

Preamble

Exportverpackung Sehnde GmbH sees itself as part of an internationally interconnected economy and, as a business operating from its various sites, is an integral part of the countries and societies in which we operate. We adhere to the fundamental principles of the 'honourable merchant' and are committed to our responsibilities as a company.

- We monitor the direct and indirect impacts of our business activities on the environment and society and strive to strike a fair balance between economic, environmental and social concerns.
- We act in accordance with generally accepted values and principles, conduct ourselves in compliance with the law and, in particular, observe internationally recognised human rights and labour standards, as set out below.
- We stand by the objectives and content of the Code of Conduct and will, within the scope of our respective legal and practical possibilities, make every suitable and reasonable effort to continuously fulfil this voluntary commitment at all company locations both at home and abroad.

Should existing national regulations conflict with the provisions of our Code of Conduct, or should the domestic context make it impossible to comply with it in full, we will seek ways to uphold the requirements of our Code of Conduct as far as possible.

We expect the same conduct from all our suppliers. We also require our employees to observe the principles of environmental, social and ethical conduct and to integrate them into the corporate culture. Furthermore, we strive to continuously improve our business practices and our products and services in the interests of sustainability and call on our suppliers to contribute to this in the spirit of a holistic approach

Ethical / moral commitment and integrity

We pursue exclusively lawful business objectives and practices and maintain business relationships only with reputable partners.

We treat business partners and customers fairly and with respect. We respect different legal, economic, social and cultural backgrounds and the specific circumstances of the countries and regions in which we operate. In doing so, we observe the laws and regulations of the countries and regions where business activities take place.

We always base our business conduct on universally accepted ethical values and principles, including integrity and respect for human dignity. We are committed to free and fair global trade.

Conflicts of interest

We remind employees that their personal interests must not conflict with the interests of Exportverpackung Sehnde GmbH or our business partners. Conflicts of interest may arise if private, financial or other personal interests are likely to influence business decisions. Our employees are obliged to disclose potential or actual conflicts of interest at an early stage and to ensure transparency. Decisions must always be made on the basis of objective and factual criteria in the best interests of the company.

Corruption, trade controls, money laundering

We reject any form of bribery and corruption. To this end, we avoid even the appearance of such conduct – whether in the form of granting or accepting unfair advantages. We act in accordance with the applicable regulations on import and export controls as well as any existing economic sanctions, and comply with the legal requirements for the prevention of money laundering.

Fair competition

We are committed to free and fair competition. We do not tolerate anti-competitive agreements and ensure that our company acts in accordance with applicable competition laws. We reject competitive advantages gained through unfair business practices.

Handling of personal data and Protection of confidential information

We respect the privacy rights of our employees, business partners and customers and, when handling personal information, comply with the applicable legal and regulatory requirements regarding the processing of personal data and information security. We protect trade secrets and other confidential information entrusted to us by our business partners and customers from unauthorised access, use and disclosure, at least in accordance with the relevant legal provisions on the protection of trade secrets.

Intellectual property

We respect the intellectual property of our business partners, customers and other third parties and ensure that adequate precautions are taken to protect intellectual property rights when exchanging know-how and technologies. This includes the lawful use of patents and licences.

Protection of consumer interests

Where our products and services affect the interests of consumers, appropriate measures are taken to ensure the safety and quality of the products or services. In doing so, we ensure that the products or services comply with the relevant statutory consumer protection provisions.

In our information and marketing activities, we take consumer interests into account by applying the legal requirements for fair business, marketing and advertising practices and consumer education.

Environmental responsibility and commitment

The protection and preservation of our natural resources concern and are the responsibility of us all. With this in mind, we conduct our business in an environmentally responsible manner and are committed to the goal of a climate-neutral future.

Protection of the environment and climate

We fulfil our environmental responsibility by applying the applicable legal requirements and recognised standards for the protection of the environment and climate. We are working to continuously reduce the negative impact of our business activities on the environment and climate.

We apply applicable law and take appropriate measures based on legal and internationally recognised standards, covering, amongst other things, the following areas:

- Proper, professional and responsible handling of hazardous substances, chemicals and waste, including their disposal
- Measures to reduce or prevent waste
- Minimising emissions from operational processes (e.g. wastewater, exhaust air, noise, greenhouse gases)
- Conservation of natural resources, for example through measures to save water, chemicals and other raw materials, and promotion of the circular economy
- Use of climate- and environmentally-friendly technologies, processes, raw materials and products
- Measures to increase energy efficiency and the share of renewable energy in energy consumption at company sites.

Animal and species protection

We adhere to the principles of animal welfare and biodiversity conservation and align our business activities accordingly. The keeping and use of animals must comply with applicable statutory animal welfare requirements and be species-appropriate. The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) serves as a guiding principle in this regard.

Human rights and labour standards

Human dignity is inviolable. We therefore respect the internationally recognised human rights enshrined in the United Nations Universal Declaration of Human Rights. We adhere to the internationally recognised labour standards of the International Labour Organisation (ILO), as set out below in this Code of Conduct.

In all our business activities, we strive neither to cause nor to contribute to human rights violations. We expect the same from our business partners. Where necessary and possible, we support our suppliers in this regard.

Employment relationships

We treat our employees with respect. We reject any form of unlawful punishment, abuse, harassment, intimidation or other undignified treatment of employees.

We apply the applicable labour law in all employment relationships and expect the same from our contractual partners. At the start of the employment relationship, employees must be provided with clear information on the essential terms and conditions of employment, including their rights and obligations, working hours, remuneration, and payment and payroll procedures.

We respect and protect the right of employees to terminate their employment relationship in accordance with the applicable notice period.

Rejection of child labour and Protection of young workers

We do not tolerate child labour and observe the applicable statutory minimum age for employment. In any case, we do not employ anyone under the age at which compulsory schooling ends under the law of the place of employment, nor anyone under the age of 15. Internships are organised in accordance with legal provisions.

We expect our contractual partners to have appropriate means of verifying age in order to prevent child labour. Should child labour be identified, all necessary measures must be taken immediately, prioritising the child's welfare, protection and development.

In the case of persons under the age of 18, the rights of young workers must be observed; they may only be employed if it is ensured that the working and employment conditions do not pose a risk to their health, safety or morals, nor are they detrimental to their development.

Rejection of forced labour

We reject forced or compulsory labour in any form. This also applies to any form of debt bondage, serfdom, slavery or slavery-like practices, human trafficking, and extends to all forms of involuntary labour and services that are incompatible with internationally recognised labour and social standards.

Principles of remuneration

We apply the statutory provisions regarding the remuneration of work. We ensure that the pay of employees in the workplace does not fall below the applicable statutory minimum wage. In countries or regions without a statutory wage framework, we ensure

that the wage paid for regular full-time work is sufficient to meet the basic needs of employees.

We do not tolerate wage deductions that are not permitted by law, including wage deductions as a disciplinary measure.

Working hours

We apply the statutory provisions on working hours, including overtime, rest breaks and annual leave.

We ensure that

- the standard weekly working hours, plus the maximum possible overtime, are not exceeded
- working time regulations are observed.

Freedom of association

We respect our employees' right to freedom of association and freedom of assembly, as well as the right to collective bargaining and collective agreements, insofar as this is legally permissible and possible in the respective country of employment. Where this is not permissible, we seek appropriate compromises for our employees.

Diversity and Inclusion, Prohibition of Discrimination

We value the diversity of our employees and promote a working environment that fosters inclusion. We are therefore committed to equal opportunities and reject any form of discrimination or unequal treatment on the grounds of national or ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief. We uphold the principle of equal pay for male and female workers for work of equal value.

Health and Safety at Work

We comply with national and international occupational health and safety standards. We ensure a safe and healthy working environment (preventing accidents, injuries and work-related illnesses) in order to safeguard the health and safety of our employees and third parties.

Implementation of the Code of Conduct

We expect our suppliers and business partners, with regard to supply chains, to identify risks within these chains and to take appropriate measures. In the event of suspected breaches, and to safeguard supply chains with increased risks, we further expect our suppliers and business partners to inform us promptly and, where necessary, regularly about the identified breaches and risks, as well as the measures taken to remedy them. Should we identify a breach of the provisions of this Code of Conduct, we will notify the supplier or business partner in writing without delay and set a reasonable grace period for them to bring their conduct into line with these provisions. If a remedy is not possible within the foreseeable future, the supplier or business partner must notify us immediately and, together with us, draw up and implement a plan with a timetable to end or minimise the breach. We reserve the right to temporarily suspend the business relationship in the meantime. If the grace period expires without result, or if the implementation of the measures contained in the plan does not remedy the situation after the expiry of the timetable and no less severe means are available, we may terminate the business relationship and cancel all contracts. A statutory right to extraordinary termination without setting a grace period, in particular in the case of intentional breaches deemed to be very serious, remains unaffected, as does the right to claim damages.

Reporting potential misconduct or complaints procedures

Reputable reports help us to counteract breaches at an early stage. This enables us to avert damage to Exportverpackung Sehnde GmbH, our employees, suppliers and business partners. All employees have the opportunity to submit reports or complaints regarding all topics mentioned in the Code of Conduct and beyond. The same applies to customers, suppliers and other business partners. Details of the reporting office can be found on our website.



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