



Code of Conduct

Preamble

VPF-Veredelungsgesellschaft mbH für Papiere und Folien & Co. KG (VPF) is a medium-sized company in the paper-, cardboard- and plastic-processing industry, based centrally in Germany. It develops, produces and distributes self-adhesive paper and film laminates worldwide, which exceed the typical standard.

Besides the long-term partnerships we seek with our valued customers and suppliers, our business activity is increasingly aimed at sustainability. For us, this involves continuously considering and balancing economic, social and ecological concerns. We do so by strictly complying with applicable legal regulations and upholding our responsible understanding of ethics.

The following Code of Conduct is intended as a guideline for the behaviour of all stakeholders, in particular employees, suppliers and service providers.

1. Basic principles

This Code of Conduct is based on our shared understanding of socially responsible business management in line with the following principles. Within the scope of our abilities and area of influence, we assume responsibility by considering the consequences of our business decisions and actions in terms of legal, economic, technological, social and ecological respects. We thereby contribute to the social and economic development of the countries and regions in which we actively or indirectly operate.

Our actions are aligned with the pertinent legal regulations. We follow ethical values and principles, in particular integrity and honesty as well as respect for the dignity of people, as defined in the Universal Declaration of Human Rights of the United Nations, the OECD Principles of Corporate Governance for multinational companies and the working standards of the International Labour Organization (ILO) as well as the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct sets down the basic principles that our employees are



required to observe. We expect the same shared understanding from our business partners around the world. This Code of Conduct does not establish any rights in favour of third parties.

2. Adherence to laws

Complying with the applicable laws and legal regulations of the countries we operate in is a matter of course for us. Where the local laws and provisions are less restrictive, we align our actions according to the principles of this Code of Conduct. In the event of contradictions between mandatory local law and the principles of this Code of Conduct, local law takes precedence. However, we endeavour to observe the content of this Code of Conduct.

3. Integrity and compliance

We have taken appropriate compliance measures that suitably cover the following topics:

3.1 Corruption

We tolerate neither corruption, bribery nor extortion as they prevent fair conditions of competition. Gifts that are intended or could appear to influence commercial decisions or otherwise produce an impermissible advantage are neither promised, offered, granted, requested nor accepted in our business relationships. Particularly strict standards apply in the treatment of people subject to special regulations under criminal and liability law (e.g. holders of public office).

3.2 Fair competition

We act in accordance with national and international competition and anti-trust law. We neither participate in price collusion, the division of markets nor collusion regarding customers, markets or offers.

3.3 Prevention of money laundering

Money laundering refers to the process of introducing unlawfully obtained funds or illegally acquired assets into legal financial circulation. We comply with our statutory duties for the prevention of money laundering and do not participate in transactions that serve to conceal or integrate unlawfully obtained assets.

3.4 Protection of information and intellectual property

We protect confidential information and respect intellectual property. Technology and knowledge transfer must occur in such a manner that safeguards intellectual property rights, customer information, business secrets

and non-public information. We observe the applicable laws on the protection of business secrets and treat the confidential information of our business partners accordingly.

3.5 Data protection

We process and protect personal data in compliance with legal regulations. Personal data is collected or processed confidentially only for lawful, previously defined purposes and in a transparent manner. This takes place only when this data is protected by appropriate technical and organisational measures against loss, alteration and unauthorised use or disclosure.

3.6 Export control

We are committed to complying with the legal requirements applicable to export control – in particular approval requirements, export bans and the proscription of assistance – in the shipment and export of our goods.

3.7 Avoidance of conflicts of interest

We avoid conflicts of interest internally and externally, which could illegitimately influence business relationships. For instance, as a rule important decisions are taken jointly by multiple people. We disclose any perceived conflicts of interest.

4. Health and safety

We safeguard the health of our employees by taking appropriate health and occupational safety measures (e.g. the implementation of a health and occupational safety management system) that suitably addresses the following topics:

- Compliance with applicable laws and alignment with international standards in relation to health and safety at work
- Appropriate workplace design, safety rules and the provision of suitable personal protective equipment
- Implementation of preventive controls, emergency measures, an accident reporting system and further appropriate measures for continuous improvement

We ensure that all our employees are briefed accordingly.

5. *Remuneration and working hours*

Remuneration is determined in accordance with applicable laws as well as any existing binding collective agreements. Remuneration also takes into account the relevant national laws on minimum wage. Employees are clearly and regularly informed in detail about the composition of their pay.

We observe the pertinent laws and (international) working standards with respect to the maximum permissible working hours and make sure that:

- working hours, including overtime, do not exceed the maximum limits permitted by applicable law;
- weekly working hours, including overtime, do not amount to more than 60 hours – even in exceptional cases – where such laws are not in place;
- employees have at least one full day free per calendar week.

6. *Respect for human rights*

We observe and support compliance with internationally recognised human rights. Moreover, we:

- respect the personal dignity, privacy and personality rights of every individual;
- protect and uphold the right to freedom of opinion and freedom of expression;
- do not tolerate any unacceptable treatment of employees, such as any physical or mental harm, sexual or personal harassment or discrimination.

6.1 *Prohibition of child labour*

We do not tolerate child labour. We do not employ any staff under the age of 15 years and we require proof of age. The minimum age may be reduced to 14 years in countries subject to the exemption for developing countries under ILO Convention No. 138. We do not employ any staff for dangerous work who are unable to prove that they are at least 18 years of age in accordance with ILO Convention No. 182.

6.2 *Prohibition of forced labour*

Forced labour, modern slavery or similar forms of coercion are banned. Labour must always be voluntary and it must always be possible to terminate the employment relationship.

6.3 Freedom of association and collective agreements

We respect the right of employees to freely associate, form a coalition and engage in collective bargaining, provided this is legally permissible and possible in the respective country in which we operate. Where this is not permissible, we seek appropriate compromises for our employees.

6.4 Promotion of diversity and equal opportunities

We promote equality of opportunity and do not tolerate any discrimination. We treat all people equally, regardless of their gender, age, skin colour, ethnic background, sexual identity and orientation, disability, religious affiliation, world view or other personal characteristics.

7. Environment, climate protection and quality

We act in accordance with the applicable laws and follow international standards to minimise negative impacts on the environment and continuously improve our activities for environmental and climate protection.

Environmental awareness is promoted among all employees and we offer necessary training and courses.

We have taken appropriate environmental protection measures (e.g. implementation of an environmental protection management system pursuant to ISO 14001) that suitably cover the following topics:

- Objective, definition and implementation of measures and their continuous improvement
- Environmental aspects such as the reduction of CO₂ emissions, increasing energy efficiency and the use of renewable energy, ensuring water quality and reducing water consumption, ensuring air quality, promoting resource efficiency, reducing waste and ensuring correct disposal as well as the responsible treatment of hazardous substances for people and the environment

• We also seek to achieve maximum quality by complying with pertinent standards of quality management systems, such as ISO 9001.

8. Handling of conflict minerals

We take measures with the necessary degree of care to avoid the use of conflict minerals in our products in order to prevent human rights violations, corruption and the financing of armed groups or similar.

9. *Supply chain*

We expect our suppliers and service providers to follow the principles of this Code of Conduct or to apply equivalent policies. Furthermore, we encourage them to impose the content of this Code of Conduct on their own supply chains.

We reserve the right to verify compliance with this Code of Conduct by our suppliers and service providers on a systematic or ad hoc basis.

This can take place in the form of questionnaires, reviews or audits.

Should doubts persist with respect to compliance with this Code of Conduct, the supplier or service provider is urged to take suitable countermeasures and to report this to their responsible contact in our company. Where these efforts fail, cooperation will be terminated.

10. *Consumer interests*

Insofar as consumer interests are affected, we comply with consumer protection regulations as well as appropriate sales, marketing and information practices. Increased attention is paid to particularly vulnerable groups (e.g. young people or pregnant women).

11. *Implementation and enforcement*

We take appropriate and reasonable efforts to implement, document and apply the principles and values described in this Code of Conduct. All employees are sensitised on the content of the Code of Conduct and are trained on relevant topics as necessary. Violations of the Code of Conduct are not tolerated and may lead to consequences under labour law.

11.1 Communication

We communicate openly with employees, customers, suppliers and other interest groups and stakeholders and seek dialogue on the requirements of this Code of Conduct and its implementation.

11.2 Reporting violations

We offer our employees and business partners a possibility for reporting potential violations of the principles of this Code of Conduct, including anonymously. Should you have any information regarding a suspected



violation, please contact your line manager or the Executive Board of VPF directly or anonymously. All reports will be investigated.

A handwritten signature in black ink, appearing to read 'R. Waltmann', is written in a cursive style.

Sprockhövel, September 2022

Ralf Waltmann, Managing Director

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