

CODE OF CONDUCT GUNDLACH VERPACKUNG GMBH

Introduction

Since its foundation, Gundlach Verpackung GmbH's business practices have been based on integrity, honesty, fair business conduct and compliance with all applicable laws. Gundlach Verpackung GmbH's Business Guidelines describe certain values and principles to which Gundlach Verpackung GmbH is committed.

The Gundlach Verpackung GmbH Code of Business Conduct specifies the company's business guidelines and supports their further implementation by setting out certain non-negotiable minimum standards of conduct in important areas. It is not the purpose of the Code to cover every conceivable situation.

Rather, it describes the benchmark against which all activities are to be measured. Employees must seek advice if they are unsure of the correct course of action in a particular situation. It is the direct responsibility of everyone to "do the right thing" - this responsibility cannot be delegated. Employees should always be guided by the following simple principles:

- avoid any behavior that could damage the reputation of Gundlach Verpackung GmbH itself
- always behave legally and honestly

In these guidelines, "employees" refers to employees, including managers and all company representatives of Gundlach Verpackung GmbH.

Compliance with laws, regulations, and guidelines

We comply with the law.

Gundlach Verpackung GmbH and its employees are bound by the law. Compliance with all applicable laws and guidelines must never be violated. Where applicable, employees must also comply with internal regulations and guidelines. These internal regulations are company-specific and may exceed the requirements of the law.

Conflicts of interest

We always act in the interests of Gundlach Verpackung GmbH.

A conflict of interest arises when the personal interests of an employee or the interests of a third party compete with those of Gundlach Verpackung GmbH. In such a situation, it may be difficult for the employee to protect the interests of Gundlach Verpackung GmbH.

Employees should avoid conflicts of interest as far as possible. In the event of a conflict of interest or if an employee is confronted with a situation that could involve or lead to a conflict of interest, the employee shall inform his or her line manager and/or the HR department to find a fair and transparent solution appropriate to the situation.

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External management and other external activities

We are proud of the reputation of Gundlach Verpackung GmbH and protect the interests of Gundlach Verpackung GmbH in the context of external activities and commitments.

No activities outside Gundlach Verpackung GmbH will be tolerated if they conflict with the employee's responsibilities for Gundlach Verpackung GmbH if they involve risks to the reputation of Gundlach Verpackung GmbH or otherwise conflict with the interests of Gundlach Verpackung GmbH. In case of doubt, employees should consult with the HR department.

Activities in the following positions in a company outside Gundlach Verpackung GmbH must be approved in advance by the HR department:

- Managing Director
- Employees
- Consultant

Approval will not be granted if the position or activity is likely to conflict with the interests of Gundlach Verpackung GmbH or the of Gundlach Verpackung GmbH or the responsibilities of the employee. Unless requested to do so by the company, employees undertake external positions or activities at their own risk, at their own expense and only in their free time.

Business opportunities

We are committed to promoting the business of Gundlach Verpackung GmbH.

Employees may not compete with the company. Nor may they take advantage of business opportunities that arise because of or in connection with their work unless the company has expressly denied its interest in these opportunities in advance.

If employees wish to take advantage of business opportunities that could be of interest to the company, they must inform their line manager, who will bring about a management decision as to whether the company wishes to take advantage of the opportunity. Even if the company does not take up an opportunity, the employee can only pursue it in his or her own interest if this action will not result in direct or indirect competition for the company.

fair business conduct

We believe in the importance of free competition.

Gundlach Verpackung GmbH is equipped to compete successfully with other companies, always in full compliance with applicable laws on competition and fair business conduct. Therefore, all employees always adhere to the following rules:

- Business policies and prices are set independently and are never formally or informally arranged with competitors or other independent parties, either directly or indirectly.
- Customers, territories, and product markets are never shared between Gundlach Verpackung GmbH and competitors but are always the result of fair competition.
- Customers and suppliers are treated fairly. All employees, especially those who work in sales and purchasing or who are in regular contact with competitors, are responsible for knowing the applicable competition laws. If in doubt, the Human Resources Department should be contacted to provide training or advice on competition laws.

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Confidential information

We value and protect our company's confidential information and respect the confidential information of others.

Confidential information is all information that is not or not yet published. This includes trade secrets, business, marketing and service plans, ideas and concepts for manufacturing and production, instructions, designs, databases, data sets, compensation information and all unpublished financial or other data. The continued success of Gundlach Verpackung GmbH depends on the use of confidential information and its non-disclosure to third parties. Unless required by law or authorized by management, employees must not disclose or permit the disclosure of confidential information. This obligation also applies after termination of employment with Gundlach Verpackung GmbH. Furthermore, employees must do everything possible to avoid inadvertent disclosure by exercising particular care when storing and transmitting confidential information.

Gundlach Verpackung GmbH respects the efforts of third parties to protect their confidential information. When third parties such as joint venture partners, suppliers or customers share confidential information with Gundlach Verpackung GmbH, it is treated with the same care as confidential information of Gundlach Verpackung GmbH. In the same way, employees protect confidential information that they have gained knowledge of during previous employment.

Fraud, protection of company assets, accounting

We insist on honesty and respect the assets and property of the company.

Employees must never engage in fraudulent or other illegal activities.

This applies to actions relating to the property, assets, financial reporting, or accounting of Gundlach Verpackung GmbH or a third party. Non-compliance may result not only in disciplinary action but also in criminal prosecution.

The financial records of Gundlach Verpackung GmbH are the basis for the management of the business and the fulfillment of obligations to various stakeholders. Therefore, all financial records must be accurate and comply with Gundlach Verpackung GmbH's accounting standards.

Employees handle Gundlach Verpackung GmbH property with care and use it only for its intended purpose. All employees protect the property of Gundlach Verpackung GmbH from loss, damage, misuse, theft, fraud, misappropriation, and destruction. These obligations apply to both tangible and intangible assets, including know-how, confidential or secret information and information systems. To the extent permitted by law, the company reserves the right to review the use of assets by employees. This also applies to the review of all e-mails, data and files stored on the company's network computers.

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Bribery and corruption

We utterly reject all forms of bribery and corruption.

Employees may never offer or promise, either directly or through intermediaries, personal or improper financial or other advantages to establish or maintain a business relationship or other advantages with a third party (whether public or private). Nor may such advantages be accepted in return for preferential treatment from third parties. Furthermore, employees must refrain from any activity or behavior that could create the appearance of such behavior or attempted behavior.

Employees must be aware that offering or giving disproportionate benefits to influence a recipient's decision may result not only in disciplinary action but also in criminal prosecution. An improper benefit can be anything of value to the recipient, including employment or consulting contracts for the benefit of closely related persons.

Gifts, hospitality, invitations

Our business and our competitive position are based on quality and expertise.

Employees may not be influenced by accepting favors, nor are they permitted to influence others through favors. Employees may only accept hospitality within the usual framework and symbolic gifts appropriate to the circumstances. They may not accept or offer gifts, hospitality, or invitations if these could give the impression that they are trying to influence the respective business relationship inappropriately.

When assessing a situation regarding the above criteria, employees shall comply with the internal guidelines applicable in their market. If no such policy exists, they will apply the most restrictive local practice to avoid any appearance of inappropriate behavior. In case of doubt, the employee shall seek the advice of his or her direct superior. No employee may accept gifts of the following nature from third parties or offer them to third parties, regardless of the value of the gift:

- Money
- Loans
- commissions
- similar benefits in monetary form.

Discrimination and harassment

We foster diversity and respect the dignity of our colleagues.

Gundlach Verpackung GmbH respects the personal dignity, privacy and personal rights of every employee and is committed to maintaining a workplace free from discrimination and harassment. Therefore, employees may not discriminate against others based on origin, nationality, religion, ethnicity, gender, age, or sexual orientation, nor may they verbally or physically harass other employees on the basis of the above or other circumstances. Employees who believe that their workplace does not comply with the above principles are encouraged to report their concerns to Human Resources.

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Compliance with human rights

We follow the Ethical Trading Initiative (ETI) Base Code for compliance with fundamental rights.

Gundlach Verpackung GmbH is committed to observing and respecting human rights throughout the entire supply chain and rejects any form of forced labor, forced servitude or involuntary prison labor, as well as discrimination within our own company and among our business partners.

Responsibility for compliance with human rights lies with the HR department. Internal issues are the responsibility of the Human Resources department, while the Purchasing department is responsible for compliance with human rights along the supply chain. Both departments implement activities and company-wide measures to ensure compliance with human rights.

Gundlach Verpackung GmbH - Purchasing Department continuously analyzes its supply chain regarding (potential) violations of human rights. In the event of violations, rapid and targeted measures can be taken to further minimize the risk of human rights violations in the future.

Child labor

We comply with international standards (ILO Conventions C 138-1973 and C 182-1999).

Gundlach Verpackung GmbH rejects child labor regardless of local laws in our own company as well as with our business partners. Gundlach Verpackung GmbH ensures that all employees are of the minimum age required by law.

Environmental Policy

Our mission is to be a leader in sustainable printing solutions and to make a positive contribution to environmental protection.

Gundlach Verpackung GmbH is applying for Science Based Targets Initiative (SBTi) certification to reduce our impact on climate change according to science-based targets.

Our environmental policy is based on the following principles:

- **Reduction of greenhouse gas emissions:** Gundlach Verpackung GmbH is committed to reducing direct and indirect greenhouse gas emissions (Scope 1, 2 and 3) in accordance with the 1.5°C targets of the Paris Climate Agreement.
- **Energy efficiency:** Optimization of our production processes and systems to increase energy efficiency.
- **Sustainable materials:** Increased use of recycled and environmentally friendly materials in our print products.
- **Waste management:** minimizing and recycling production waste and improving the recyclability of our products.
- **Water management:** reducing water consumption.
- **Employee engagement and training:** promoting environmental awareness and training employees in sustainable practices.
- **Transparency and reporting:** Regular monitoring, measurement and reporting of our environmental impact to independent institutions and our customers.

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Violation of the Code

We consult the Code, comply with its provisions, and seek advice in case of doubt.

It is the responsibility of each employee to ensure full compliance with all provisions of this Code and to seek guidance from a supervisor or Human Resources if necessary. "Doing the right thing" and upholding the highest standards of integrity is the personal responsibility of every employee and cannot be delegated.

When in doubt, employees should always be guided by the basic principles set forth in the introduction to this Code. Any failure to comply with this Code may result in disciplinary action up to and including dismissal and, if warranted, legal proceedings or criminal prosecution.

Reporting illegal behavior or behavior contrary to the Code

We take responsibility for behaving with integrity in all situations.

Employees shall report any practices or activities that they believe are inappropriate or even illegal under this Code to their direct supervisor or Human Resources. If deemed appropriate due to the nature of the matter to be reported, reports of violations may also be made to the external Data Protection Officer:

DSO Datenschutz Osnabrück GmbH / Mercatorstrasse 11 49080 Osnabrück
E-mail address: info@dso-datenschutz.de Phone: 0541/6008131

can be reported.

It is guaranteed that all information will be treated confidentially and that no conclusions can be drawn about the whistleblower.

We want to emphasize that we take all reports seriously and that we are committed to investigating and remedying possible violations of laws and internal policies.

Gundlach Verpackung GmbH prohibits retaliation against employees who make reports in good faith, but also protects the rights of the accused person.

31. January 2024

i.V.



Date

Signature Management