



Code of Conduct

Transparent compliance rules,
that create trust

Coroplast
group

Dear Employees,

The Coroplast Group thrives on the trust of its customers, employees and the general public based on the integrity and efficiency of the company. Trust, fairness and reliability are crucial basic principles for our success. In order to win, maintain and justify this trust, it is of the utmost importance that all employees in all areas of the company comply with our policies.

To ensure sustainable compliance in all areas of the company and to conduct responsible corporate governance and control, we have developed a comprehensive compliance management system. Hence, we are providing our employees with a guide and a binding framework for action to cope with daily challenges. Our Compliance Officer is your contact for all compliance issues. We encourage you to report possible violations of the Code of Conduct directly to the Compliance Officer.

The Management Board of the Coroplast Group is emphatically committed to complying with the Code of Conduct, and expects the same from every person who works for the Coroplast Group. Our most important resources for achieving our corporate goals are the expertise and entrepreneurial spirit of our employees.

We value the commitment and passion with which our employees contribute to the company's success. For these reasons, let us work together to ensure that compliance is not only promoted but also actively practiced and continuously developed as a natural and intentional part of our corporate culture.

The Board of Management



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Corporate governance – what is important to us

As a traditional, independent, family-managed company, we attach great importance to integrity.

At the Coroplast Group, integrity means:

- › having a common understanding of values and behaving correspondingly
- › compliance with both statutory and internal regulations by management, executives and employees worldwide

Entrepreneurial thinking is at the forefront of everything we do. At the same time, **loyalty, trustworthiness, reliability, respect, appreciation and commitment** are important characteristics of our corporate culture.



Social responsibility

For over 90 years, the Coroplast Group has been aware of its social responsibility.

Respecting human rights, ensuring fair working conditions in a non-discriminatory environment, employees' freedom of association and the unimpeded work of employee representatives are indispensable components of value-oriented corporate governance at the Coroplast Group.

We guarantee occupational health and safety in compliance with the existing local regulations.



Gifts and invitations

In order not to jeopardise our entrepreneurial activities, we must avoid even the mere appearance that an employee's business decisions could be impaired by receiving personal invitations or gifts.

Our employees do not accept gifts that have the character of a personal advantage and should consult with the Compliance Officer with any questions or concerns.

Coroplast Group employees may not issue invitations or give gifts that could be construed as an attempt to influence a business partner. Particularly strict standards apply to any dealings with public officials.

Question:

As contract negotiations are about to begin, I would like to invite my customer and his family to a luxury hotel at the Côte d'Azur (Southern France). All expenses for transport, accommodation and meals are covered by the Coroplast Group. May I hold the event as planned?

Answer:

Please discuss your concern with your compliance contacts. In view of the upcoming negotiations, you should reduce the scope of your event to a common business setting (e.g. a dinner in a reasonably priced restaurant).



Business relationships and product conformity

The Coroplast Group maintains trusting and fair business relationships with customers, suppliers, service providers and business partners.

In doing so, we comply with the standards set out in this Code of Conduct and expect our service providers and business partners to feel obliged to comply with similar standards and rules.

In particular, these include compliance with all national laws and regulations, including minimum wage requirements.

The Coroplast Group complies with all legal and official regulations as well as internal standards that apply to its products. The same principle applies to all our production facilities and plants.



Question:

Can the Coroplast Group be held liable for legal violations by suppliers or service providers that are either directly or indirectly connected with the business relationship?

Answer:

Yes, but it depends on the particular case in question. For business partners with increased risk (e.g. sales agents in risk countries), special preventive measures therefore need to be taken. The legal department can provide further details.

An aerial photograph of a rowing team in a scull on a body of water. The team consists of four rowers, two in red shirts and two in white shirts, all wearing caps. They are using long oars with yellow blades. The water is a deep blue with visible ripples and splashes from the oars.

Competition and antitrust laws

The Coroplast Group is committed to engaging in fair competition in all its business relationships and expects the same from its business partners. We therefore comply with the competition and antitrust laws that apply to us.

Any agreements (including those of an informal nature) between companies that could prevent, restrict or distort competition are prohibited. This applies in particular to price agreements or dividing up markets, customers or suppliers with competitors.

Any agreements entered into between competitors regarding product developments or technical standards can also be problematic under antitrust law. If there is any doubt, always contact the legal department in advance.

Antitrust laws must also be complied with in our dealings with customers and suppliers. For example, it is prohibited to prescribe the sales prices our distributors may charge. Territorial restrictions and exclusivity agreements can also be regarded as relevant restrictions of competition under antitrust law and always require prior verification by the legal department regarding their legal admissibility.

Question:

You want to prevent a distributor from reselling products purchased from the Coroplast Group below a minimum price for fear of “price erosion”. Is this permissible?

Answer:

The setting of (minimum) resale prices is not permitted within the EU. In other countries (e.g. the USA), this may be generally permissible if certain criteria are met. It is therefore advisable to be cautious in this regard. You are required to clarify the issue with the legal department in advance.

Trade controls and conflict minerals

The Coroplast Group complies with all applicable national and international trade control laws that restrict or prohibit the import and export of products, services and technologies.

We do not import from or export to countries or organisations for which there is an applicable embargo.

We have defined appropriate internal processes to determine whether the products we supply could contain metals originating from the Democratic Republic of Congo or its neighbouring countries (so-called “conflict minerals”).

Details on this topic are available in our “Conflict Minerals Policy”.

Question:

The Coroplast Group intends to sign a non-disclosure agreement with a company that is subject to an export ban in order to exchange certain technical information. The finished products, however, are to be sold exclusively to another company that is not affected by the export ban. Is this permissible?

Answer:

No, it isn't. The mere transfer of technology with a company that is subject to an export ban may violate applicable trade control laws.



Avoiding conflicts of interest

The Coroplast Group expects loyalty from all its employees. Business decisions are made exclusively in the interest of the company.

Any actions or decisions that are influenced by personal or private interests may be contrary to these corporate interests.

In order to protect both yourself and the Coroplast Group, as an employee you are required to disclose any such conflicts and/or assumed conflicts of interest in advance. In order to do so, please contact your compliance partner.

These standards also apply to the selection of new employees.



Question:

A good friend works for one of our service providers and is responsible for generating new business at that company. How should I behave and may that person participate in our tendering procedures?

Answer:

The personal relationship must be made transparent within the company, ideally by contacting a compliance partner. If you are involved in the decision to select the service provider, you must withdraw from the process for your own protection, to ensure that the final selection of the service provider is made by another person.

Just like any other provider, the service provider is allowed to participate in the tendering procedure. However, the service provider may not be given preferential treatment or provided with information that is not available to others.

Data protection and data security

The Coroplast Group protects the personal data of its employees, customers, suppliers, applicants and other data subjects.

We gather, collect, process, use and store personal data only in accordance with existing legal requirements and our data protection policy.

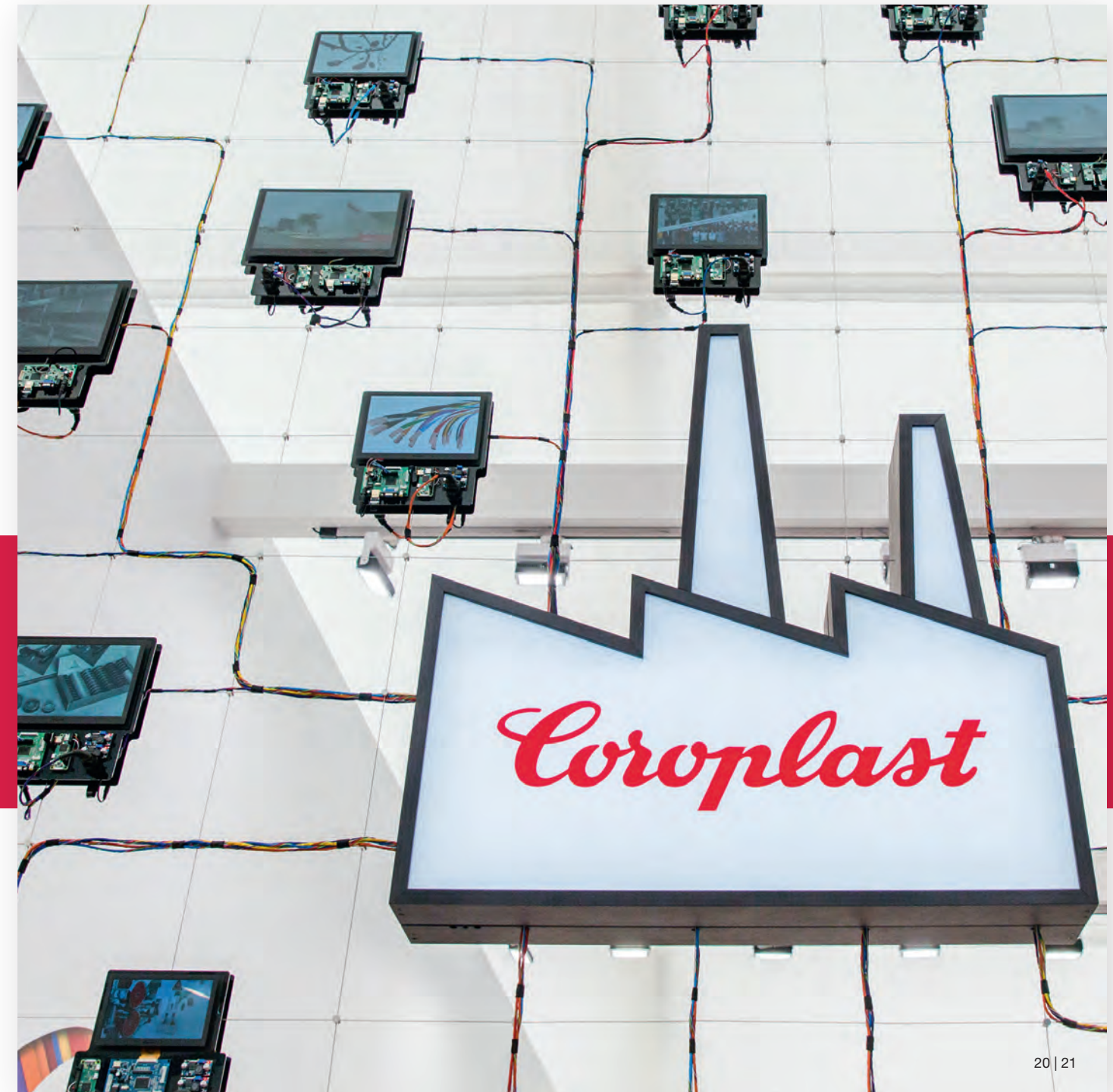
We take adequate and appropriate technical and organisational measures to protect the data in our possession from unauthorised access, unauthorised use, misuse or loss.

Question:

I have already completed a data protection training course in which “personal data” were discussed. Could you define this term again?

Answer:

Personal data pertains to information about a named or easily identifiable person. These data include, for example, name, address, telephone numbers, email addresses, date of birth, bank details, salary and assessments.



Key questions for testing yourself

The following key questions will provide you with guidance as to whether you are acting in accordance with the corporate values set out in the Coroplast Group Code of Conduct.

If the questions can be answered in the affirmative, your behaviour is most likely in accordance with the company's values.



- 1 Do I make my decisions in accordance with statutory and in-house stipulations?
- 2 Can I exclude the possibility that my conduct may, under certain circumstances, be detrimental to the company's interests?
- 3 Would I still consider my decisions correct if the Coroplast Group were required to represent them in public?
- 4 Are my decisions and my behaviour transparent for others in the company?
- 5 Do I act as a role model?
- 6 Would my behaviour withstand examination by a third party?

If you have any queries or doubts, please contact the Compliance Officer (contact on page 27)

Compliance with the Code of Conduct

The regulations contained in this Code of Conduct reflect the fundamental elements of Coroplast's corporate culture. We expect each of our employees to identify with our ethical principles and act in accordance with these principles of conduct at all times.

Our managers exemplify our principles and ensure that the employees assigned to them are aware of and comply with the regulations contained in this Code of Conduct.

Our employees are aware that the Coroplast Group will not tolerate violations of this Code of Conduct or of applicable laws, standards and internal company regulations, and that any such violations may, in individual cases, result in consequences under labour, civil or criminal law.

If a Coroplast Group employee has any type of concern regarding the behavioural guidelines set out in this Code of Conduct or becomes aware of a possible violation, they are required to submit this concern to their manager or to the Compliance Officer for clarification.





How do I report violations?

You are required to report compliance violations or corresponding suspicions internally. First of all, consider personally contacting the manager concerned.

Any reports of misconduct can, of course, also be submitted to the Compliance Officer by telephone or email at any time.

All information will be handled confidentially. The identity of whistle-blowers is protected. You will not suffer any retaliation for providing information on the misconduct of third parties in good faith.

Please use the following email address to report misconduct:
compliance@coroplast-group.com

Who can I contact if I have any questions or uncertainties?
Your direct manager is the first person to contact with any questions regarding the application of this Code of Conduct in your day-to-day work.

You can also contact the Compliance Officer at any time:
Roland Merta T +49 202 2681 502

Where can I find further information?

- › On the compliance intranet page
- › At compliance training sessions
- › In the Coroplast Group guidelines on specific compliance topics

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WEWIRE