

STI Group Corporate Compliance

PIONEERS IN PACKAGING



Code of Conduct and Ethics for business and cooperation partners

As of 22/02/2022

Dear business partner,

The STI Group are pioneers of the packaging industry, and like no other company, the STI Group stands for innovative, sustainable and creative products and services which move markets and make our company a strong partner of strong brands.

Transparency and credibility are essential components of our family business culture. Being seen to practise cultural openness, tolerance and respect both inwardly and outwardly marks our international profile.

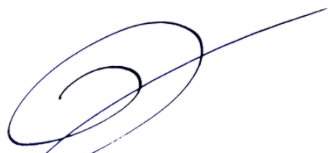
As a responsibly acting family business, the STI Group observes the legal regulations, and regulatory and ethical standards in their spheres of influence. We also expect the same from our business partners.

We live by our values, honour our commitments reliably, and act fairly and honestly so we have integrated our guidelines in this Compliance Policy. In addition, we are committed to the ten principles of the United Nations Global Compact and the conventions of the International Labour Organisation (ILO Conventions). Our success as a company in a dynamic and highly competitive market depends on the observance of these obligations and beliefs.

This "STI Group Corporate Compliance for Business Partners" is a guideline for all our business and cooperation partners. We therefore ask that you confirm compliance in your company by returning the signed compliance form.

The contents are checked annually and, in the event of legal amendments, immediately updated. In this case, you will receive a revised version.

We look forward to a continued good and responsible working relationship.



Jakob Rinninger
Managing Director / CEO
STI - Gustav Stabernack GmbH



Niklas Herting
Managing Director / CFO
STI - Gustav Stabernack GmbH

Lauterbach, 22/02/2022



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1. Our guidelines

The success of the STI Group is based on many factors and is - just like the picture of the company - shaped by the people who work for the Group. Against this background the STI Group has summarized its values in five guidelines which provide direction and perspective to the employees. They are an expression of our self-conception and the basis of our joint success.



■ **Respect and fairness**

We treat our partners and colleagues fairly, work closely and openly with our customers and maintain a trusting working relationship with all our business partners. We welcome diversity and respect the cultural differences of our employees. We hold open discussions and value different opinions that serve the future of the STI Group.

■ **Creativity and pleasure**

We enjoy our work! Motivation and inspiration form the basis for creative and intelligent solutions. We are proud of our individual performance and share successes with our colleagues. We are delighted with the market successes of our customers, which we have helped to shape. We are optimistic about the future! We think positively!

■ **Responsibility**

We accept responsibility for our environment and society and therefore act sustainably in every respect. We behave responsibly towards customers, suppliers and colleagues and are committed to our goals. Our sense of responsibility fosters loyalty.

■ **Enthusiasm**

We do what we love, and love what we do. We are convinced of our products and services and would like to convey this enthusiasm to other people. We are striving for outstanding solutions that enable our customers and ourselves to be the decisive step ahead in the market.

■ **Success**

Our products and services have a direct impact on the success of our customers. We are responsible for our success and are only satisfied when our customers are enthusiastic about working with us.

2. Our understanding of sustainability and compliance with laws and regulations

- Sustainability is the focus of the actions of the internationally active STI Group and its affiliated companies. When designing products and services as well as central corporate decisions, environmental and climate protection values and the fundamental concept of a circular economy guide our family business. We are supported in the implementation of our objectives by a management system based on international standards which are under continuous development. The STI Group purchases raw materials, goods and services from business partners/suppliers in order to ensure the sustainable success of its customers with innovative product and service solutions. The basis for this is responsible corporate management geared towards long-term value creation. For this reason, the STI Group directly integrates business partners/suppliers into its sustainability strategy.
- In addition to procedural, economic and technical criteria, the STI Group also pays attention to social and ecological aspects such as human rights, working conditions, corruption prevention and environmental protection in its procurement activities. In the conflict between product/service, market, region and process, our key factors when selecting and evaluating business partners are costs, quality, reliability, innovation and sustainability.
- The STI Group expects its business partners/suppliers to comply in their activities with the respectively applicable national and local laws - irrespective of whether they are supranational or local law - the principles of the United Nations Global Compact and this STI Group Code of Conduct, as long as they do not violate the applicable EU law (for deliveries in the EU), as laws, local customs and standards may differ in the individual locations. The regulations of the applicable law override any possible contrary instruction.
- The business partners and suppliers of the STI Group undertake to comply with all statutory provisions and regulations, in particular the counter-terrorism regulations, the REACH and RoHS regulations and declare to comply with applicable EU directives or regulations or national legislation. They are also expected to introduce suitable processes that support compliance with the applicable laws in their companies and promote continuous improvement in relation to the principles and requirements of the STI Group Code of Conduct. Furthermore, the STI Group expects its business partners/suppliers to ensure that their affiliated companies also comply with and recognise all principles and requirements described here. This Code of Conduct is valid for all companies of the STI Group worldwide.

3. Human and workers' rights

The STI Group expects its business partners and suppliers to comply with the fundamental employee rights of the applicable national legislation as well as to recognise the core labour standards of the International Labour Organisation (ILO) and the International Human Rights Charter of the United Nations, taking into account the laws and legal forms applicable in the various countries and locations. The STI Group expects its business partners and suppliers to respect the rights of third parties and to keep any negative impacts to a minimum, taking into account international standards.

3.1 Child labour

The STI Group expects that its business partners and suppliers prohibit and refrain from any kind of child labour in their companies.

3.2 Discrimination

The STI Group expects its business partners and suppliers to promote equal opportunities and equal treatment of genders and diversity and to prevent discrimination in the recruitment of employees and in the promotion or granting of training and further education measures. No employee shall be discriminated against on grounds of gender, age, colour, ethnic or social origin, sexual identity, disability, religion or belief, or political opinion.

3.3 Forced labour

The STI Group expects that its business partners and suppliers do not permit or participate in any form of forced labour or human trafficking in their companies.

3.4 Freedom of association

The STI Group expects its business partners and suppliers to respect the rights of employees to form an employee representation and to conduct collective bargaining in accordance with national legislation.

3.5 Working hours and remuneration

The STI Group expects its business partners and suppliers to comply with the applicable national legislation on working hours. Furthermore, employees of business partners and suppliers are expected to receive remuneration that is in accordance with the applicable national laws.

4. Health and safety at work

The STI Group expects its business partners and suppliers to comply with the applicable national legislation on health and safety at work. Furthermore, it is expected that business partners and suppliers establish and apply an appropriate occupational health and safety management system (e.g. in accordance with ISO 45001). This includes, on the one hand, mitigating actual and potential occupational safety risks and, on the other hand, training employees in order to prevent accidents and occupational diseases as far as possible.

5. Environmental protection

The STI Group expects all business partners and suppliers to comply with the applicable national environmental laws, regulations and standards. Furthermore, business partners and suppliers are expected to establish and apply an appropriate environmental management system (e.g. in accordance with ISO 14001) in order to minimise environmental impacts and risks and to improve environmental protection in day-to-day business operations.

6. Conduct in a business environment

6.1 Prohibition of corruption and bribery

The STI Group expects its business partners and suppliers not to tolerate corruption and to ensure in their companies compliance with the United Nations (UN) conventions and the Organisation for Economic Cooperation and Development (OECD) to combat corruption and the relevant anti-corruption laws. In particular, they must ensure that their employees, subcontractors or representatives do not offer, promise or grant any advantages to STI Group employees



or related third parties with the aim of obtaining, offering, promising or granting an order or another preference in business dealings.

6.2 Invitations and gifts

The STI Group expects that its business partners and suppliers do not misuse invitations and gifts to influence them. Invitations and gifts to STI Group employees or related parties are only granted if the reason and scope are appropriate, i.e. they are of low value and can be considered an expression of generally accepted local business practice. Similarly, the business partners and suppliers of STI Group employees do not demand any unreasonable advantages.

6.3 Avoiding conflicts of interest

The STI Group expects its business partners and suppliers to make decisions regarding their business activities with the STI Group exclusively on the basis of objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of relatives or other related persons or organisations, are to be avoided from the outset.

6.4 Free competition

The STI Group expects its business partners and suppliers to behave fairly in competition and to observe the applicable antitrust laws. Business partners and suppliers neither participate in agreements contravening anti-trust laws with competitors nor misuse a potentially existing dominant position.

6.5 Money laundering

The STI Group expects its business partners and suppliers to comply with the relevant legal obligations for the prevention of money laundering and to not participate in money laundering activities.

6.6 Data protection

The STI Group expects its business partners and suppliers to ensure the confidentiality of customer and employee data and the compliance with data protection regulations. The collection, processing and use of personal data in the company and also within the framework of the operation of the internet site takes place in accordance with the relevant national and international data protection standard.

6.7 Email and internet/telecommunications

All emails, SMS, MMS and internet records or messages that go out from the STI Group's electronic communications systems or arrive there are treated as company records. The business partners and suppliers of the STI Group are obliged not to write or tolerate any offensive, obscene or offensive e-mails.

6.8 Confidential information and intellectual property

The success of the STI Group and its business partners depends on the protection of confidential information and intellectual property. Both parties must therefore always treat this information in strictest confidence. That particularly applies to inventions, research results and technical data, formulas, discoveries, drafts, improvements, ideas, production guidelines, computer programs, trademarks, patents, copyrights, unpublished financial or price information, other confidential information and all the documentation referring to them.



Confidential information also includes customer data, information about sales and marketing as well as the corresponding databases, marketing plans, staff data plus business proposals and strategies. All business partners of the STI Group treat the information acquired through the cooperation as confidential information of the STI Group.

Because of the high significance of confidentiality for the STI Group, business partners are in part obliged to sign agreements with respect to the use of confidential information and intellectual property of the STI Group or their customers (non-disclosure agreements).

7. Supplier relationships

The STI Group expects its suppliers to communicate all principles and requirements described here to their subcontractors and suppliers and also take them into account when selecting them. Suppliers encourage their subcontractors and suppliers to comply with the described standards on human rights, working conditions, corruption prevention and environmental protection in the context of fulfilling their contractual obligations. Furthermore, the STI Group expects its suppliers to only use materials from legal sources and to be able to prove this on request.

8. Compliance with the Code of Conduct

- The STI Group expects its suppliers to identify risks within supply chains and to take appropriate measures with regard to them. In the event of suspicion of violations and to safeguard supply chains with increased risks, the supplier shall promptly and, if necessary, regularly inform the STI Group about the identified violations and risks as well as the measures taken.
- The STI Group can check compliance with the standards and regulations listed in this document by means of a self-assessment questionnaire as well as sustainability audits at the production sites of the suppliers. The supplier agrees that the STI Group may carry out such audits to check compliance with the Code at the supplier's business premises during normal business hours after reasonable advance notice from persons appointed by it. The supplier may object to individual audit measures if they would violate mandatory data protection regulations.
- Any violation of the principles and requirements mentioned in the STI Group Code of Conduct is regarded as a significant impairment of the contractual relationship on the part of the business partners or suppliers. In the event of suspicion of non-compliance with the described principles and requirements of the STI Group Code of Conduct (e.g. negative media reports), the STI Group reserves the right to demand information about the corresponding situation. Furthermore, the STI Group is entitled to extraordinarily terminate individual or all contractual relationships with business partners or suppliers that demonstrably do not fulfil the STI Group Code of Conduct or that do not strive for and implement improvement measures after a reasonable period has been set by the STI Group.
- I hereby confirm compliance with the STI Group Compliance. At the same time, I undertake to communicate the content of this Code to employees, contractors and subcontractors in a way that is comprehensible to me and to take all necessary precautions to implement the requirements. Please sign



and return this page to your contact person in the STI Group no later than two weeks after receipt of the document.

9. Complaint/reporting office (external whistleblower system)

Every business partner and supplier is required to report possible unlawful conduct against the rules of the STI Group Code of Conduct summarised here and to point out possible criminal offences or (serious) violations of the law or rules or incorrect business practices, e.g. in the areas of antitrust law, corruption, supply chain due diligence law etc., which concern persons and companies of the STI Group, via an external, electronic whistleblower system, which is operated by an external, independent service provider and fulfils the highest requirements with regard to the protection of the identity of the whistleblower as well as the security of the transmitted information ("**whistleblower system**"), while strictly maintaining confidentiality and anonymity (insofar as legally permissible and under certain conditions there is no obligation to disclose the identity to third parties) to the responsible reporting office ("**complaint office**") of the STI Group and thus contribute to the detection and punishment of (serious) grievances or rule/legal violations without any persons or "**whistleblowers**", who in connection with their professional or business activity have gained information of offences that are potentially criminal or subject to fines, being identified or subject to any potential disadvantage. The same applies if weaknesses or other circumstances of business partners and suppliers that could lead to legal violations are noticed.

All indications of violations are followed up consistently and any proven misconduct is appropriately sanctioned. Anyone who reports actual or suspected misconduct in good faith via the whistleblower system must not fear any negative consequences for themselves. However, intentional false reports can lead to legal action.

The objectives of the whistleblower system are the protection of the STI Group, the whistleblowers and all persons who contribute to investigating and remedying misconduct and rule violations. Disadvantaging them can constitute a (serious) rule violation.

This whistleblower system ensures that only those persons responsible for receiving and processing reports have access to the reports received from business partners and suppliers.

At the same time, the whistleblower system safeguards the interests of those affected. The presumption of innocence applies to them as long as a violation is not proven. The foundation for the functioning of the whistleblower system is formed by uniform processes as well as confidential and professional whistleblowing. This also means that investigations are only initiated if there are concrete indications of a (serious) rule violation.

Failure to comply with the report can itself constitute a (serious) rule violation that can be punished by law. The whistleblower system can be accessed worldwide around the clock via the Internet using the link <https://report.hintcatcher.com/TInoNv9wwHPVNNj2cnDy/>. The information will be accepted anonymously.

Furthermore, the Compliance Department is only authorised to process personal data if this is necessary for the fulfilment of its tasks.



In addition to submitting reports via the whistleblower system, suspected cases can also be reported to the Chief Compliance Officer of the STI Group under the following contact details – as the responsible complaints office – and the suspicion can be addressed there in open contact.

By email: compliance@sti-group.com

By post: STI – Gustav Stabernack GmbH
Chief Compliance Officer (CCO)
-Complaints office -
Richard-Stabernack-Straße
D-36341 Lauterbach, Germany

However, business partners and suppliers have the option of submitting any information externally to the responsible supervisory authorities ("external reporting office").

Confirmation of receipt of the notification must be given within seven (7) days. Information about the processing status and measures taken must be provided within three (3) months.

Company: _____

Signature: _____

Name and position: _____

Place and date: _____

Reference:

Global Compact der Vereinten Nationen
www.unglobalcompact.org

Internationale Arbeitsstandards (ILO)
www.ilo.org/global/standards/lang--len/index.htm

Internationale Menschenrechtscharta der
Vereinten Nationen
www.un.org/en/rights

