



# ZERHUSEN

KARTONAGEN

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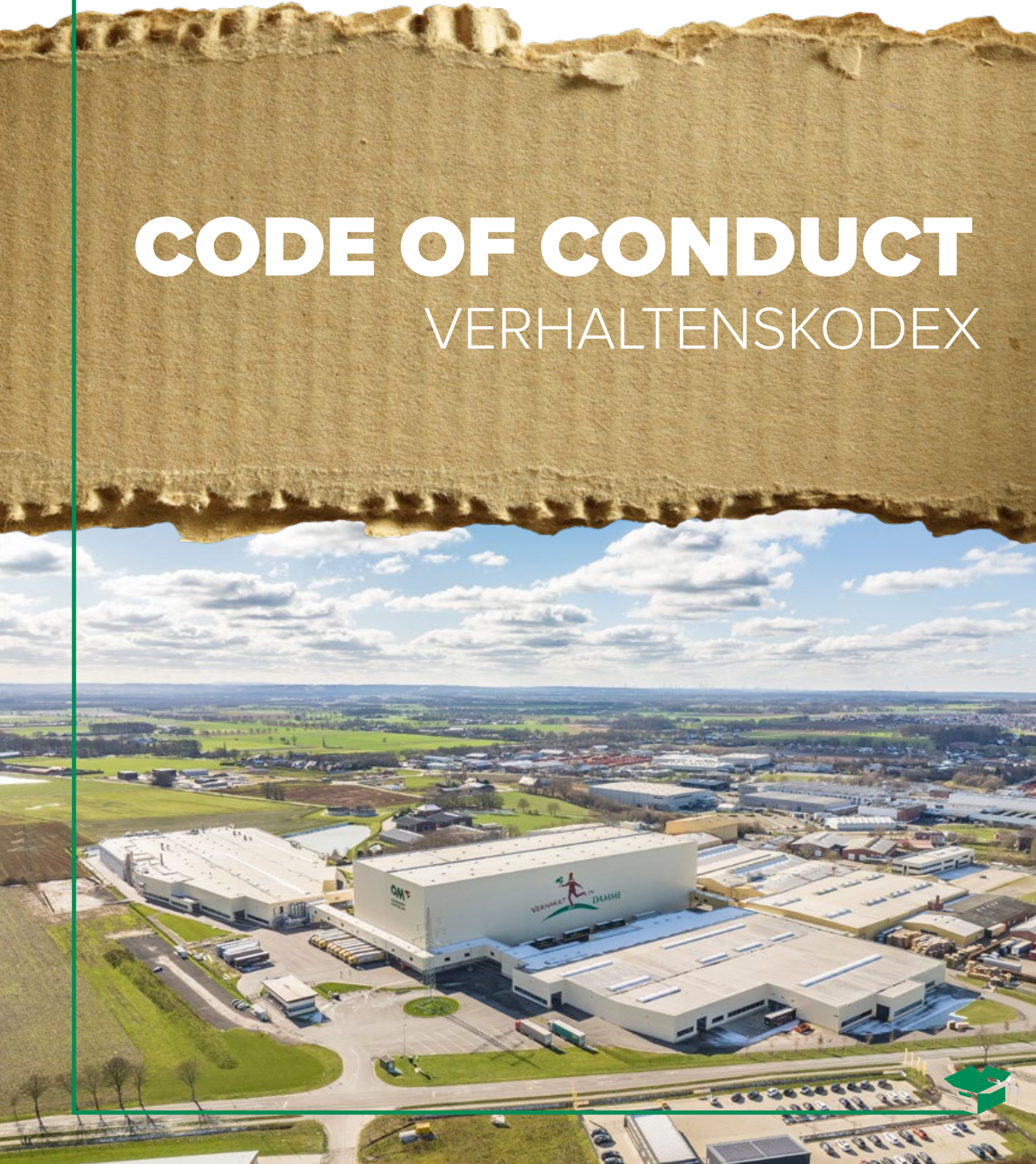
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# CODE OF CONDUCT

## VERHALTENSKODEX



## General

Ethical behavior and personal integrity are fundamental components of our corporate culture. We are committed to working with high ethical standards, fulfilling our obligations, and acting with integrity. We are convinced that ethical and economic values should be mutually dependent and that business relationships based on fair practices lead to long-term satisfaction for all.

We are confident that sustainable economic success can only be ensured if we involve our employees and business partners, whose activities play a key role in our supply chain, in the development of ethical standards and the establishment of social, economic, and environmental responsibility.

In the spirit of a holistic approach, we would like to establish the following regulations for a joint Code of Conduct with our employees and business partners. Outside the legal sphere of the Federal Republic of Germany, the Code of Conduct is based, amongst other aspects, on international conventions, including the General Declaration of ILO Core Labor Standards. Furthermore, the Code of Conduct is based on national laws and regulations, such as the Supply Chain Duty of Care Act.

We expect all employees and business partners to behave in accordance with our ethical principles. Furthermore, we expect our managers to live and communicate our ethical principles and set standards for compliance with them.

We expect our employees and contractual partners to comply with the laws and regulations of the countries in which they operate and to be committed to them in a reliable manner. They must always act lawfully, honestly, and fairly in all aspects of their work.



## Child Labor

We do not tolerate child labor, neither in our own company nor among our business partners. The right to a healthy and happy childhood is highly valued by us and supported by a broad corporate commitment. Any non-compliance is reportable.

When hiring young employees, we comply with the applicable occupational health and safety laws, in particular the Youth Employment Protection Act. Without exception, no children or young people under the age of 15 are employed for work of any kind in the company. Age verification is the responsibility of the HR department.

We give young people from the age of 15 the opportunity to learn a recognized profession in our company. Every trainee is offered the opportunity to be taken on after successfully completing their training.

We enable children from the age of 13 and young people to complete internships in the company as part of their school education. The interns should acquire basic theoretical and practical knowledge in a company in the manufacturing industry. Children are under the care of an adult.

If we have reasonable grounds to suspect that a supplier is employing children or young people under the age of 15 to carry out operational work, we reserve the right to investigate the suspicion as part of an unannounced supplier audit. If we discover a breach of our principles, we reserve the right to terminate the supplier relationship immediately without compensation. The supplier will only be considered if he can credibly prove to us that he does not employ children or young people under the age of 15 for operational work.

## Respecting Human Rights

We exclude all forms of forced and compulsory labor, including, but not limited to:

- » Physical and sexual violence
- » Bonded labor
- » Withholding of wages, including the payment of labor fees and/or the payment of a deposit to take up employment
- » Restriction of the worker's mobility/movement
- » Withholding of passport and/or identity documents
- » Threat of denunciation to the authorities



Our basic principle is as follows:

- » Employment relationships are voluntary and based on mutual consent without threat of punishment
- » Overtime is voluntary. Employees who refuse to work overtime will not be penalized. Under certain circumstances, precisely defined by the applicable legislation, overtime may be compulsory for a short period of time.

## **Corruption, Undue Influence, Monopolies**

We strive to develop a close and trusting relationship with suppliers, customers and business partners. No employee or contractual partner may offer or grant undue advantages to business partners in the public or private sector or exert undue influence in any other way. Employees may therefore not demand or accept any personal benefits, monetary payments, gifts, invitations to meals or other benefits for themselves or third parties from business partners. If an employee of Zerhusen Kartonagen GmbH accepts inadmissible advantages, this employee may be reported to the Human Resources Department without harm to himself/herself. The Human Resources Department shall decide on any possible consequences under labor law for the employee responsible.

If we have reasonable grounds to suspect that a contractual partner is offering inadmissible benefits, we reserve the right to investigate the suspicion as part of an unannounced supplier audit. If we discover a breach of our principles, we reserve the right to terminate the business relationship immediately. The contractual partner will only be considered again if he can credibly prove to us that he has implemented measures and devices that prevent any attempt to take advantage.

We are in favor of fair and open competition on the world's markets. Employees of Zerhusen Kartonagen GmbH must not engage in anti-competitive practices that exclude, restrict or distort free competition.



## **Confidentiality**

We treat business practices - both our own and those of customers and suppliers - confidentially. We are committed to forwarding sensitive data only to those employees who need it to carry out their work. If employees have knowledge of protected information, they are not entitled to pass it on to third parties without authorization, regardless of whether it is internal or external to the company. This obligation to the company extends beyond the employment relationship. In return, we also expect our business partners to handle our data confidentially.

Our policy is to protect and respect the intellectual property of third parties.

## **Discrimination, Harassment and Abuse**

Discrimination is a form of behavior that puts another person at a disadvantage in their living environment due to their age, gender, origin, skin color, religion, nationality, disability, language, sexual or political orientation, which must be protected. We respect the dignity of every person and reject all forms of discrimination. We apply the same standards to all employees in selection procedures, employment and wage levels (principle of equality).

Disciplinary measures do not include the use of psychological or physical coercion, including corporal punishment, as well as financial penalties, provided that no harmful, intentional or grossly negligent act justifies a claim for damages. Employees are free to seek help and have the right to appeal disciplinary decisions. Employees are free from discrimination, violence or harassment, whether physical or psychological. Employees are free to exercise their right to form or participate in work-related organizations.

## **Complaint Management**

There is a grievance process that employees are aware of and that allows them to raise complaints or concerns without retaliation. Complaints are recorded and processed, and the anonymity of employees is protected.



## Whistleblower Protection Act

The Whistleblower Protection Act protects whistleblowers and enables them to uncover and report wrongdoing. Malpractice includes corruption, fraud and discrimination. Reports can be made in writing to a dedicated e-mail address. Reports can also be made anonymously by telephone via a telephone number with an answering machine. Zerhusen Kartonagen GmbH implements the law to ensure transparency and accountability.

The obligation to make reasonable efforts can be fulfilled.

## Compliance with Environmental Standards

### Careful use of resources:

Zerhusen Kartonagen GmbH strives to reduce the consumption of raw materials to a minimum in every business activity. We pay particular attention to the economical use of energy and water. The use of renewable resources is preferred if possible.

### Avoidance and reduction of environmental pollution:

Zerhusen Kartonagen GmbH attempts to reduce all possible emissions as much as possible in accordance with state-of-the-art technology. We control harmful emissions and treat them before they are released into the environment. We strive to prevent waste as much as possible. The materials used should be recycled whenever suitable.

### Avoidance of hazardous substances:

Substances that pose a risk to people and the environment if released are avoided wherever possible. We will introduce a hazardous substance management system that ensures safe use and transportation as well as safe storage, reprocessing, recycling and disposal.

### Environmentally friendly products:

When developing products and services, Zerhusen Kartonagen GmbH strives to ensure that it uses energy and natural resources efficiently. The products should be eligible for being reused, recycled or disposed of safely.

  
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**Roland Zerhusen**  
Managing Director

Damme, 01/01/2024



## Declaration of Commitment

By signing this declaration, the Contractual Partner agrees to comply with the principles and requirements of the Zerhusen Kartonagen GmbH Code of Conduct and to take all necessary precautions for its implementation. It further agrees to communicate the content of this Code of Conduct to its employees in a comprehensible manner and to attempt to contractually obligate its subcontractors to comply with the principles and requirements defined in the Code of Conduct.

The agreement comes into force upon signing and becomes part of all existing and future contracts between the contractual partner and the companies of Zerhusen Kartonagen GmbH.

Compliance with the obligation constitutes a primary obligation according to the respective contracts and therefore entitles Zerhusen Kartonagen GmbH to terminate the respective contract without notice in the event of violations for which the Contractual Partner is responsible.

\_\_\_\_\_, \_\_\_\_\_  
*City* *Date*

\_\_\_\_\_  
*Signature(s) of authorized representative(s) and company stamp*

\_\_\_\_\_  
*Name(s) of the signing person(s) in printed form, company name and address*

