

Code of Ethics for Business Partners of the Rovema Group

Creating value together for generations - by doing the right thing

ROVEMA GmbH and its subsidiaries (hereinafter collectively referred to as ROVEMA) bear a special responsibility towards society, employees, and business partners as a premium provider of packaging machines and systems.

For us, compliance means not only adhering to laws but also "doing the right thing" by following ethical principles to make good decisions. The ROVEMA Code of Ethics describes the standards by which we measure ourselves and sets out the principles to which we and our employees are committed.

ROVEMA is committed to sustainability and has made a commitment to adhere to the ten principles of the UN Global Compact.

We expect our business partners to act sustainably and responsibly, recognizing their social responsibility towards their own company, customers, suppliers, the environment, and society.

This Code of Ethics outlines the requirements based on the principles of the UN Global Compact and the United Nations Universal Declaration of Human Rights, which our customers, suppliers, and other contractual partners must comply with as a prerequisite and essential part of our collaboration.

Our business partners are also encouraged to communicate these principles to their contractual partners and ensure their adherence.

Integrity and Business Conduct

ROVEMA considers integrity and reliability in business relationships as essential for sustainable business practices. Our business partners are expected to uphold the following key principles regarding integrity and business conduct:

Respect for the Law

Compliance with all applicable laws and regulations of the respective legal systems.

Human Rights and Working Conditions

ROVEMA does not tolerate human rights violations. Our business partners commit to adhering to national and international regulations for the protection of human rights. Child labor is prohibited. Our business partners shall not allow the employment of children in their own operations or those of their business partners.

Employment relationships are created exclusively on a voluntary basis and can be terminated subject to agreed deadlines. **Forced labor** and any form of modern **slavery** and **human trafficking** are prohibited.

Our business partners create fair and safe workplaces. They **do not** tolerate **discrimination** based on gender, age, ethnic origin, nationality, social status, political opinion or sexual orientation and promote diversity.

The working environment is free from harassment and unlawful practices or discrimination.

Freedom of Association and Expression

Our business partners support the protection of free expression and personal rights and uphold the right to collective bargaining in accordance with applicable laws.

No Conflicts of Interest

Business decisions are made exclusively based on proper considerations. Personal interests, especially of a financial nature, must not play a role. Our business partners therefore undertake to prevent conflicts of interest

No Bribery & Corruption

Our business partners comply with all applicable anti-corruption laws. They ensure that their employees, subcontractors, or representatives do not offer, promise, or grant advantages to ROVEMA employees to obtain orders or other business advantages.

Fair Competition

Our business partners comply with all applicable competition laws and behave fairly in competition. They do not engage in secret agreements with competitors or practices that prevent, distort, or restrict competition according to applicable antitrust laws. They do not misuse any dominant market position unlawfully.

Data Protection and Information Security

Our business partners must protect the personal data of their employees, business partners and customers. They must ensure that the use of personal data - as well as the collection, recording, storage and deletion of such data - is always carried out in compliance with the applicable laws and regulations.

Confidential information of Rovema will not be disclosed to third parties without authorization and will be protected at all times, including through appropriate information security measures.

Health and safety in the workplace

Our business partners provide their employees with a safe and healthy working environment and regularly identify potential safety risks in accordance with legal regulations.

This means preventing accidents by establishing an appropriate occupational health and safety management system. This includes the identification, assessment and reduction of actual and potential accident and health risks, the recording and investigation of incidents, the training and instruction of employees in a comprehensible form, the provision of suitable work equipment and protective equipment as well as appropriate measures for emergency care and response.

Responsibility towards the Environment and Communities

Our business partners take a responsible approach to the environment and natural resources. They avoid risks to people and the environment, minimize environmental impacts and use resources efficiently. Their processes, facilities and resources comply with the applicable legal requirements and standards for environmental protection.

Sanctions

Our business partners comply with all applicable regulations for the import and export of goods, services, and information, as well as applicable embargoes and sanctions, and contribute to preventing the proliferation of weapons of mass destruction and the uncontrolled transfer of conventional arms. They ensure that sensitive goods are not supplied or otherwise made available for internal repression, serious human rights violations, or the promotion of terrorism abroad.

Money Laundering and Terrorism Financing

Our business partners comply with all laws prohibiting money laundering or the financing of illegal or unlawful purposes. They take appropriate measures within their companies to prevent money laundering and terrorism financing.

Due Diligence in the Supply Chain

ROVEMA is committed to complying with applicable legal regulations regarding human rights and environmental due diligence both in its own business operations and throughout the supply chain. Our business partners must also comply with these due diligence obligations. They contractually oblige their suppliers and subcontractors to adhere to these due diligence obligations and the principles contained in the Code of Ethics and to pass them along the supply chain.

If a violation of human rights and environmental due diligence obligations in the supply chain by the business partner or their suppliers and subcontractors is imminent or has already occurred, the business partner must immediately take appropriate remedial measures to prevent, end, or reduce the extent of the violation. If immediate cessation of the violation is not possible, the business partner must promptly develop and implement a plan to end the violation or minimize its impact as quickly as possible. This plan must include a concrete timeline describing the steps to minimize or end the violation. The business partner coordinates their plan and timeline with ROVEMA.

The business partner is obliged to inform ROVEMA immediately of any occurred and imminent violations of the aforementioned duties of care as well as of any concept for ending or minimizing such violations. As long as the breach of the duties of care has not been

remedied, ROVEMA is entitled to suspend the business relationship with the business partner. If the business partner does not take any remedial measures or if these are not successful, ROVEMA shall be entitled to withdraw from the contract with the business partner after the expiry of a reasonable period or - in the case of a continuing obligation or contract for work and services - to terminate it extraordinarily without notice.

The business partner is also obliged to inform ROVEMA immediately of all human rights and environmental risks known to him that are relevant to the delivery or service to ROVEMA.

If the business partner violates the duties of care stated herein and/or the principles listed in the Code of Ethics for Business Partners of Rovema GmbH and third parties assert claims against Rovema due to this violation or a fine is imposed on Rovema, the business partner is obliged to indemnify Rovema against these claims and fines.

Whistleblower system

If there are any indications of a violation of the law or the principles of the Code of Ethics, you can contact us via the SpeakUp portal, our electronic, multilingual whistleblowing system (also anonymously):

<https://www.speakupfeedback.eu/web/rovemaexternal/de>