

CODE OF
CONDUCT

-ENGLISH-





1 INTRODUCTION

We, the management of the LINHARDT Group, are convinced that compliance with ethical values is necessary for long-term economic success.

This includes fair dealings with one another and conduct within the framework of the specified standards in day-to-day business. We consider the success of our customers to be the key to achieving long-term and sustainable business success and steady growth, and consider that it goes without saying that the requirements of all interested groups should be met in the process.

As the management of the LINHARDT Group, we take our responsibility for a sustainable business strategy and its appropriate implementation very seriously. Integrity and compliance with the laws and ethical principles are a key element here to preserve the authenticity of our company.

This "LINHARDT – Code of Conduct" defines how we conduct our business in an ethical and socially responsible manner. In combination with the "LINHARDT – Visions & Guidelines" and the "LINHARDT – Management Commitment", standards and instructions which ensure respectful and dignified treatment of our employees, safe working conditions, and sustainable environmental practices are defined.

This Code of Conduct contains the following:

- How our management perceives their responsibility,
- How we interact with our employees and colleagues,
- What behaviour customers can expect from us,
- How we interact with our suppliers, and
- How we behave when dealing with communities and the environment.

Each manager and each individual employee is responsible for behaving in accordance with this Code of Conduct. Our managers act as role models because they exemplify the principles of conduct and endeavour to ensure that they are implemented in all situations.

Viechtach, 23.10.2019

Johannes Schick
Management



Human rights

We respect and promote the dignity of each individual and support the protection of and compliance with international human rights. For us, it goes without saying that we do not use child labour and reject all forms of forced labour. We refuse to tolerate any working conditions which are in conflict with international or local laws and practices.

Discrimination

We do not tolerate any form of discrimination in hiring, remuneration, training opportunities, promotion, dismissal, or retirement on the basis of our employees' race, ethnic origin, gender, age, marital status, religion or world view, disability, pregnancy, sexual orientation, membership of a trade union, or membership of a political party and naturally also require our employees to resolutely oppose such discrimination.

Freedom of association & right to collective bargaining

As the Linhardt Group, we respect the right of all employees to join or leave associations or organisations of their choice for the purposes of the promotion and protection of employees' interests, to work for them, and to establish them, and we comply with the appropriate agreements with our employees' collective representatives here in accordance with the applicable local laws and regulations.

Disciplinary measures

We oppose the use of corporal punishment, mental or physical coercion, and verbal insults.

Employee motivation & training

We consider motivated employees and their identification with our company's aims to be a significant factor for success. Support for our employees is therefore particularly emphasised in the "Linhardt – Visions & guidelines". In the process, we concentrate on job-specific training which is applicable within the company, as well as on the development and promotion of future management potential.

Health & safety

The health and safety of our employees is protected to greatest degree possible through the provision of a healthy and safe working environment. Each individual contributes to a safe and healthy working environment through compliance with the safety regulations which apply within our company. We also offer our employees a voluntary health programme, as well as training in all health and safety-related fields. Doctors are available to employees during working hours.



Compliance with cartel & competition law regulations

With our high-quality products, innovative solutions, and our reliability, we measure ourselves openly and fairly on the global markets. In the process, we do not engage in any unlawful or criminal practices, such as bid rigging for example, which exclude, distort, or limit competition in any manner.

Conflicts of interest & bribery / corruption

All of our employees avoid situations in which their personal or financial interests come into conflict with the company's interests.

In particular, they are prohibited here from being involved with competitors, customers, or suppliers' companies or entering into business relationships with them in a private sphere if this would result in a conflict of interest. Such a conflict of interest always occurs if the type and extent of a share are such that actions in pursuit of the business affect our company in any way. Our employees unequivocally distance themselves from requesting, accepting, or taking unfair or unlawful benefits which may influence business decisions or transactions. Likewise, none of our employees offer, or grant or seek to grant business partners, their employees, or other third parties undue advantages, or make any agreements regarding this during business activities of any type.

Protection of assets & confidentiality

Each individual is expected to protect the company's material and immaterial assets, to handle operational and trade secrets, as well as business information relating to customers, confidentially, and to comply with the applicable principles for data protection.

"Linhardt privacy policy"

Suppliers

We have high expectations of our suppliers and require them to comply with the same strict principles which we strive for ourselves in the management of their businesses, particularly in the treatment of employees. When selecting suppliers, the Linhardt Group of Companies takes into consideration the suppliers' capabilities with regard to

- the implementation of appropriate quality systems,
- the availability of equipment and organisational structures, and
- the ability to meet environmental protection and data protection requirements.

Environment & recycling

As a company in the packaging industry, we are committed to nature. We protect our environment through state-of-the-art systems. Each employee makes their contribution to the production of high-quality products in processes which are considerate of the environment. We save environmental resources through in-house energy production and the use of raw materials from the recycling economy.



Corporate citizenship

We are expressly committed to our responsibility to the residents in the communities in which we maintain our operations and are committed to open communication with all authorities, as well as with societal and public interest groups.

Compliance

This "LINHARDT – Code of Conduct" has been established, approved, and brought to the attention of all employees by the management. Our employees comply with this Code of Conduct without exception while exercising their duties.

Stricter or more detailed guidelines which are nevertheless fundamentally in line with these corporate principles may apply in certain regions, countries, or roles. Questions regarding application or interpretation, as well as reports of possible violations, are directed to the respective superiors. Procedures, practices, or actions which are inconsistent with this Code of Conduct should be corrected and result in disciplinary action.

1. Other applicable documents

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| DOC-18-00201 | : | Code of Conduct for Suppliers |
| DOC-18-00202 | : | Management Commitment |
| DOC-18-00687 | : | Linhardt Vision & Guidelines |



A handwritten signature in black ink, which appears to read "Johannes Schick". The signature is fluid and cursive.

Johannes Schick
CEO - LINHARDT Gruppe