

Code of Conduct of PACKNERS GmbH

Preamble

PACKNERS GmbH aims to ensure compliance with global requirements for ethical and moral behavior, as well as the guidelines for correct competition and antitrust behavior (Compliance) through these guidelines. This also includes promoting fair and sustainable standards in dealings with employees, customers, suppliers, and the environment.

I. GENERAL REGULATIONS

1. Scope

These guidelines apply to all locations of PACKNERS GmbH.

2. Laws, Standards, and Ethical Behavior

PACKNERS GmbH adheres to the applicable laws and standards of the countries in which it operates. It is guided by universally accepted ethical values and principles, particularly integrity, righteousness, and human dignity.

3. Business Partners, Authorities, and Consumers

We act according to the principles of fairness, honesty, and partnership. We maintain a relationship of trust with authorities.

4. Business Secrets

Business secrets of partners are treated confidentially by all employees of PACKNERS GmbH. Disclosure to third parties or making such information publicly accessible is prohibited, even after the termination of employment.

1/3

II. ANTITRUST AND COMPETITION LAW REQUIREMENTS

1. Antitrust Law

We are committed to fair competition. Laws protecting competition, especially antitrust laws and other competition-regulating legislation, are strictly observed.

Illegal agreements on prices or other conditions, sales territories, or customers, as well as the misuse of market power, are against our principles.

2. Bribery and Corruption

PACKNERS GmbH rejects bribery and corruption in any form and does not tolerate such behavior.

We fully accept and comply with the compliance policies of our business partners and refrain from actions that create personal dependencies or influence future business decisions.

In case of uncertainty, every employee should ask themselves, "How would it look if it were on the front page of the newspaper?"

Employees are allowed to accept invitations and gifts. We trust that they always act in the company's best interest. If the value exceeds €50, a member of the management must be informed by the employee. In countries where gifts are customary as a matter of politeness, it must be ensured that no binding dependencies arise and that local legal norms are respected.

III. GLOBAL GUIDELINES

1. Human Rights

The internationally recognized human rights (Universal Declaration of Human Rights – UN Doc. 217, also known as the UN Human Rights Charter) are explicitly and sustainably supported.

Even in cases of disciplinary measures, all company members are treated with dignity and respect. Such measures are only taken in accordance with applicable national and international standards and internationally recognized human rights.

2. Child Labour

Child labour and any form of exploitation of children and adolescents are intolerable. Applicable laws are, of course, observed.

3. Forced Labour

All forms of forced labour, debt bondage, serfdom, slave labor or slavery, and similar conditions are rejected. Employees throughout the supply chain must not be forced to work directly or indirectly through violence or intimidation (see ILO Conventions 29 and 105).

4. Compensation, Workers' Rights

All employees receive fair wages for full-time employment that comply with legal regulations and are sufficient to cover basic needs. Wages are paid in a practical manner (usually via bank transfer), and a pay slip is provided to a reasonable extent (see ILO Conventions 26 and 131).

We respect the freedom of association and the effective right to collective negotiation (see ILO Conventions 87 and 98).

5. Working Hours

The working hours of PACKNERS GmbH comply with applicable national law.

6. Health and Safety

The applicable regulations for ensuring health and safety at the workplace are followed. Systems are in place to prevent health risks and ensure the highest possible safety (see ILO Conventions 1 and 14).

7. Environmental Protection

PACKNERS GmbH considers the goals of sustainable environmental protection and strives to use the most environmentally friendly production methods at all times. In accordance with the principles of the Rio Declaration of the United Nations (27 Principles of the Rio Declaration on Environment and Development, adopted by the United Nations Conference on Environment and Development (UNCED), Rio de Janeiro, 1992), the company handles natural resources responsibly.

IV. ETHICAL AND SOCIAL PRINCIPLES

1. Non-Discrimination

Discrimination in hiring or employment, particularly based on race, ethnic or national origin, colour, gender, mental or physical disability, age, religion, membership in an employee organization, or other personal characteristics, is not tolerated by PACKNERS GmbH.

2. Harassment

We disapprove of physical, psychological, or sexual violence.

3. Freedom of Expression

The right to freedom of expression and free speech is guaranteed at all times.

4. Privacy

Privacy is respected.

V. COMPLIANCE WITH THE CODE OF CONDUCT

1. Measures

These guidelines are made available to all employees in an appropriate form (www.packners.com/download) and are regularly communicated appropriately. All employees, managers, and the management of PACKNERS GmbH are responsible for compliance.

2. Whistleblower Protection

The separately published Whistleblower Protection Act regulates the protection of all employees who, in connection with their professional activity or in the course of preparation for professional activity, obtain information about violations and report or disclose such information to the designated reporting offices under this law (whistleblowers).

3/3



Frank Gausepohl
Managing Director

Emsbüren, April 17, 2026