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## Code of Conduct

- Respect for Human Rights
- General Business Practice
- Environmental Business Practice
- Employee and Stakeholder Wellbeing



„It is Faller Packaging’s corporate culture that connects us all. It is this that makes our company a community. On this basis, we bear responsibility for society and the environment of which we are a part of. That is why all our actions are guided by the principle of sustainability and the pursuit of a future worth living. Thank you for making your contribution to the success of this community every day. Simply Better, Always Ahead and Together.“

  
Dr. Michael Faller

  
Dr. Daniel Keesman

## Faller Packaging: Code of Conduct

This document is designed to provide guidance and expectations for all employees of the Faller Packaging group regarding their behaviour as well as actions in the workplace. As a member of our organisation, you are expected to always conduct yourself in a professional and ethical manner, and to comply with all applicable laws and regulations. This code of conduct outlines the values and principles that we believe

are essential to maintaining a positive and respectful work environment. It serves as a guide for making ethical decisions in the course of our daily work. Our commitment to these principles ensures that we maintain the trust and confidence of our clients, partners, and stakeholders, as we continue to build a strong and successful organisation.

# Content

1.1. Faller Packaging: Code of Conduct .....	3
<b>1. Respect for Human Rights .....</b>	<b>4</b>
1.1. Respect and Honesty .....	4
1.2. Labour and Human Rights .....	4
1.3. Diversity and Inclusion .....	4
1.4. Enforcement and Monitoring.....	4
<b>2. General Business Practice.....</b>	<b>4</b>
2.1. Ethics and Compliance .....	4
2.2. Fair Competition.....	4
2.3. Fraud & Money Laundering.....	4
<b>3. Environmental Business Practice.....</b>	<b>5</b>
3.1. Environmental Management .....	5
3.2. Ethics and Sustainable Procurement .....	5
3.3. Sustainable Innovation, Technology and Supply Chain.....	5
3.4. Circular Economy .....	5
<b>4. Employee and Stakeholder Wellbeing.....</b>	<b>6</b>
4.1. Career Management.....	6
4.2. Working Conditions and Occupational Health and Safety.....	6
4.3. Dangerous Goods and Waste Handling.....	6
4.4. Data Protection & Confidentiality and Information Security.....	6
4.5. Transparency and Reporting.....	6
4.6. Whistleblower.....	6
4.7. Community Engagement and Social Responsibility.....	6
4.8. Animal Welfare & Biodiversity.....	6



# Respect for Human Rights

## Respect and Honesty

- We are committed to conducting our business with integrity, transparency, and honesty.
- We respect the rights, dignity, and privacy of all individuals and are dedicated to treating them with fairness and equality.
- We do not tolerate discrimination, harassment, or any other form of inappropriate behaviour.
- We strive to maintain an open and respectful dialogue with all stakeholders, including our employees, customers, suppliers, and partners.
- We are dedicated to building long-term relationships based on mutual trust, respect, and shared values.

## Labour and Human Rights

- We are respecting human rights and labour rights in all our operations and supply chain.
- We prohibit any form of forced labour, child labour, or human trafficking.
- We provide a safe and healthy working environment for all our employees and contractors, and promote the wellbeing of our workers.
- We respect the freedom of association and the right to collective bargaining of our employees and contractors and comply with applicable labour laws, and regulations relating to labour relations and freedom of association.
- We ensure that it does not engage in any form of discrimination, harassment, or abuse.

## Diversity and Inclusion

- We promote diversity and inclusion in all our operations and supply chain.
- We ensure no engagement in any form of discrimination based on gender, race, ethnicity, religion, sexual orientation, or any other personal characteristic.
- We promote and support diversity and inclusion in our workforce as well as supply chain, and ensure that we provides equal opportunities to all.
- We engage with our stakeholders to promote diversity and inclusion and to address any issues or concerns related to this topic.

## Enforcement and Monitoring

- We ensure that this code of conduct is communicated to all employees and contractors, and that they are trained to understand and comply with it.
- We have set up a robust monitoring and enforcement system to detect and address any violations of this code of conduct.
- We ensure regular internal and external audits of compliance with this code of conduct.
- We take appropriate corrective action in case of any non-compliance with this code of conduct.

# General Business Practice

## Ethics and Compliance

- This code of conduct and its ethics are communicated to all employees and contractors, and sets clear standards for behaviour and ethical decision-making.
- We comply with all applicable laws and regulations, including those related to ethics, anti-corruption, and anti-bribery.
- We have effective governance and management systems in place to ensure that we operate in a responsible, ethical, and sustainable manner.
- We implement measures to prevent and detect any unethical or illegal behaviour within our operations and supply chain, where reporting and addressing of any concerns or violations related to ethics and compliance are systemised.

## Fair Competition

- We compete fairly and honestly in the marketplace, and do not engage in anti-competitive practices.
- We comply with all applicable laws and regulations relating to fair competition, including those related to antitrust and competition.
- We ensure that our employees and management avoid conflicts of interest that may compromise their impartiality or integrity.

## Fraud & Money Laundering

- We have procedures in place to prevent and to detect fraud and to manage and investigate suspected cases of fraud.
- We prevent money laundering and terrorist financing, and comply with all applicable anti-money laundering laws and regulations.





# Environmental Business Practice

## Environmental Management

- We have a comprehensive environmental management system that is based on relevant international standards such as ISO 14001.
- We have clear policies and procedures for sustainability management and reporting, and ensure that these are integrated into the overall management system.
- We conduct regular environmental impact assessments to identify and mitigate any negative impacts of our activities on the environment.
- We ensure that we use sustainable materials and packaging throughout the supply chain, and to minimise the use of non-renewable resources.
- We set ambitious goals for sustainability, and regularly assess and report on the progress towards these goals.
- We implement measures to reduce carbon footprint and greenhouse gas emissions, such as energy-efficient practices, use of renewable energy sources, and implementation of carbon offset programs to mitigate the impact on climate change.
- We regularly review and update our sustainability strategy and action plan, based on the results of the sustainability performance assessment and stakeholder engagement.
- We ensure that we comply with all applicable environmental laws and regulations.

## Ethics and Sustainable Procurement

- We promote ethical behaviour and integrity in all business activities and operations.
- We ensure that the procurement processes are sustainable as well as ethical, and that environmental, social, and ethical performances are considered for the selection of suppliers.
- We ensure that we have a transparent and accountable supply chain that respects human rights, labour rights, and environmental standards.

## Sustainable Innovation, Technology and Supply Chain

- We prioritise sustainability in the innovation and product development processes.
- We promote and support sustainable innovation in our supply chain and encourage our suppliers to adopt sustainable practices.
- We ensure that the products and services are designed with sustainability in mind, and that they have a positive impact on the environment and society.
- We embrace innovation and technology to drive sustainability improvements throughout the operations and supply chain.
- We invest in research and development of sustainable products and packaging, and seek out innovative technologies and materials that can help it reduce the environmental impact.
- We encourage collaboration with other stakeholders and industry partners, to share knowledge and expertise to accelerate progress towards sustainability goals, feedback into innovation and technology strategy.
- We ensure continuous improvements for identifying and addressing any sustainability risks or issues in our supply chain.

## Circular Economy

- We strive to reduce waste, emissions, and resource consumption throughout our operations and supply chain.
- We design our products and packaging with circularity in mind, and ensure that they are recyclable, reusable, or biodegradable.
- We implement circular economy practices such as closed-loop systems, product take-back programs, and waste reduction initiatives.
- We engage with our stakeholders to promote circular economy practices and to collaborate on solutions for waste reduction and resource efficiency.
- We ensure that the senior management is committed to sustainability and that sustainability is a key factor in decision-making processes.



# Employee and Stakeholder Wellbeing

## Career Management

- We provide opportunities for our employees to develop their skills and advance their careers.
- We have policies and procedures in place to manage employee performance, provide feedback, and address employee concerns.

## Working Conditions, Occupational Health and Safety

- We provide fair and reasonable working conditions for our employees, including reasonable working hours, breaks, and compensation.
- We comply with all applicable labour laws and regulations relating to working conditions.
- We provide a safe and healthy workplace for our employees, contractors, and other stakeholders throughout the operations and supply chain.
- We comply with all applicable occupational health and safety regulations and standards.
- We ensure that our products and packaging comply with all applicable health and safety regulations and standards.
- We provide adequate training and protective equipment to all employees and contractors to ensure their health and safety.
- We implement measures to prevent accidents, injuries, and illnesses in the workplace, and to mitigate their impact if they occur.
- We ensure that there are emergency response plans and procedures in place to respond to any health and safety incidents.

## Dangerous Goods and Waste Handling

- We handle and dispose of dangerous goods and waste in a safe and responsible manner, and comply with all applicable laws and regulations.
- We have policies and procedures in place to identify, assess, and manage the risks associated with handling dangerous goods and waste.

## Data Protection, Confidentiality and Information Security

- We protect the confidentiality and security of personal and sensitive information, and comply with all applicable data protection and privacy laws and regulations.
- We have policies and procedures in place to protect information assets from unauthorised access, use, or disclosure.

## Transparency and Reporting

- We try to our best ability to be transparent in our operations and supply chain, and provide accurate and complete information to our stakeholders.

- We have systems in place for tracking and reporting environmental and social performance, and for monitoring progress towards sustainability goals.
- We provide transparent and reliable information about our sustainability performance to relevant stakeholders, and ensure that the sustainability reporting is accurate, credible, and verifiable.
- We regularly report on our sustainability performance and strive for a progress using globally recognised reporting frameworks, such as the Global Reporting Initiative (GRI) or the Sustainability Accounting Standards Board (SASB).

## Whistleblower

- We have a whistleblower policy and process in place to enable employees to report concerns and complaints related to ethics, compliance, or misconduct.
- We protect whistleblowers from retaliation, and investigate and address reported concerns and complaints promptly, systematically, and impartially.

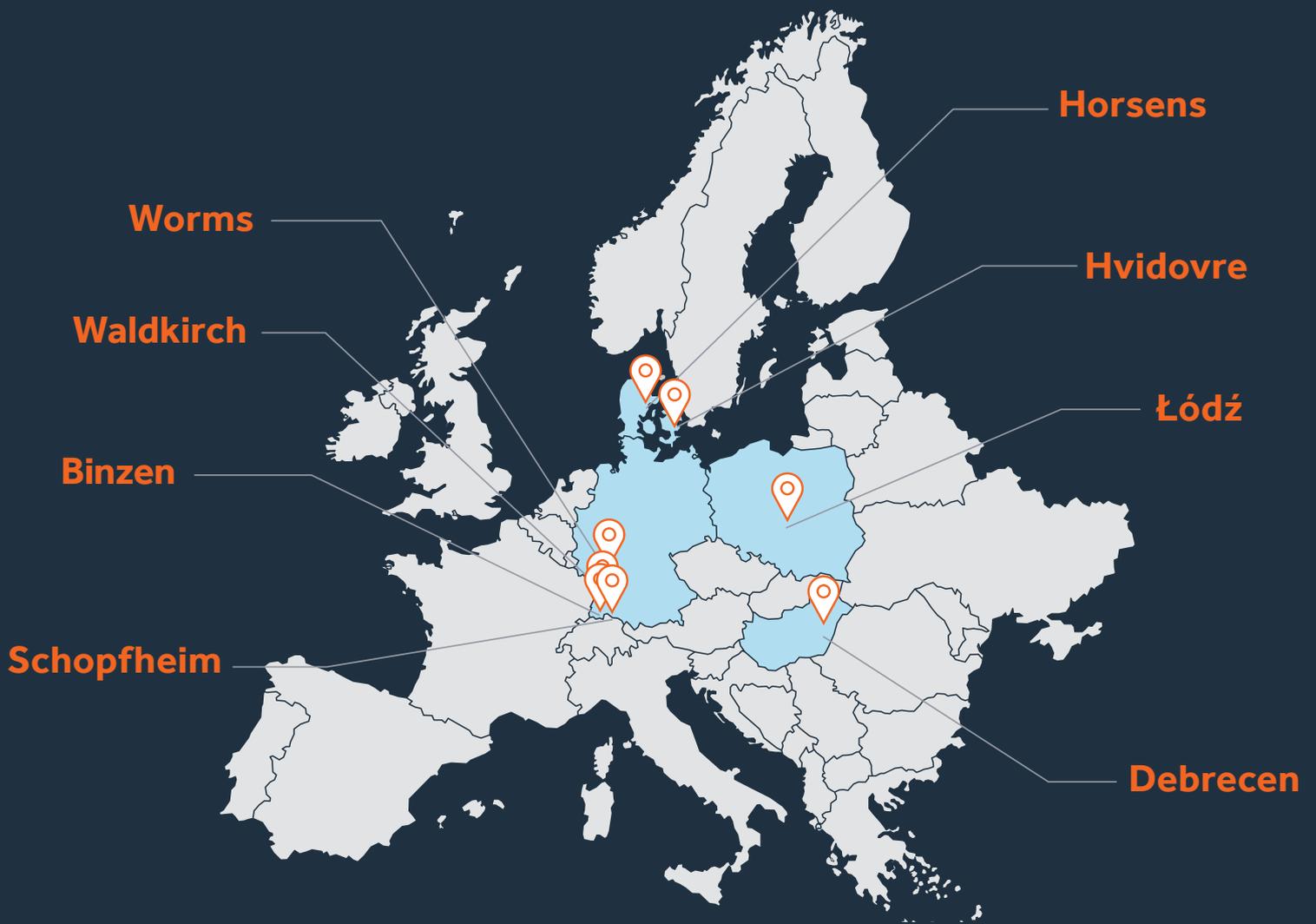
## Community Engagement and Social Responsibility

- We engage with the communities in which we operate and ensure that we contribute to their social and economic development.
- We respect the cultural heritage and traditions of the communities in which we operate, and ensure that our activities do not negatively impact their way of life.
- We support local suppliers and businesses, and ensure that this creates opportunities for employment and entrepreneurship in the communities in which we operate.
- We communicate transparently and honestly with local stakeholders, and seek their input and feedback on our operations and plans

## Animal Welfare & Biodiversity

- We ensure that we do not engage in any form of animal cruelty or abuse in the operations or supply chain, and support the adoption of animal welfare standards and practices throughout our supply chain.
- We respect biodiversity and take measures to minimise our impact on ecosystems as well as wildlife, for instance through sustainable material selection, reducing pollution and waste, as well as protecting the landscape.
- We ensure that our suppliers and contractors meet the same animal welfare and biodiversity standards that it applies to its own operations.





**4 countries**



**7 locations**



**1.400 employees**

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