

# **Policy Statement on the Respect for Human Rights and the Environment**

**As of December 2025**

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## 1 Our commitment to respecting human rights and environmental obligations

Die Respect for human rights and environmental obligations and compliance with applicable laws are fundamental principles of SYZYGY AG and its subsidiaries — together referred to as the “SYZYGY Group,” and in this statement also as “we.”

In our business activities, we strive to prevent, identify, and address adverse impacts on people and the environment, and to seek opportunities to advance human rights and fundamental freedoms.

WPP plc holds a 50.3 percent stake in SYZYGY AG. SYZYGY AG is therefore embedded in WPP plc’s global governance and compliance structures. At the same time, as an independent, publicly listed company, SYZYGY AG fulfils its own statutory obligations under the German Stock Corporation Act and the requirements of the Frankfurt Stock Exchange’s regulated market.

This policy statement sets out the SYZYGY Group’s commitment to respect human rights and environmental obligations. It underscores the relevance of human rights to our business activities and outlines the steps we take to protect these rights.

This statement applies to all subsidiaries of SYZYGY AG, including our companies in the United Kingdom and Poland, and should be read together with the policies and codes of conduct set out in the chapter Preventive Measures and Process Integration.

Our approach is based on the German Act on Corporate Due Diligence Obligations in Supply Chains (Lieferkettensorgfaltspflichtengesetz – LkSG) and the following internationally recognized standards and frameworks:

- The United Nations Universal Declaration of Human Rights,
- The United Nations International Covenant on Civil and Political Rights,
- The United Nations International Covenant on Economic, Social and Cultural Rights,
- The conventions and recommendations of the International Labour Organisation (ILO), including the ILO's core labour standards,
- The UN Guiding Principles on Business and Human Rights,
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct,
- UNICEF's Children's Rights and Business Principles,

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- The Charter of Fundamental Rights of the European Union,
- The Ten Principles of the United Nations Global Compact (UNG) and
- the UK Modern Slavery Act 2015.

## **2 Human rights and environmental expectations and areas of action**

Meeting human rights and environmental obligations is a core element of our corporate responsibility and a foundation of our relationships with all stakeholders.

Our policies and procedures aim to minimize human rights risks. We focus on the material human rights topics identified through risk analyses—areas where we see the greatest potential adverse impact on people linked to our operations and our global supply chains.

### **Employees:**

We respect the human rights and fundamental freedoms of all our employees, including freelancers.

- **Prohibition of discrimination**

We reject discrimination of any kind—regardless of gender or gender identity, cultural or national origin, ancestry, skin color, religion or belief, disability, age, sexual orientation, family or marital status, or military or veteran status. We recruit, select, and promote on the basis of qualifications, relevant experience, and performance.

- **Compliance with occupational health and safety**

Through our occupational health and safety management, we provide safe working conditions and take appropriate measures to prevent accidents and work-related illnesses as far as reasonably possible. Our employees receive training and guidance to support a safe and healthy work environment.

- **Compliance with laws on pay and working hours**

We comply with applicable national laws on working time, remuneration, minimum income, and social benefits, or — where such national provisions are absent—the relevant ILO standards.

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- **Compliance with freedom of association**

We recognize our employees' right to freedom of association and collective bargaining in accordance with applicable laws and strive to promote social dialogue at all levels of the company.

- **Prohibition of child and forced labour**

We pursue a zero-tolerance approach to forced labour, modern slavery, all forms of child labour, debt bondage, human trafficking, and any form of unfree labour.

- **Compliance with data protection and privacy**

We are committed to safeguarding data protection and the privacy of all employees, business partners, and clients.

- **Prevention and detection of corruption and bribery**

We maintain a strict zero-tolerance policy toward corruption and bribery and firmly oppose any attempt at improper influence.

## **Society and environment:**

Across our operations and our entire supply chain, we respect environmental obligations and the rights of local communities. We commit to integrating environmental practices and the prevention of air, water, and soil pollution into our business strategy, in line with leading external frameworks.

The SYZYGY Group aims to drive the continuous reduction of the environmental impacts of our operations and supply chain and to maximize our positive environmental contributions.

SYZYGY endeavours to act in line with the Paris Agreement. Further information is available in our Environmental Policy.

## **Suppliers:**

We expect our suppliers to respect the human rights of their own employees and suppliers and to meet human rights and environmental standards consistent with the SYZYGY Group's expectations set out above. All suppliers are therefore required to comply with the SYZYGY Group Supplier Code of Conduct

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and to apply applicable human rights and environmental requirements to their own business and supply chain.

## 3 Risk management system and responsibilities

To promote respect for human rights in our own operations and throughout our supply chains — and to ensure our human rights and environmental expectations are met — we have implemented a sustainability-related control system at SYZYGY AG, integrated into our enterprise-wide risk management.

The Executive Board of SYZYGY AG assumes primary responsibility for compliance with our human rights and environmental due diligence obligations, reflecting our commitment to these principles as cornerstones of our culture and strategy.

Compliance with human rights and relevant environmental aspects within our Group companies and across the supply chain is ensured through a multi-layered control system: business units and central functions are responsible for operational risk management and for implementing internal and external requirements. In addition, compliance, risk, and control functions monitor adherence to legal and internal rules and assess existing measures. The Legal & Compliance function also conducts independent audits and ensures the effectiveness of our due diligence processes.

## 4 Risk analyses and impact assessments

We conduct regular, comprehensive risk and impact assessments to identify and understand potential and actual adverse impacts on people and the environment arising from our own activities and those of our business partners and suppliers across our supply chain.

SYZYGY AG recognizes the importance of including the perspectives of potentially affected rights-holders in our analysis and assessment processes.

Our due diligence system uses a multi-phase approach to identify and prioritize risks.

### *Phase 1: Abstract risk analysis*

As of December 2025

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Using authoritative sources such as indices, studies from NGOs, international organizations, expert groups, and trade unions, the compliance, risk, and control function conducts an abstract risk analysis. This analysis focuses on risks arising from:

- Our business: our locations, business units, and activities.
- Direct supplier relationships<sup>1</sup>: supplier locations, and the products and services procured

## *Phase 2: Specific risk analysis and assessment*

To enable a concrete and comprehensive understanding, risks are contextualized and, where appropriate, further substantiated. This includes review of identified risks with relevant internal stakeholders, validation based on risk-based self-assessments and publicly available reports, and classification and assessment against appropriate criteria to prioritize risks by severity and likelihood. We also work to identify sector- and country-level risks and to assess and validate these risks both at individual site level and at supplier level. In our 2024 risk analysis, potential risk topics assessed included treatment of employees, occupational health and safety, and appropriate remuneration.

We recognize that our business activities and procurement structure—and the resulting risk profile—can change during the year. We therefore conduct ad hoc risk assessments where necessary, for example when we enter new business areas, engage suppliers in higher-risk countries, or receive credible reports of human rights or environmental violations not previously known to us.

Risk assessments are extended to indirect suppliers<sup>2</sup> when we obtain substantiated knowledge of human rights or environmental risks or violations in our extended supply chain. Such information may come from credible sources, including reports submitted through our grievance mechanism or specific notifications or reports from NGOs, expert organizations, or authorities.

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<sup>1</sup> Within the meaning of the LkSG, direct suppliers are the contractual partners of the SYZYGY Group who are directly involved in the manufacture of products or the provision of services. They have a direct business relationship with SYZYGY AG and its subsidiaries.

<sup>2</sup> Within the meaning of the LkSG, indirect suppliers are all other suppliers below the direct supplier in the downstream supply chain. They have no direct contractual relationship with the SYZYGY Group.

## 5 Preventive measures and process integration

Regular risk analyses are the cornerstone of SYZYGY AG's strategy to address human rights and environmental risks and violations. This proactive approach enables us to implement targeted and effective preventive measures where they can have the greatest impact.

We integrate the results of risk assessments into core business processes and derive appropriate preventive measures. To facilitate this, the responsible functions in business units and subsidiaries have developed a comprehensive catalogue of risk-based measures. This enables effective collaboration with affected business areas and suppliers to mitigate potential risks.

In addition, specialized training is provided for employees and departments responsible for operational implementation of due diligence obligations.

SYZYGY AG has also established a set of complementary structural measures that promote effective risk management in our own operations and among our suppliers.

*A robust framework for ethical conduct:*

SYZYGY AG has established a robust framework of policies and strategies to ensure compliance with human rights and environmental standards both internally and in our business relationships:

The SYZYGY Group **Code of Conduct** anchors our commitment to ethical behavior, integrity, and respect for human rights. It serves as a binding guide for all employees, managers, and corporate bodies and sets out their responsibilities in upholding these principles.

Building on the Code of Conduct, the SYZYGY Group **Supplier Code of Conduct** sets our expectations for suppliers. Contracted suppliers must comply with the Supplier Code of Conduct and thereby confirm their alignment with our standards. These standards cover requirements related to human rights (including modern slavery such as child or forced labour or debt bondage) and labour practices (such as non-discrimination, health and safety, and compensation in accordance with all applicable wage laws), social impacts, and other sustainability topics. Suppliers are also asked to cascade equivalent standards within their own supply chains.

The SYZYGY Group **Environmental Policy** formalizes our commitment to climate protection and environmental principles and standards. The SYZYGY Group commits to reducing carbon emissions in its

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own operations and supply chain, integrating environmental practices into business strategy, and continuously reducing the environmental impacts of operations and supply chains.

*Fostering a culture of fair treatment and empowering employees in our own operations:*

We provide regular training to enable our employees to implement the requirements embedded in our policies. All employees complete mandatory ethics training upon joining, followed by periodic refresher training. Topics include business integrity, human rights, data protection, and sustainability.

Employees also receive additional training and guidance to support the implementation of the processes for which they are responsible.

## 6 The complaints mechanism

The SYZYGY Group fosters a culture of integrity and transparency. We enable our employees as well as partners, suppliers, and other external stakeholders, including shareholders, to raise concerns about potential or actual violations of the Code of Conduct or other policies and applicable laws.

The “Right to Speak” complaints mechanism operates via the EthicsPoint platform provided by NAVEX Global, an independent third-party provider. Reports can be submitted online or by phone through the NAVEX EthicsPoint Right to Speak website.

Our complaints mechanism is available to anyone who wishes to report conduct that violates our corporate culture and Code of Conduct, including risks or violations related to human rights, environmental obligations, or other commitments arising from ethical standards, internal policies, or legal requirements, caused by or with a sufficient likelihood of being caused by the business conduct of SYZYGY AG, its subsidiaries, or its suppliers across the supply chain.

The SYZYGY Group ensures that the whistleblowing system operates independently and autonomously. It meets the legal requirements of the EU Whistleblower Directive and provides special protection against retaliation where reports are made in good faith and on reasonable grounds. The identity of reporting persons and of affected individuals is protected through a secure and confidential mechanism that guarantees anonymity upon request. Neither the external provider nor the responsible func-

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tions at WPP and the SYZYGY Group disclose confidential information to unauthorized parties. Investigation teams are independent, free from instructions, and appropriately trained to ensure a fair and impartial review.

Detailed information on the mechanism—including a description of process steps, timelines, internal responsibilities, and the rights of reporting persons—is set out in the **SYZYGY Group's Rules of Procedure for the Right to Speak complaints process**. These are publicly accessible via the websites of SYZYGY AG and its subsidiaries.

## 7 Remediation measures

In the event of human rights or environmental violations, SYZYGY AG has established a process to develop and implement appropriate remediation measures swiftly. Our approach prioritizes stakeholder engagement and the perspectives of rights-holders in designing and implementing suitable solutions.

If violations occur within our own operations, our process includes immediate and targeted measures to stop the harmful activity and address its root cause.

Where violations are identified at our direct business partners and suppliers or among indirect suppliers, we seek, where possible and appropriate, to participate in collaborative processes to develop a remediation plan that defines clear responsibilities and timelines. We reserve the right to suspend or terminate business relationships if, despite our best efforts, no demonstrable progress is achieved.

## 8 Effectiveness review

Die SYZYGY AG regards human rights and environmental due diligence as an iterative, evolving process that requires continuous review and improvement. We regularly assess the effectiveness of our processes and measures, defining “effectiveness” as the ability to prevent or minimize human rights and environmental risks, or to end violations or significantly mitigate their impacts.

Our assessment focuses in particular on preventive measures, remediation measures, and our grievance mechanism, which we consider critical levers to positively impact the situation of rights-holders.

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## 9 Reporting and documentation

SYZYGY AG maintains comprehensive documentation of due diligence processes and measures. This documentation underpins transparency with our stakeholders. In accordance with the Corporate Sustainability Reporting Directive (CSRD), we have, since fiscal year 2024, published disclosures on material environmental, social, and governance topics, as well as sustainability-related risks and opportunities. Our first reporting, partially aligned with the CSRD requirements, was published in March 2025 in the SYZYGY AG Annual Report and, in line with the European Sustainability Reporting Standards, also presents our progress on management systems and due diligence.

## 10 Conclusion and approval by the Executive Board

In recognition of the evolving nature of human rights and sustainability, this policy statement is a living document. We are committed to refining our approach to address emerging challenges and to continuously improve our performance.

SYZYGY AG, December 19, 2025



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Frank Wolfram  
Chief Executive Officer



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Erwin Greiner  
Chief Financial Officer



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Frank Ladner  
Chief Technical Officer