

Code of Conduct

All employees of **alupak** must be familiar with these principles and rules and must comply with them. Our managers have the task of ensuring this and being a role model themselves in complying with our Code of Conduct. Our Code of Conduct is based on internationally recognised and accepted agreements on compliance with human rights or fighting corruption as well as on legal provisions. It is designed to help resolve ethical and legal challenges. Every employee can contact their respective manager or HR management at any time if they have questions or comments. HR management is also responsible for labour practices, human rights and ethics issues.

As a family business with over 50 years of tradition, **alupak** stands for fairness and integrity, sustainability and environmental awareness as well as for innovation and quality packaging solutions for our customers. These values will continue to characterise our actions in the future.

1 Basic behavioural requirements

a. Lawful behaviour

Obedying the law is the top priority for **alupak**. Every employee must comply with the statutory provisions of the legal system within which he or she is acting. Breaches of the law must be avoided at all costs.

Every employee must expect disciplinary consequences in the event of a breach – irrespective of the sanctions provided for by law – as every breach of the law is also a breach of their contractual obligations.

b. Mutual respect, honesty and integrity, working conditions

We respect the personal dignity, privacy and personal rights of each individual. We work together with employees and external business partners of different nationalities, ethnic backgrounds, skin colours, cultures, religions and world views. We do not tolerate discrimination on these grounds or on the grounds of gender, sexual identity, age or disability. We do not tolerate physical punishment and personal insults, physical, sexual, psychological or verbal harassment or abuse.

We are open and honest and stand by our responsibility. We are reliable partners and only make promises that we can keep. We expect our employees to behave honestly.

We offer fair employment conditions, pay appropriate remuneration and take the needs of our employees into account when implementing operational measures. We do not accept any form of child or forced labour.

c. Responsibility for the reputation of alupak

The reputation of **alupak** is largely determined by the appearance, actions and behaviour of each individual member of our workforce. Unlawful or inappropriate behaviour by even one employee can cause considerable damage to the company. Every employee is required to pay heed to, uphold and promote the reputation of **alupak**.

d. Management, responsibility, supervision

Integrity and compliance with legal provisions and with the internal regulations of **alupak** start with the company management. Every manager is responsible for their employees. They must earn recognition through exemplary personal behaviour, performance, openness, reliability and social competence. This also means that managers must always address and emphasise the importance of correct behaviour in day-to-day business and set an example in terms of integrity and compliance.

Managers set clear, ambitious and realistic goals and are exemplary in adhering to them. They lead through trust and give their employees as much personal responsibility and freedom of action as possible. They challenge and encourage their employees. At the same time, they make it clear to their employees that compliance with the laws and guidelines of **alupak** is a top priority under all circumstances and at all times. Managers are also available to their employees to clarify any uncertainties regarding compliance with legal provisions, questions or professional and personal concerns. However, the manager's responsibility does not release the employees from their own responsibility.

We are committed to:

- Treating each other with respect
- Reliability and sincerity
- Openness, including to criticism
- A co-operative management style
- Clear, quick decisions within the given framework

In this way, we create the basis for personal responsibility, initiative, commitment and joint entrepreneurial success!

Every manager has organisational and supervisory duties to fulfil. They are responsible for ensuring that no violations of laws, internal guidelines or this Code of Conduct of **alupak** occur in their respective area of responsibility that could have been prevented or made more difficult by appropriate supervision.

Managers remain responsible even if individual tasks are delegated.

2 Dealing with business partners and third parties

a. Compliance with competition law and antitrust law

The state protects fair competition through competition and antitrust laws. Violations of these regulations are met with severe penalties. These penalties also apply to employees who violate these laws. Every employee is therefore obliged to comply with all rules of fair competition and cartel avoidance. Any form of agreement with competitors that distorts competition, for example with regard to prices and capacities, is prohibited. The same applies, of course, to agreements with competitors to waive competition, to submit sham bids, etc.

b. Offering and granting benefits

We win orders fairly through the quality and price of our products and services and not by offering others undue advantages.

No employee may – directly or indirectly – offer or grant unauthorised benefits of any kind to public officials or business partners in connection with business activities. No monetary payments or other benefits may be made in order to influence decisions or gain an unjustified advantage. All donations must comply with applicable laws and internal guidelines.

Promotional gifts to employees of business partners must be selected so as to avoid any appearance of dishonesty or impropriety on the part of the recipient. They may not be granted if they can be interpreted as an attempt to influence a public official or a business partner in order to gain advantages for **alupak**.

c. Requesting and accepting benefits

No employee may use his or her official position to demand, accept, obtain or find out about benefits. This does not include accepting occasional gifts of symbolic value or invitations to meals or events if the occasion and scope of the invitation are appropriate and refusing the invitation would be contrary to the principle of courtesy.

Employees may not accept gifts or other benefits from companies or persons with whom they have a business relationship that exceed the value of customary small gifts.

d. Special rules for the awarding of contracts

Anyone bidding for a contract expects us to scrutinise their offer fairly and impartially. Suppliers are to be selected solely on a competitive basis after comparing the quality, performance, price and suitability of the products and services offered.

e. Donations

As a responsible member of society, **alupak** donates money and goods for education and science, culture as well as charitable and social projects. Donations to individuals, for-profit organisations and organisations whose objectives are not compatible with those of **alupak** are not permitted. Donations to private accounts are not permitted.

Donations must be transparent, i.e. the recipient of the donation and the specific utilisation by the recipient must be known. Donations should be tax-deductible. Requests for donations are generally subject to the approval of management.

3 Combating money laundering

It is the stated aim of **alupak** to maintain business relationships only with reputable customers, consultants and business partners whose business activities are in accordance with legal regulations and whose financial resources are of legitimate origin. All employees are obliged to comply strictly with anti-money laundering laws. Suspicious behaviour by customers, consultants or business partners must be reported. All applicable regulations on recording and accounting for cash and other transactions and contracts must be complied with.

4 Trade controls

alupak follows all export control and customs laws and regulations that apply in the respective countries in which we operate. Such regulations may apply in connection with direct or indirect exports or imports from or to sanctioned countries or in connection with third parties concerning whom, for example, there are grounds for suspicion with regard to national security or who are involved in criminal activities. Violations of these regulations and laws can lead to drastic penalties, including exclusion from simplified import and export procedures, i.e. interruption of the seamless supply chain.

All employees involved in the import and export of goods and services are required to comply with all applicable economic sanctions, export control and import laws and regulations, as well as all policies and processes related to their business activities.

5 Avoidance of conflicts of interest

All employees are obliged to make their business decisions in the best interests of **alupak** and not on the basis of personal interests. The following rules apply to avoid conflicts of interest or loyalty:

a. Disclosure obligation

Every employee must disclose to their manager any personal interests (including those of family members or close personal friends) that may exist in connection with the performance of their official duties. Attempts by business partners to influence employees of **alupak**, their family members or close personal friends must be reported immediately.

b. Transparent awarding of contracts

No employee may give or arrange for an order to be given to family members or close personal friends without the prior written consent of the responsible manager.

c. Private commissioning of business partners of alupak

No employee may have private orders carried out by companies with which he/she has dealings in his/her business activities for **alupak** if this could give him/her advantages that are not customary in the market. This applies in particular if the employee has or can exert direct or indirect influence on the commissioning of the company by **alupak** or if he/she is involved in the processing of orders by that company on official business.

d. Use of alupak employees for private purposes

Managers are prohibited from misusing their authority to order their employees to work on personal projects for them.

e. Non-compete clause

An employee may not manage or work for a company that competes with **alupak** in whole or in part. They may not engage in any activities that compete with **alupak**.

f. Involvement in third-party companies

Furthermore, direct or indirect involvement in an unlisted company that competes with **alupak** in whole or in part is prohibited.

Prior written authorisation is required for any investments in companies that are business partners of **alupak**. This authorisation is granted by management and documented in the relevant employee's personnel file. Authorisation will not be granted or may be withdrawn if the employee has business dealings with the company in question.

Any involvement of close relatives in a competitor company or another of the companies described above must be reported in writing by the employee to the HR department if this could affect the interests of the company and must be documented in the employee's personnel file.

Investments in listed companies and in the form of equity funds or similar investments where the investor is generally not informed about the identities of individual shareholders are excluded from the above rule.

6 Dealing with information

a. Records and reports

Open and effective collaboration requires accurate and truthful reporting. This applies equally to relations with management, employees, customers, business partners, the public and government agencies.

All records and reports made internally or given externally must be accurate and truthful. According to the principles of proper accounting, data entries and other records must always be complete, correct, timely and system-compliant. The requirement to provide truthful information also applies to expense and travel expense claims.

b. Confidentiality

Every employee must maintain confidentiality about internal company matters that have not been made public. This includes, for example, details relating to the organisation of the company and its facilities, as well as business, manufacturing and development processes, projects and internal reporting figures.

Non-public information from or about suppliers, customers, employees, consultants, agents and other third parties must also be protected in accordance with legal and contractual requirements. In particular, no employee is permitted to make recordings, files, image and sound documents or reproductions without the authorisation of their manager, unless this is directly related to their professional activities.

The obligation to maintain confidentiality continues to apply even after the employment relationship is terminated.

c. Data protection and data security

Access to the intranet and internet, global electronic information exchange and dialogue as well as electronic business processing are crucial prerequisites for the effectiveness of each and every one of us and for business success as a whole. However, the advantages of electronic communication are combined with risks to privacy and data security. Taking effective precautions against these risks is an important part of IT management, and forms part of management responsibilities as well as the behaviour of each individual.

Personal data may only be collected, processed or used in so far as this is necessary for specified, clear and legitimate purposes. In addition, personal data must be stored securely and may only be transferred with the necessary precautions. A high standard of data quality and technical protection against unauthorised access must be guaranteed. The use of data must be transparent for the data subjects, and their rights to information and correction and (if applicable) to objection, blocking and deletion must be safeguarded.

7 Dealing with company equipment

alupak has numerous systems and facilities such as computers, copiers, software, machines, tools and other work equipment in its offices and operating sites. These may only be used for company purposes and not for personal benefit. Exceptions require authorisation by the management.

8 Environment, energy, occupational health and safety

The protection of the environment, the conservation of its natural resources, the efficient use of energy as well as safety in the workplace and health protection are corporate goals of high priority for us. An integrated management system sets high standards and ensures compliance with the law.

Environmentally friendly design and technical safety are fixed targets right from the development stage of our products. Every employee must perform to an exemplary standard in the area of environmental protection and occupational safety. In particular, employees are encouraged to exploit all reasonable opportunities for process optimisation in order to reduce the consumption of energy and raw materials in production and at the same time limit emissions. Developing and promoting a sense of responsibility for the environment, energy use and occupational safety at all levels is an ongoing management task. Each individual has a shared

responsibility to support **alupak** in its endeavours to create safe working conditions. The working environment must meet the requirements of a health-orientated design. Every employee must pay constant attention to occupational safety.

9 Complaints and information

Every employee has the right to make a personal complaint to their manager, the HR department or the management or to bring to light any circumstances that might indicate a breach of the Code of Conduct; this can also be done anonymously. The matter will then be thoroughly investigated. Appropriate measures are taken where necessary. Any information will be treated confidentially within the framework of the statutory regulations. Whistleblowers must not suffer any unjustified disadvantages as a result of their actions.

However, communications made with the intention of falsely accusing colleagues or managers will not be tolerated. Such behaviour also constitutes a serious breach of this Code of Conduct.

10 Measures in the event of violations of this Code of Conduct

In the event of violations of this Code of Conduct, the company will take action and take appropriate measures to clarify the situation properly. The company will primarily try to resolve the matter by explaining the importance of the values to the employees concerned in order to encourage them to change their behaviour. However, labour or disciplinary measures may also be taken in response to any breaches of this Code of Conduct within the framework of the applicable regulations.

The company management will ensure that this Code of Conduct is effective by creating the necessary framework conditions and providing the required resources.

11 Implementation and control

The management actively promotes the broad dissemination of the Code of Conduct and ensures it will be implemented sustainably. Compliance with the law and adherence to the Code of Conduct must be regularly monitored in all organisational units of **alupak**.