



Klingele Code of Conduct

KLINGELE
PAPER & PACKAGING GROUP



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Dear Colleagues,

- KLINGELE PAPIERWERKE GMBH & CO. KG (hereinafter referred to as “Klingele”) is a modern company with now 100 years of company tradition. The success of our entire group of companies has always been based on responsible and ethical conduct vis-à-vis employees, business partners, society and the environment. We want to succeed in fair competition through quality innovation and service. We are committed to the basic values of integrity, transparency and responsibility in business dealings and therefore want to ensure compliance with all applicable national and international legislation. The reputation of our company and the trust of our suppliers and customers and consequently also the existence of our company depends very much on the conduct of each individual employee.
- As a common policy, the code of conduct contains binding minimum standards that apply to every Klingele employee, representative and partner. Compliance with laws and internal regulations is a matter of course in our business activities. This way, we contribute to securing and strengthening the long-term competitiveness and successful positioning of Klingele. Furthermore, violations may lead to significant costs and jeopardise the economic existence of our company.
- The Klingele shareholders and management expect every employee to act within the law. This code of conduct aims to raise awareness of legal risks and help to avoid violations of the law. It therefore provides a framework, but may of course not include all laws and is therefore never complete. Please contact your supervisor of the management if you have any questions and comments.
- We thank you for making a contribution to our corporate culture and our reputation as a trusted business partner through your own personal conduct.

Dr. Jan Klingele
Managing Partner of the Klingele Group

General requirements



Compliance with our code

- The task of every manager at Klingele is to ensure that their assigned employees are familiar with this policy and comply with the provisions contained therein. Managers have a special duty to act as a role model. They embody our values convincingly and live our corporate culture to the full. It is also the task of the company and its managers to create an environment in which all issues may be addressed openly and without fear of reprisals.
- Questions about this policy will always crop up again and again. If employees are unsure about the correct conduct, they may discuss the matter with their supervisor or the management.
- Of course, every single Klingele employee always remains responsible for their own actions and this also applies if the manager has given their approval.
- The management and all managers at Klingele ensure compliance with the policy and will follow up on any violations detected without exception. Violations against the policy will not be tolerated and may result in consequences for the employment relationship and for compensation claims.

➤➤ In addition to their function as a role model, our managers are tasked with implementing the code of conduct in the company and ensuring it is complied with. <<



Scope of our code

- All companies and therefore all employees of the Klingele Group fall within the scope of this code. This includes, in particular, all companies in which the Klingele family directly or indirectly holds a total of more than 50% of the voting shares and consequently may effectively control the management of a company. In the event of an equal joint venture with a business partner or a minority shareholding, Klingele will assert its influence in order to prevent violations of the principles of this policy and call the shareholding into question in the event of significant misconduct by the company on a repeated basis.
- The code of conduct requires that all Klingele companies comply with the applicable laws and provisions of the company in which the company is based or has its place of business. In the areas of occupational safety, environmental protection and product safety in particular, Klingele also endeavours to comply with European standards in non-EU countries, provided that they do not conflict with the legal provisions of the respective country.
- In many cases we have also undertaken to comply with hygiene, safety or quality and environmental or social standards that go over and above the statutory minimum.

➤➤ **We comply with the applicable law at local, national and international level.** <<



Avoidance of conflicts of interest

- In day-to-day business we may be faced with decisions where the interests of the company conflict with our personal interests. Such conflicts of interests may lead to us no longer making impartial decisions that are in the best interest of the company.
- Employees are obliged to avoid any activity inside and outside the company that will lead or may lead to a conflict between their personal interests and the interests of Klingele. In particular, it is prohibited to operate a company that is in competition or in a business relationship with Klingele and to have a significant shareholding in such a company.
- The same also applies to business relationships with relatives or companies in which a family member of an employee holds shares or has a significant interest in the company in some other way. Should a business relationship with this company be in the interest of Klingele despite this family relationship, the family or private relationship must be reported to the supervisor or the business relationship must be approved.
- Business matters should never be influenced by personal interests or considerations. No employee must abuse their position or Klingele property for personal benefits or any other gain.

➤➤ **We draw a line between private and business interests.** <<





Handling of company property

- We assume that assets belonging to the Klingele Group will be handled carefully and appropriately. The assets are only permitted to be used for the purpose of business activities. Non-material values, such as know-how and intellectual property rights, are also company property. The explicit approval of the responsible manager or a company manager is required in order to remove company property from the business premises or to use it for private purposes.

➤➤ We use company property or other company assets in a responsible manner. <<

Financial integrity

- We must act responsibly, honestly and correctly when handling company funds and dealing with business transactions. All business transactions are properly accounted for and recorded. All business records created, published and made available to the relevant authorities, shareholders and creditors must be correct and complete in accordance with the applicable accounting principles.

➤➤ We also demonstrate our integrity through our complete and orderly accounting. <<



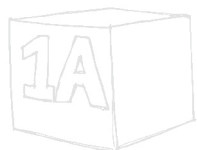
Dealing with business partners and third parties



Product safety and product quality

- Our products are the basis for our customers' trust. We are therefore committed not only to comply with the legal requirements with regard to quality and safety but also to fulfil the highest quality standards for our products. Our goal is to ensure the trust and satisfaction of customers as well as the good reputation of the company. Of course, this includes compliance with the relevant legal provisions, especially concerning the product safety, product liability and warranty.

» Our customers rely on the fact that we produce and deliver high-quality products.«



Fair competition

- Fair competition creates incentives for innovation and high product quality for the benefit of our customers. We support free competition and the free development of all market players. We must therefore respect the principles of fair and open competition.
- Agreements of any kind with competitors regarding prices, terms and conditions, market sharing, non-compete agreements and other economically sensitive matters are strictly prohibited. This also includes informal discussions and informal agreements ("gentlemen's agreements") that have as their object or affect the above-mentioned restrictions on competition. An exception applies only if individual measures have been previously checked to determine their compatibility with the applicable antitrust regulations.

» We participate in competition in a fair and proper manner.«



Protection against corruption and bribery

- We are convinced that our products can compete in the marketplace on their own merits. Competition in Germany and abroad must not be influenced or distorted by bribes. Klingele prohibits all employees to engage in or tolerate corruption.
- We also expect all business partners to comply with and enforce these principles. Employees must therefore demand or accept no personal benefits, cash payments, gifts, invitations to business meals or other incentives for themselves or for third parties. None of us must offer or grant cash payments, gifts or other incentives to business partners or third parties when negotiating, awarding or executing a contract. This applies worldwide, regardless of the location and culture. More detailed information can be found in the policy entitled "Dealing with gifts and invitations at Klingele". Minor exceptions to this principle are permitted. This is always the case if the incentive or the acceptance of an incentive does not appear to constitute corrupt conduct and falls within the scope of commonly accepted gestures of politeness or business gifts of negligible value. These must be handled in accordance with the law by which we are bound and the guideline regarding the prevention of corruption.
- We must make sure in each case that the recipient does not conceal acceptance of an incentive and is therefore not forced into a position in which they could be bribed. The points that we need to be aware of in this respect and the other exceptions that are permitted can be found in the guideline regarding the prevention of corruption.
- The offer or granting of cash payments, gifts or other incentives to public officials is generally prohibited, even if they are low in value.

» We will not sacrifice the reputation and integrity of our company for an unfair competitive advantage.«

Handling of information



Data protection, confidentiality and protection of the rights of third parties

- › Our customers, business partners and employees expect us to handle their information and personal data carefully and in accordance with the applicable data protection laws. Compliance with the Data Protection Directive is therefore very important for Klingele.

›› We handle personal data and confidential information with the utmost care. ‹‹

- › All employees are required by law to observe data confidentiality and not to collect, process or use the personal data of employees, customers and third parties without authorisation, i.e. without their consent or legal permission. The person concerned must be informed by Klingele when their personal data is collected for the first time if it is collected without their knowledge. The person concerned may request information about their stored data, provided that no trade secrets are involved.
- › Confidential information and trade secrets as well as business documents (including E-mails) are the property of Klingele and must be stored and maintained properly. They must only be disseminated to the general public by representatives explicitly authorised to do this and must be protected from unauthorised access by third parties and other employees. We must fully comply with the applicable company policies on data protection at Klingele at all times.
- › We respect the effective proprietary rights of third parties, such as patents, copyrights or trademarks and refrain from any unauthorised use. No employee must acquire or utilise secrets from a third party without authorisation.

Protection of copyright laws and personal rights

- > We are committed to observing the respective copyright laws and personal rights when using images, photos, texts and products in official Klingele media.
- > Pictures of individuals must only be used with their consent or within the scope permitted by law.

>> We respect the personal rights and privacy of employees when handling personal data. <<



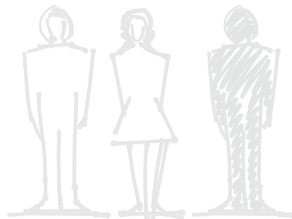
Humans and the environment



Working environment

- All Klingele employees contribute to a corporate culture characterised by openness, fairness, understanding and tolerance in their day-to-day activities. We expect all employees to be friendly, objective and fair when dealing with colleagues, employees and third parties.
- No employee must be harassed, discriminated against or disadvantaged for no justifiable reason because of their race, nationality, ethnicity, gender, religion or beliefs, political views, age, disability or sexual orientation.
- For Klingele, an occupational health management programme is the basis for successful business activities. Klingele complies with the applicable occupational health and safety regulations and provides for a safe and healthy working environment in order to maintain the health of its employees and avoid accidents, injuries and work-related illnesses.
- The necessary measures are taken to avoid accidents and physical and mental injuries that may arise in connection with the activity.

➤➤ **Our values are above all expressed in our respectful treatment of each other. <<**



Working hours and child labour

- The respective legal regulations, company standards on working hours and statutory public holidays are observed.
- We assert the rights of children and young people. Any exploitation of children and young people is prohibited and is rejected by us. The legal regulations, national standards and directives concerning the protection of children and young employees are observed. In the case of minors working for the company, it is important to make sure that they are not exposed to situations that are dangerous, unsafe or hazardous to their health.

➤➤ **Fair working conditions are an integral part of our corporate culture. <<**

Protection of the environment

- As an international company we are responsible for protecting the environment and preserving it for future generations. We are therefore continuously working towards reducing our impact on the environment at our own locations and along the supply chain. For this reason, we comply with all the relevant environmental regulations at all times and set binding environmental and energy saving goals.
- Every employee must observe the applicable environmental laws and can make an active contribution to protecting the environment through their own responsible and environmentally-conscious actions.

➤➤ **We want to have only a positive impact on our environment. <<**

Questions about decision-making

- Many decisions in day-to-day business are simply routine. But sometimes we are faced with a situation where the right decision is difficult. If you are unsure as to whether a decision complies with the requirements of the code of conduct, it helps to ask yourself a few simple questions:

➤➤ Integrity means making the right decision even if no-one is watching. <<

- Is my decision legally correct and in line with the expectations of Klingele?
 - Can I make my decision in the best interests of Klingele and free of any conflicting personal interests?
 - Can I make the decision with a clear conscience?
 - Can I justify my decision openly outside the company? What would my friends and family say about it?
 - Does my decision preserve Klingele's good reputation?
- If you can answer “yes” to each of the questions, your decision is probably acceptable. If you are in doubt about any of these questions, seek advice from your supervisor or the contacts in our Compliance Organisation Department.



Where you can report concerns

- The regulations within this code of conduct are communicated to all employees and are available as a text document on the Klingele website. We expect all employees to act responsibly in accordance with this code of conduct. If there are reasonable grounds to suspect a violation of any one of the above-mentioned regulations, this must be reported immediately.

➤➤ We take seriously what you have to say. <<

- If you have any questions or want to report a possible violation, please contact your direct supervisor. If you do not want to contact your manager, you can take up direct contact with Christina Lauber, our Compliance Officer, or in the case of data protection concerns, Ralf Zlamal, our Data Protection Officer.

➤ Contact

Internal Compliance Officer

Christina Lauber
E-mail: christina.lauber@klingele.com
Tel.: +49 7151 701 250
Mobile: +49 173 490 50 83

External Data Protection Officer

Ralf Zlamal
IITR Datenschutz GmbH
E-mail: zlamal@iitr.de
Tel.: +49 89 189 173 60

- Our messages are treated anonymously and in the strictest confidence. If a suspicion of misconduct is reported in good faith, no negative effects are to be expected.
- It is prohibited to use the complaints procedure for deliberately false evidence and information. It should be noted that we are legally obliged to communicate strictly confidential information vis-à-vis third parties in individual cases (e.g. to initiate a preliminary investigation). Employees may also be summoned as a witness depending on the respective case.

Consequences of violations

- In the event of violations, we reserve the right to initiate disciplinary and legal actions vis-à-vis the appropriate employee depending on the seriousness of the violation.

➤➤ **We are aware that violations may have far-reaching consequences.** <<



Conclusion

- All company regulations and policies must be compatible with the Klingele Code of Conduct. We cannot predict every individual case and every situation. The code of conduct is therefore broad-based and kept very general. We don't want it to replace any existing regulations or procedural instructions. Instead it is meant to address the key points of your own responsibility and the corporate responsibility and consequently give all employees a clear understanding of the principles and ethical values applicable at Klingele.
- **The code of conduct is also available on the Klingele Paper & Packaging Group website and on the intranet.**

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