



## **Code of Conduct**

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### **Preamble**

For ROVEMA, sustainable economic, ecological and social action is an indispensable element of entrepreneurial culture. This also includes integrity in dealings with employees, business partners and the public, which is best achieved through exemplary conduct.

This is why we have developed a code of conduct that is to serve as a guiding principle for shareholders, management, executives and all employees in the company. ROVEMA adopts the 10 principles of the UN Global Compact as its own. Management and shareholders expect these fundamental principles to be disseminated and implemented within their respective spheres of influence.

As a service group, ROVEMA is dependent on winning and maintaining the trust of customers and business partners through impeccable conduct. ROVEMA wants to be perceived as credible, serious and reliable and to act accordingly.

This Code of Conduct therefore sets standards and provides guidance on how all employees can work together to comply with them. The Code is intended to help overcome ethical and legal challenges in day-to-day work and provide orientation in conflict situations. Violations are investigated in the interest of all employees and the company and their causes eliminated. This also includes the consistent prosecution of misconduct within the framework of the applicable legal regulations.

## 1. Basic values

ROVEMA is active with the variety of its business activities in different economic, regulatory, cultural and social environments. The reputation of ROVEMA is essentially shaped by the appearance, actions and behavior of each individual. Appearance, action and behavior are determined by the following basic values:

### ***Legality***

The observance of law and order as well as the recognized value standards of the respective cultural circles is our top priority. ROVEMA expects its employees as well as its business partners to comply with the law.

### ***Society and environment***

We accept our social responsibility and are committed to a responsible approach to the environment and nature.

### ***Open-mindedness***

We are open for an unprejudiced and trusting cooperation with all employees, customers and suppliers. We do not tolerate different treatment based on nationality, sex, race, colour, disability, origin, religion, ideology, age or sexual orientation. We support freedom of association.

### ***Tolerance***

We respect the different beliefs, personal dignity, privacy and personal rights of each individual.

### ***Innovation***

We encourage the creativity and commitment of all employees in the workplace and are open to new ideas and solutions.

## 2. Application and validity

This Code of Conduct sets standards for all ROVEMA employees. It applies to shareholders, managing directors, executives, employees as well as to persons who are deployed functionally equivalent to the employees.

It applies to all companies directly or indirectly majority-owned by ROVEMA. The Code of Conduct is to be applied in the same way to other participations and in relations with suppliers and representatives wherever possible.

### 3. Legal basics

#### ***Legality***

Compliance with law and regulations as well as internal guidelines and specifications is the company's top priority. ROVEMA is committed to the respect and observance of internationally recognized human rights.

The reputation of ROVEMA is shaped by the appearance, actions and behaviour of each individual person. All employees therefore behave in a manner that does not damage the reputation of ROVEMA.

#### ***Data protection***

The use of modern information technologies raises questions of informational self-determination in many areas, which we regard as a valuable asset. ROVEMA takes data protection into account when dealing with personal data of customers, employees and business partners. The data protection officer of ROVEMA supports the specialist offices in this respect. Personal data will only be processed if this is legally permitted or if the person concerned agrees. We are committed to the principles of the economical storage of personal data and to the transparency of data processing.

#### ***Privacy***

When cooperating with suppliers, development partners, other packaging machine manufacturers, dealers or other business partners, the protection of confidential information, know-how and trade secrets is particularly important.

Every employee is obliged to use data and information which come to his knowledge in the operational scope exclusively within the permitted scope and to check whether the recipient is entitled in the event of a transfer within and outside the company. Depending on the importance of the information, additional security measures such as confidentiality obligations or audits must be agreed.

We also respect and protect the confidential information of others. We use external knowledge only to the extent that it is known to us lawfully or from generally accessible sources.

#### ***Corporate governance***

ROVEMA is committed to responsible, transparent and long-term success oriented corporate management.

#### **4. Respect and honesty**

ROVEMA respects the personal dignity, privacy and personal rights of each individual. Differences in treatment based on nationality, sex, race, colour, disability, origin, religion, ideology, age or sexual orientation are not tolerated, nor are child labour and degrading working conditions.

ROVEMA is a reliable and fair business partner. This applies both to internal cooperation and to business transactions with external partners. Our conduct towards business partners is professional, transparent, respectful and fair.

All employees are required to handle company property with care and to protect it from loss, theft or misuse.

The commitment and ingenuity of our employees, efficient action and a good working atmosphere are indispensable prerequisites for a high reputation and entrepreneurial success. Our corporate culture is characterised by mutual respect, team spirit, openness and professionalism.

#### **5. Health and safety**

In order to avoid health hazards, occupational health and safety regulations must be observed. Occupational health and safety is not a minor matter, but a binding task for each individual. The managers have a role model function in this respect.

We plan and operate our plants in strict compliance with safety regulations. In this way, we reduce the risk of accidents and ensure trouble-free plant operation. The responsible managers assume their operator responsibility and entrepreneurial duties. They ensure that the employees working on an installation are carefully selected and instructed.

The safety of employees at work and the protection of health are supported by all employees through prudent action; beyond their own area of responsibility, in particular by informing their superiors or other suitable bodies. Managers have a role model function in minimizing these risks.

ROVEMA has recognized the minimization of the risks for health and safety of its customers as a responsibility in all business areas. This is supported and promoted by all employees through prudent action.

#### **6. Ethics and business practices**

##### ***Protection of interests***

Business decisions are made exclusively in the interest of ROVEMA. Personal interests or considerations outside the employment relationship, in particular financial interests

or considerations, must not play a role at any level of decision-making. Actual or potential conflicts of interest must be reported to the supervisor immediately.

All employees have the duty to avoid direct or indirect (business) relations which could have an adverse effect on ROVEMA.

### ***Discounts and gifts***

Business decisions at ROVEMA are based on objective criteria such as the reliability and integrity of a business partner, his service, the achievement of prices in line with the market as well as adequate product and service quality. A decision must never be influenced by the promise or granting of personal privileges.

All employees are obligated, when working with business partners, to observe the principle never to give the appearance of influencing decisions in business matters by accepting or offering benefits or gifts.

The prohibition on accepting or granting benefits applies not only to direct financial benefits but also to other benefits which could call into question the independence of the service, such as disproportionate invitations and gifts. Therefore, financial and other contributions which exceed the framework of normal and reasonable business practice are to be rejected.

Only symbolic occasional or promotional gifts of little value are common and acceptable. The same applies to business lunches within the usual and reasonable limits which serve a legitimate professional purpose, such as lunch during or after a business meeting. When accepting or granting benefits, all employees must always observe the limits of custom and appropriateness. When it comes to higher-value grants, the written approval of the responsible manager must be obtained beforehand.

### ***Corruption***

We do not tolerate any kind of corruption or bribery, neither against public nor private officials, neither active nor passive. We therefore maintain transparency in our dealings with all customers, suppliers and authorities and comply with the international anti-corruption standards laid down in the 10th Principle of the UN Global Compact and in national anti-corruption and bribery laws.

### ***Competitions***

With our products and services we arouse emotions - also in advertising. We always comply with the applicable requirements of consumer protection and competition law regarding transparency and accuracy. We are committed to the principle of fair competition and provide our customers with all the information they need to make prudent and conscious decisions.

ROVEMA is fully committed to the principles of market economy and free and fair competition. We pursue our corporate goals exclusively according to the principle of performance and in compliance with the applicable competition rules, in particular antitrust law. We also expect this from our competitors and business partners.

Our employees must not enter into any anticompetitive agreements with competitors or coordinate their conduct with competitors in an anticompetitive manner. This applies in particular with regard to prices, price components, conditions and calculations. Included are list prices, minimum prices, offer prices, price surcharges, discounts, bonuses and terms of payment and delivery. Further prohibited are agreements or concerted practices which restrict or control the sale of goods or services, e.g. interference with the price sovereignty of resellers (dealers), production, sales or supply quotas. All forms of market partitioning, such as customer partitioning or territorial agreements, are also prohibited. Furthermore, ROVEMA will not exchange any competition-sensitive information (including current information on prices, price components, conditions, sales, capacities and capacity forecasts, quantities and investments) with competitors.

### ***Money laundering***

ROVEMA may not be misused for money laundering. Transactions in which an infringement cannot be ruled out shall be rejected. The laws and regulations to combat money laundering are complied with without exception.

## **7. Public statements**

Official statements to the media as well as the communication of ROVEMA with the media are only carried out by the management or the employees expressly commissioned and authorised for this purpose. External enquiries from the media must be forwarded to these employees.

## **8. Social responsibility**

### ***Sustainable development***

The assumption of responsibility towards society and the environment is an essential factor for sustainable corporate success. This is why we are committed to economic, ecological and social development at our sites. Our actions are characterized by transparency, cooperation and open dialogue with our stakeholders.

### ***Environment***

Only those who operate sustainably can be successful in the long term. Environmental law provides ROVEMA with binding standards for this purpose. The employees responsible for environmentally relevant facilities and activities are aware of their special responsibility in complying with environmental law. In addition to compliance with environmental requirements, ROVEMA strives to continuously improve its environmental



performance. All employees take their environmental responsibility seriously by acting in accordance with the rules.

### ***Donations***

Due to our social obligation ROVEMA grants money and donations in kind for science, research, art, culture and sport as well as for social and charitable tasks. Each donation must be accounted for in a transparent manner so that the recipient of the donation and the intended use are clearly identifiable.

## **9. Implementation of the Code of Conduct**

### ***All employees must comply with applicable law***

Every ROVEMA employee is obliged to comply with this code of conduct. It's not enough just to take note of him. Rather, every employee must review his or her actions on the basis of the above principles and align them accordingly.

### ***All managers must ensure compliance with this Code in their area of responsibility.***

Every manager is obliged to inform and sensitize his employees to the content and significance of this Code of Conduct. It supports its employees to the best of its ability to act lawfully. If there are indications of violations of the law, these must be investigated consistently. Executives are required on their own initiative to regularly check compliance with the applicable law and seek dialogue with their employees to this end. This is the only way to ensure that the principles laid down in this Code are lived on a daily basis and remain firmly anchored in our corporate culture.

### ***ROVEMA does not accept violations of the law by its employees***

Negligent violations of the law by employees can result in sanctions under labor law, up to and including the termination of the employment relationship. If damage is caused by violations of the law, this may also result in personal liability on the part of the employees. Penalties or fines may also be imposed.

### ***Questions about the Code of Conduct***

This Code of Conduct cannot foresee, let alone provide answers to, every conceivable legal or ethical form.

Employees who are not sure how to behave correctly in a particular situation can contact Mr. Ralf Buch, Chief Financial Officer, as Chief Compliance Officer (e-mail [compliance@rovema.de](mailto:compliance@rovema.de)). It goes without saying that such requests will be treated strictly confidentially.