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Code of Sustainability

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Preface

As reflected in our corporate values, we are committed to leadership in sustainability.

The purpose of this Code of Sustainability is to outline our strategic direction in sustainability. This document summarizes our ambition framework as well as the policies and concepts established by Henkel in the areas of environment, social and governance for material matters as identified by the double-materiality assessment under the Corporate Sustainability Reporting Directive (CSRD). The structure of the document follows the contents defined under the European Sustainability Reporting Standards (ESRS).

This document applies to all employees worldwide, in all of the business areas and cultural spheres in which we operate. It provides a framework for decision-making and engagement within our sphere of influence.

Our 2030+ Sustainability Ambition Framework

Our corporate purpose defines the common ground that unites all of us at Henkel: Pioneers at heart for the good of generations. With our pioneering spirit, our knowledge, our products and technologies, we want to enrich and improve the lives of people every day – and shape a viable future for the next generations.

Sustainable business practices have been an integral part of our company culture for decades and are also a central element of our vision of the future. Together with innovation and digitalization, sustainability forms the core of our corporate strategy, the Purposeful Growth Agenda.

Sustainability is fundamental for creating a competitive edge, enabling business growth and generating value for our business and industry customers, consumers and all of our stakeholders. Our 2030+ Sustainability Ambition Framework sets the frame for our global sustainability strategy, with clear ambitions and targets that we want to achieve in this decade. We will build on our particular strengths, such as the innovation of our business units, the comprehensive knowledge of our employees, as well as various contact points of our products and technologies with customers and consumers.

We see our company as an important player and partner in society, and we intend to work with others to create fundamental change. At Henkel, we see sustainability as a constant endeavour to make progress on current topics and keep learning about new issues, based on scientific knowledge.

To drive sustainable development, we have set ourselves ambitious goals as part of our 2030+ Sustainability Ambition Framework that build on our progress to date and which we are rigorously pursuing.

We have included different ESG dimensions and defined key areas of focus in 2022, which we link to the high aspiration of achieving a “Transformational Impact for the Good of Generations”:

- **Regenerative Planet:** We strive to achieve a circular economy, a climate-neutral future and the regeneration of nature. To this end, we are further developing our business activities to drive solutions in the areas of climate, circularity and nature.

- Thriving Communities: We actively contribute to people being able to lead a better life through our business and brands. To this end, we focus on equity, education and wellbeing.
- Trusted Partner: We are committed to product quality and safety while ensuring business success with integrity, focusing on performance, transparency and collaboration.

In summary, we want to actively drive the transformation to a sustainable economy and society. We are convinced that we can effectively contribute to change with our strategic framework and the priorities we have set, building on our values-based culture, deep rooting in science and our passion for technology.

We recognize that we can only achieve our ambition of transformational change by thinking in systems and collaborating with our partners along the value chain and beyond.

In addition to our nine topic areas, we have also defined three central levers that will help us achieve and scale up the progress we need:

- Products and technologies are at the heart of everything we do. We create more value for our customers and consumers by constantly innovating to offer better performance with a reduced environmental footprint.
- People are key for our business and our sustainability-related activities. Our employees contribute to sustainable development through their engagement. Our suppliers, shareholders, customers, consumers and neighbors play an important role in driving impactful change together.
- Partnerships are decisive for implementing and scaling progress for sustainability. We share knowledge and drive systemic solutions forward by working together with our partners along the value chain, and also with experts, universities, civil society and other companies.

Our main sustainability-related policies in Henkel (ESRS 2)

Our policies are a key instrument that provides strategic guidance on how to manage our impacts, risk and opportunities. Our Code of Sustainability is a key document that brings together Henkel's main policies and principles for environmental, social, and governance topics. It references other central documents, which provide further details about specific topics.

		ESRS E1	ESRS E2	ESRS E3	ESRS E4	ESRS E5	ESRS S1	ESRS S2	ESRS S3	ESRS S4	ESRS G1
Topic specific documents	Code of Conduct						X				X
	Nature Policy	X		X	X						
	Net Zero Deforestation Policy				X						
	Circularity Policy					X					
	Responsible Sourcing Policy		X		X			X	X		
	Diversity, Equity, Inclusion (DEI) Policy						X				
	Social Standards						X		X		
	SHE Standards		X					X	X		X

The provisions in our Code of Sustainability and the additional documents apply to the Henkel Group worldwide, including all operations and subsidiaries as well as their upstream and downstream value chain. No business units, regions, specific activities or stakeholders are excluded.

The Henkel Management Board bears overall responsibility for our sustainability policies, including topic specific strategies. The Sustainability Council aligns common positions, priorities and targets, prior to approval by the Management Board. The Sustainability Council also regularly reviews the effectiveness of our policies and progress towards our objectives, as well as the material impacts, risks and opportunities and their changes. The business units (Adhesive Technologies and Consumer Brands) and relevant corporate functions are responsible for the implementation of sustainability policies, the planning of relevant actions as well as for the provision of necessary resources. They are advised by dedicated sustainability teams.

In setting policies, we consider the interests of all our relevant stakeholders. Key internal and external stakeholders include retail and industrial customers, end-users, employees, shareholders, suppliers, and producer responsibility organizations.

Henkel's sustainability strategy and goals

In both business units, the importance of sustainability topics in our relationships with customers, consumers, and end users has continued to grow in recent years. We aim to meet these expectations and understand sustainability as a competitive edge in our corporate strategy, which we want to leverage through sustainability-related goals.

Our focus areas are based on the global priorities of our two business units and the goals we pursue concerning specific regions, markets, and customer groups, including consumers and end users.

With our extensive experience, we strive to position ourselves as a leading partner in sustainability for our industrial and retail customers, offering future-oriented solutions that help them achieve their own sustainability goals.

Our guiding commitments

We have defined three commitments in terms of our products and services as well as engagement with customers, consumers and stakeholders:

- We commit to involve our customers and consumers to enable sustainable choices in terms of product selection and use.
- We commit to report and disclose transparently and actively engage with our stakeholders on our strategy and performance.
- We commit to drive the transformation of our portfolio to increase the sustainability contribution of our products.

Sustainability is fundamental for creating a competitive edge, enabling business growth and generating value for our business and industry customers, consumers and all our stakeholders. In addition to our customers, partners and consumers, who are increasingly interested in sustainability-oriented products and solutions and expect transparent and reliable information, there are other stakeholders, such as ESG-orientated investors, employees, suppliers, and business partners.

Climate Change (ESRS E1)

Setting the paths toward net-zero

As a globally operating company, Henkel acknowledges its responsibility to reduce its impact on climate change and to adapt to climate change to ensure a long-term sustainable business model. To achieve this, the Company aligns its climate strategy with the 1.5-degree target of the Paris Climate Agreement. In this context, Henkel pursues the target of reaching net-zero GHG emissions across the value chain by 2045 and of neutralizing any residual GHG emissions released into the atmosphere after 2045. This includes a stepwise reduction of our absolute direct and indirect GHG emissions (including biogenic emissions resulting from land-use changes and the extraction of biological raw materials to produce bioenergy), followed by counterbalancing the impact of any remaining emissions in line with the SBTi Corporate Net Zero Standard. Along with this net-zero target, we follow a clear commitment:

- We commit to reduce the carbon intensity of our business

To achieve these emission reduction targets and our commitment, Henkel plans to continuously increase its energy efficiency over time and to transition to renewable energies while avoiding investing in the expansion of fossil fuel usage where possible. We also want our products and technologies to contribute to reducing or, depending on the application, avoiding the generation of GHG emissions. In terms of our brands and technologies, we manufacture products that are associated with consumption of energy when they are used, such as detergents, shower gels and hot-melt adhesives. We want to contribute to reducing our customers' and consumers' energy consumption and the associated GHG footprint through innovations for greater energy efficiency.

As such, our Code of Sustainability covers the sub-topics of climate change mitigation and energy. Energy efficiency, use of renewable energy and other levers to mitigate climate change are addressed in our Climate Transition Plan.

Henkel also supports several third-party standards or initiatives like the global net-zero imperative to limit global warming to 1.5 degrees Celsius as defined in the Intergovernmental Panel on Climate Change's (IPCC) Special Report on Global Warming. In addition, we also support the guidance and ambitions of the Kyoto Protocol and the Paris Climate Agreement. With our actions, we aim to contribute to the nationally determined contributions (NDC) of the countries in which we operate.



Henkel recognizes the Sustainable Development Goals (SDGs) of the United Nations as crucial toward climate change mitigation, especially SDG 7 "Clean and Affordable Energy", SDG 11 "Sustainable Cities and Communities" and SDG 13 "Climate Action". Henkel also follows the GHG Protocol Corporate Accounting and Reporting Standard, the GHG Protocol Policy and Action Standard (for policies and strategies) and the GHG Protocol for Project Accounting (for projects), as the basis of our GHG emission accounting.

Pollution (ESRS E2)

Managing SVHC as an element of our Responsible Chemistry Approach

Henkel manages SVHC in line with its Responsible Chemistry Approach and internal standards such as our globally applicable SHE-standards. In addition to following the SVHC definition of the ESRS, we also take local definitions into account. By complying with our internal standards, we ensure that negative impacts of SVHC are avoided in the Henkel value chain.

Our Responsible Chemistry Approach

As a global company operating in consumer goods (laundry and home care, hair and body care), adhesives, sealants and coatings, and with a complex value chain, Henkel recognizes its responsibility to protect the health, safety and rights of employees, value chain workers, consumers and the environment. This is addressed with a four-fold commitment:

1. We comply with statutory requirements regarding hazardous substances.
2. We actively ensure the safe handling of hazardous substances throughout our upstream value chain and within our own operations.
3. We provide solutions that are safe for consumers, end-users and the environment.
4. We continuously drive innovation to develop products with lower hazard.

We identify and address material impacts, risks and opportunities that influence our strategy and business model. Safety risks related to hazardous substances are an important element. In line with our SHE-standards high importance is given to occupational health and safety to protect the well-being of our workforce in our own operations. Providing personal protective equipment and maintaining high safety standards are fundamental in our production operations. The requirements also include controlling the emissions from Henkel's production operations to levels that do not harm the environment. The requirements also include controlling the emissions from Henkel's production operations to levels that do not harm the environment.

As part of this Responsible Chemistry Approach, Henkel is also committed to the relevant upholding labor and social standards, including internationally acknowledged human rights, throughout its value chain.

Our business and industry customers, as well as consumers and end-users, rightfully expect that our products are safe when they are used as intended. In line with this, trust in Henkel's products is foundational to our reputation and success among customers and consumers. Our products are assessed according to global standards even in countries that do not have clear

product safety regulations in place. Ensuring product safety and transparency is essential, especially as millions of people use our products every day.

Our Portfolio Transformation

We are committed to driving the transformation of our portfolio to increase the sustainability contribution of our products. To that end, we aim to balance resource consumption, climate impact and product safety. Doing so, we do not accept trade-offs for the health and safety of consumers, end-users and the environment.

A major element of the portfolio management approach is the proactive development of products with lower hazards than their predecessor solutions. It is key for those alternatives that the level of quality and efficiency of the product solution for our customers is maintained or even improved. We implement products with lower hazards before they are regulated. We apply this approach globally and do not restrict ourselves to the regions where the substance is regulated or will be regulated.

In addition, Henkel has systematically standardized its methodology for sustainable portfolio assessment. Those employees in the Product Development, Product Safety and Sustainability Management departments who participate in the product development process are trained in the "Responsible Chemistry" approach to reduce the share of products containing SVHC in the portfolios of both business units. As such, they have the methods and data at their disposal to assess the extent of the presence of SVHC in products.

Due to the different characteristics of the portfolios of the two business units, their respective policies have different priorities. The raw material strategy of our Consumer Brands business considers that many of the products pass into wastewater after use – such as detergents and cleaning agents, as well as hair and personal care products. For that reason, their raw material strategy has a focus on (bio)degradable ingredients. The strategy pursued by Adhesive Technologies for the responsible use of chemicals ("Responsible Chemistry") is embedded in the sustainable portfolio assessment process of this business unit.

Our approach to managing SVHC

Through our Responsible Chemistry approach, we reduce our business risk that is linked to commercializing SVHC-containing products. We proactively develop solutions to replace products containing SVHC without compromising the quality and efficiency of the product solution for our customers. We are doing this because reducing emissions from the process is less expensive and less demanding from a technical point of view when using products without SVHC. These advantages can also be a benefit for our customers.

Henkel's policy for minimizing the use of SVHC consists of four elements:

- Henkel complies with local laws and regulations that prohibit these substances or restrict their use and concentration in a product.
- In cases where it is not yet possible to eliminate SVHC, Henkel ensures that products containing SVHC can be used safely by providing instructions for the proper use of these products.
- Henkel anticipates future regulations and works with stakeholders to identify the need for alternative solutions for products containing SVHC.
- In cases where alternatives without SVHC are available, Henkel actively engages with stakeholders along the value chain to encourage them to switch to these alternatives.

The policy is in line with the “zero pollution hierarchy” of the EU action plan to prevent pollution of air, water and soil. With all conceptual elements, we introduce measures to minimize the most harmful chemicals, both in consumer products and in products for professional users

We also aim to ensure sufficient control of incidents and emergency situations along our value chain. Our responsible sourcing policy addresses the safe handling of chemicals at our suppliers. Our SHE standards ensure safe the handling of chemicals in our operations and oblige us to market products that are safe when used as intended. Our product safety data sheets provide the relevant information to our customers. In addition, we have established a Product Crisis and Recall Management Process. These elements act in combination to control and limit the impact of incidents and emergency situations on the environment and/or civil society.

Through portfolio management we monitor the progress of specific initiatives to reduce products containing SVHC in the two business units and report these to the Consumer Brands and Adhesive Technologies Executive Committees.

We ensure that Henkel makes its contribution to achieving the goals of the ‘Global Framework on Chemicals’ of the United Nations Environment Program to avoid SVHC.

For SVHC, strategic topic leaders for pollution in the business units are responsible for the development of concepts and policies addressing SVHC. They are responsible for their governance and lead the implementation of relevant measures based on company-wide standards and programs.

Water and Marine Resources (ESRS E3)

Holistic water stewardship approach

As a globally operating company, Henkel acknowledges its responsibility for actions on water scarcity and the protection of aquatic ecosystems and marine resources. In this context, Henkel aims for holistic water stewardship that enables responsible water management across the value chain based on collective action. This includes reduction of water consumption, circular water use and engagement in water-replenishment projects. We promote sustainable water management in our operational processes, primarily by reducing water withdrawal and consumption. We apply efficiency measures and the reuse of wastewater wherever possible. We apply wastewater treatment and regularly monitoring the quality of wastewater to avoid water pollution resulting from our operational activities as well as to enable water recycling. If pollutants need to be removed before conventional wastewater treatment, we carry out pre-treatment.

When sourcing water, sustainability and environmental compatibility are our top priorities. We place particular emphasis on the use of renewable and responsibly managed water sources. We strive to avoid over-extraction from vulnerable ecosystems and prefer sources that have a minimal impact on local communities and wildlife. We strive to reduce water consumption in areas at water risk in our own operations and across our value chain. Innovation in product design plays a central role for us. Innovations are aimed at optimizing water requirements in production and reducing the water consumption of our products in the use phase. We also focus on product design innovations that prevent water pollution in the downstream value chain. In doing so, we aim to replace substances that have a negative impact on people or nature without compromising the quality and efficiency of the solutions. To promote the responsible use of water in the up-stream value chain, we aim to work more closely with our suppliers. We encourage them to improve their practices in the areas of water conservation, quality monitoring, wastewater treatment and recycling.

With our policy, we also demonstrate commitment to several third-party standards or initiatives, such as the efforts toward a European Blue Deal that is complementary to the EU Green Deal and the Sustainable Development Goals (SDGs). Henkel respects the Planetary Boundary related to Freshwater Change. Freshwater Change is identified as a strategic priority for the whole Company. Since 2021, Henkel has been an endorsing member of the CEO Water Mandate, an initiative of the UN Global Compact. Accordingly, Henkel commits to adopting and implementing a comprehensive approach to water management.

Biodiversity and Ecosystems (ESRS E4)

Commitment to protecting and restoring biodiversity

Henkel takes responsibility for the protection of biodiversity on earth and is committed to protecting and restoring biodiversity with a focus on forests, land and water. Our policy sets the guiding principles for our biodiversity targets and ambitions, as well as general principles for the selection of actions and the transition strategy toward our targets and ambitions.

Henkel supports the efforts toward the global "Nature Positive" goal (de-fined by the Nature Positive Initiative and WWF and in line with the United Nations Kunming-Montreal Agreement) to strengthen resilience to climate change. This support for environmental protection and restoration extends to activities along and beyond the value chain. Henkel strives to avoid negative impacts on threatened and protected species, especially impacts of own operations located in or near sensitive ecosystems. In alignment, Henkel does not trade with species listed in the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and respects legally designated protected areas.

Henkel is driving the transition to renewable raw materials, including recycled materials, bio-based materials and materials derived from carbon capture and utilization. To avoid, reduce and minimize potential negative impacts on the environment and people in the upstream value chain, Henkel is committed to responsible sourcing of raw materials. Henkel is also committed to zero net deforestation and has an ambition of deforestation- and conversion-free sourcing of high-volume commodities with a high risk for deforestation, conversion or human rights violations. This particularly applies to timber, pulp and paper, palm oil, palm kernel oil and their derivatives, and other commodities falling under relevant national and international legislation.

Henkel's deforestation- and conversion-free ambition for relevant commodities includes the following principles: transparency along the value chain, no conversion of natural ecosystems to agriculture or other land uses, no burning or use of fire for land clearing or replanting, and a zero net deforestation or DCF (deforestation- and conversion-free) or NDPE (No Deforestation, No Peat and No Exploitation) commitment of suppliers. This is in line with legal requirements, such as the upcoming European Deforestation Regulation (EUDR), but goes beyond national and regional regulations due to the global scope of the concept. Henkel strives to minimize the direct drivers of biodiversity loss in its own operations, such as the reduction of production waste, waste to landfill, air, water and soil emissions, as well as reduction of freshwater consumption. In addition, we also aim for an increased nature-orientation at our sites and avoid additional soil sealing or land clearance. Our ambitions toward zero net deforestation and conversion in our value chain hold true for our own operation sites as well.

Henkel strives to trace supplies upstream to the point where compliance can be ascertained using several approaches varying according to commodities: tracing material to the production unit (agricultural or forestry land), or via a third-party certification scheme or via supplier systems that provide control back to the production unit level; or sourcing from areas documented to be low risk.

Furthermore, Henkel expects its suppliers to undertake best efforts to aim for sustainable production or sourcing of agricultural or forestry feedstocks. This includes using agroforestry and other regenerative practices, wherever possible.

Henkel also recognizes the social consequences of biodiversity and ecosystem-related impacts. Human beings are strongly dependent on nature and biodiversity, e.g. in terms of natural pollination, formation, protection and decontamination of soils and sediments as well as regulation of detrimental organisms. Moreover, the natural world is an invaluable source of medicinal, biochemical and genetic resources. Henkel is committed to conducting its business in a manner that minimizes its environmental footprint and supports the preservation and enhancement of biodiversity to also support social sustainability and improve livelihood of communities. Henkel also aims to contribute to the societal net-zero goal by reducing net emissions beyond its own value chains (known as “beyond value chain mitigation”).

Supporting international frameworks

Through the implementation of the policy, Henkel commits to several third-party standards and initiatives. Henkel respects the planetary boundaries related to biosphere integrity, overloading with novel entities and land-system change as main boundaries relevant for biodiversity loss, together with freshwater system change and climate change.

Henkel supports the goals of the “Convention on Biological Diversity” together with its two supplementary agreements, the Cartagena Protocol and the Nagoya Protocol. Henkel supports the four global goals and 23 targets of the Kunming-Montreal Global Biodiversity Framework (GBF). Henkel operates in alignment with the international conventions on the emission of potentially hazardous chemical substances, such as the Vienna Convention/Montreal Protocol on the avoidance of ozone-depleting substances, the Basel Convention on trade with hazardous wastes, the Stockholm Convention on persistent organic pollutants and the Minamata Convention on mercury emissions. Henkel recognizes the Sustainable Development Goals (SDGs) of the United Nations, in terms of the protection of ecosystems and biodiversity especially SDG 14 “Life below Water” and SDG 15 “Life on Land”, as crucial goals toward the preservation of ecosystems and biodiversity.

Furthermore, Henkel acknowledges climate change, land use change, pollution, direct exploitation and invasive species as the main drivers for biodiversity loss in accordance with



the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES). Henkel supports the EU Biodiversity Strategy for 2030 together with its relevant objectives and targets as European frameworks for the protection, preservation and restoration of natural habitats and biodiversity.

Resource Use and Circular Economy (ESRS E5)

Holistic approach to resource inflows, outflows and waste management

Henkel is working on the transition to a circular economy, aiming to align resource inflows and outflows with circular principles. To promote circular principles in our value chain, we have defined targets outlined in this chapter, as well as the following two commitments:

- We commit to increase the renewable share of ingredients and packaging materials.
- We commit to emphasize sustainable packaging designs that minimize the use of packaging material and support reuse.

Inflows

Our resource inflows are comprised of raw and packaging materials for our products. In line with our commitments, our activities focus on the following areas:

- Increasing the proportion of raw materials based on renewable and recycled resources in product formulations.
- Reducing the amount of raw materials used by reformulation of products.
- Increasing the proportion of recycled materials in packaging.
- Reducing the amount of packaging materials to a minimum, without compromising the quality, performance or safety of products.

Henkel strives to reduce the use of fossil-based materials to mitigate the environmental footprint and avoid contributing to the depletion of natural resources. As such, Henkel prioritizes the use of sustainable materials such as recycled resources for packaging and the use of renewable resources as the basis for our ingredients. The Company also supports the sustainable procurement of renewable resources through intense collaboration with strategic suppliers.

Recognizing the Company's reliance on secondary material inflows, Henkel is also dedicated to supporting Extended Producer Responsibility (EPR) systems for packaging. Henkel is supporting and financing waste collection and recycling through EPR fees. This supports processes that enable pack-aging waste to be recycled at the end of its life cycle and to become available as post-consumer recycled material to replace primary packaging material and fossil-based virgin plastics.

Henkel expects all suppliers to minimize emissions by keeping materials within the economic cycle. Suppliers are also expected to drive progress toward a circular economy by applying the 5Rs of the circular economy: Reduce, Reuse, Repair, Recycle, Recover. Henkel strives to raise awareness about sustainable waste disposal in its own operations and among its suppliers.

Additionally, our suppliers are expected to comply with the requirements of the applicable legal frameworks on conflict minerals.

Outflows

The Company is pursuing the goal of designing its packaging portfolio for recycling or reuse. Our business unit Consumer Brands is working to increase the share of biodegradable ingredients by reformulating its products and replacing less biodegradable solutions. Solutions from the Adhesive Technologies business unit help to reduce resource consumption in the use phase. They increase the reparability potential and can contribute to extending the service life of products and technologies.

Henkel promotes the integration of circular economy principles within operational practices for raw and packaging materials, as well as finished products. This includes maximizing resource efficiency and minimizing resource consumption, while also engagement of stakeholders by fostering collaboration with our suppliers and customers.

Waste

Henkel strives to reduce waste from its own production facilities, as well as in upstream and downstream value chain facilities. Our goal is to reduce waste at the source by making production processes more efficient. This requires refining manufacturing techniques, minimizing the use of raw materials, reducing the formation of by-products and implementing lean manufacturing practices to generate less waste overall

Henkel also complies with international conventions specifically related to the management of mercury, persistent organic pollutants (POPs) and hazardous waste, as well as compliance with the prohibitions and requirements of the Minamata Convention, the Stockholm Convention and the Basel Convention. Through the implementation of the policy, Henkel commits to several third-party standards and initiatives that go beyond the legal requirements to make our product footprint more sustainable. These include:

- Renewable Carbon Initiative
- Packaging design-for-recycling standards and methods
 - Consumer Goods Forum (Golden Design Rules)
 - Ellen MacArthur Foundation (EMF) – Global Plastic Commitment
 - APR Design® Guide for Plastics Recyclability
- German Minimum Standards
- US Plastics Pact
- Together for Sustainability (TfS)
- Responsible Minerals Initiative (RMI)

In setting the policy, we consider the interests of our key internal and ex-ternal stakeholders. In addition, Henkel prioritizes consumers and customers when it comes to resource use and circular economy. We engage with them to understand their expectations about recyclable, reusable, bio-based and environmentally compatible products. Their feedback shapes the design and development of products and packaging that align with circular economy principles.

The engagement of our stakeholders, especially our employees, is crucial to drive the transformation to circular economy practices. Henkel offers its employees various training programs aiming to foster a culture of innovation and to encourage participation with ideas and solutions supporting the Company's circular economy targets. Furthermore, Henkel works closely with its suppliers to raise awareness about the principles of the circular economy regarding sustainable materials and waste reduction.

Own Workforce (ESRS S1)

Fair working conditions and equal treatment and opportunities for all

We are committed to respecting the rights and entitlements of employees and to providing fair working conditions. To guide our efforts, we have defined a target outlined below in this chapter, as well as three commitments:

- We commit to continuously ensure that our employees earn a living wage or higher.
- We commit to build a proactive SHE culture, reduce recordable incidents and eliminate serious harm potential.
- We commit to respect human rights across our own operations and supply chain.

In addition to the corresponding national laws, we have set out the following policies to deliver on our commitments and ensure fair working conditions.

Working conditions

- **Working time:** The maximum work time of a normal work week must usually not exceed 48 hours, unless otherwise permissible by law. Exceptions to this rule apply only where both of the following conditions exist: National law allows work time exceeding this limit and a freely negotiated collective bargaining agreement is in force that allows work time averaging, including adequate rest periods. All overtime work undertaken must not exceed 12 hours per week. At least one day off must be granted per seven-day working period.
- **Adequate wages:** Henkel is committed to ensuring that our employees earn a living wage or higher. Compensation shall be reviewed on a regular basis and considering job performance in a non-discriminatory manner. Furthermore, remuneration must be paid as agreed and without undue delay. Deductions from remuneration must be clearly stated.
- **Collective bargaining:** Henkel engages in open and constructive dialogue with its employees and their representatives. The right to collective bargaining must be respected and exercise of that right must not result in any sanctioning of employees.
- **Work-life balance:** Henkel supports work-life balance through flexible working arrangements, adherence to working time regulations and provisions for appropriate leave and parental leave. We believe that parental leave should apply based on the caregiver role and not based on gender or biological parent status. As such, all genders, as well as adoptive-, foster-, surrogacy-, and LGBTQ+-parents should be able to take parental leave. Any local Henkel policies on parental leave comply with and are adopted in accordance with local rules and regulations.
- **Health and safety:** Henkel places strong emphasis on ensuring the health and safety of all employees. This is reflected in the above commitment to build a proactive SHE culture, reducing recordable incidents and eliminating serious harm potential. The Corporate SHE

Standards define safety, health and environmental requirements, as well as protection goals. To complement these standards, binding procedures outline relevant requirements in greater detail. Guidance documents, including best practice examples, support effective implementation. The SHE Standards apply globally across the Henkel Group and each affiliated company is required to implement them through an appropriate management system. The implementation is defined regionally and locally. Every employee is responsible for health and safety within the scope of their authority

Equal treatment and opportunities for all

- Gender equality and equal pay for work of equal value: We are committed to fair working conditions, which includes the concept of “equal pay for work of equal value”. Salary bands and grading systems contribute to fair pay practices by providing a structured framework for compensation. This should ensure that employees with similar roles and responsibilities receive comparable pay. These practices support the reduction of discrepancies in salary decisions across the organization.
- Diversity: The diversity of talents, mindsets, perspectives, qualities and attributes of our employees and business partners characterizes our Company. At Henkel, we pursue a holistic approach to DEI. Our strategic initiatives focus on several core dimensions: Gender, internationality and ethnicity, LGBTQ+, people with disabilities, and generations. In addition, our policies cover anti-discrimination and anti-harassment specifically on the basis of race, ethnicity, color, gender, sexual orientation, gender identity, religion, political affiliation, trade union membership, disability, nationality, social origin or age. When it comes to DEI, we ensure transparency through the reporting of diversity metrics and accountability with a clearly defined DEI governance structure. We strive to create a work environment that is free from bias toward certain groups of employees. We work to remove potential barriers to equal opportunities. Leaders at Henkel can foster responsibility in the area of DEI by supporting the hiring of candidates from underrepresented groups. This includes the consideration of inclusive recruitment recommendations and working against potential biases in hiring decisions. Other priorities include avoiding potential biases in decisions regarding promotions or talent management and sponsoring underrepresented talent groups. Henkel also aims to retain employees in all stages of life by offering a high degree of flexibility as an employer. The most important offerings here include enabling management positions to be designed as part-time jobs or as a job-sharing model, as well as flexible working arrangements and options for remote working in order to meet individual needs with regard to the integration of work and private life in different phases of life. All formats are offered in accordance with the job requirements

These policy objectives have to be supplemented by local legal requirements in order to legally safeguard their applicability. We respect the applicable law in the countries in which we

operate. In cases where international human rights are restricted by local laws, we strive to promote the principles behind the international standards without conflicting with local laws.

Henkel's above commitment to respecting human rights across our own operations and supply chain entails our obligation to respect internationally recognized human rights. As such, our policy also explicitly addresses zero tolerance of forced labor and child labor. Our commitment also includes that, where necessary, appropriate measures for remediation are provided.

The Henkel Management Board bears overall responsibility for our sustainability concepts and policies. For policies relating to our own workforce, global or local process owners for a respective topic are responsible for the development and governance of the policies, under the leadership of the Human Resources Executive Committee. The Human Resources Executive Committee continuously oversees workforce-related matters and the Executive Vice President for Human Resources, Infrastructure and Sustainability regularly informs the Management Board, Shareholder Committee and Supervisory Board. Relevant workforce-related and compliance-related matters are reviewed by the Compliance & Risk Committee.

Supporting international frameworks

Through the implementation of the policy, Henkel commits to several third-party standards or initiatives. Henkel supports the United Nations Universal Declaration of Human Rights and several globally recognized declarations for multinational companies. We have integrated key requirements based on various public standards, such as the United Nations Global Compact, the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and the expectations set out in the United Nations Guiding Principles on Business and Human Rights, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights and the International Labor Organization (ILO) Conventions. In addition, we are actively involved in multi-stakeholder associations and forums such as the Business Coalition for Tackling Inequality (BCTI) of the World Business Council for Sustainable Development (WBCSD) and AIM-PROGRESS to support the practical implementation of these commitments and the exchange of best practices.

In setting the policy, we consider the interests of our key internal and external stakeholders. In addition to that, Henkel prioritizes the voices of its employees when it comes to policies for its own workforce. Henkel is committed to open and constructive dialogue with its employees and their representatives.

Workers in the Value Chain (ESRS S2)

Safeguarding human rights and engaging with suppliers

Henkel is committed to respecting internationally acknowledged human rights for the workers in its value chain and therefore requires suppliers to ensure fair working conditions and respect for human rights. We have defined three commitments that guide our efforts:

- We commit to respect human rights across our own operations and supply chain.
- We commit to improve livelihoods of vulnerable workers within our value chain.
- We commit to develop our 'Established Suppliers' toward a solid sustainability maturity.

In this context, Henkel's suppliers worldwide are required to comply with the cross-industry Code of Conduct of the German Association for Supply Chain Management, Procurement, and Logistics (BME), which is grounded in the principles of the United Nations Global Compact. This code outlines expectations regarding labor practices, human rights and environmental responsibility. Management systems must be built on robust policies and effective due diligence mechanisms for the risk assessment to identify, prevent, mitigate and potentially remedy violations. The impacts and capabilities of individual suppliers must be considered. The BME Code of Conduct is applicable internationally and is linked to our contractual relationships with strategic suppliers alongside the Responsible Sourcing Policy.

Our Responsible Sourcing Policy is based on our global Corporate Standard Procurement, our Safety, Health, and Environmental (SHE) standards and our Social Standards, covering a wide range of social as well as environmental and governance aspects, which ensure that the interests of supplier companies are safeguarded, and their rights and expectations are considered. In addition to that, our product safety or product stewardship concepts cover the safe transport, handling and disposal – in addition to their end-use – ensuring the safety of value chain workers when handling Henkel products as intended. We are committed to providing safe products of the highest quality, for the benefit of all our stakeholders.

In this context, our most important expectations toward our suppliers are as follows:

- Suppliers must have management systems in place to identify, assess and mitigate risks to ensure health and safety of people affected by their operations.
- Suppliers do not tolerate child labor (according to the International Labor Organization - ILO).
- All work is voluntary, and suppliers do not permit or cause forced, bonded or indentured labor, slavery or human trafficking.

As such, the policy explicitly addresses the issues of human trafficking, forced labor and child labor.

The effectiveness of preventive measures and remedial actions and the complaints procedure, as well as the material impacts, risks and opportunities and their changes, are regularly reviewed by the Procurement Committee, the Sustainability Council and the Compliance and Risk Committee, if appropriate.

The Henkel Management Board bears overall responsibility for our sustainability concepts and policies. For all procurement activities and for ensuring responsible supply chain management, the Chief Procurement Officer (CPO) and the Procurement Committee are responsible.

Supporting international frameworks

Through the implementation of the policy, Henkel commits to several third-party standards and initiatives. These include the Universal Declaration of Human Rights, the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, the Conventions of the International Labor Organization, the International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights, the United Nations Global Compact, as well as the expectations set out in the United Nations Guiding Principles on Business and Human Rights. The United Nations Guiding Principles include key elements such as frameworks and policies, risk analysis, effective measures, and reporting and complaints mechanisms, which we have incorporated into our approach to respecting human rights. In addition, the OECD Due Diligence Guidance for Responsible Business Conduct acts as a benchmark for our approach, which we continuously review and develop as necessary.

In cases where international human rights are restricted by local laws, we strive to promote the principles behind international standards without conflicting with local laws. Where local laws exceed international standards, we will comply with these laws.

In setting the policy, we consider the interests of our key internal and external stakeholders. In addition to that, Henkel prioritizes our suppliers and supply chain partners who play an essential role in our sustainability transformation. Intensive dialogue and close cooperation are the basis to develop and maintain ethical and sustainable relationships with them. In this spirit, we carefully consider our suppliers' performance, commitment and continuous improvement when selecting and collaborating with them.

In addition to the publication of our Code of Sustainability and Responsible Sourcing Policy on our corporate website, the requirements toward suppliers are also made available on our Supplier Portal, are part of the supplier onboarding process and are part of our contracts, wherever applicable.

Henkel has a clearly regulated complaints procedure: Possible compliance violations or human rights violations in terms of actual or suspected breaches shall be reported as soon as possible to Henkel's Compliance Department.

Affected Communities (ESRS S3)

Respecting human rights for affected communities

Henkel is committed to doing business in an ethical and legal manner. This is inseparably linked with our commitment to respecting internationally acknowledged human rights. Henkel respects local, national and international land, water and resource rights, including those of indigenous communities. Suppliers must respect land rights including collective and traditional rights of women, indigenous peoples and local communities and other vulnerable groups that may be affected by their operations and sourcing practices. Suppliers must not engage in any form of land-grabbing. If legally permitted land use changes are made, suppliers are required to obtain the free, prior and informed consent (FPIC) of affected indigenous communities, as well as any other forms of participation that are required by local law. This applies in particular if a local community's access to water or other resources is affected. Unlawful forced evictions are not permitted.

The Sustainability Council regularly reviews the effectiveness of our policies and progress toward our objectives, as well as the material impacts, risks and opportunities and their changes. Where relevant, the Compliance and Risk Committee may also review these elements of our approach based on the initiative of the Chief Sustainability Officer.

The Henkel Management Board bears overall responsibility for our sustainability concepts and policies. For all procurement activities and for ensuring responsible supply chain management, the Chief Procurement Officer (CPO) and the Procurement Committee are responsible.

Supporting international frameworks

Through the implementation of the policy, Henkel commits to several third-party standards and initiatives, such as the United Nations' Universal Declaration of Human Rights and several globally recognized declarations for multinational enterprises. We have integrated central requirements derived from different public standards, e.g. the United Nations Global Compact, the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, as well as the expectations set out in the United Nations Guiding Principles on Business and Human Rights, International Covenant on Economic, Social and Cultural Rights, the International Covenant on Civil and Political Rights and the International Labor Organization (ILO) Conventions.

Regarding affected communities, Henkel has made various commitments as part of its human rights policy and has established processes and mechanisms to comply with multilateral conventions and legal requirements.

The OECD Guidelines for Responsible Business Conduct serve as a benchmark for our due diligence efforts, which we continuously review and develop as needed. We also publish a policy statement on the German Supply Chain Due Diligence Act (LkSG), which outlines our approach to due diligence. Our due diligence obligations also include respecting the human rights of communities and indigenous peoples. For example, our policy statement prohibits the illegal acquisition of land, forests and waters. Additionally, our grievance mechanism allows all individuals affected by our business activities, including affected communities, to report potential misconduct via our whistleblower system. We have established clear due diligence and compliance processes to identify and assess potential negative impacts of our business activities. We also ensure access to remedy is established and accessible when necessary.

In setting this policy, we consider the interests of our key internal and external stakeholders. When it comes to affected communities, Henkel prioritizes indigenous peoples. To take their interests into account and address potential indirect negative impacts on them in the upstream value chain, we collaborate with legitimate representatives such as non-governmental organizations (NGOs) and regional and local experts.

Consumers and End-Users (ESRS S4)

Product safety and high-quality information for our consumers and end-users

We are committed to providing safe products of the highest quality, while also providing the corresponding high-quality information for our consumers and end-users. Our efforts are guided by a commitment:

- We commit to provide to our customers and consumers sustainability-related information about our products and solutions.

Access to quality information

In line with our commitment to transparent and responsible communication, we are guided by international standards, clear principles and rules for responsible consumer communication based on compliance, honesty and transparency, and social responsibility and ethics in advertising. These principles are reflected in our global position on responsible and sustainable marketing, which ensures that consumers and end-users receive accurate, complete and easily understandable information about our products — in full compliance with applicable local and global regulations, labelling requirements in our countries of operation, and our internal standards. In the same spirit we also respect local traditions and other social norms. We support self-regulatory bodies and industry associations to promote fair-ness and accountability in marketing practices.

We are committed to disclosing potential negative consequences related to product use when relevant and to ensuring that all environmental, health or performance claims are substantiated by robust scientific evidence. We avoid greenwashing, ensure all materials respect human dignity, and avoid discriminatory content. We monitor feedback from diverse groups and carefully choose media channels to prevent environments that promote violence, pornography, racism, or hatred.

We also strive to enhance transparency by helping consumers understand product ingredients, correct usage and proper disposal — for example, through standardized safe use icons, recycling symbols and clear packaging instructions developed in collaboration with industry partners such as A.I.S.E. (European Association of Detergent and Cleaning Product Manufacturers).

The effectiveness of our policies and progress toward our objectives is ensured by extensive monitoring and tracking. Monitoring related to product safety and hazard communication is the responsibility of the Head of Product Safety and Regulatory Affairs in each business unit and is reviewed in the respective leadership meetings. Product-related sustainability claims and

information are reviewed through the Brands Sustainability and Product Stewardship Steering Committee in the Consumer Brands business unit and in Adhesive Technologies business unit they are assessed as needed by the respective business unit in cooperation with the central sustainability team. For any other product information, controls are clearly defined. Regulatory changes are directly reflected and monitored in the processes and shared by the local country teams with the global team.

Health and Safety

Every day, millions of people get in touch with our products. We therefore ensure that products are safe for their intended use in terms of human health and the environment. We comply with requirements regarding health and safety, as well as labelling, that are applicable to us in the countries we operate in. We constantly review and assess our products to ensure that they remain compliant. Our product safety or product stewardship concepts cover the safe transport, handling and disposal of products in addition to their end-use. These concepts also ensure the safety of workers in the value chain when handling Henkel products as intended. This policy is monitored through the specific portfolio-steering initiatives in each business unit.

The health and safety of our consumers and end-users is also ensured through our human rights policy commitments. We provide rigorous quality controls, safety assessments, lifecycle monitoring, and remedies for potential adverse impacts.

The Henkel Management Board bears overall responsibility for our sustainability concepts and policies. In Adhesive Technologies, the leaders of the strategic business units have responsibility for implementing Henkel's objectives with respect to access to information. In our Consumer Brands division, the members of the executive committee take this responsibility.

In setting the policy, we consider the interests of our key internal and external stakeholders. In addition to that, for the proactive transformation of products and the provision of quality information, we particularly focus on intensive dialogue with customers and consumers while striving to learn about their needs.

We engage directly with consumers and end-users, while also interacting with retailers and distributors to ensure our actions align with their increasing demand for sustainable products and transparent information. As part of our complaints mechanism, anyone affected by Henkel's business activities (including consumers) can use the whistleblower system. Consumers and end-users can rely on our Customer and Consumer Service channels, which can be accessed through a dedicated hotline and/or email address to discuss any concerns. The respective contacts are displayed on the labels of our products and can be found on the websites.

Business Conduct (ESRS G1)

Our corporate culture and protection of whistleblowers

Corporate culture

Fostering a culture of diversity, equity and inclusion, teamwork and family spirit are cornerstones of our success. Only in a fair, healthy, and safe work environment will our employees be able to reach their full potential. It is a mindset that we want to represent and stand for at Henkel, but also beyond in society, having our employees serve as role models for future generations.

We are committed to fostering a respectful and inclusive culture that enables our employees to be their best every day. Henkel is committed to a diverse and inclusive workforce, recognizing it as a key strength that fosters talent retention, innovation and understanding of stakeholders. The Company promotes a culture of trust, teamwork, and respect with zero tolerance for harassment, bullying or discrimination. We provide our employees with opportunities that are equally accessible to all, enabling them to contribute to Henkel and grow both professionally and personally. Aspects of corporate culture are addressed and discussed at the meetings of the Management Board and Supervisory Board at least once a year and on an ad-hoc basis.

Whistleblower system and access to remedy

Our Code of Conduct, our values, our Leadership Commitments and other internal standards outline the high expectations for our behavior and business practices as well as that of our stakeholders. Possible violations of these standards, including breaches of applicable laws, can be reported by employees, stakeholders and all other individuals affected by our business activities through our whistleblower system. This includes risks to human rights and the environment, as well as violations of human rights or environmental obligations that arise from Henkel's business activities or suppliers. Potential compliance violations or human rights abuses related to actual or suspected breaches must be reported to Henkel's Compliance department immediately.

We have established clear due diligence and compliance processes to identify and assess potential negative impacts of our business activities. We also ensure access to remedy is established when necessary. Any compliance issues and potential violations are regularly reported to the Management Board, the Audit Committee of the Supervisory Board, the Shareholders' Committee and other local committees. In individual cases, actions are determined and their implementation is monitored according to the principle of "prevention, detection, response," based on a case-specific protocol. This includes investigations, reviews of

remediation actions and documentation of cases. Possible remedies are classified based on the severity of the violation and the outcomes of any prior corrective actions.

Our ethical and compliant behavior includes strict compliance with whistleblower laws globally, including the EU Directive (EU) 2019/1937. The process ensures a confidential and fair process for reporting and addressing potential misconduct. Those who report suspected violations in good faith are protected and any kind of retaliation against them will not be tolerated. The reporting channels for whistleblowers are communicated to our employees and external stakeholders in an appropriate manner, including via the intranet and the internet. Henkel's central compliance organization can be reached through the following channels: via email (compliance.office@henkel.com), using the web form or either by name or anonymously via Henkel's compliance hotline. On our website, in the section Whistleblower Process and Compliance Hotline, we provide procedural guidelines for the grievance mechanism. This document is available in more than 40 languages.

Henkel is committed to handling whistleblower reports with the highest level of care, promptness and confidentiality, in full compliance with relevant data protection laws. Access to these reports is limited to the necessary members of Henkel's Compliance Group (both local and global) and, when needed, other relevant departments or external professional investigators or auditors for the purpose of conducting an investigation and taking appropriate action. Henkel ensures that all whistleblower reports are properly recorded and documented. The investigation process is guided by principles of procedural fairness and objectivity, leading to an impartial decision. Throughout the process, individuals involved are presumed innocent until evidence proves a violation has occurred. Henkel takes a strong stance against confirmed misconduct, which could result in disciplinary actions against those responsible. The effectiveness of the whistleblower process as a grievance mechanism is reviewed annually and on an ad hoc basis, and adjusted as needed.

Compliance management system

The principles described above are of fundamental importance for internal collaboration at Henkel and also extend to interactions with suppliers and business partners. Henkel's compliance culture involves continuous monitoring and improvement of the compliance process.

The Henkel Executive Board bears the overall responsibility for the compliance organization, which ensures adherence to global laws and policies. The company-wide compliance organization is led by the Chief Compliance Officer (CCO) with global responsibility. The CCO is supported by the Corporate Compliance Office with the Head of Corporate Compliance & Data Protection, and by an interdisciplinary Compliance & Risk Committee, as well as by 50

local compliance officers worldwide. The various tasks and responsibilities are clearly defined. The compliance structure is responsible for all compliance activities, coordinates training and education, monitors compliance with internal and external regulations, and supports the development and implementation of globally binding internal standards.

To impart clear rules of conduct to our employees, and especially to avoid any conflicts of interest in everyday working situations, we focus on regular training courses and communication measures. Our managers play a key role with regard to compliance. Given their position within the Company, they bear a special responsibility to set an example for employees. For this reason, all of our managers across the globe must participate in our mandatory Compliance eLearning program and attend relevant training courses, usually several onboarding courses as well as at least one specific training per year. The program addresses many different compliance topics, such as data protection, competition law and anti-corruption.