

# Code of Conduct

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## Our basic understanding

silver plastics® has been developing and selling intelligent packaging solutions for the food sector since 1968. We are a family business and aspire to be a competent partner. This includes sustainable entrepreneurship, especially with regard to future generations and responsible corporate governance in accordance with the following guidelines.

Our company and all our employees<sup>1</sup> take responsibility within the scope of our possibilities and room for manoeuvre by considering the legal, economic, technological, social and ecological consequences of our daily decisions.

We therefore act in accordance with the applicable legal regulations and are guided by ethical values such as integrity, honesty and respect for human rights, as set out in the principles of the United Nations Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the provisions of the International Labour Organization (ILO) and the United Nations Guiding Principles on Business and Human Rights.

This Code of Conduct sets out the basic principles of our actions. These values and standards can only be practised by the employees working for silver plastics®. Therefore, this Code of Conduct must be observed by all employees. We expect the same basic understanding from our business partners.

Franz-Josef Klein  
Managing Director / Managing  
Director

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<sup>1</sup> To simplify wording and improve readability, we use the word "employees" in the following sections. This Code of Conduct naturally always refers to the male, female and diverse form (m/f/d).

## **1. Compliance with laws**

Compliance with all applicable laws and regulations is a matter of course for silver plastics® and its employees. This basic understanding requires full compliance with all binding legal regulations in all countries in which silver plastics® operates. Should the relevant laws and regulations in individual countries be less restrictive, the actions of silver plastics® and its employees shall be guided by the principles of this Code of Conduct. If local law conflicts with these principles, the mandatory local law shall apply. In this case, we endeavour to comply with the principles of this Code of Conduct to the best of our ability.

Employees of silver plastics® are responsible for complying with the legal requirements in their area of work. Management at all levels informs itself about the applicable laws and regulations and gives the respective employees the necessary instructions. Internal company information and regular training are intended to support employees in complying with the relevant laws and the principles of this Code of Conduct.

## **2. Health and Safety**

silver plastics® safeguards the health and safety of its employees by taking appropriate health and safety measures. silver plastics® is committed to ensuring that all standards for the protection of health and safety in the workplace are established and adhered to within the company. These include

- Compliance with applicable laws and regulations, taking into account international standards for the protection of occupational health and safety.
- The appropriate design of the workplaces, taking into account the applicable safety regulations, including the provision of suitable personal protective equipment.
- The implementation of preventive controls, including emergency measures, an emergency reporting system and other measures to ensure health and safety at work.
- Ensuring that all employees are instructed accordingly. To this end, silver plastics® has issued internal guidelines, such as occupational safety instructions, which must be complied with in the respective applicable version.

## **3. Production, hygiene and quality standards**

The high demands silver plastics® places on the quality of our products oblige us not only to comply with legal regulations as a matter of course, but also to voluntarily comply with higher hygiene and quality standards. To this end, silver plastics® has developed a

Quality Management Manual (hereinafter referred to as "QM Manual"). All silver plastics® employees involved in the provision of services and quality are obliged to proceed in accordance with the QM manual.

silver plastics® also ensures a hygienic and safe working environment for all employees; appropriate training and equipment for constant compliance with the high requirements of the QM system and packaging safety are planned and implemented. With regard to hygiene requirements, all internal silver plastics® guidelines, such as the silver plastics® hygiene guidelines, must be observed.

#### **4. Environment, energy, sustainability and climate protection**

silver plastics® has set itself the goal of protecting the environment and respecting the applicable environmental standards. Thus silver plastics® acts in accordance with the requirements of the applicable laws and is guided by international standards in order to reduce harmful effects on the environment and to continuously improve measures for environmental and climate protection. This also includes sustainable and resource-conserving production for environmentally friendly products.

The individual measures include

- The definition and implementation of environmental protection measures and their continuous improvement.
- Consideration of environmental aspects, such as reducing CO<sup>2</sup> emissions, increasing energy efficiency and avoiding energy from fossil fuels, as well as ensuring water and air quality and reducing water consumption.
- The focus on the economical use of materials and raw materials right from the processing of raw materials, in which silver plastics® pays holistic attention to the economical use of materials and raw materials and recycles 100% of all raw materials used internally with the aim of completely avoiding waste. The obligation to treat the environment with care in the production of plastic packaging, above and beyond the legal requirements, by using raw materials, energy and packaging materials sparingly and in an environmentally friendly manner, and by disposing of waste in an environmentally friendly manner in order to continuously reduce our impact on the environment.

#### **5. Conflict materials**

We take all measures to avoid the use of conflict materials in our products as far as possible in order to prevent human rights violations, corruption or the violation of other obligations and fundamental values mentioned in this Code of Conduct.

## **6. Relationships with competitors and business partners**

silver plastics® competes fairly by ensuring fair pricing and the protection of customers and consumers. This behaviour guides our relationship with competitors, suppliers, dealers, distributors and customers. We refrain from entering into contracts or other activities that fix prices or pricing formulas, divide markets or customers, or restrict free competition.

Unauthorised agreements on prices or other conditions, sales territories or customers as well as the abuse of market power are prohibited in all countries and contradict the principles of silver plastics®. All employees follow the silver plastics® guidelines "Correct behaviour in competition" as amended from time to time.

## **7. Supply chain responsibility**

We expect our business partners, in particular our suppliers, to comply with the applicable legal requirements for supply chains at national, European and international level as well as the principles of this Code of Conduct or equivalent codes of conduct. We encourage and support them in applying the values and principles of this Code of Conduct in their supply chains. We reserve the right to check our suppliers' compliance with the aforementioned requirements systematically and on an ad hoc basis, for example by means of questionnaires, assessments and audits.

If there are any doubts about compliance with the above requirements, we will ask the suppliers to take appropriate measures. Suppliers are also obliged to notify silver plastics® of a breach at their premises or at the premises of one of their direct suppliers, which is part of a supply chain for silver plastics® as an indirect supplier, within two weeks of notification.

In the event of imminent or actual infringements, we shall support the supplier within the scope of the statutory provisions and our possibilities. If we are unsuccessful, we reserve the right to take appropriate measures, up to and including termination of the business relationship. In addition, our suppliers undertake to indemnify silver plastics® against all civil law claims, fines and other sanctions in the event of violations on their part.

Our suppliers are informed that the energy efficiency or energy-related performance of a product, system, or service is an important criterion in our procurement decisions. Products, systems, and services that have an impact on our energy consumption are also evaluated regarding their energy efficiency.

## **8. Insider trading**

Insider information is information that is not freely available to the public and that an investor would consider important for his decision to buy or sell securities of a company, including financial results, product innovations, strategic or current plans or ongoing projects to buy or sell companies or businesses. Every employee must treat insider information as strictly confidential.

Employees are prohibited from trading in shares or other securities affected by such insider information until such insider information has been made public.

## **9. Corruption**

The reputation of silver plastics® for trustworthy, honest and fair behaviour must not be jeopardised by offering or receiving bribes or by participating in corruption. We therefore do not tolerate bribery, corruptibility, corruption or extortion.

Benefits that are linked to the intention or may give the appearance of influencing business decisions or obtaining any other unauthorised advantage may not be promised, offered, granted, demanded or accepted.

This includes the offering and receiving of payments, but also gifts, hospitality or services that can reasonably be expected to influence business behaviour or business transactions, whereby the customary acceptance or granting of courtesy gifts of symbolic value in business transactions is not covered by this.

This applies when dealing with domestic or foreign public or political officials, representatives of international organisations or any representatives of the private sector.

## **10. Money laundering prevention**

Money laundering includes all transactions aimed at channelling illegally obtained funds and assets into the legal financial and economic cycle. We comply with all legal requirements for the prevention of money laundering and do not participate in transactions related to money laundering.

## **11. Finance and Accounting**

All silver plastics® business activities must be properly authorised and fully and accurately recorded in the books and records in accordance with applicable accounting principles and silver plastics® existing financial policies. As a result, silver plastics® prohibits false or misleading entries in its books and records and in any official filings.

## **12. International trade bans and boycotts**

All silver plastics® employees comply with the national and international trade and boycott regulations for exports, imports, transport and currencies that apply to trade in certain products in the respective countries.

### **13. Compliance with human rights**

silver plastics® and its employees respect and support the observance of fundamental and human rights. This includes, in particular, respecting the personal dignity, privacy and personal rights of the individual, guaranteeing the right to freedom of opinion and expression and protection against discrimination of any kind. This also includes the prohibition of child labour and forced labour in accordance with international standards.

The obligation to comply with fundamental and human rights applies both to employees and to third parties, such as persons commissioned by silver plastics® or business partners. To protect against discrimination, we promote equal opportunities and treat all people equally, regardless of their gender, age, ethnic origin, religious affiliation, disability or sexual identity and orientation.

### **14. Cooperation and collaboration with public officials**

Local, national and international authorities have specific and different requirements to protect the public interest. All employees must behave honestly and correctly in their dealings with government representatives or officials and acquire the necessary knowledge of local regulations when doing business with them.

### **15. Labour relations**

Employees can expect silver plastics® to fulfil its responsibilities as an employer in a timely and correct manner. silver plastics® in turn expects its employees to commit themselves to silver plastics® to the best of their ability.

The following principles apply:

- We promote a non-discriminatory work culture that supports mutual respect, openness and individual integrity.
- We respect the standards and norms of health and safety regulations in the workplace.
- When hiring and promoting employees, we make decisions based on personal qualifications, skills and performance, but not on gender, race or other discriminatory factors.

- We support the exchange of opinions between employees and management.
- We do not use or support forced or child labour.
- We do not tolerate violence in the workplace, including threats, threatening behaviour, harassment, intimidation or similar behaviour.
- We protect the personal data and privacy of our employees.

All employees are expected to carry out their work without being under the influence of drugs or alcohol. The possession, distribution and use of illegal drugs is prohibited, as is the consumption of alcohol while at work.

## **16. Conflicts of interest**

Employees avoid any conflict of interest that could arise if their own personal, family or financial activities come into conflict with their objectivity and loyalty to silver plastics®. If an employee is considering an activity that could cause a conflict of interest, such as consultancy contracts or shareholdings in companies, he or she must obtain prior authorisation from the management.

## **17. Protection of information, business data and intellectual property**

Confidential information (including technical, commercial or legal information) and trade secrets are important assets. We protect confidential information and respect intellectual property.

No employee may disclose such information to unauthorised third parties, either within or outside silver plastics®. Every employee must maintain the confidentiality of such information vis-à-vis third parties, e.g. customers or suppliers of silver plastics®. These confidentiality obligations shall continue to apply even after termination of the employment relationship with silver plastics®.

Confidential information includes, for example

- Technical information on current or planned products and manufacturing processes;
- Procurement plans, supplier, customer or price lists;
- Cost, pricing, marketing or service strategies;
- non-public income reports and all other financial reports;
- Information regarding disposals, mergers and acquisitions of companies, business divisions or businesses.



## **18. Data protection**

Compliance with all data protection regulations is a matter of course. We therefore process, store and protect personal data in compliance with all data protection laws. Personal data is collected confidentially and only for lawful and previously defined purposes and in a transparent manner and is not passed on.

Personal data is only processed if it is protected against loss, alteration, unauthorised use, disclosure or unauthorised forwarding using appropriate technical and organisational measures.

## **19. Use of information technologies**

With regard to the use of computers, the Internet and silver plastics® software in the workplace, all employees are required to follow the internal guidelines of silver plastics®. Every employee is required to protect silver plastics® networks and to avoid criminal offences and the misuse of software.

## **20. Offences**

Any silver plastics® employee who violates this Code of Conduct is subject to appropriate measures in individual cases, up to and including termination of the employment contract. Indications of violations of this Code of Conduct will not result in any disadvantages for the employee. Violations should be reported immediately to either the Compliance Officer or the Managing Director.

## **21. Implementation of and compliance with the Code of Conduct**

We take suitable and appropriate measures to comply with the principles and values described in this Code of Conduct. Each team member is responsible for the implementation and enforcement of the Code of Conduct.

To support employees in complying with the Code of Conduct, silver plastics® provides employees with appropriate information and training to ensure that they understand and follow the Code of Conduct correctly.

Violations of this Code of Conduct will not be tolerated and may lead to consequences under labour law.

If employees have any questions about this Code of Conduct or require support in applying it, they can contact their line manager or the Compliance Officer at any time.

This Code of Conduct enters into force on 1 February 2020.

silver plastics® GmbH & Co. KG

A handwritten signature in black ink, appearing to read 'Klein', written in a cursive style.

Franz-Josef Klein

Managing Director / Managing Director