

# Supplier Code of Conduct

**Manufacturing sustainable packaging** is a goal – and a mission – that at Ströbel we take very seriously. The entirety of the technologies we deploy, the products we make and the concepts and innovations that we develop have one common goal: to make an optimal contribution to ensuring a viable future and way of life for future generations. To this end, we abide by rigorous standards when it comes to adhering to all applicable regulations and business ethics. This Code of Conduct lays out the standards and practices governing our activities, so as to ensure that we are adhering at all times to all relevant legal regulations and company policies.

The underlying principles of our tireless efforts to achieve sustainable development for our supply chain are of central importance to us. We aim to help our suppliers improve their sustainability performance within our supply chain. We expect our suppliers to observe not only all applicable rules and regulations, but also all internationally recognized human rights, environmental, social and corporate governance standards – also known as ESG standards, particularly as these standards are laid out in international covenants.

We also expect our suppliers to implement these same standards in their dealings with their providers and subcontractors. As a Ströbel supplier, we expect you to strictly adhere to the ESG standards listed below. They are based on the ten principles of the UN's Global Compact Initiative, the United Nations Guiding Principles on Business and Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

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## **When it comes to environmental matters, we expect you to do the following:**

- Adhere to all applicable environmental and work safety regulations, as well as all international covenants concerning environmental standards.
- Support the furtherance of environmentally sustainable product development, manufacturing, logistics, usage and end of life disposal.
- Implement management policies and practices that ensure compliance with all applicable product quality and safety requirements.
- Take all measures necessary to (1) safeguard the health and safety of your employees and the people who live or work in the environs of your production facilities; and (2) protect the general public against any health hazard that may be engendered by your products and/or your production processes.
- Use resources efficiently, employ energy-efficient, green technologies, reduce waste, and keep air, water and soil pollution to an absolute minimum.
- Minimize any negative impact of your activities on biodiversity, climate change and local or regional water supplies, with a view to ensuring that all populations affected by your activities can lead a safe and enjoyable existence.
- Ban unlawful evictions and unlawful seizure of land, forests or waterbodies.

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## When it comes to social issues, we expect you to do the following:

- Ensure that your business activities and the way you treat your employees are fully in line with the tenets of international human rights principles, and do not involve, either directly or indirectly, anything resembling forced labor (including but not limited to modern-day slavery and human trafficking) or child labor of any kind. You furthermore need to ensure that none of the semi-finished products that you use are produced using labor of this kind.
- Support, and if possible advocate for, freedom of association and collective bargaining rights, in accordance with the relevant regulations.
- Treat your employees with respect, proactively foster an integrative work environment, and prohibit the following: discrimination, obstacles to equal opportunity, harassment, abuse, or inhumane treatment occasioned by factors such as national origin, race, skin color, religion, world-views, gender, sexual orientation, gender identity and/or any personal expression or manifestation thereof, age, physical or mental disabilities, political or union affiliations, nationality, motherhood, marital status – or any other characteristic that is protected by any statute. Proactively show support for all of the above via your choices of suppliers and subcontractors.
- Enable your employees and other stakeholders to express their concerns about work related issues and to act as whistleblowers in the event any illegal practices come to light at the workplace.
- Adhere to local and regional laws concerning minimum wage and working hours, and provide your employees with financial compensation that is commensurate with local socioeconomic conditions.
- Ensure that all company security personnel adhere to all applicable legal regulations.
- Ensure that no product in your portfolio contains conflict minerals that directly or indirectly finance or support armed groups or that give rise to human rights violations, pursuant to Annex II of OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (OECD DDG). Carry out due diligence for supply chains of minerals in accordance with OECD DDG guidelines.

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## When it comes to governance, we expect you to do the following:

- Adhere to all national and international trade laws and regulations, especially (but without limitation) cartel laws, trade compliance and sanction regulations
- Regard business integrity as the cornerstone of all your business relationships.
- Forbid bribery, corruption and money laundering of any kind.
- Forbid the giving of gifts to any private individual or elected official, if such gifts are given with the intention to influence business decisions or to make their recipients violate their duties and obligations.
- Show impeccable respect for your employees' privacy, keep confidential all information concerning your staff and business associates, and safeguard all data and intellectual property in your possession against misuse.
- Implement a compliance management system that aims to ensure that your company adheres to all applicable statutes, regulations and standards.
- Implement training measures with a view to providing your managerial and rank and file employees with adequate knowledge and understanding of the provisions of this Supplier Code of Conduct, of all applicable statutes and regulations, as well as of all commonly accepted standards.
- You can either accept the principles enunciated above or demonstrate your commitment to complying with these principles by drafting your own Code of Conduct or company policy that integrates the provisions contained herein.
- We reserve the right to conduct audits or evaluations with a view to determining whether your company is complying with all applicable statutes, regulations and standards; and will take appropriate measures regarding our relationship with you, in the event any shortcomings or irregularities that are cause for concern come to light via any such audit or evaluation. We furthermore reserve the right to terminate any business relationship if any violation of any applicable international standards, guidelines or other principles comes to light, and such violation is not rectified in a timely fashion, or if any systematic violation of this type comes to light. This Supplier Code of Conduct shall be without prejudice to any farther-reaching contractual obligations, which shall take precedence over the provisions herein. This shall apply in particular to any contractual provisions that require you to comply with specific ESG standards and/or any statutory requirements related to any supply chain (e.g. the German Supply Chain Act).