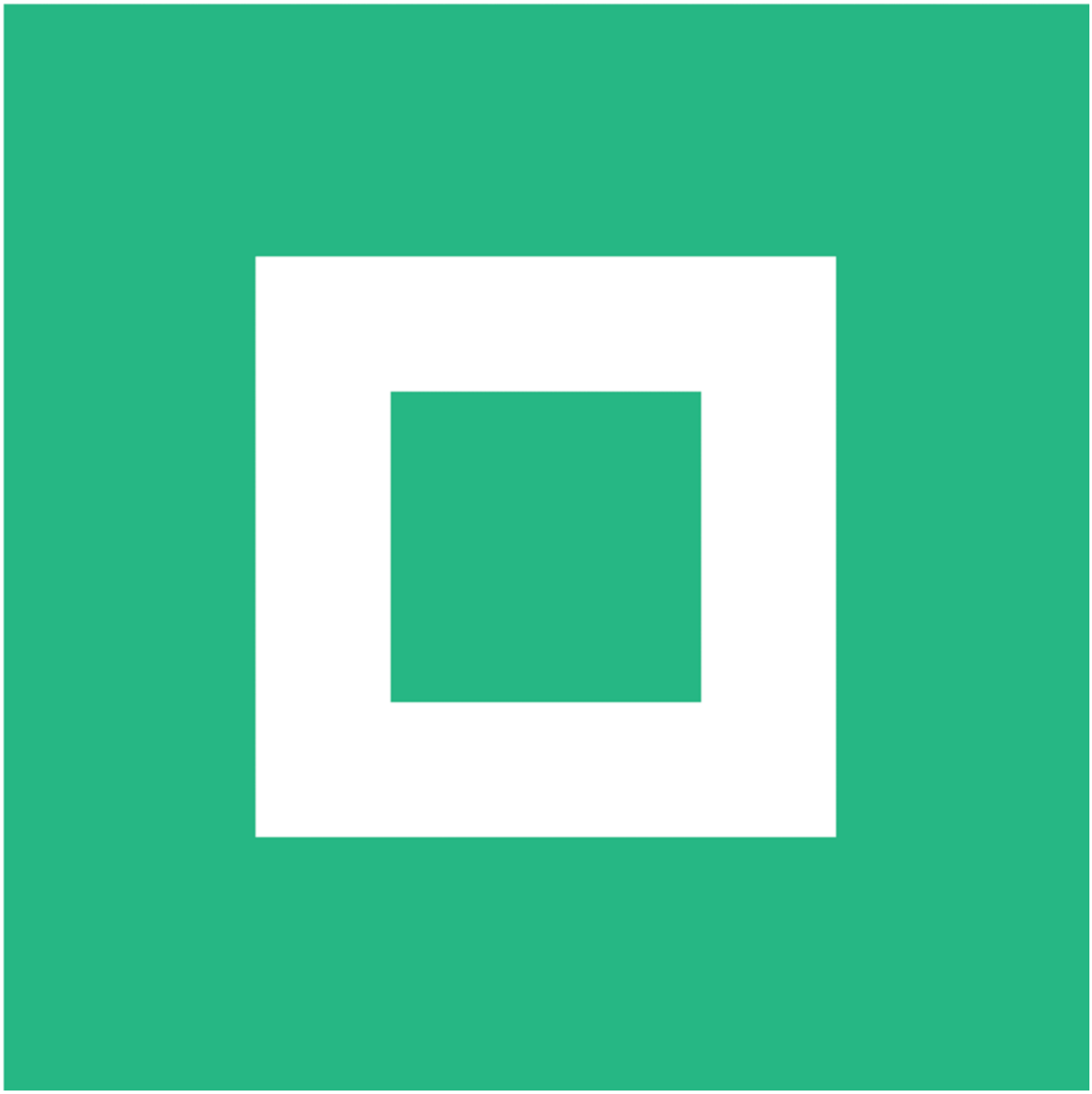
SYNTEGON
PROCESSING & PACKAGING

Code of Conduct for Business Partners

Syntegon Group



Preamble

From its beginnings in the last century, Syntegon has grown to become a leading global supplier of technology and services. Throughout its development, the company has been guided by its values and ethical principles. Adherence to the principle of legality, and acting responsibly and fairly in our business dealings, have always been the cornerstone of our corporate values.

Our business partners play a significant role in achieving these goals. We thus regard a common understanding of ethical values and sustainable practices as the essential basis of such relationships. The rules and requirements stated in this Code of Conduct form an important part of every collaboration agreement between Syntegon and its business partners

Principle of strict legality

Syntegon strictly respects the principle of legality in all activities of the Group, both implicitly through its actions and explicitly in contractual agreements. These include payment of applicable taxes and customs duties, compliance with competition and antitrust laws, a strict prohibition of corruption and money laundering, application of state of-the-art technology, procurement of the required official licenses, compliance with export control laws, and respect for the legal rights of third parties.

Consequently, we expect our business partners to act in accordance with the prevailing laws and regulations, to comply with the principles of the United Nations Global Compact and to abide by the rules of the present Code of Conduct as part of their collaboration with Syntegon. We furthermore expect them to take steps to ensure that third parties engaged for the purpose of fulfilling contractual obligations towards Syntegon also comply with this Code of Conduct.

Fair treatment of employees

Our business partners must observe the fundamental rights of their employees based on the applicable national labor laws. The following rules are aligned with the International Labor Organization's (ILO), Declaration on Fundamental Principles and Rights at Work.

Human rights

Our business partners respect internationally recognized human rights and actively protect such rights.

Child labor

Our business partners observe the prohibition of employing a child under the age at which compulsory education ends according to the law of the place of employment, whereby the age of employment may not be less than 15 years. Where the law of the place of employment, in accordance with International Labor Organization Convention No. 138, permits children of a lower minimum age for employment, that minimum age shall apply. Our business partners also respect the dignity and rights of children.

Forced labor

Our business partners reject all forms of forced labor and respect the principle of freely chosen employment.

Freedom of association

Our business partners respect freedom of association and the right to form interest groups. They grant their employees the right to articulate their interests within the framework of the labor laws in force in their country.

Equal opportunities

Our business partners do not tolerate discrimination against employees on the basis of

national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief.

Fair working conditions

Our business partners pay wages and social benefits equal to or higher than the rates prescribed by national or regional authorities, legal standards, or other labor agreements. The applicable regulations governing working hours and vacation entitlements are observed.

Occupational health and safety

At the minimum, our business partners comply with national standards of workplace safety and hygiene and take appropriate measures to ensure that the relevant occupational health and safety requirements are met, in order to ensure healthy working conditions.

Environmental protection

Our business partners take measures to avoid risks to human life and the environment, limit the environmental impact of their operations, and manage resources responsibly. All processes, operating sites and production resources employed by our business partners must meet the applicable legal requirements and standards concerning fire safety and environmental protection.

Business relations

Avoiding conflicts of interest

Decisions made by our business partners must be based on factual considerations, rather than being improperly influenced by personal interests. If any business partner becomes aware of a potential conflict of Interest, this fact must be communicated to Syntegon immediately.

Free competition

Our business partners observe the rules of fair competition, complying with all applicable statutory regulations. Moreover, they refrain from forming cartels or engaging in concerted practices deliberately or incidentally designed to bypass, restrict or distort competition as defined by antitrust laws, or abuse a dominant market position.

Corruption

Our business partners agree to abide by the applicable anti-corruption laws. In particular, they ensure that their employees, subcontractors or representatives do not offer, promise or grant advantages to associates of the Syntegon Group with the aim of obtaining a contract or other preferential treatment in the course of business. The same rules apply to agreements with third parties, concluded in connection with a contract with Syntegon.

Trade secrets

Our business partners must ensure that confidential company information is kept secret and intellectual property rights are respected. This condition applies beyond the termination of the business relationship. Our business partners furthermore agree to comply with all applicable data protection laws and limit their use of third-party software (including open-source software and firmware) only within the scope allowed by law and in compliance with the respective license conditions.

Money laundering

Our business partners are required to comply with the legal regulations concerning the prevention of money laundering.

Funding of armed groups

We expect our business partners to desist from all activities that might directly or indirectly contribute to the funding of armed groups. This includes the observance of international treaties

and national laws concerning trade in conflict minerals and other natural resources.

Due diligence obligations in the supply chain

Syntegon is committed to complying with applicable legal regulations on human rights and environmental due diligence, both in its own business operations and throughout its supply chain. Our business partners also undertake to comply with these due diligence obligations. The business partner shall also contractually oblige its suppliers and subcontractors to comply with such due diligence obligations and the basic principles contained in this Code of Conduct and to pass them on along the supply chain.

Syntegon reserves the right to conduct audits to verify compliance with the aforementioned due diligence obligations and basic principles itself or via third parties specialized in this area. The business partner shall allow short-notice appointments for auditing. The business partner undertakes to grant Syntegon or the third party access to all operating sites, testing facilities, warehouses and adjacent areas, and shall enable the inspection of documents relevant to the audit.

Business partners and other suppliers in the supply chain can use Syntegon's whistleblowing system (https://www.bkms-system.net/bkwebanon/report/clientInfo?cin=zhejp9&c=-1&language=ger) to anonymously report violations of human rights and environmental due diligence or Syntegon standards that occur within the supply chain, if desired. Business partners shall inform their employees and their subcontractors about this whistleblower office.

Insofar as a violation of human rights and environmental due diligence obligations in the supply chain by the business partner or its suppliers and subcontractors is imminent or has occurred, the business partner must immediately take appropriate remedial action that is suitable to prevent or end the violation or reduce its extent. If a quick and immediate termination of the violation of the aforementioned due diligence obligations by the business partner cannot be achieved, the business partner shall immediately prepare and implement a concept to terminate the violation as soon as possible or to minimize the effects of the violation. The business partner's concept must include a concrete timetable on what implementation steps will be taken to minimize or stop the violation of the aforementioned due diligence obligations. The business partner shall coordinate his concept and schedule with Syntegon.

The business partner shall inform Syntegon immediately about past and imminent violations of the aforementioned due diligence obligations as well as about a possible concept for the termination or minimization of such violations. As long as the violation of the aforementioned due diligence obligations has not ended, Syntegon is entitled to suspend the business relationship with the business partner. If a business partner does not take any corrective measures or if the corrective measures are not successful, Syntegon is entitled, after the unsuccessful expiry of a reasonable period set by Syntegon, to withdraw from the contract with the business partner or – if it concerns a continuing obligation or a contract for services – to terminate this contract extraordinarily without notice.

Furthermore, the business partner undertakes to inform Syntegon immediately about all human rights-related and environment-related risks known to him and relevant for the delivery or service provided to Syntegon.

If the business partner violates the aforementioned due diligence obligations and/or the basic principles listed in this Code of Conduct and third parties assert claims against Syntegon as a result of this violation, or if a fine is imposed on Syntegon as a result of this violation, the business partner shall indemnify Syntegon from these third-party claims and the fine.

To the extent necessary and reasonable for the business partner, the business partner shall support Syntegon in fulfilling its legal obligations to comply with human rights and environmental due diligence obligations.

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