

## 1. Validity

This Code of Conduct applies to all offices and production facilities of KM Packaging GmbH in Europe.

## 2. Laws, standards and values

All employees of KM Packaging GmbH commit themselves to compliance with all laws and regulations of the respective country and company. In addition, all are guided by generally accepted values and principles. In particular, the following apply

Integrity  
Righteousness  
Respect  
Trust

This creates a framework for ethical and moral behavior, as well as for behavior that is correct under competition and antitrust law.

## 3. Human and labor rights

The guidelines in this area follow the code of conduct of the international Business Social Compliance Initiative (BSCI) and the conventions of the International Labor Organization (ILO). Internationally applicable human rights are recognized and promoted.

### 3.1 Child and forced labor

Any form of forced labor, bonded labor, serfdom and slave labor/slavery, as well as conditions similar to these, are rejected. Any employment relationship must be on a voluntary basis and for fair pay. Child labor and exploitation of young people is rejected. Employees must be at least 16 years old or older.

### 3.2 Health and safety at work

KM Packaging GmbH has a wide range of measures in place to ensure occupational safety, such as protective clothing, regular training courses, accident statistics to enable accidents to be avoided as a result, and an occupational safety committee. Care is taken to prevent accidents in advance and to continuously increase safety in the workplace.

### 3.3 Remuneration

All employees shall receive a fair wage for full-time employment that is at least sufficient to cover basic needs. Working hours shall be in accordance with applicable national law, industry standards or relevant ILO conventions. Additional work can only be done on a voluntary basis.

### 3.4 Non-discrimination, harassment and equality

Discrimination on any grounds is contrary to our ethical values and will not be accepted. All people, whether applicants or existing employees, should have a level playing field. Whether as colleagues, in the relationship with external partners or in the relationship with superiors, everyone is obliged to strive for the highest standards in dealing with each other. Physical, psychological and sexual violence as well as sexual harassment must have no place in the company. All cases that become known will be followed up and punished with appropriate measures.

### 3.5 Working conditions

Working conditions are of a high standard in accordance with occupational health and safety measures, as well as German standards. All employees in the office are entitled to ergonomic and best possible working utensils. This is discussed individually. In production, the workplaces are continuously reviewed and improved according to the given, production-technical possibilities.

All employees are encouraged and invited to freely express their wishes and suggestions regarding working conditions.

**The freedom of expression and privacy of all employees is respected and supported.**

## **4. Ethical principles**

The guidelines in this area follow the OECD Guidelines for Multinational Enterprises, the BSCI Code of Conduct and the United Nations Global Compact.

### **4.1 Bribery and corruption**

KM Packaging GmbH is committed to fair competition. We observe and support compliance with laws protecting competition, in particular antitrust law. Inadmissible agreements on prices or other conditions, sales territories or customers, as well as an abuse of market power, are contrary to our principles. We reject bribery and corruption and do not tolerate such behavior.

### **4.2 Gifts**

Small gifts and attentions, especially around Christmas between business partners and our employees are fine and accepted. Larger gifts, especially if they exceed a value of 50,- Euro, should not be accepted. It is recommended to thank for the gift in a friendly manner and to refuse in a friendly manner with reference to the Ethics Policy. If problems arise, the supervisor may be consulted.

In addition, care should be taken to ensure that gifts from business partners are not connected with orders placed, product launches or tender awards, in order to rule out bribery and corruption.

### **4.3 Business Secrets**

Business secrets of business partners and KM Packaging GmbH itself are treated confidentially by all company employees. The disclosure of confidential information to third parties or making it publicly available is prohibited. This also applies after leaving the company. This may include: customer/supplier relationships, prices, use of materials, technologies, machines, raw material purchases, etc.

### **4.4 Reporting violations of ethical standards**

All employees are encouraged to report violations of KM Packaging GmbH's ethical standards and human and labor rights via the email address [Ethik@km-packaging.com](mailto:Ethik@km-packaging.com), the care box, the ethics officer or the supervisor without fear of sanctions or consequences.

### **4.5 Alcohol and drug use**

Consuming alcohol and drugs before or during work hours is prohibited. If alcohol or drugs have been consumed, you put yourself and others at risk. Machines may not be operated. Instructions may not be followed properly. The inhibition threshold is lowered, which means that situations can no longer be assessed correctly and often also the interaction, i.e. the tone, suffers. If necessary, you may not be able to help others adequately in accident situations or something similar.

If you are dependent on alcohol or drugs and need help, please contact the ethics officer at [Ethik@km-packaging.com](mailto:Ethik@km-packaging.com).

### **4.6 Dealing with social networks**

Ethical behavior extends beyond professional working hours. Even in their private free time, employees must always be aware that their contributions to Twitter, Facebook, Instagram, podcasts, online diaries or similar public media in written, visual or audio form should always meet high ethical standards. Especially if you are recognizable as an employee of KM Packaging GmbH and / or a reference to your work at KM Packaging is made.

KM Packaging GmbH expressly advocates non-discrimination, against bullying, for the protection of trade secrets and trusts in the integrity and morality of all employees.

**5. Product safety**

KM Packaging GmbH places the safety of the manufactured products and thus the consumers in the center of its interest. If there are any indications that a product is contaminated, damaged or defective in any other way, all stakeholders will be informed and products will be returned. We are convinced that this is the only correct way to prevent long-term damage to the company, even if financial losses are possible in the short term.

All employees are expressly requested and asked to report possible damage / defects in products to Quality Assurance. If this is not possible, the supervisors, the ethics officer or the management are also available. For this purpose, too, the channels of the suggestion box or the e-mail address [Ethik@km-packaging.com](mailto:Ethik@km-packaging.com) can be used.

**6. Ecology and Sustainability**

As one of the most important goals, we focus on sustainability in the supply chain. This means that, for the benefit and success of all parties involved, we give high priority to managing the environmental, economic and social impacts over the entire life cycle of products and services and expect the same from our suppliers.

In this area, we rely on established standards such as ISO 14001, which include the following points:

- Treatment and discharge of industrial wastewater
- Handling of air emissions
- Dealing with waste and hazardous substances
- Reducing consumption of raw materials and natural resources
- Dealing with energy consumption / efficiency

In addition, KM Packaging GmbH strives for environmentally friendly production methods, in accordance with the Rio Declaration of the United Nations. We rely on renewable energies and use them as far as we can in the manufacturing process. We try to give preference to recycled materials as raw materials where possible.

We ask all our business partners to comply with the OECD Guidelines on Conflict Minerals.

The General Leadership of

**KM Packaging GmbH**



Klaus Mauer -  
CEO



Dr. Ute Jausel  
CHRO



Holger Frank  
CFO



Christopher Kurz  
COO

Ubstadt-Weiher May 30<sup>th</sup> 2022