



Passion for packaging



## Code of Conduct

- Last update: June 2020 -

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### **Preamble**

Sustainable economic, ecological and social acting is an indispensable element of ROVEMA's corporate culture. This also includes integrity in dealing with employees, business partners and the public, which is best achieved by exemplary behavior.

Therefore, we have developed a code of conduct, which should be a model for shareholders, management, executives and all employees in the company.

ROVEMA adopts the 10 principles of the UN Global Compact. Management and shareholders expect that these fundamental principles are disseminated and implemented within the respective sphere of influence.

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

Therefore, this code of conduct sets standards and contains instructions how all employees can cooperate in their compliance. The code is intended to help to cope with ethical and legal challenges in daily work and to provide orientation in conflict situations. Violations are investigated and their causes eliminated in the interest of all employees and the company. This also includes the consistent pursuit of misconduct within the framework of the applicable legal regulations.

### 1. Core values

With the diversity of its business activities ROVEMA is active 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 standards of value of the respective cultural area is our highest priority. ROVEMA expects its employees as well as its business partners to comply with the law and order.

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

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

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

We are open to an unprejudiced and trusting cooperation with all employees, customers and suppliers. We do not tolerate different treatment on grounds of nationality, gender, race, skin colour, disability, origin, religion, ideology, age or sexual identity. We support freedom of association.

#### ***Tolerance***

We respect different convictions, the 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 employees of ROVEMA. It is valid for partners, managing directors, executives, employees as well as for persons who are functionally equivalent to the employees.

It is valid for all companies which are directly or indirectly majority owned by ROVEMA. For other shareholdings as well as in the relationship with suppliers and representatives the code of conduct should be applied in the same way wherever possible.

### **3. Legal basics**

#### ***Legality***

Compliance with the law and the internal guidelines and specifications is the top priority in the company. ROVEMA is committed to respect and observe internationally recognized human rights.

The reputation of ROVEMA is shaped by the appearance, actions and behavior 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 high value asset. ROVEMA takes the data protection comprehensively into account when handling personal data of customers, employees and business partners. The data protection officer of ROVEMA supports the specialist departments in this respect. Personal data will only be processed if this is legally permitted or the person concerned agrees. We are committed to the principles of economical storage of personal data and 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, expertise and trade secrets is particularly important.

Every employee is obliged to use data and information that comes to his or her knowledge within the scope of the company exclusively within the permitted scope and to check whether the recipient is authorized in the event of disclosure 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 only use external knowledge as far as it is lawfully known to us 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. A different treatment because of nationality, sex, race, skin colour, disability, origin, religion, ideology, age or sexual identity is not tolerated.

ROVEMA is a reliable and fair business partner. This applies for internal cooperation as well as for business transactions with external partners. Our behavior towards business partners is professional, transparent, respectful and fair.

All employees are obliged 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 regarded by us as indispensable prerequisites for a high reputation and business success. Our corporate culture is characterized by mutual respect, team spirit, openness and professionalism.

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

In order to avoid health hazards, occupational safety and health and safety regulations must be observed. Occupational safety is not a secondary matter, but an obligatory task for each individual. The managers have an important role model function.

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 operating responsibilities and entrepreneurial duties. They ensure that the employees working on a plant are carefully selected and instructed.

The safety of employees in the company and health protection are supported by all employees by acting prudently; beyond their own area of responsibility, in particular by informing their superiors or other suitable bodies. Managers are expected to set an example in minimizing these risks.

ROVEMA has recognized the minimization of the risk for the safety and health of the customers in all business units as a responsibility. This is supported and promoted by all employees by acting prudently.

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

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

Business decisions are made exclusively in the interest of ROVEMA. Personal, especially financial interests or considerations outside of the employment relationship may not play a role at any level of decision-making. Actual or potential conflicts of interest must be reported to the superior.

All employees have the duty to avoid direct or indirect (business) relationships that could have an adverse impact on ROVEMA.

#### ***Benefits 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 market-conform prices as well as adequate

product and service quality. A decision must never be influenced by the prospect or granting of personal benefits.

All employees are obliged to observe the principle that in their cooperation with business partners, they must never give the impression that they intend to influence 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 that could jeopardize official independence, such as invitations and gifts in disproportionate amounts. Financial and other benefits that exceed the scope of normal and appropriate business practice must therefore be rejected.

Only symbolic occasional or promotional gifts of low value are customary and acceptable. The same applies to business meals in the usual and appropriate framework, which serve a legitimate professional purpose, for example lunch during or after an official meeting. Both when accepting and granting gifts, all employees must always observe the limits of customary practice and appropriateness. If higher-value benefits are involved, prior approval must be obtained from the responsible manager.

### ***Corruption***

We do not tolerate any form of corruption or bribery, neither towards public or private officials, active or passive. We therefore maintain transparency in our dealings with all customers, suppliers and authorities and comply with international anti-corruption standards as set out 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. In doing so, we always observe the applicable requirements of consumer protection and competition law with regard to transparency and accuracy. We are committed to the principle of fair competition and provide our customers with all the information necessary for a prudent and conscious decision.

ROVEMA commits itself to the principles of the market economy and free and fair competition without restrictions. We pursue our business objectives exclusively according to the performance principle and under consideration of the valid competition rules, especially the cartel law. We also expect this from our competitors and business partners.

Our employees must not enter into agreements with competitors that restrict competition or coordinate their conduct with competitors in an anti-competitive manner. This applies in particular with regard to prices, price components, conditions and calculations. Included are, among other things, list prices, minimum prices, offer prices, price supplements, discounts, bonuses as well as payment and delivery conditions. Also prohibited are agreements or concerted practices that restrict or control the sale of goods or services, e.g. intervention in the pricing power of resellers (dealers), production, sales or delivery quotas. Also prohibited are all forms of market partitioning, such as customer allocation or territorial agreements. 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 should not be misused for money laundering. Transactions, where an offence cannot be excluded, are to be rejected. The laws and regulations for the fight against money laundering are observed without exception.

## **7. Public statements**

Official statements to the media as well as the communication of ROVEMA with the media is only carried out by the management or the employees who are explicitly commissioned and authorized for this purpose. External inquiries of media have to be forwarded to these employees.

## **8. Corporate social responsibility**

### ***Sustainable development***

Awareness of responsibility towards society and the environment is a key factor in sustainable corporate success. We are therefore committed to the economic, ecological and social development of our locations. Our actions are characterized by transparency, cooperation and an open dialogue with our stakeholders.

### ***Environment***

Only those who manage sustainably can be successful in the long term. The environmental law provides ROVEMA with binding standards for this. The employees responsible for environmentally relevant facilities and activities are aware of their special responsibility in complying with environmental law. Beyond the compliance with environmental law requirements ROVEMA strives for a continuous improvement of its environmental services. All employees take their responsibility for the environment 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. Every donation must be accounted for transparently in such a way that the recipient of the donation and the purpose of the donation can be identified without any doubt.

## **9. Human Rights and working conditions**

ROVEMA supports the UN Framework Convention, the principles of the Global Compacts of the United Nations and the UN Guiding Principles on the Economy and Human Rights. We comply with applicable national and international laws and expect the same from our employees.

***Health and safety at work***

We ensure the occupational safety and health protection of our employees in the workplace in compliance with the applicable laws and regulations. Possible hazards and resulting health risks are regularly and appropriately assessed and the necessary protective measures are taken. In addition, our employees are continuously instructed in general safety regulations.

***Wages, salaries and working hours***

Our employees are in a regular employment relationship. When they are hired, they receive employment contracts in which the working hours and remuneration are specified. All remuneration is paid in accordance with the contractual agreements without delay and usually at the end of the month. We comply with all applicable wage or salary and working time laws. We do not require our employees to work longer than the maximum hours permitted by law.

***Non-discrimination - Fair and equal treatment***

We treat our business partners and employees with dignity, respect and integrity. We do not discriminate based on ethnic or national origin, race, colour, religion, gender, age, disability or other health status, sexual orientation, gender identity, pregnancy, former military service, political affiliation, trade union membership, marital status.

Any form of psychological, physical, sexual or verbal abuse, intimidation, threat or harassment must not and will not be tolerated.

***Child labor and forced labor***

We do not employ workers younger than the minimum age specified in the applicable laws and regulations.

We do not use forced labor (involuntary work) in our company and do not tolerate it in our business contacts. Forced labor refers to all types of bonded labor such as the use of corporal punishment, arrest, threat of violence, surveillance measures or the withholding of passports, work permits, deposits, etc.

***Freedom of Association***

We respect the right of our employees to assemble freely and in accordance with applicable local laws. We also respect the right of our employees not to participate in such meetings. Our employees and/or their representatives must be able to speak freely and openly to management about concerns related to your working conditions.

### 10. Implementation of the Code of Conduct

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

Every employee of ROVEMA is obliged to observe this code of conduct. It is not enough to simply take note of it. Rather, every employee has to check his or her actions against the above principles and orientate them accordingly.

#### ***All managers must ensure that this Code is observed in their area of responsibility.***

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

#### ***ROVEMA does not tolerate violations of law by its employees***

Any culpable violations of the law by employees can result in sanctions under labor law, up to and including termination of the employment relationship. If damage is caused by legal violations, this can also result in personal liability 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 issue.

Employees who are not sure how to act 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 enquiries are treated in strict confidence.