

Code of Conduct for Business Partners

July 2023

Our Code of Conduct for Business Partners

For Moderne Verpackung Carl Bernh. Hoffmann GmbH in Wetter/Ruhr (further on „Moderne Verpackung“), sustainability means operating responsibility over the long term – with respect to our customers, investors, and business partners, our employees and society, as well as to natural resources. Moderne Verpackung respects and supports the implementation of the values of the International Charter of Human Rights, particularly the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We expect our business partners and especially our suppliers to act in a similar way. Our aim in drawing up this Code of Conduct is therefore to help create a common understanding of how these principles must be implemented in everyday working life. Compliance with the principles formulated in this Code of Conduct for Business Partners (hereinafter referred to as the “Code of Conduct”) has an influence on the business relationship between Moderne Verpackung and the business partner and is an integral part of our evaluation and selection of suppliers, for example. “Business partner” includes, but is not limited to, suppliers, vendors, service providers, dealers, contract partners, sales representatives, brokers, advisors and their staff, agents and representatives.

1. Work

Freely Chosen Employment

Moderne Verpackung respects the right to free choice of employment. We do not tolerate forced labor, involuntary prison labor or any other unlawful obligation of workers, any form of slave labor, serfdom, bonded labor or human trafficking in either our own business area or within the area of influence of our partners. Consequently, employees are free to terminate their employment relationship subject to the applicable period of notice.

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Prohibition of Child Labor

Child labor and any form of exploitation of children are prohibited at Moderne Verpackung and in our value chain. The definition of child labor is based on the principles of the United Nations Global Compact and the International Labor Organization (ILO). If a local law prescribes a higher legal minimum age for workers or longer compulsory schooling, the higher age shall apply. The special need to protect young employees is respected.

Fair Treatment and Equal Opportunities

Our business partners must provide a working environment in which employees are treated fairly and without discrimination and inhumane treatment or threats of inhumane treatment are not tolerated. We do not accept physical punishment, psychological or physical duress, threats, insults or coercion, including (sexual) harassment and (sexual) abuse. Our business partners are required to promote equal opportunities and equal treatment of employees and prevent discriminatory behavior. Particularly in hiring and employing human resources, business partners must not disadvantage, treat preferentially or exclude anyone based on gender, national, ethnic, or social origin, skin color, ideology, religion, age, disability, appearance, sexual preferences and identity, political opinion or marital status.

Working Hours, Remuneration, and Other Benefits

We require the legal regulations in force and the ILO standards on working hours to be complied with in our supply chain. The remuneration paid must be in accordance with the laws in force as well as the legal minimum wage and industry standards. The same applies to overtime and compensation for hours worked in excess of contract as well as to other stipulated employee benefits. We expect employees to be offered fair, competitive remuneration and equal pay for work of equal value. Employees shall be regularly informed about the calculation of their remuneration in a comprehensible form. Remuneration shall be paid at regular intervals and may not be unlawfully withheld as a disciplinary or punitive measure.

The Right to Collective Bargaining and Freedom of Association

Our business partners must respect the right of all employees to form and join unions and worker representative groups and to bargain collectively in accordance with the laws in force. Employees who are members of a union or of a worker representative group must neither be treated preferentially nor be disadvantaged.

2. Health and Safety in the Workplace

Our business partners must ensure a safe working environment at all their production sites as well as a safe living environment in all company -provided living quarters without endangering the health of their employees. A health and safety management system that complies with the relevant legal regulations shall be implemented.

Health and Safety Precautions

All mechanical, chemical, and biological hazards in the workplace as well as risks arising from use of the infrastructure shall be identified, assessed, and documented. Appropriate measures must be taken to protect employees. These documented plans shall be reviewed at regular intervals and updated as needed.

Information and Training

Safety information on all identified hazards must be furnished to the relevant employees. Obligatory training courses tailored to the hazards involved in the employees' work must be given and shall be documented.

Operation and Maintenance

Our business partners must have the necessary processes in place and resources available to ensure adequate maintenance of all equipment and its safe operation.

3. Environment

Measures shall be implemented and documented at all of our business partners' production sites so as to minimize the impact of business activities on the environment by reducing or avoiding emissions, conserving natural resources, minimizing the use of hazardous substances, and avoiding or recycling waste wherever possible. Persons with responsibility for environmental issues shall be designated who will establish, implement and further develop the company's environmental position. A corresponding environmental management system shall be implemented to ensure compliance with national laws and regulations.

Compliance

Our business partners are bound to comply with all laws in force, environmental regulations, and recommendations for environmental protection. All required environmental permits, registrations, and licenses must have been obtained and the associated requirements must be met. Environmental reporting shall comply with the relevant legal and regulatory requirements.

Waste, Wastewater, Emissions

Our business partners have systems in place to ensure safe, appropriate management of emissions, waste, and wastewater, particularly with regard to disposal, transportation, storage, and recycling. Waste, wastewater or emissions that could have a negative impact on human health or the environment must be appropriately handled, collected, controlled, and treated prior to disposal, release or return to the environment. Wastewater disposal shall be carried out by authorized plants. Traceability of the wastewater disposal shall be guaranteed. A contingency plan with appropriate processes and trained personnel shall be in place so that suitable steps can be taken to avert danger in the event of a threat to the environment and groundwater.

Use of Chemicals

Where applicable, our business partners must comply with REACH guidelines. Our business partners do not supply Moderne Verpackung with products containing chemicals as defined in Article 3, Paragraph 1(a) and Annex A of the Stockholm Convention on Persistent Organic Pollutants of May 23, 2001. Furthermore, our business partners ensure that products supplied to Moderne Verpackung have either not been manufactured with mercury or mercury compounds, or that mercury waste has been properly treated. Energy-related services, including energy efficiency, energy use, and energy consumption, must be continuously improved through appropriate energy management and conscious action as well as by raising awareness among employees.

Product Stewardship

Product stewardship means complying with the legal and normative requirements for the product and defining and communicating the requirements for handling the product. In addition, our business partners are committed to the use and development of climate-friendly products.

4. Ethics

Compliance with the rule of law is a given for us. Accordingly, we expect our business partners to comply with the legal framework and other general conditions applicable to them.

Business Integrity

All forms of corruption, bribery, extortion, embezzlement, and money laundering are prohibited and must not be practiced or tolerated by the business partner. Our business partners may not promise, grant, offer, accept or demand any unlawful advantages or benefits, particularly in business transactions with third parties or public officials, or be involved in any other unlawful attempts to influence business or government relations. They are also prohibited from making payments to or granting other advantages to an individual, a company or a public official with the objective of influencing decision-making processes. Furthermore, our business partners shall not influence Moderne Verpackung employees in their decisions to award contracts by giving them or related parties unlawful gifts.

Fair Competition

Our business partners shall engage in fair competition and observe and uphold all antitrust laws in force. Our business partners shall ensure that they do not engage in any anticompetitive practices, which include, but are not limited to, price fixing and market sharing agreements.

Confidential Information, Intellectual Property, Data Protection

Our business partners are bound to use Moderne Verpackung intellectual property and all confidential information, including personal data collected, stored, and processed for or by Moderne Verpackung, in an appropriate and responsible manner within the scope of the applicable statutory or contractual provisions and to take all necessary protective measures in this regard to prevent its misuse, theft, fraud, unauthorized access, disclosure or modification. This also includes unauthorized disclosure and / or publication of information received from or on behalf of Moderne Verpackung. The transfer or sharing of technology or expertise must be effected in a manner that protects intellectual property rights and complies with applicable legal or contractual provisions.

Conflicts of Interest

We expect our business partners to avoid interactions with Moderne Verpackung employees or their relatives and related parties that might conflict with or appear to conflict with the interests of Moderne Verpackung. Any relationships or kinship with Moderne Verpackung employees that could constitute a conflict of interest must be disclosed.

Conflict Minerals

Our business partners shall guarantee responsible procurement of minerals and ensure that no products containing metals whose base minerals or derivatives originate from a conflict region where they contribute directly or indirectly to the funding or support of armed groups or to human rights violations are supplied to Moderne Verpackung.

Compliance with Trade Regulations

All export and import control regulations as well as all other applicable commercial and customs regulations, particularly the laws on sanction programs and economic embargoes in force, must be complied with.

5. General Rules of Conduct

Obligation and Responsibility

The obligation to comply with the requirements and expectations arising from this Code of Conduct shall be fulfilled, for example by allocating appropriate resources.

Legal and Other Requirements

Our business partners shall ensure that they comply with all applicable legal requirements, regulations, permits, authorizations, licenses and other regulations, generally accepted standards, and contractual arrangements.

Risk Assessment and Risk Management

Processes shall be in place to identify, assess, and manage risks related to the areas identified in this Code of Conduct and ensure compliance with the applicable legal requirements.

Documentation

Compliance with the principles and requirements set forth in this Code of Conduct and other applicable laws and regulations shall be appropriate and documented in verifiable form.

Training

Our business partners shall take a preventive approach and encourage timely raising of awareness among their employees and business partners of possible hazards and risks. Employees and management shall attend obligatory courses and training programs tailored to their work to enable them to fulfill the requirements set forth in this Code of Conduct.

Continuous Improvement

Our business partners shall have management systems in place to ensure compliance with the expectations set out in this Code of Conduct. Moderne Verpackung anticipates continuous improvement based on targets it has set itself as well as development of plans and implementation of measures to remedy shortcomings identified internally or externally.

6. Relationship to Business Partners

Compliance with the Moderne Verpackung Code of Conduct

We require our business partners to act in accordance with the principles and requirements set forth in this Code of Conduct that are applicable to them. Our business partners must ensure that their affiliates also acknowledge and comply with these principles and requirements. Our business partners shall ensure that they also have their own suppliers, subcontractors, service providers, and business partners submit letters of commitment that obligate them to observe the principles and minimum standards described in this Code of Conduct.

Verification of Compliance

Moderne Verpackung reserves the right to verify compliance with the principles and requirements set forth in this Code of Conduct at regular intervals at the business partner's premises either itself or through a third party commissioned by Moderne Verpackung. This includes, in particular, the right to carry out on-site inspections at the business partner's premises. If requested to do so, our business partners shall furnish all necessary documents demonstrating compliance with this Code of Conduct.

Consequences in the Event of Non-Compliance

Our business partners must notify Moderne Verpackung as soon as they become aware of violations of the principles and requirements set forth in this Code of Conduct, and it is expected that our business partners take appropriate corrective action. If Moderne Verpackung suspects non-compliance with this Code of Conduct, it reserves the right to request information about the relevant circumstances from the business partner. If it has been proven that a business partner violated this Code of Conduct and failed to take appropriate corrective action within a reasonable period of time, Moderne Verpackung reserves the right to take appropriate legal action, in particular to terminate the contractual relationship with the business partner immediately without notice.

7. Raising Concerns

Our business partners shall provide communication channels for confidential reporting of possible unlawful behavior. Where reports have been submitted, the necessary investigations shall be conducted and appropriate corrective action taken as required. If a business partner establishes that a Moderne Verpackung employee or a person commissioned by Moderne Verpackung is in violation of the laws in force or the principles of this Code of Conduct, the business partner is encouraged to report this to Moderne Verpackung immediately. Contact details are available on the Moderne Verpackung home page at schutzverpackung.eu.

Page for signature

We hereby confirm that we have read and fully understood the Moderne Verpackung Code of Conduct for Business Partners which shall become effective as of today and that we agree to comply with it.

In witness of the foregoing, this confirmation page has been executed by a duly authorized representative of the Moderne Verpackung Business Partner as named hereinafter.

Full Legal Company Name

Company Address

Name of Signatory

Job Title

Place, Date

Signatur, Company Stamp

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