesdruckerei Group and the European Signature Dialog association. The subject of discussion was the EU Commission's proposal for the introduction of trustworthy digital identities and the corresponding requirements.

### **Supplier dialog**

The Bundesdruckerei Group maintains a long-standing partnership with most of its suppliers. This applies especially to strategic suppliers, which is due to our special products, i.e., ID documents, banknotes or passports. We use this circumstance to establish and expand long-term strategic supplier relationships.

The most common form of dialog is the supplier talks that we hold in conjunction with annual supplier assessments. Due to the Coronavirus

pandemic, these talks mainly took place digitally in 2021. Audits are another form of dialog in which we talk about various aspects of sustainability, such as occupational safety.

## Key Performance Indicators to criteria 9

Key Performance Indicator GRI SRS-102-44: Key topics and concerns

The reporting organization shall report the following information:

- a. Key topics and concerns that have been raised through stakeholder engagement, including:
  - i. how the organization has responded to those key topics and concerns, including through its reporting;
  - ii. the stakeholder groups that raised each of the key topics and concerns.

Our **customers'** expectations and requirements beyond customer satisfaction have a lot to do with aspects of sustainability. In addition to environmental issues, for instance, our products must be easy to use since this promotes both acceptance and long use. In this respect, our document verification devices, for example, must also be compatible with future generations of ID cards and passports. Issues such as accessibility, social inclusion and product compliance are also becoming increasingly important (see criterion 10).

Based on the results of our comprehensive annual **employee survey**, we have identified focus topics that we wish to address in the coming years through appropriate measures. These include mobile working and flexible working time models, work-life balance and environmentally and health-friendly mobility (see criteria 13-16).

The Bundesdruckerei Group provides advice to stakeholders from **ministries and authorities**, from the German parliament (*Bundestag*) as well as other officials at EU, federal-government, federal-state or municipal level. During the course of political debate on digital transformation and data-based business models, various concerns are being brought to the attention of the Bundesdruckerei Group. This includes, for instance, questions relating to data security and data protection, but also data ethics or the design of secure digital identities.

In terms of **supplier dialog**, the most important issue is the result of the supplier assessment itself and the associated potential for improvement and/or other measures. The assessment covers many areas relevant to sustainability, such as health and the environment. Another common subject of supplier discussions is communication about existing sustainability activities on the part

of suppliers.

Last but not least, the Bundesdruckerei Group systematically records comments, including complaints, from other stakeholder groups, such as **residents**, as part of its management systems. In the reporting year, two complaints were registered and appropriate measures were identified.

## 10. Innovation and Product Management

The company discloses how innovations in products and services are enhanced through suitable processes which improve sustainability with respect to the company's utilisation of resources and with regard to users. Likewise, a further statement is made with regard to if and how the current and future impact of the key products and services in the value chain and in the product life cycle are assessed.

As a federal enterprise, we create trust in the digital society. We promote technological developments and see ourselves as an innovation partner and driving force in the areas of secure identities and data. In our innovations, we strive for an optimal balance between safety, user-friendliness and sustainability as well as cost-effectiveness. For us, sustainable products are not only resource- and energy-efficient, but also accessible and therefore usable for all citizens.

### **Synergies between sustainability and digitization:**

The Bundesdruckerei Group harnesses the potential of digitization to protect the environment. In addition to the digitization of numerous workflows and processes, we have, for example, been using visualization of server systems in the IT operations of the data centers for many years now in order to save energy.

In line with the Group strategy, the Innovations business unit has been examining the use of future-proof technologies more closely from the point of view of sustainability since the 2021 reporting year. For example, research is being conducted into how quantum computers can be used to keep the use of technology-related resources as low as possible (e.g. through resource-saving data storage, optimization of existing technologies or the use of new information logics).

### **Corporate digital responsibility**

The Bundesdruckerei Group sees itself as a shaper of a digital transformation that is oriented towards people and values. Data protection and data security are therefore top priorities for our products. That is why we have either

already established, or are currently planning, an information security management system in accordance with ISO 27001 at Bundesdruckerei GmbH, D-Trust GmbH and INCO Sp. z o.o.. Bundesdruckerei GmbH is also certified according to ISO 15408 (IT Common Criteria). This means that most stringent IT security requirements for products are taken into account as early as the development phase.

We develop modern, safe, high-quality and reliable solutions in cooperation with the scientific community. These solutions protect digital identities and go a long way towards ensuring the secure digitization of society and the economy. Working with leading universities and research institutions, the Bundesdruckerei Group is researching materials and technologies to develop user-friendly and secure applications for the digital future. This enables us to drive basic and applied research and ensure the transfer of important research results into practice.

#### **Our customers' sustainability requirements**

As a federal enterprise, our products must comply with certain legal requirements, e.g., the RoHS and REACH directives as well as the Packaging and Battery Act. In 2021, a Product Compliance Team was set up in the Quality Management department to keep a central record of all the relevant legal requirements for our products, pass them on to the specialist departments and support these departments in implementing them.

There are also special requirements for sovereign documents, a core business of the Bundesdruckerei Group. For example, an ID card must be usable for at least ten years, regardless of the degree of use. In general, quality and durability are very important product characteristics to us. In order to extend the useful life of our devices, especially for the verification of ID documents, we develop them from the outset to be as low-maintenance as possible. This enables us to replace individual assemblies quickly. The devices must also be compatible with future generations of documents in order to remain operational for a long time.

#### **Accessibility in products and services**

In addition to environmental aspects, the issue of accessibility is also of great importance to us. Our products and services should be accessible to all citizens. We go beyond the legal requirements (e.g. Federal Ordinance on Barrier-Free Information Technology).

In the Technology division, a user experience team is responsible for thinking about and creating user-oriented and accessible designs for every project. We implement the specific requirements for accessibility together with our competent partner - Sozialhelden e. V..

Sozialhelden puts future products and services to the test as early as the prototype phase. We try to break down all barriers to code level, use case by

use case, in order to ensure social inclusiveness of as many products and services as possible. In addition to a user-friendly design, accessibility of online applications also includes the option of presenting the required steps in sign language or plain language. We have most recently implemented corresponding features with the Digital Registration on Entry, for example.

We have set up a Community of Practice in order to further expand the knowledge within the Group and to train the developers, product managers and designers accordingly. We invite external experts to the monthly meetings. They help us to address important aspects of accessibility.

### **Impacts along the value chain**

We are aware of the environmental and social impacts of our production. We identify the direct impacts of our production (e.g. occupational accidents, carbon emissions, fuel consumption) as part of the occupational safety, energy and environmental management systems and take appropriate measures.

With respect to our products, we subject all raw materials that become parts of our products to extensive incoming goods inspections right at the start of the value chain. In addition to ensuring a high level of quality, this approach also minimizes production waste, which in turn means reducing the total amount of waste. All products that are expected to have prolonged skin contact are tested by external environmental laboratories (e.g. according to toy guidelines or toxicity guidelines, as in the case of self-adhesive stamps).

Our sovereign products, such as ID cards and passports, must meet legal requirements, e.g. with regard to document validity. Despite intensive use, our documents are designed to last for the duration of their validity without any loss of quality and to provide document holders with a high level of security when traveling abroad at borders and airports when it comes to checking their documents.

For example, we test each product development and modification against all applicable standards for durability using an internal laboratory accredited for this purpose. In many critical tests, we also go far beyond the requirements of the standards in order to guarantee maximum durability of our products for our customers and also in accordance with our own high standards. Annual supplier assessments are also carried out as part of the AEU management systems (see criteria 4 and 9).

We moreover engage with our suppliers to strengthen efficiency and the circular economy along the entire value chain. Devices produced by us are returned to our company at the end of their service life and are professionally disassembled and disposed of. Further measures in the 'Innovative and secure products' field of action:



Measures	Period	Status 2021
Re-certification of the management system for quality according to ISO 9001	Every three years	Continuous
Re-certification of the management system for data security according to ISO 27001	Every three years	Continuous
Re-certification of the management system for technology security according to ISO 15408	Every three years	Continuous
Re-certification of the laboratory management system (testing and calibration laboratories) according to ISO 17025	Every three years	Continuous
Introduction of a laboratory management system (digitization lab)	2021	Completed
Establishment of the Product Compliance team	2021	Completed
Execution of Contract Compliance Audit	Annually	Continuous
Expansion of collaboration with universities and research institutions	Annually	Continuous
Collaboration with Sozialhelden e.V.	Since late 2020	Continuous

## Key Performance Indicators to criteria 10

### Key Performance Indicator G4-FS11

(report also in accordance with GRI SRS): Percentage of assets subject to positive and negative environmental or social screening.  
(Note: the indicator should also be reported when reporting to GRI SRS)

The G4-FS11 indicator is a sector disclosure for the financial sector, which is therefore not relevant for the Bundesdruckerei Group and is therefore not reported.

In the context of the increasing importance of sustainability issues in the financial sector, the Bundesdruckerei Group has set itself the goal of investing in ESG-compliant assets.

Aligning investment objectives with ESG sustainability factors has been an integral part of the Group's investment policy since 2018. To begin with, this referred primarily to the equities asset class, as ESG-oriented products were predominantly selected in this segment. Percentage targets were defined for the following years in this segment as a means of achieving objectives.

ESG research agencies calculate sustainability ratings on the basis of various rating methods. These ratings measure opportunities and risks based on the ESG factors of environmental, social and responsible corporate governance. Industry-adjusted and therefore relative scores derived from the rating allow for a comparison of several portfolios and benchmarks. MSCI ESG ratings show the extent to which companies are exposed to specific ESG risks and what strategy they have implemented to manage those risks. Companies with higher ESG risks need to demonstrate advanced risk management strategies to achieve a good rating. In addition, consideration is given to whether companies can use opportunities in the environmental and social spheres as a competitive advantage. The ESG profile at company level takes into account all assets that can be directly or indirectly attributed to individual companies. MSCI is considered one of the market leaders and has access to a correspondingly large database in this respect. Taking into account the capital investments made by Bundesdruckerei and the companies involved through shares, corporate bonds, profit participation certificates, etc., a rating is calculated which then relates to the entire capital investment. This provides a means of measurement that enables comparisons to be made over time.

In its 2021 investment guideline, the Bundesdruckerei Group defines a clearly outlined requirement for the entire capital investment (not only concerning the equities segment). The objective is to achieve an investment grade rating of "BBB" or better at company level according to the MSCI classification. Bundesdruckerei was able to exceed this target with a rating of "A".

Every investment decision is made in accordance with the MSCI rating.

## Criteria 11–20: Sustainability Aspects

### Criteria 11–13 concerning ENVIRONMENTAL MATTERS

#### 11. Usage of Natural Resources

The company discloses the extent to which natural resources are used for the company's business activities. Possible options here are materials, the input and output of water, soil, waste, energy, land and biodiversity as well as emissions for the life cycles of products and services.

A responsible use of natural resources is central to our business activities. In this context, the Bundesdruckerei Group has defined specific environmental targets aimed at extensive resource and energy efficiency as well as environmentally friendly processes and products.

The most important aspects with regard to the Bundesdruckerei Group's use of natural resources are energy consumption – and the associated greenhouse gas emissions (see criterion 13) – and waste generation. On the one hand, this is due to our relatively high energy input needed to meet the considerable demand for indoor air in the production facilities: identity documents such as ID cards and passports can only be produced under stable climatic conditions. On the other hand, hazardous waste is generated during the production of ID documents and banknotes, for example. Hazardous waste (as defined by section 3 of the Waste Catalog Ordinance (*AVV, Abfallverzeichnis-Verordnung*)) was also generated during the refurbishment the company premises. We have laid down strategic goals for these two aspects, which are reflected in our sustainability strategy (see criteria 3 and 12).

What's more, the companies of the Bundesdruckerei Group require water and fuels, such as diesel and gasoline, as well as raw materials and supplies, such as paper, inks, hazardous materials, films and packaging materials. More detailed information on material consumption and emissions can be found in the indicators for criteria 12 and 13.

## 12. Resource Management

The company discloses what qualitative and quantitative goals it has set itself with regard to its resource efficiency, in particular its use of renewables, the increase in raw material productivity and the reduction in the usage of ecosystem services, which measures and strategies it is pursuing to this end, how these are or will be achieved, and where it sees there to be risks.

### **Environmental policy: avoid, reduce and compensate**

The overarching goal of the Bundesdruckerei Group is to continuously improve environmental and climate protection as well as the energy efficiency of its operations. The principles of action underlying this goal are 'avoid, reduce and compensate'. We are on the right track here: we have achieved our greenhouse gas emission reduction targets in recent years while at the same time growing our turnover (by more than 30%).

In 2020, we defined reduction of our GHG emissions and offsetting remaining GHG emissions as a concrete, measurable environmental target. We undertook to maximize the potential for avoiding and cutting our emissions as far as technically and economically feasible. Accordingly, the Bundesdruckerei Group aims to reduce the amount of CO<sub>2</sub> equivalents (CO<sub>2</sub>e) generated by 5% by 2023 (base year 2018). We monitor the extent to which we have achieved our goals on an annual basis.

It is technically impossible for the group of companies to completely eliminate CO<sub>2</sub> emissions due to the energy-intensive production processes. This is why the Bundesdruckerei Group is involved in recognized and certified climate protection projects to compensate for unavoidable emissions. In 2021, we offset the unavoidable GHG emissions of 2020 to the amount of 3,643 t CO<sub>2</sub>e (see criterion 13).

We also adopted our updated occupational health and safety, energy and environmental (AEU) principles at the end of 2020. These are set out in our general Group guidelines and apply to all subsidiaries. This sets out our specific responsibilities towards our employees and the public in terms of occupational health and safety as well as energy efficiency and environmental protection. These primarily include conduct in compliance with the law, employee participation, continuing professional development and constant improvement, as well as the consideration of environmental and social aspects in our business relationships.

In order to make our environmental policy and our actions measurable, we use established environmental and energy management systems, the effectiveness

of which is regularly confirmed by certification conducted by an external body. We have set operational and strategic objectives within these management systems as part of our integrated approach.

### Strategic and operational objectives of our management systems

Our environmental management system in compliance with ISO 14001 and our energy management system in compliance with ISO 50001 provide an important framework with which we improve our activities on an ongoing basis. In the reporting year, we improved the process of developing strategic and operational environmental and energy objectives and documented them transparently. The senior management has also adopted new objectives (see below). Environmental performance and target achievement are monitored through internal audits and external certification of the management systems, partly on the basis of defined indicators (see criterion 7). We identify and review appropriate measures based on the results of the annual reviews.

At the beginning of 2022, we adjusted our strategic environmental and energy targets for the Bundesdruckerei Group (see overview).

Strategic objectives	Base value (base year)	Target value (target year)	2021
<b>Primary energy consumption</b> for the period 2021 to 2025 Reduce by 1.5% per year	56,544,811 kWhPrimary (2019)	52,303,590 kWhPrimary (2025)	59,622,951 kWhPrimary
Expansion of a sustainable energy supply through the <b>sustainable use of renewable energies</b>	0 kWh (2020)	2,500,000 kWh (2025)	0 kWh
Reduce <b>greenhouse gas intensity</b> of business activity across the Group by 5% by 2023	9.18 gCO <sub>2</sub> e/€ (2018)	8.72 gCO <sub>2</sub> e/€ (2023)	3.37 gCO <sub>2</sub> e/€
Reduce mixed <b>municipal waste</b> by 10% by 2024 to achieve the legally required separation rate of 90%*.	401 t (2016)	360 t (2024)	187 t

\*We have already achieved this strategic objective. A new objective will be devised in 2022.

Further objectives and measures are listed here (selection):

Measures	Period	Status 2021
Re-certification of the energy management system pursuant to ISO 50001	Every three years	Continuous
Expansion of a sustainable energy supply through the sustainable use of renewable energies	Every three years	Continuous
Internal monitoring audits of the environmental and energy management systems	Annually	Continuous
Assessment of the risks of environmental impacts	Annually	Continuous
Introduction of the integrated management approach (AEU) at genua GmbH and INCO SpóÅ,ka z o.o.	2023	Scheduled
Investigation of more production areas with respect to optimizing waste management	2022	Due to the pandemic situation, further production areas could not be examined due to internal regulations. Follow-up in 2022.
Preparation of the Product Carbon Footprint for two Bundesdruckerei GmbH products	2021	Completed
Introduction of software for the management of hazardous substances	2021	Started
Introduction of FSC certification for a safety product.	2022	Scheduled
Expansion of the charging infrastructure for e-operation (company vehicles) on the premises of Bundesdruckerei GmbH	2021	Started
In-house electricity generation concept at the headquarters	2022	Started
Heat recovery in indoor air technology	2021	Started
Training: Liability of managers, plant managers and operators with a focus on environmental, occupational health and safety and energy law	2021	Completed
Introduction of a sustainable mobility concept	2022	Scheduled

### Our AEU management systems

The Bundesdruckerei Group pursues an integrated approach in order to manage, control and improve operations on an ongoing basis with regard to occupational health and safety (see criterion 15) as well as energy efficiency and environmental protection (AEU). As part of the AEU management systems, we have drawn up a comprehensive program of targets (see criterion 3 - field of action "Climate protection and resource efficiency"). The AEU management systems have also encompassed Maurer Electronics GmbH since 2021, in

addition to Bundesdruckerei Gruppe GmbH, Bundesdruckerei GmbH, and D-Trust GmbH. We intend to extend the scope to the entire Group by 2023.

The responsible departments work together very closely to dovetail the various aspects. Meetings to discuss the integrated process work are held every 14 days. Monthly reports are also sent to those responsible for overseeing the implementation. These culminate in an annual management review, which is discussed jointly with the senior management.

### **Key aspects and risks**

The Bundesdruckerei Group continuously and systematically identifies, evaluates and monitors the impact of its business activities on the environment and the resulting risks and opportunities in relation to its subsidiaries covered by the integrated approach (see criterion 7). This should prevent or reduce undesirable effects on the environment.

Environmental aspects include, for example, planned new developments and changes, atmospheric emissions, discharges into water bodies, contamination of soils, quantities of waste generated, consumption of electricity, heating oil and water, and the quantitative and qualitative handling of hazardous substances or substances hazardous to water. Operational disruptions and foreseeable emergencies are also taken into account.

Firstly, all of the environmental aspects that directly affect the Bundesdruckerei Group and on which it can exert an influence are recorded. Secondly, environmental aspects emanating from strategic suppliers and service providers are also factored in. The aim is to obtain an overview of the potentially relevant impacts on the environment throughout the entire life cycle, which serves as a baseline for possible improvement measures on existing (or even planned) installations, processes and activities.

### **Environmental management**

We introduced our environmental management system in 1998 to coordinate and control operational environmental management. We implement the requirements of the respective management standard and have them confirmed by external audits. The aim is to improve the company's environmental performance on a continuous basis and to reduce the environmental impacts along the value chain.

A core element of the environmental management system is waste management. We promote the recycling of materials by systematically collecting hazardous and non-hazardous waste and mixtures (e.g. municipal waste) separately.

As an essential topic in our sustainability strategy (field of action 4), we have formulated various strategic measures with which we aim to reduce municipal waste:

- Ensure correct sorting
- Reduce material use
- Minimize storage sizes
- Optimize material flows

The volume of mixed municipal waste was reduced by 8% in 2021 compared to the previous year and amounted to 187 tons. This means that we have already achieved our strategic objective for 2024 in 2021. At the same time as preparing this DNK declaration, we are also developing a new strategic goal for the coming years. We continue to document and analyze the quantities of waste produced as part of the evaluation of key figures.

Overall, we see further potential in better waste separation. At present, municipal waste is sent to a pre-treatment plant to remove the recyclables it contains. We want to avoid this step in the future and improve sorting on the premises of Bundesdruckerei GmbH.

Due to the Coronavirus pandemic, in 2021 no targeted technical measures were implemented to reduce the volume of waste, as the employees were largely working from home.

### **Energy management**

As a production company, energy is a key issue for the Bundesdruckerei Group. The Bundesdruckerei Group released two strategic goals in 2021 based on the "Energy Efficiency Strategy 2050" and the "German Sustainability Strategy" published by the German government and subsequently communicated them throughout the Group.

Firstly, we want to reduce primary energy demand by 1.5% per year in the period 2021 to 2025, compared to the base year 2019. We want to achieve this through efficient use of resources and energy. In practical terms, this means promoting digital structures, innovative technologies and process data acquisition as well as the associated possibilities of intelligent process control.

Secondly, we are striving for the gradual expansion of a sustainable energy supply through the use, creation, participation and support of renewable energy plants. This goal helps to increase independence, transparency and cost efficiency in energy provision. Further efforts are needed in these areas to be able to achieve the goals. In 2022, for example, we will provide the Energy Management department with more resources in order to counteract the current increasing trend in primary energy demand, among other things.

Both goals are linked to tangible measures and key figures that are used to monitor and steer them. They are incorporated into our externally certified energy management system in accordance with ISO 50001. We are constantly refining the energy assessment required by the ISO standard. This will enable



us better to derive the relevant energy use areas and set new priorities.

We have already identified the first significant areas of energy use using potential analyses. For us, these are building operations with ventilation and air-conditioning systems and production operations with industrial machinery. Experts from both fields will identify savings measures and implement them together. We are also benefiting from the know-how gained through collaborations with specialized research institutes.

We are relying on expanding the metering infrastructure and using digital tools to ensure the highest possible process data transparency. Our aim is to identify energy consumption patterns and associated savings potential, from which other areas of the company can then benefit. More specifically, we initiated a pilot phase with a Big Data tool in 2021.

## Key Performance Indicators to criteria 11 to 12

Key Performance Indicator GRI SRS-301-1: Materials used

The reporting organization shall report the following information:

**a.** Total weight or volume of materials that are used to produce and package the organization's primary products and services during the reporting period, by:

**i.** non-renewable materials used;

**ii.** renewable materials used.

Materials used by Bundesdruckerei GmbH are raw materials, auxiliary materials and supplies, such as inks, foils, paper-like packaging material, hazardous materials and paper. Due to the Bundesdruckerei Group's extensive product portfolio, it is not possible to provide any further aggregated information on the quantities of materials used at this point. The future disclosure of this information will be reviewed in the course of the introduction of new processes for the collection of relevant sustainability indicators.

Key Performance Indicator GRI SRS-302-1: Energy consumption  
The reporting organization shall report the following information:

**a.** Total fuel consumption within the organization from non-renewable sources, in joules or multiples, and including fuel types used.

**b.** Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.

**c.** In joules, watt-hours or multiples, the total:

**i.** electricity consumption

**ii.** heating consumption

**iii.** cooling consumption

**iv.** steam consumption

**d.** In joules, watt-hours or multiples, the total:

**i.** electricity sold

**ii.** heating sold

**iii.** cooling sold

**iv.** steam sold

**e.** Total energy consumption within the organization, in joules or multiples.

**f.** Standards, methodologies, assumptions, and/or calculation tools used.

**g.** Source of the conversion factors used.

Energy consumption   Bundesdruckerei Group (in kWh)	2019	2020	2021
Electricity	25.703.496	24.965.325	26.546.843
Natural gas	1.884.758	1.567.441	1.670.552
District heating	16.477.914	15.178.093	17.923.701
Fuel oil	635.260	545.088	556.539
Diesel consumption	1.269.803	1.086.810	726.376
Gasoline consumption	389.778	494.136	709.706

\* Figures for 2019 have subsequently been corrected.

Electricity consumption in 2021 increased by approximately 6% compared to the previous year, heat consumption by as much as approximately 18%. The reasons for this were not only the weather conditions – responsible for around 13% of the increase in heat consumption – but also the renewed increase in production volumes as well as the increase

in energy consumption due to the greatly increased level of air replacement as a result of the anti-covid measures in the company.

The share of plug-in hybrids (PHEV) in our vehicle fleet has increased significantly since 2019. With very few exceptions, most PHEVs are equipped with a gasoline engine, so the switch from diesel to PHEV is also accompanied by a shift to gasoline fuel. At the same time, the pandemic has led to an increase in private transport by car, which explains the sharp rise in gasoline consumption.

#### Key Performance Indicator GRI SRS-302-4: Reduction of energy consumption

The reporting organization shall report the following information:

**a.** Amount of reductions in energy consumption achieved as a direct result of conservation and efficiency initiatives, in joules or multiples.

**b.** Types of energy included in the reductions; whether fuel, electricity, heating, cooling, steam, or all.

**c.** Basis for calculating reductions in energy consumption, such as base year or baseline, including the rationale for choosing it.

**d.** Standards, methodologies, assumptions, and/or calculation tools used.

The Bundesdruckerei Group's main energy sources are electricity and district heating. Our first strategic goal is to reduce primary energy consumption by 1.5% per year between 2021 and 2025 (in relation to 2019). Here we distinguish between primary and secondary energy consumption.

In this reporting year, we did not manage to stick to this target trajectory. As mentioned above, there are three reasons for this: (1) increase in production, (2) weather and (3) energy consumption by ventilation systems (anti-covid measures).

Energy consumption   Bundesdruckerei Group (in kWh)	2019	2020	2021
Energy consumption*	46.361.009	43.836.893	48.133.717
Primary energy consumption**	56.869.937	55.573.872	59.622.951

\* Energy consumption according to energy utility billing

\*\* Primary energy consumption takes into account the upstream process chain (extraction, conversion, distribution)

Key Performance Indicator GRI SRS-303-3: Water withdrawal  
The reporting organization shall report the following information:

- a.** Total water withdrawal from all areas in megaliters, and a breakdown of this total by the following sources, if applicable:
  - i.** Surface water;
  - ii.** Groundwater;
  - iii.** Seawater;
  - iv.** Produced water;
  - v.** Third-party water.
- b.** Total water withdrawal from all areas with water stress in megaliters, and a breakdown of this total by the following sources, if applicable:
  - i.** Surface water;
  - ii.** Groundwater;
  - iii.** Seawater;
  - iv.** Produced water;
  - v.** Third-party water, and a breakdown of this total by the withdrawal sources listed in i-iv.
- c.** A breakdown of total water withdrawal from each of the sources listed in Disclosures 303-3-a and 303-3-b in megaliters by the following categories:
  - i.** Freshwater ( $\leq 1,000$  mg/L Total Dissolved Solids);
  - ii.** Other water ( $> 1,000$  mg/L Total Dissolved Solids).
- d.** Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used.

Water withdrawal   Bundesdruckerei Gruppe GmbH, Bundesdruckerei GmbH and D-Trust GmbH	2019	2020	2021
Water withdrawal (in m³)	37.580	31.005	30.718

Water withdrawal decreased by about 3% compared to the previous year due to the pandemic, as employees worked less often at our premises as a result of mobile working arrangements.

Key Performance Indicator GRI SRS-306-3: Waste generated  
The reporting organization shall report the following information:

- a. Total weight of waste generated in metric tons, and a breakdown of this total by composition of the waste.
- b. Contextual information necessary to understand the data and how the data has been compiled.

Waste generation   Bundesdruckerei Gruppe GmbH, Bundesdruckerei GmbH and D-Trust GmbH	2019	2020	2021
Hazardous waste (in t)	91,8	102,8	71,0
Non-hazardous waste (in t)	1.888	1.696	1.910
Separate collection rate (in % - target 90%)	69,8	75,3	84,0

Compared to the previous year, the total amount of waste (excluding construction and demolition waste) decreased by 10%. The separate collection rate increased by 8.7% to 84% in 2021. We have therefore taken a clear step towards the legally mandated 90% separate collection rate. The latter is due to the high number of employees working from home. This has resulted in less municipal waste. Separately collected municipal waste increased in 2021 due to increased production. With regard to hazardous substances, we continuously carry out substitution tests.

## 13. Climate-Relevant Emissions

The company discloses the GHG emissions in accordance with the Greenhouse Gas (GHG) Protocol or standards based on it and states the goals it has set itself to reduce emissions, as well as its results thus far.

### Strategic climate protection

Protecting our climate is a high priority for the Bundesdruckerei Group. As a federal enterprise, we are committed to contributing to the climate protection goals adopted by the federal government (Energy Efficiency Strategy 2050 and German Sustainability Strategy). When it comes to climate protection, we also follow the principles of avoiding, reducing and compensating. We offset unavoidable emissions through recognized climate protection projects. Having adopted the goal of saving greenhouse gas (GHG) emissions and subsequently offsetting remaining GHG emissions in 2019, the issue has taken on vital

importance and has been elevated to Group level as a strategic corporate goal for the reporting year 2021 (see criterion 12). Accordingly, we aim to reduce our GHG emissions, measured in CO<sub>2</sub> equivalents (CO<sub>2</sub>e), on a permanent basis. In 2020, we also developed and adopted a new strategic goal within the framework of the ISO 50001 energy management system. The goal indicates the greenhouse gas intensity (GHG intensity) of the business activity, with reference to the Bundesdruckerei Group. Consequently, we aim to reduce the GHG intensity of our business activities by 5% by 2023 compared with 2018 and offset the remaining emissions through climate protection projects. This goal applies to the entire Bundesdruckerei Group. In 2021, we again offset our unavoidable CO<sub>2</sub> emissions. We offset a total of 3,643 t CO<sub>2</sub>e in the reporting year through projects that have been awarded the respected "Gold Standard" by the Swiss non-profit certification company of the same name. We support two climate protection projects in cooperation with "Klima ohne Grenzen gGmbH". The majority (3,543 t CO<sub>2</sub>e) of the offsetting went to the "Efficient cooking stoves for sustainable development" project in East Africa, while the remaining 100 t CO<sub>2</sub>e were offset through the German project 'Rewetting of the Königsmoor' in Schleswig-Holstein.

### GHG footprint

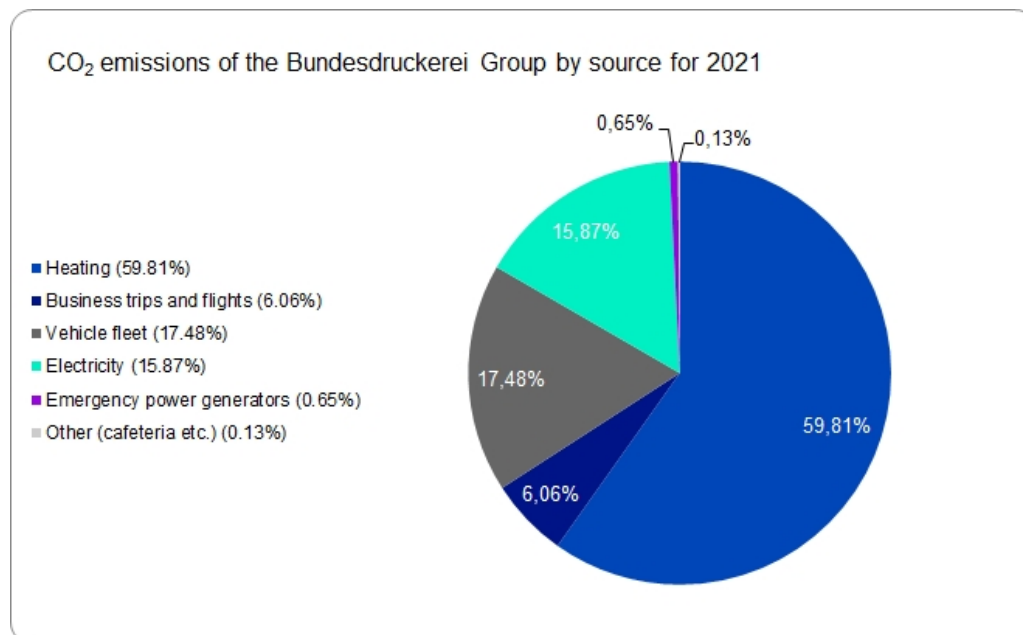
Compiling a report on the Group's Corporate Carbon Footprint (CCF) is an essential part of environmental management. The Bundesdruckerei Group has already been calculating this since 2015 and follows the recommendations of the Greenhouse Gas (GHG) Protocol. We use this as a basis to derive practical measures for each of the results in the respective scopes. In the coming years, we are aiming for a successive improvement of the Scope 3 analysis, as we currently only take into account business travel by air and rental car. The GHG emissions of the Bundesdruckerei Group amounted to 2,161 t CO<sub>2</sub>e in 2021. Compared to 2020, this equates to a reduction of 40.67%. This decrease is mainly due to the new CO<sub>2</sub> factor for district heating and the sharp drop in travel (in the form of flights) as a result of the Coronavirus pandemic.

Greenhouse gas intensity of the Bundesdruckerei Group	2019	2020	2021*
Greenhouse gas intensity (in g CO <sub>2</sub> e/€)	8,75	6,41	3,37

### Most important sources of emissions

Based on our largest sources of emissions (see illustration below), we especially aim to reduce emissions from our heat purchases in the coming years. In an effort to reduce district heating and gas consumption further, the companies of the Bundesdruckerei Group are striving to optimize their heating systems. We want to make a decisive contribution to reducing our GHG

emissions by increasing the use of renewable energy sources, which we have formulated as a strategic goal (see above). Bundesdruckerei GmbH, D-Trust GmbH and genua GmbH purchased 100% green electricity in this reporting year. This resulted in GHG emissions savings of 11,150 t CO<sub>2</sub>e compared to the normal electricity mix. We source a proportion of renewable electricity directly from Germany to support the German energy transition. From 2022, all Maurer GmbH sites will also have switched to green electricity.



### Sustainable mobility

With the increased use of video conferencing, we also succeeded in significantly reducing the number of business trips by air even before the Coronavirus pandemic (Scope 3 – Air travel of the Bundesdruckerei Group 2019: 1,829 t CO<sub>2</sub>e). In the pandemic year of 2020, emissions resulting from business travel fell by approximately 80% to 401.1 t CO<sub>2</sub>e. We have therefore continued to pursue this strategy even after the acute phase of the pandemic and have made greater use of digital meetings, conferences and training across the Group in 2021. As a result, we were once again able to reduce CO<sub>2</sub> emissions significantly: business travel and flights generated a total of 131.0 t CO<sub>2</sub>e in 2021 – around 30% less than in 2020.

In order to reduce the fuel consumption of its vehicle fleet, the Bundesdruckerei Group procures its vehicles in accordance with an internal guideline for a low-CO<sub>2</sub> vehicle fleet. The procurement of hybrid and electric vehicles is expressly desired, insofar as this makes financial sense and is appropriate for the planned usage pattern. In addition, the Bundesdruckerei Group offers its employees financial incentives to choose particularly low-emission company cars. Now 62% of the Bundesdruckerei Group's fleet is either purely electric or has a plug-in hybrid engine. This means that our fleet

CO<sub>2</sub> emissions are around 72 g/km, while the EU directive specifies a maximum of 95 g/km.

We are currently working on a new corporate mobility management system. As part of a pilot project with Berliner Verkehrsbetriebe (BVG), we tested the roll-out and acceptance of the BVG app Jelbi in the 2021 reporting year. The app combines all of Berlin's mobility services on one platform and is currently only available to private individuals. In the business version, the companies provide their employees with a mobility quota for free personal use; in our pilot, 75 employees were able to test the mobility budget for bike, scooter and moped sharing, conventional Berlin public transport services and taxi rides. As a federal enterprise, we want to promote sustainable mobility behavior in our workforce with this promising project and reduce our GHG emissions (Scope 3) at the same time. In 2022, we will incorporate the experiences from the Jelbi pilot into a new sustainable mobility concept.

Many of our employees also use bicycles to get to work. In order to motivate even more employees to use bikes, the Bundesdruckerei Group is joining forces with a specialised mobility service provider and leases employees their personal dream bike. There are no limits on how the bicycles can be used: for work, in everyday life, on holiday or for sport. The monthly installments are automatically deducted from the gross salary over a period of 36 months. By partnering with a mobility service provider, employees can save up to 40% compared to the traditional purchase price thanks to tax incentives.

#### **Notes for data presentation**

The following comments apply to the presentation of our emissions (see performance indicators for criterion 13):

- In accordance with the GHG Protocol, the Bundesdruckerei Group takes into account the greenhouse gases carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PCFs) and sulfur hexafluoride (SF<sub>6</sub>) in its carbon balance measured in CO<sub>2</sub> equivalent (CO<sub>2</sub>e)
- The base year for the calculation is 2021
- The emission factors required for the calculation of the CO<sub>2</sub> balance, including the respective global warming potential (GWP) rates, are taken from recognized databases (e.g., GEMIS) or requested from utilities for a market-based calculation
- The selection of emission factors is as specific as possible



## Key Performance Indicators to criteria 13

Key Performance Indicator GRI SRS-305-1: Direct (Scope 1) GHG emissions

The reporting organization shall report the following information:

**a.** Gross direct (Scope 1) GHG emissions in metric tons of CO<sub>2</sub> equivalent.

**b.** Gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub> or all.

**c.** Biogenic CO<sub>2</sub> emissions in metric tons of CO<sub>2</sub> equivalent.

**d.** Base year for the calculation, if applicable, including:

**i.** the rationale for choosing it;

**ii.** emissions in the base year;

**iii.** the context for any significant changes in emissions that triggered recalculations of base year emissions.

**e.** Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.

**f.** Consolidation approach for emissions; whether equity share, financial control, or operational control.

**g.** Standards, methodologies, assumptions, and/or calculation tools used.

Scope 1 emissions of the Bundesdruckerei Group in tonnes of CO <sub>2</sub> e	2019	2020	2021
Bundesdruckerei Gruppe GmbH*	–	–	0,0
Bundesdruckerei GmbH	449,5	425,1	382,7
Maurer Electronics GmbH (incl. Maurer Electronics Split d.o.o.)	0,0	0,0	0,0
D-Trust GmbH**	0,9	0,0	0,9
genua GmbH	3,5	2,5	2,3
iNCO SpóÅ,ka z o.o.	9,3	5,7	8,2
<b>Overall</b>	<b>463,2</b>	<b>433,3</b>	<b>394,1</b>

*\*The GHG emissions of Bundesdruckerei Group GmbH have only been collected since the 2021 reporting year.*

**\*\* The total value of Scope 1 emissions for D-Trust GmbH 2021 was 0.95 t CO<sub>2</sub>e and was rounded down to 0.9 t CO<sub>2</sub>e here for presentation reasons.**

## Key Performance Indicator GRI SRS-305-2: Energy indirect (Scope 2) GHG emissions

The reporting organization shall report the following information:

**a.** Gross location-based energy indirect (Scope 2) GHG emissions in metric tons of CO<sub>2</sub> equivalent.

**b.** If applicable, gross market-based energy indirect (Scope 2) GHG emissions in metric tons of CO<sub>2</sub> equivalent.

**c.** If available, the gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all.

**d.** Base year for the calculation, if applicable, including:

**i.** the rationale for choosing it;

**ii.** emissions in the base year;

**iii.** the context for any significant changes in emissions that triggered recalculations of base year emissions.

**e.** Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.

**f.** Consolidation approach for emissions; whether equity share, financial control, or operational control.

**g.** Standards, methodologies, assumptions, and/or calculation tools used.

<b>Scope 2 emissions of the Bundesdruckerei Group in tonnes of CO<sub>2</sub>e</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Bundesdruckerei Gruppe GmbH*	–	–	0,0
Bundesdruckerei GmbH	2.407,1	2.175,3	1.042,3
Maurer Electronics GmbH (incl. Maurer Electronics Split d.o.o.)	346,1	345,2	334,4
D-Trust GmbH	20,8	19,3	7,9
genua GmbH	108,6	161,9	122,1
iNCO SpóÅ,ka z o.o.	97,5	106,9	129,6
<b>Overall</b>	<b>2.980,1</b>	<b>2.808,6</b>	<b>1.636,3</b>

**\*The GHG emissions of Bundesdruckerei Group GmbH have only been collected since the 2021 reporting year.**

Key Performance Indicator GRI SRS-305-3: Other indirect (Scope 3) GHG emissions

The reporting organization shall report the following information:

**a.** Gross other indirect (Scope 3) GHG emissions in metric tons of CO<sub>2</sub> equivalent.

**b.** If available, the gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all.

**c.** Biogenic CO<sub>2</sub> emissions in metric tons of CO<sub>2</sub> equivalent.

**d.** Other indirect (Scope 3) GHG emissions categories and activities included in the calculation.

**e.** Base year for the calculation, if applicable, including:

**i.** the rationale for choosing it;

**ii.** emissions in the base year;

**iii.** the context for any significant changes in emissions that triggered recalculations of base year emissions.

**f.** Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.

**g.** Standards, methodologies, assumptions, and/or calculation tools used.

Scope 3 emissions of the Bundesdruckerei Group in tonnes of CO <sub>2</sub> e	2019	2020	2021
Bundesdruckerei Gruppe GmbH*	–	–	8,5
Bundesdruckerei GmbH	1.090,5	240,3	86,0
Maurer Electronics GmbH (incl. Maurer Electronics Split d.o.o.)	32,7	10,6	8,1
D-Trust GmbH	53,5	11,7	1,5
genua GmbH	651,3	138,4	26,6
iNCO SpóÅ,ka z o.o.	1,1	0,0	0,3
<b>Overall</b>	<b>1.829,1</b>	<b>401,0</b>	<b>131,0</b>

*\*The GHG emissions of Bundesdruckerei Group GmbH have only been collected since the 2021 reporting year.*

Key Performance Indicator GRI SRS-305-5: Reduction of GHG emissions

The reporting organization shall report the following information:

- a.** GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO<sub>2</sub> equivalent.
- b.** Gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all.
- c.** Base year or baseline, including the rationale for choosing it.
- d.** Scopes in which reductions took place; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3).
- e.** Standards, methodologies, assumptions, and/or calculation tools used.

The base year for calculating the reduction in GHG emissions at the Bundesdruckerei Group is 2011. This was the first year in which a GHG balance sheet was drawn up. Included in the scope of this first assessment were Bundesdruckerei GmbH, D-Trust GmbH and Maurer Electronics GmbH with a total footprint of 15,103 t CO<sub>2</sub>e. In the current reporting year 2021, this total value for all subsidiaries was 2,161 t CO<sub>2</sub>e. Despite the expanded scope, this figure equates to a reduction of 86.7%.

**Note:**

The calculation of Scope 3 in 2011 used various sources, while in 2019 and 2020 only business travel by air was taken into account. In 2021, the use of rental cars was also factored into the calculation. For better comparability, the Scope 3 figure from 2011 was adjusted accordingly in the calculation of total emissions.

## Criteria 14–20 concerning SOCIETY

### Criteria 14–16 concerning EMPLOYEE-RELATED MATTERS

#### 14. Employment Rights

The company reports on how it complies with nationally and internationally recognised standards relating to employee rights as well as on how it fosters staff involvement in the company and in sustainability management, what goals it has set itself in this regard, what results it has achieved thus far and where it sees risks.

##### **Respect for workers' rights**

As an employer of 3,507 employees (as of December 31st, 2021), it is the strategic goal of the Bundesdruckerei Group to create long-term secure and attractive jobs (see field of action: 'Sustainable employer'). We are therefore committed to ensuring equal, social and fair working conditions for all employees as well as appropriate remuneration, and upholding employee rights.

We comply without exception with national and EU legal regulations for employment protection, protection against dismissal and co-determination (e.g., the General Equal Treatment Act and the Works Constitution Act) at all our premises in Germany. Furthermore, the entire Bundesdruckerei Group undertakes to comply with the rights for employees defined by the United Nations (e.g. through the UN Global Compact), the International Labor Organization and the Organization for Economic Cooperation beyond just its sites in Germany. This includes respect for human rights, the prevention of discrimination in employment and occupation, the right to a minimum wage and freedom of association.

Employees have the opportunity to report suspected violations of the law to their superiors, the relevant works councils or persons of trust within the HR department or via the whistleblowing system (see criterion 17) at any time. Managers are trained to deal with such reports so that employees can always turn to a reliable and competent contact person. Audit mechanisms in HR and occupational health and safety - documented in our AEU<sup>[1]</sup> management systems - ensure that employee concerns are met and associated potential risks, such as staff turnover and skills shortages, are minimized.

The strict legal requirements within the EU and Germany, the regular risk assessment in accordance with ISO 31000 and the Bundesdruckerei Group's strong commitment to safeguarding employee interests are among the factors that contributed to the fact that there were no significant risks in relation to the violation of employee rights in 2021. However, the outbreak of the Coronavirus pandemic in 2020 has necessitated numerous special health and safety measures and continued efforts to ensure the performance of the workforce in 2021:

- Expansion of our internal crisis response team to include relevant employees at Group level
- Continuous updating of the relevant risk assessment and the measures defined therein
- Special protection for at-risk individuals
- Continuation of our comprehensive preventive testing strategies (with PCR and antigen rapid tests) as well as setup of a separate vaccination program with vaccination offers for relatives as well
- Development of our internal Coronavirus hotline for employees, including its own contact tracing, into a general Health Hotline, which is managed by two employees.
- Permanent expansion of our internal counseling services for psychosocial issues
- Appointment of an additional company doctor
- Further formalization of mobile working (via VPN) and expansion of support services, e.g. through ergonomic workstation equipment for home use
- Expansion of our general support services, e.g. in the form of management and employee coaching (thematic focus on hybrid leadership, among others)
- Wide-ranging communication with the workforce and, in 2021, additional information formats to raise employee awareness of health and safety issues
- Work shift separation in production
- Various support services for employees aimed at reconciling family/care and work as well as maintaining health and performance (e.g. through digital sports and physical activity programs)

In addition, comprehensive health performance management (HPM) was introduced in 2020 as a cross-cutting initiative at Bundesdruckerei GmbH, D-Trust GmbH, Maurer Electronics GmbH and Bundesdruckerei Gruppe GmbH. Its measures contribute to the strategic goal of maintaining efficiency and motivation at work. HPM includes, for example, measures for employee development that follow changes in their employment and health situation, management development, occupational health and safety as well as prevention and rehabilitation. The HPM is linked to our ISO 45001 management system, which we implement as part of our integrated management approach for occupational health and safety, energy and

environment (AEU). The interdisciplinary Health Performance Management Circle is responsible for the operational goals of HPM and derives focus topics and measures from the annual employee survey, among other things, and develops them further.

### **Staff participation**

Further individual and demand-oriented measures for employee participation are also being rolled out in addition to regular surveys. These measures took place in a limited or digital form in 2021 due to the Coronavirus pandemic and were supplemented by new formats:

- Annual survey among our employees since 2021
- Continuation of our comprehensive value process, notably by means of a digital tool. This enables employees to organize virtual workshops with their teams in which they can reflect systematically on cooperation against the backdrop of the "new world of work" and the Group's values (*trust, respect, commitment, openness, courage*)
- Annual Campus Week (held in digital form in 2021) with lectures and workshops including activities for all employees on current topics and projects
- Townhall meetings for divisional managers, at which the senior management present the latest developments in the company
- Publications on our intranet sites and in our inhouse staff magazine @bdr for regular reporting (internal news, events and Covid updates)
- Our intranet, including the so-called tweet wall, as a central internal social platform for information, open exchange and participation

These formats are also used to involve and engage employees actively in the implementation of our sustainability program (see criteria 8, 9 and 16). Our officers for occupational safety, health management, energy management, environmental protection and waste management, for instance, are both contact persons and multipliers for their topics and are included each year in reporting for the Declaration of Compliance with the German Sustainability Code.

Our company suggestion scheme and idea management system also give employees at Bundesdruckerei GmbH the opportunity to initiate improvements - including for greater sustainability (e.g. an idea from 2021: reduction of the number of advertising catalogs sent out for products and services, primarily to conserve resources but also to save storage space).

---

[\[1\]](#) Occupational health and safety, energy efficiency and environmental protection (AEU)

## 15. Equal Opportunities

The company discloses in what way it has implemented national and international processes and what goals it has for the promotion of equal opportunities and diversity, occupational health and safety, participation rights, the integration of migrants and people with disabilities, fair pay as well as a work-life balance and how it will achieve these.

### **Equal opportunities for corporate success**

The Bundesdruckerei Group is aware of the importance of work-life balance<sup>[1]</sup> for strengthening equal opportunities and diversity (in all respects) for its own corporate success. The further development of a human resources policy based on life phases is designed to take into account the dynamic and hybrid world of work as well as social changes in order to attract and retain qualified employees in the long term. Our HR policy aims to create a family-oriented and inclusive corporate culture with a focus on preserving good health, solidarity with the Bundesdruckerei Group, motivation and the performance of our employees throughout their career.

Trust, respect, commitment, openness and courage are the values we live by in everyday life and which we adopted together with our employees in 2019. Bullying/bossing, sexual harassment as well as discrimination and derogatory behavior of any kind are strictly prohibited in the company agreement 'Social Behavior at Work'.

We ensure non-discriminatory pay for all employees by, for instance, applying collective agreements that are customary in the industry to the majority of our employees and by paying them in accordance with the prevailing market rates. We are also creating a framework for more transparency with regard to equal pay for men and women by implementing the Pay Transparency Act (see criterion 8).

In the interest of equal opportunities, it is important to us that we actively promote women in leadership positions. Our professed target was to have at least 30% of first and second tier managerial roles held by women by 2021. As of the reference year 2021, we have exceeded that target – including in the new organizational structure – with 45.8% of first tier management roles held by women and 32.7% in second tier roles at the Bundesdruckerei Group.

### **Family-friendliness and inclusion**

In order to offer an attractive, family-friendly and inclusive working environment, the above mentioned companies of the Bundesdruckerei Group implement a variety of measures:



- Flexible working time models, for instance, through part-time and flextime models as well as mobile working options
- Offering short-term help with childcare (e.g. daycare centers or emergency care) or with caring for family members who need long-term care or in crisis situations (e.g. 24-hour crisis hotline in cooperation with external partners)
- Occupational integration management (BEM) beyond the legal framework and provision of internal psychosocial counseling
- Enforced preventive measures for health performance management and occupational health and safety due to the Coronavirus pandemic (e.g. procurement of masks, testing strategy, vaccination program, targeted support services such as coaching for dealing with stress in the context of mobile working, etc.).
- Regular training and instruction in the handling of hazardous substances as well as risk assessments

Bundesdruckerei GmbH has also had a company agreement on the integration of severely disabled persons, on the implementation of corresponding measures and central representation for severely disabled persons since 2012. In 2021, our subsidiary genua GmbH was named one of the most family-friendly companies in Bavaria by the Bavarian State Ministry of Economic Affairs, Regional Development and Energy and the State Ministry of Family, Labor and Social Affairs with the *Erfolgreich.Familienfreundlich* ("Successful.Family-friendly") award. The deciding factors were the demand-oriented measures, such as the introduction of trust-based working time, the ability to organize working time independently and on one's own responsibility, and the company's own day care center. genua GmbH was also awarded Great Place to Work® certification in November 2021. For its part, Bundesdruckerei GmbH has been awarded the seal of the "Fair Company" initiative on account of the aforementioned extensive measures and progress made in the context of reconciling family and private life, and was awarded the *berufundfamilie* (Work and Family) certificate for the third time in a row in 2020 following a successful re-audit. As part of the 2020 audit and confirmed by the 2021 Implementation Report, the Bundesdruckerei Group has decided to introduce further measures in the following areas in the coming years:

- Flexible working (Work 4.0)
- Empowering employees with regard to the digital strategy
- Mindfulness in the dynamic and hybrid world of work
- New forms of collaboration
- Healthy working practices
- Support for employees with family and care responsibilities

These planned measures are intended to contribute to the strategic goal of promoting a work-life balance and ensuring our employees are productive and in good health. This also includes working on a Group-wide support system in the next few years. Family-friendliness and inclusion will therefore continue to

be developed in employer branding as well as in the context of staff recruitment at Group level with a common employer promise.

<sup>[1]</sup> Family is defined as any situation where responsibility is shouldered (upbringing, relationship or care), in particular for partners, children or relatives.

## 16. Qualifications

The company discloses what goals it has set and what measures it has taken to promote the employability of all employees, i.e. the ability of all employees to participate in the working and professional world, and in view of adapting to demographic change, and where risks are seen.

### **Lifelong learning as a principle for the future**

As an important employer and training company, we are particularly committed to supporting and retaining our employees, boosting their performance and motivation to work, taking into account their employment and health biographies, and to designing their working environment in a socially fair and future-oriented manner. The Bundesdruckerei Group's declared strategic goal is therefore to further strengthen lifelong learning with the help of support programs and individual training and further education.

Each employee is unique and needs different framework conditions to be efficient and effective. Our aim is to use tailored concepts to promote the talents, skills and the will to achieve of each individual. Our human resources development therefore also focuses on the regular identification of individual qualification and training needs to provide specific further training for employees along with a range of entry-level opportunities for career starters. In addition, potential analyses are carried out on a needs-oriented basis. By regularly surveying qualification and training needs, we ensure that there are no significant risks related to (insufficient) qualifications.

Our training program includes internal basic and advanced qualification programs for all employees (e.g. on orientation and empowerment in the digital world of work, IT, project management and mindful working). This offering is supplemented by target group-specific formats (internal and external) and, since 2021, by the "study@bdr" program to promote vertical development (mindset transformation) among our employees in a targeted manner. In addition, our employees receive support for their qualification efforts through study financing, educational leave or scholarships. There is a special offer for managers in the form of the Leadership Program and for junior managers as part of the Development Center.

In 2021, our focus was again on demand-oriented and customized continuing education (e.g. through e-learning). It has been possible for employees to book these services digitally since 2019. The "Leaders Summit" was also held again with 120 participants. Due to the ongoing Coronavirus situation, there were also special offerings in 2021, such as employee coaching and crisis response coaching for managers.

Our employees also receive annual trainings (general compulsory instruction and job-related instruction, e.g. on laser and radiation protection). These regular trainings were supplemented by special instructions required during the Coronavirus pandemic. Regular training sessions are also held for safety officers, environmental protection officers, clearance assistants and energy officers, in addition to briefings on the AEU<sup>[1]</sup> management system.

### **Promotion of good health as a guiding principle**

Health Performance Management interfaced with our integrated management system combines medical occupational health and safety with employee health promotion and forms part of the Bundesdruckerei Group's strategic goal of maintaining performance and work motivation. To this end, numerous offers are available to all employees of the Bundesdruckerei Group:

- Internal seminars for employees to promote health literacy, e.g., on the topic of mindfulness ('Search Inside Yourself')
- Various digital exercise offerings such as Pilates, back fitness, yoga and Qi Gong
- The 'active break' at the (mobile) workplace during working hours
- Cooperation with external partners such as fitness studios
- Ergonomics advice at the (mobile) workplace
- Cooperation with a mobility service provider to offer targeted bicycle leasing offers for the commute to work, in everyday life or for sports
- Needs-oriented and targeted further development of the leadership program
- Formats for internal knowledge transfer

For employees who are absent for a longer period of time due to illness, we look for the best possible solutions together with those affected within the framework of our occupational integration management (BEM) - if necessary with the involvement of company doctors - in order to restore their ability to work. The BEM team dealing with internal psychosocial counseling was strengthened by the addition of a Case Manager in 2021. All Bundesdruckerei GmbH, D-Trust GmbH and Maurer Electronics GmbH employees can also make use of the BEM service as a preventive measure, before absences due to illness occur. We also support employees with health problems wherever possible with individual, technical and organizational measures such as ergonomic and rehabilitative adjustments to the workplace, technical equipment for the visually impaired, job coaching or special shoes for people with diabetes. Peer

---

addiction counselors are also on hand to help any employees with questions about substance abuse and addiction prevention. In 2021, three more peer addiction counselors started their training and it is planned that one more will be available for senior staff in 2022.

In order to reduce the risk of accidents at work, we have implemented a number of measures to increase safety on the way to work by bike, e.g. safety training, repair checks and provision of safety equipment. All accidents at work, on the way to work and near misses are comprehensively analyzed in order to eliminate potential hazards – wherever possible – and raise awareness.

---

[\[1\]](#) Occupational health and safety, energy efficiency and environmental protection (AEU)

## Key Performance Indicators to criteria 14 to 16

---

Key Performance Indicator GRI SRS-403-9: Work-related injuries  
The reporting organization shall report the following information:

**a.** For all employees:

- i.** The number and rate of fatalities as a result of work-related injury;
- ii.** The number and rate of high-consequence work-related injuries (excluding fatalities);
- iii.** The number and rate of recordable work-related injuries;
- iv.** The main types of work-related injury;
- v.** The number of hours worked.

**b.** For all workers who are not employees but whose work and/or workplace is controlled by the organization:

- i.** The number and rate of fatalities as a result of work-related injury;
- ii.** The number and rate of high-consequence work-related injuries (excluding fatalities);
- iii.** The number and rate of recordable work-related injuries;
- iv.** The main types of work-related injury;
- v.** The number of hours worked.

**You will find the remaining numbers c-g of the indicator SRS 403-9 in the GRI standard and may additionally report them here.**

Key Performance Indicator GRI SRS-403-10: Work-related ill health

The reporting organization shall report the following information:

**a.** For all employees:

- i.** The number of fatalities as a result of work-related ill health;
- ii.** The number of cases of recordable work-related ill health;
- iii.** The main types of work-related ill health.

**b.** For all workers who are not employees but whose work and/or workplace is controlled by the organization:

- i.** The number of fatalities as a result of work-related ill health;
- ii.** The number of cases of recordable work-related ill health;
- iii.** The main types of work-related ill health.

**You will find the remaining numbers c-e of the indicator SRS 403-10 in the GRI standard and may additionally report them here.**

<b>Workplace health and safety: Workplace accidents</b>	
<b>Reportable workplace accidents (&gt;3 days lost)</b>	
<b>Workplace accidents (1-3 days lost)</b>	
<b>Reportable workplace accidents per 1,000 employees</b>	
<b>Fatal workplace accidents</b>	
<b>Reportable commuting accidents (&gt;3 days lost)</b>	
<b>Commuting accidents (1-3 days lost)</b>	
<b>Reportable commuting accidents per 1,000 employees</b>	
<b>Medical emergencies</b>	
<b>Near misses</b>	

The sickness rate is used by the Bundesdruckerei Group to record all long-term and short-term illnesses (with and without a medical certificate) as well as any days of absence due to rehabilitation measures (e.g. spa stays). Work-related illness is also included in the sickness rate. However, since they account for a relatively small proportion of the sickness rate, they are not shown separately.

<b>Sickness rate in % by company</b> (Planned working time 220 days/year)	<b>2019</b>	<b>2020</b>	<b>2021</b>
Bundesdruckerei GmbH	8,5	7,3	6,4
D-Trust GmbH	7,4	4,3	4,4
Maurer Electronics GmbH	5,2	3,0	2,5
Maurer Split d.o.o.	No data	No data	3,0
genau GmbH	No data	No data	4,0
iNCO Sp. z o.o.	No data	No data	5,7

The sickness rate at the Bundesdruckerei Group was lower in 2021 than in 2020 (in relation to all Group companies on average: 6.7% in 2020 and 5.7% in 2021). Only at D-Trust GmbH did it increase slightly (0.1%). Both developments are due in part to the Coronavirus pandemic, which continued to unfold dynamically in 2021. The sickness rate for the subsidiaries Maurer Split

d.o.o., genua GmbH and INCO Sp. z o.o. was recorded at Group level for the first time in 2021, which is why no comparative values are yet available. At the same time, it was possible to build up qualified staff in a wide range of fields in the reporting year 2021 (full-time equivalent in 2021: 196).

**Main types of illness:**

The Bundesdruckerei Group and its employees represent a cross-section of the population and job profiles, not least due to their respective size. The illnesses are therefore congruent with the illnesses reported by the statutory health insurance companies.

Key Performance Indicator GRI SRS-403-4: Worker participation on occupational health and safety

The reporting organization shall report the following information for employees and for workers who are not employees but whose work and/or workplace is controlled by the organization:

**a.** A description of the processes for worker participation and consultation in the development, implementation, and evaluation of the occupational health and safety management system, and for providing access to and communicating relevant information on occupational health and safety to workers.

**b.** Where formal joint management-worker health and safety committees exist, a description of their responsibilities, meeting frequency, decision-making authority, and whether and, if so, why any workers are not represented by these committees.

As required by law, the works council of Bundesdruckerei GmbH is involved in matters of occupational health and safety, as well as occupational safety and accident prevention and has established a works council committee for occupational health and safety, ergonomics, health, addiction and environmental protection for this purpose. The senior occupational safety specialist organizes occupational safety committee meetings four times a year. Here, the occupational safety representatives, works councils and other participants come together to develop, implement and perform assessments of occupational safety and health management.

An intranet page, which is available online to all employees, is used for internal communication on occupational safety and health protection. Other elements of internal information and communication include information provided in company meetings and internal training, as well as the annual evaluation of the AEU management system. Bundesdruckerei GmbH also gives its employees the opportunity to contribute ideas for improvements and innovations in the field of occupational health and safety with its idea management or company suggestion scheme (see criteria 8 and 14).

Key Performance Indicator GRI SRS-404-1: Average hours of training

The reporting organization shall report the following information:

**a.** Average hours of training that the organization's employees have undertaken during the reporting period, by:

**i.** gender;

**ii.** employee category.

The following data for 2019 and 2020 refer to Bundesdruckerei GmbH, D-Trust GmbH, Maurer Electronics GmbH (without Maurer Split d.o.o.) and INCO SpóÅ,ka z o.o.; for 2021, the data refer to the entire Bundesdruckerei Group:

Average number of days for education and training	2019	2020	2021
Training days (total)	4.267	763	4.441

A

subdivision by sex and employee category is not taken into account in the data collection, as qualification and further training are considered independent of hierarchy.

The number of training days increased in 2021 compared to 2020, mainly because the training days provided by Maurer Split d.o.o. and genua GmbH (a total of 2,235 days) were included for the first time. But even without the data from Maurer Split d.o.o. and genua GmbH, the number of training days doubled compared to the previous year, as digital courses were increasingly and systematically provided. However, due to the ongoing Coronavirus pandemic, the number of training days has still not reached the same level as in 2019.



Key Performance Indicator GRI SRS-405-1: Diversity

The reporting organization shall report the following information:

**a.** Percentage of individuals within the organization's governance bodies in each of the following diversity categories:

**i.** Gender;

**ii.** Age group: under 30 years old, 30-50 years old, over 50 years old;

**iii.** Other indicators of diversity where relevant (such as minority or vulnerable groups).

**b.** Percentage of employees per employee category in each of the following diversity categories:

**i.** Gender;

**ii.** Age group: under 30 years old, 30-50 years old, over 50 years old;

**iii.** Other indicators of diversity where relevant (such as minority or vulnerable groups).

Composition of the main bodies of the Bundesdruckerei Group:

---

<b>Managing directors</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	
Males	2	2	2	
Females	0	0	0	
<b>Overall</b>	<b>2</b>	<b>2</b>	<b>2</b>	
<b>Age structure</b>				
Under 30	0	0	0	
30-50 years	0	0	0	
Over 50	2	2	2	
<b>Number of different nationalities*</b>				
	1	1	1	
<b>Supervisory board</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	
Males	9	9	6	
Females	3	3	6	
<b>Overall</b>	<b>12</b>	<b>12</b>	<b>12</b>	
<b>Age structure</b>				
Under 30	0	0	0	
30-50 years	0	0	2	
Over 50	12	12	10	
<b>Number of different nationalities*</b>				
	1	1	1	

Composition of the workforce of Bundesdruckerei GmbH, D-Trust GmbH and Bundesdruckerei Gruppe GmbH (excluding Maurer Electronics GmbH and Maurer Split d.o.o., genua GmbH and iNCO SpóÅ,ka z o.o.) for 2019 and 2020 and composition of the workforce of the entire Bundesdruckerei Group for 2021:

<b>Senior employees</b>	<b>2019</b>	<b>2020</b>	<b>2021</b> (Group-wide for the first time)	
Males	35	30	37	

Females	13	13	18	
<b>Overall</b>	<b>48</b>	<b>43</b>	<b>55</b>	
<b>Age structure</b>				
Under 30	0	0	0	
30-50 years	17	17	31	
Over 50	31	26	24	
<b>Number of different nationalities*</b>				
	1	1	1	
<b>Staff members</b>	<b>2019</b>	<b>2020</b>	<b>2021</b> (Group-wide for the first time)	
Males	1.050	1.039	1.726	
Females	591	627	959	
<b>Overall</b>	<b>1.641</b>	<b>1.666</b>	<b>2.685</b>	
<b>Age structure</b>				
Under 30	188	181	414	
30-50 years	952	1,003	1,579	
Over 50	501	482	692	
<b>Number of different nationalities*</b>				
	23	31	33	
<b>Employees</b>	<b>2019</b>	<b>2020</b>	<b>2021</b> (Group-wide for the first time)	
Males	541	556	526	
Females	289	261	239	
<b>Overall</b>	<b>830</b>	<b>817</b>	<b>765</b>	
<b>Age structure</b>				
Under 30	131	102	85	
30-50 years	184	307	297	
Over 50	415	408	383	

Number of different nationalities*					
		16	13	11	

*\*Note: The number of different nationalities mentioned refers in each case to the company with the largest number of different nationalities (in this case: Bundesdruckerei GmbH).*

The average length of employment at the Bundesdruckerei Group (weighted by subsidiaries) was recorded for the first time in 2021 and amounts to 10.1 years.

## Key Performance Indicator GRI SRS-406-1: Incidents of discrimination

The reporting organization shall report the following information:

**a.** Total number of incidents of discrimination during the reporting period.

**b.** Status of the incidents and actions taken with reference to the following:

- i.** Incident reviewed by the organization;
- ii.** Remediation plans being implemented;
- iii.** Remediation plans that have been implemented, with results reviewed through routine internal management review processes;
- iv.** Incident no longer subject to action.

Under the terms of our company agreement entitled "Social behavior at the workplace", the management and employee representatives of Bundesdruckerei GmbH promote a working atmosphere characterized by an open, fair and solution-oriented approach to conflicts of all kinds. In the event of a conflict, employees are encouraged to address it openly or report it via our anonymous whistleblowing system on the respective company websites (see criterion 17).

Clearly defined processes are in place for dealing with incidents of discrimination. In the event of a conflict, employees can turn to various contact persons in the Human Resources department so that an amicable solution can then be sought together to resolve the conflict. The aim is to use a defined conflict management process to...

- ...maintain performance, motivation and peace at the workplace
- ...create awareness of conflicts in the organization and their impact on teams and the company
- ...provide a clear framework for action that makes our values and attitudes towards conflict as a company clear and serves as a guide for employees
- ...undertake early assessment of potential conflicts and to avoid

unresolved and escalated conflicts.

In the event of repeated or particularly serious cases, measures will be taken following employment law. There were no reported cases of discrimination in the 2021 reporting period.

## Criterion 17 concerning RESPECT FOR HUMAN RIGHTS

### 17. Human Rights

The company discloses what measures it takes, strategies it pursues and targets it sets for itself and for the supply chain for ensuring that human rights are respected globally and that forced and child labour as well as all forms of exploitation are prevented. Information should also be provided on the results of the measures and on any relevant risks.

The Bundesdruckerei Group or persons acting on its behalf comply with the applicable laws and, in particular, respect the Basic Law of the Federal Republic of Germany, Article 1 of which enshrines respect for human rights as the paramount requirement. Our aim is to uphold human rights without exception. As part of our Compliance Management System (CMS), for which overall responsibility lies with the senior management, we conduct regular audits to ensure that suppliers, service providers and business partners also comply with their human rights due diligence obligations (see criterion 20). No negative human rights incidents were reported or identified in 2021.

We reaffirm our commitment to respecting human rights and rejecting child and forced labor throughout the Bundesdruckerei Group by means of the "Conduct within the company - Code of Conduct" guideline, which has also applied uniformly to our subsidiaries genua GmbH and the Croatian-based Maurer Electronics Split d.o.o. since autumn 2021. This guideline defines human rights standards across the board and lays them down in a uniform code of conduct. This refers specifically to Article 1 of the German Basic Law and the core employment standards of the International Labor Organization of the United Nations. Furthermore, in 2021 the Bundesdruckerei Group decided to appoint in 2022 a dedicated person to be responsible for human rights issues, thereby creating a governance structure to monitor human rights due diligence.

The Bundesdruckerei Group has been a member of the UN Global Compact

since December 2021 and is committed to upholding the initiative's ten universal principles. The purpose of the membership is to promote proactive engagement and exchange of experiences on "human rights and labor standards" within the network.

Around 95% of the suppliers, service providers and business partners with whom the Bundesdruckerei Group collaborates are based in Germany and the EU. Due to strict requirements and laws at national and European level, there are therefore no significant risks of our business activities or products having negative impacts on human rights. We also aim to fully meet our obligations with regard to immaterial risks and conduct risk-based compliance audits of suppliers and other business partners with a higher risk potential (e.g., with regard to the procurement of raw materials and supplies) and to report key findings to management on a quarterly basis. In addition, by agreeing to the General Terms and Conditions of Purchase, our suppliers undertake to comply with legal and social provisions (e.g., paying the minimum wage).

In the short term, we will expand the risk analysis in line with the requirements of the German Supply Chain Due Diligence Act (LkSG) in order to strengthen the human rights due diligence process and manage the identified risks accordingly. The relevant internal stakeholders (including the Procurement, Finance, Internal Audit, Corporate Sustainability and Compliance departments) of the Bundesdruckerei Group are closely involved in this process.

In 2020, the Bundesdruckerei Group introduced a central complaints mechanism on its website, which was extended to the websites of its subsidiaries in 2021. This web-based whistleblowing system enables direct and encrypted communication even with anonymous whistleblowers. Any employee or external business partner can use this system to report grievances and suspected cases of misconduct, including in relation to human rights aspects, under the highest level of protection. With this instrument, we ensure that our values and corporate principles are upheld and that the trust of our customers, partners and the public is maintained. Our "Code of Conduct for Business Partners" is available to the general public on our website in order to emphasize our expectations of our business partners to uphold human rights due diligence obligations.

## Key Performance Indicators to criteria 17

Key Performance Indicator GRI SRS-412-3: Investment agreements subject to human rights screenings

The reporting organization shall report the following information:

**a.** Total number and percentage of significant investment agreements and contracts that include human rights clauses or that underwent human rights screening.

**b.** The definition used for ‘significant investment agreements’.

In 2021, the Bundesdruckerei Group did not enter into any significant investment agreements or contracts in Germany or abroad, which meant that human rights audits were not necessary. There are two corporate investments in Poland and Croatia, and thus in the EU, in the form of INCO Spolka z o.o. and Maurer Electronics Split d.o.o.. Both companies are directly or indirectly 100% controlled by Bundesdruckerei Gruppe GmbH. The standards for respecting human rights are just as firmly established there as they are in all other subsidiaries.

The Bundesdruckerei Group considers significant investment agreements or contracts within the meaning of performance indicator GRI SRS-412-3 of the German Sustainability Code to be agreements or contracts for the acquisition of domestic or foreign companies or company shares of more than 50%.

Key Performance Indicator GRI SRS-412-1: Operations subject to human rights reviews

The reporting organization shall report the following information:

**a.** Total number and percentage of operations that have been subject to human rights reviews or human rights impact assessments, by country.

As the Bundesdruckerei Group does not operate any facilities outside the European Union, there were no specific human rights compliance audits in 2021 that go beyond the annual risk-based compliance audits and affect the business premises. There are no significant risks here for the Bundesdruckerei Group.

Key Performance Indicator GRI SRS-414-1: New suppliers subject to social screening

The reporting organization shall report the following information:

**a.** Percentage of new suppliers that were screened using social criteria.

95% of our suppliers are based in Germany or the EU and must therefore comply with strict national and European specifications and laws relating to human rights and social regulations. This performance indicator is therefore not relevant for the Bundesdruckerei Group. When signing a contract, suppliers to the Bundesdruckerei Group have to comply with the General Terms and Conditions of Purchase applicable to the respective location. In addition, compliance audits are carried out at regular intervals in accordance with internally defined rules for total annual order volumes of more than EUR 50,000 (net).

Key Performance Indicator GRI SRS-414-2: Social impacts in the supply chain

The reporting organization shall report the following information:

**a.** Number of suppliers assessed for social impacts.

**b.** Number of suppliers identified as having significant actual and potential negative social impacts.

**c.** Significant actual and potential negative social impacts identified in the supply chain.

**d.** Percentage of suppliers identified as having significant actual and potential negative social impacts with which improvements were agreed upon as a result of assessment.

**e.** Percentage of suppliers identified as having significant actual and potential negative social impacts with which relationships were terminated as a result of assessment, and why.

95% of our suppliers are based in Germany or the EU and must therefore comply with strict national and European specifications and laws relating to human rights and social regulations. This performance indicator is therefore not relevant for the Bundesdruckerei Group. When signing a contract, suppliers to the Bundesdruckerei Group have to comply with the General Terms and Conditions of Purchase applicable to the respective location. In addition, compliance audits are carried out at regular intervals in accordance with internally defined rules for total annual order volumes of more than EUR 50,000 (net).



## Criterion 18 concerning SOCIAL MATTERS

### 18. Corporate Citizenship

The company discloses how it contributes to corporate citizenship in the regions in which it conducts its core business activities.

The Bundesdruckerei Group wishes to contribute to establishing the greater Berlin area as a leading place for secure identities and as a driving force in the field of high-security technology in Germany. At the same time, we see it as our social responsibility to become involved in social and cultural causes in the region. We do this primarily within the framework of educational projects that help children and young people from socially disadvantaged backgrounds to develop their talents and their own identity. After all, we understand the importance of the question of identity for social cohesion and participation. The focus is on projects in the neighborhood around Bundesdruckerei GmbH in Berlin.

In recent years, the Bundesdruckerei Group has systematically expanded its commitment as well as its cash donations to educational projects. The Communications & Public Affairs department is responsible for coordinating our engagement activities. Due to the Coronavirus pandemic and the associated restricted access to and even closures of social and cultural institutions in 2020 and 2021, our employees were only able to get personally involved in social projects to a limited extent. Nevertheless, we implemented a considerable number of measures in 2021:

- Support for Straßenkinder e. V. with the BOLLE Children's and Youth Center and the integrated Kids Café in Berlin Marzahn
  - 100 spring care packages for homeless children (distributed by the street workers of Straßenkinder e. V.)
  - 200 winter care packages for homeless children including food and hygiene products (distributed by the street workers of Straßenkinder e. V.)
  - Craft packages as an alternative to the on-site craft session on the theme of spring for the BOLLE Children's and Youth Center, as well as a Halloween-themed craft afternoon at the BOLLE Children's and Youth Center
  - Annual Christmas campaign called *Gemeinsam erfüllen wir Kinderwünsche* ("Together we fulfil children's wishes"), in which the presents were again not handed over personally in 2021 due to contact restrictions, but sent to the BOLLE Children's and Youth Center instead

- Donation to the Kids Café in the BOLLE Children's and Youth Center and the "W17" drop-in center for street children in Warschauer Straße
- Financial support for the educational institution StreetUniverCity towards facilitating learning about digitization in the TERRA Ecotainment LAB 2021 (an inclusive and diversity-sensitive laboratory for civic education on topics such as global learning, sustainability and climate change).

Bundesdruckerei GmbH has also endowed a junior professorship as part of the Einstein Center Digital Future (ECDF) in Berlin on the topic of Distributed Security Infrastructures since 2017 and a new endowed professorship at Freie Universität Berlin since 2021, which conducts research on the topic of cyber security and artificial intelligence in particular. We concurrently provide both financial and personal support to Verband Sichere Digitale Identität e. V. (Secure Digital Identity Association). This association is a nationwide network for companies, universities and research institutions that promotes the transformation from analogue to digital identities.

Separately from the education projects and foundation professorships, the Bundesdruckerei Group delivered six *Bürgerkoffer* – a sort of mobile office in a suitcase – to the region affected by the disastrous floods in 2021. They were sent there to help reissue as quickly as possible any affected documents that had been destroyed or were missing as a result of the flood.

A cooperation with the platform "Das macht Schule" also started in 2021, with the aim of donating old but functional IT hardware to schools. The platform is supported by the *Das macht Schule* Association and the *Das macht Schule* non-profit limited company. So far, four schools have received end-of-life computers, printers and monitors directly from the company's headquarters in Berlin.

A Group-wide approach (risks and opportunities, strategies and goals) for social and regional commitment is to be developed in 2022/2023 to coincide with the new organizational structure of the Bundesdruckerei Group (December 1st, 2020). This approach should allow for tangible impact measurement and serve as a strategic framework for existing and future measures. Due to the pandemic, this project could not be fully realized in 2021. A risk analysis has also not been carried out to date for reasons of proportionality and materiality of other sustainability aspects (e.g. criteria 17 and 20).

## Key Performance Indicators to criteria 18

Key Performance Indicator GRI SRS-201-1: Direct economic value generated and distributed

The reporting organization shall report the following information:

**a.** Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organization's global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components:

- i.** Direct economic value generated: revenues;
- ii.** Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country, and community investments;
- iii.** Economic value retained: 'direct economic value generated' less 'economic value distributed'.

**b.** Where significant, report EVG&D separately at country, regional, or market levels, and the criteria used for defining significance.

The following table shows the directly generated and distributed economic value of Bundesdruckerei GmbH:

Directly generated economic value (in T€)	2019	2020	2021
<b>Net sales</b>	<b>602.280</b>	<b>568.142</b>	<b>773.996</b>
Other operating income	26.169	32.615	49.081
Other interest and similar income	619	887	1.499
<b>Distributed economic value</b>			
Cost of materials	135.222	139.806	189.076
Personnel expenses		206.701	253.651
Personnel expenses (wages and salaries)	162.331	171.680	203.936
Social security contributions and pensions	30.842	35.020	49.715
Interest and similar expenses	27.440	22.701	20.851
Taxes on income and earnings	40.253	15.853	51.796
<b>Equity capital ratio (in %)</b>			
Equity capital ratio	41,9	41,3	44,5

A country-specific breakdown is not provided as Bundesdruckerei GmbH is located in Germany, generates the majority of its sales in Germany and procurement is primarily carried out in Germany.

## Criteria 19–20 concerning ANTI-CORRUPTION AND BRIBERY MATTERS

### 19. Political Influence

All significant input relating to legislative procedures, all entries in lobby lists, all significant payments of membership fees, all contributions to governments as well as all donations to political parties and politicians should be disclosed by country in a differentiated way.

Secure identities, data and infrastructures are indispensable for the successful digitization of the public administration and the German economy. These issues are therefore high on the political agenda. With our know-how, we enable political players to create the framework conditions for secure digitization of the economy and the public administration and to strengthen the digital sovereignty of the federal government. In doing so, we always act in a politically neutral manner, supporting individual politicians and parties neither financially nor with contributions in kind. We see ourselves as a competence provider, advising the federal government with expertise, especially on matters of secure digitization, digital sovereignty and cyber security.

In 2017, the regular 'cybersec.lunch' format was launched together with the Tagesspiegel newspaper, where experts from politics, business and science come together to discuss issues. This format took place twice in 2021 in digital form:

- cybersec.lunch #18 - *Mit Datenmittlern und Datentreuhändern zum Erfolg?* (How to succeed with data middlemen and data fiduciaries) (03.03.2021)
- cybersec.lunch #19 – *Digitale Identitäten: Türöffner zum digitalen EU-Binnenmarkt* (Digital identities: opening the door to the EU's digital single market) (16.06.2021)

Since many political and regulatory decisions are made at European level, we are also in contact with representatives of the European Commission and the European Parliament. Bundesdruckerei GmbH is therefore listed in the EU Transparency Register under No. 19718482463983.

In September 2020, the Bundesdruckerei Group, together with the European Signature Dialog association, organized the 'European Digital Identity Roundtable' (EDIR) – a new format for exchange between European decision-makers, trust service providers and companies. The second roundtable – held in person in Brussels and online – took place on 16 November 2021. The focus was on the EU Commission's proposal to introduce trusted digital identities and the associated legislative, political and technical challenges.

In 2021, the following laws and legislative processes were among those that were relevant for the Bundesdruckerei Group:

- Regulation of the EU Parliament and of the European Council amending Regulation (EU) No 910/2014 (eIDAS) with a view to establishing a framework for a European digital identity
- Online Access Act (OZG) for improving online access to administrative services
- Data Governance Act (DGA) for simplifying the exchange of data between companies, private individuals and the public sector
- Draft Digital Services Act (DSA) and Digital Market Act (DMA) for regulating the digital economy in the EU
- IT Security Law 2.0 (IT-SiG 2.0) for enhancing the security of information technology systems
- Digital Supply and Care Modernization Act (DVPMG) for modern networking in the health sector
- Network and Information Security Directive 2.0 (NIS 2.0) to establish a high level of cyber security in the EU

The Bundesdruckerei Group is also involved in various regional, national and international political committees, industry associations and standardization organizations, such as Bitkom e. V., Verband Sichere Digitale Identität e. V. (VSDI) and the German Institute for Standardization (DIN). A complete list of committee and association memberships can be found on the Bundesdruckerei Group website.

## Key Performance Indicators to criteria 19

Key Performance Indicator GRI SRS-415-1: Political contributions  
The reporting organization shall report the following information:

**a.** Total monetary value of financial and in-kind political contributions made directly and indirectly by the organization by country and recipient/beneficiary.

**b.** If applicable, how the monetary value of in-kind contributions was estimated.

The Bundesdruckerei Group does not support politicians and political parties – neither directly nor indirectly, neither financially nor in kind.

## 20. Conduct that Complies with the Law and Policy

The company discloses which measures, standards, systems and processes are in place to prevent unlawful conduct and, in particular, corruption, how they are verified, which results have been achieved to date and where it sees there to be risks. The company depicts how corruption and other contraventions in the company are prevented and exposed and what sanctions are imposed.

As a federal government security company, the Bundesdruckerei Group maintains an open corporate culture characterized by adherence to ethical values and by acting in accordance with the law. That is why the issue of compliance is a high priority. We have been reinforcing our high integrity standards since the end of 2021 through our membership of the UN Global Compact.

Compliance management systems (CMS) have been set up at the Bundesdruckerei Group to ensure conduct that complies with laws and guidelines. genua GmbH has its own compliance system, which is equivalent to the CMS of the rest of the Bundesdruckerei Group and has been subject to the requirements of the guideline "Conduct within the Company - Code of Conduct" since 2021. The consistency of both systems will be further developed in the coming years. In the following, the contents therefore refer to the Bundesdruckerei Group without including genua GmbH.

Our Compliance Management System (CMS) is centrally anchored in the Internal Audit, Compliance & Data Privacy Protection department of Bundesdruckerei GmbH. It is audited every two years in accordance with IDW PS 980 for appropriateness, suitability and effectiveness and defines clear processes for compliance with and monitoring of norms, laws, self-regulations and industry standards as well as internal guidelines, regulations and instructions to the Bundesdruckerei Group in the interest of preventing rule breaches. In 2021, Bundesdruckerei GmbH also had its CMS audited for the first time in accordance with ISO 37001 (anti-corruption management system) and received a corresponding certificate, which will be validated in future by annual monitoring audits.

The objective of our CMS is to systematically create the conditions within the organization to prevent breaches of compliance requirements and to identify

and deal with breaches that have occurred. Annual compliance audits will be conducted to identify, monitor and minimize compliance risks. In 2021, there were no confirmed compliance violations at the Bundesdruckerei Group, nor were any corresponding legal proceedings pending.

The Chief Compliance Officer (CCO) is responsible for coordinating compliance management at the Bundesdruckerei Group. Overall responsibility for the CMS lies with the legal representatives of Bundesdruckerei Gruppe GmbH. The CCO reports directly to the CEO of Bundesdruckerei GmbH and reports in writing to the management boards of Bundesdruckerei GmbH and Bundesdruckerei Gruppe GmbH on a quarterly basis. In addition, compliance is also monitored by our internal control system and internal audits. With the help of the following compliance measures, the Bundesdruckerei Group actively prevents misconduct and violations in identified and material risk areas, including theft of company property, corruption, computer crime and data protection:

- Annual risk-based compliance audits, for instance, of travel/expense claims
- Compliance audits of external suppliers with an annual turnover of more than EUR 50,000 (net) as well as of consultants, agents and commercial representatives, also below this threshold value
- Internal codes of conduct to regulate lawful behavior (included in employment contracts and thus binding for all employees)
- Further topic-specific guidelines to raise awareness with regard to compliant behavior (e.g., with regard to purchasing, risk and opportunity management)
- Digital training courses conducted in 2021 covering key aspects of compliance, anti-trust and competition law
- Specialist training units for purchasing, sales and finance regarding anti-corruption in different formats
- Internal eLearning that educates employees on compliance and anti-corruption topics every two years and encourages them to comply accordingly
- Depending on the individual's area of expertise, regular exchange of information with compliance officers on key compliance issues
- Centralized complaints mechanism via the web-based and encrypted whistleblowing system for anonymous reporting of grievances and suspected misconduct (since 2020), including rules for handling tip-offs and reports of compliance violations

Due to the Covid pandemic – as in the previous year – compliance with the resolutions under the Infection Protection Act was an important issue in 2021. For this purpose, a crisis response team consisting of relevant senior employees and management was already convened in January 2020 to address the Covid pandemic and decide on appropriate measures (hygiene rules, mobile working, separation of shifts in production, purchase of rapid tests, etc.).

## Key Performance Indicators to criteria 20

Key Performance Indicator GRI SRS-205-1: Operations assessed for risks related to corruption

The reporting organization shall report the following information:

- a.** Total number and percentage of operations assessed for risks related to corruption.
- b.** Significant risks related to corruption identified through the risk assessment.

The relevant corruption risks were reviewed across the Group in 2021 as part of the annual risk-based compliance audit. No significant corruption risks were identified.

Key Performance Indicator GRI SRS-205-3: Incidents of corruption

Die berichtende Organisation muss über folgende Informationen berichten:

- a.** Total number and nature of confirmed incidents of corruption.
- b.** Total number of confirmed incidents in which employees were dismissed or disciplined for corruption.
- c.** Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.
- d.** Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases.

In 2021, there were no confirmed cases of corruption at the Bundesdruckerei Group, nor were there any public legal proceedings related to corruption pending.



Key Performance Indicator GRI SRS-419-1: Non-compliance with laws and regulations

The reporting organization shall report the following information:

- a.** Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of:
  - i.** total monetary value of significant fines;
  - ii.** total number of non-monetary sanctions;
  - iii.** cases brought through dispute resolution mechanisms.
- b.** If the organization has not identified any non-compliance with laws and/or regulations, a brief statement of this fact is sufficient.
- c.** The context against which significant fines and non-monetary sanctions were incurred.

In 2021, there were no significant fines or non-monetary sanctions at the Bundesdruckerei Group due to non-compliance with laws and/or regulations.

# Overview of the GRI indicators in the Sustainable Code declaration

In this Sustainable Code declaration, we have reported according to the "comply or explain" principle on the GRI indicators listed below. This document refers to the GRI Standards 2016, unless otherwise noted in the table.

Areas	Sustainable Code criteria	GRI SRS indicators
STRATEGY	<ol style="list-style-type: none"> <li>Strategic Analysis and Action</li> <li>Materiality</li> <li>Objectives</li> <li>Depth of the Value Chain</li> </ol>	
PROCESS MANAGEMENT	<ol style="list-style-type: none"> <li>Responsibility</li> <li>Rules and Processes</li> <li>Control</li> </ol>	GRI SRS 102-16
	<ol style="list-style-type: none"> <li>Incentive Systems</li> </ol>	GRI SRS 102-35 GRI SRS 102-38
	<ol style="list-style-type: none"> <li>Stakeholder Engagement</li> </ol>	GRI SRS 102-44
	<ol style="list-style-type: none"> <li>Innovation and Product Management</li> </ol>	G4-FS11
ENVIRONMENT	<ol style="list-style-type: none"> <li>Usage of Natural Resources</li> <li>Resource-Management</li> </ol>	GRI SRS 301-1 GRI SRS 302-1 GRI SRS 302-4 GRI SRS 303-3 (2018) GRI SRS 306-2 (2020)*
	<ol style="list-style-type: none"> <li>Climate-Relevant Emissions</li> </ol>	GRI SRS 305-1 GRI SRS 305-2 GRI SRS 305-3 GRI SRS 305-5
SOCIETY	<ol style="list-style-type: none"> <li>Employment Rights</li> <li>Equal-Opportunities</li> <li>Qualifications</li> </ol>	GRI SRS 403-4 (2018) GRI SRS 403-9 (2018) GRI SRS 403-10 (2018) GRI SRS 404-1 GRI SRS 405-1 GRI SRS 406-1
	<ol style="list-style-type: none"> <li>Human Rights</li> </ol>	GRI SRS 412-3 GRI SRS 412-1 GRI SRS 414-1 GRI SRS 414-2
	<ol style="list-style-type: none"> <li>Corporate-Citizenship</li> </ol>	GRI SRS 201-1
	<ol style="list-style-type: none"> <li>Political Influence</li> </ol>	GRI SRS 415-1
	<ol style="list-style-type: none"> <li>Conduct that Complies with the Law and Policy</li> </ol>	GRI SRS 205-1 GRI SRS 205-3 GRI SRS 419-1

\*GRI has adapted GRI SRS 306 (Waste). The revised version comes into force on 01.01.2022. In the course of this, the numbering for reporting on waste generated has changed from 306-2 to 306-3.