

In order to ensure that all August Faller employees and those acting on behalf of the company are aware of the company's anti-corruption policy and adhere to its guidelines, procedure anti-corruption policy' has been introduced to avoid corruption, conflicts of interest and other unethical behavior.

The company is committed to professional, fair and honest business activities and to complying with all anti-corruption legislation. Professional and honest business practices protect the company's reputation and ensure business security.

1. Scope/area of application

This procedure applies to all employees, in every sites of August Faller GmbH & Co. KG, incl. all international sites, regardless of their position, as well as contractors, suppliers, consultants, agents and other persons acting on behalf of the company.

This anti-corruption policy applies in all countries where August Faller does business, along with the need to comply with local laws. In the event of discrepancies caused by conflicts between local laws and the principles contained in this document, the stricter rules must be applied.

2. Responsibilities

All employees, officers, directors of August Faller and persons acting on behalf of the company, as well as persons doing business with the company, are required to comply with all anti-corruption laws. Employees are prohibited from engaging, permitting the engagement of other employees, approving or tolerating behavior that violates or may violate the company's anti-corruption policy. Persons in managerial positions have both personal responsibility and responsibility for subordinate employees.

A breach of this policy constitutes a breach of employee duties.

The group indicated below are responsible for the following:

<p>Employees</p>	<ul style="list-style-type: none"> • Read, understand and act in accordance with the requirements and regulations contained in the anti-corruption policy in all markets in which the company operates • Complete the required training based on the code of conduct • Prevention, detection and reporting of corruption cases • Confirm or certify compliance with this policy upon request.
<p>Managers</p>	<ul style="list-style-type: none"> • Read, understand and act in accordance with the requirements and regulations contained in the anti-corruption policy in all markets in which the company operates • Complete all training in the required procedures for assuming the role of manager • Ensuring strong leadership and commitment to promoting an anti-corruption culture • Confirm or certify compliance with the anti-corruption policy upon request • Prevention, detection and reporting of corruption cases

	<ul style="list-style-type: none"> • Take care and ensure that employees and business partners comply with the anti-corruption policy .
Third Parties	<ul style="list-style-type: none"> • Read, understand and act in accordance with the requirements and regulations contained in code of conduct all markets in which the company operates • Complete the required training on code of conduct • Prevention, detection and reporting of corruption cases • Confirm or certify compliance with the anti-corruption policy upon request
Compliance Officer	<ul style="list-style-type: none"> • Update the requirements and provisions of the anti-corruption policy • Provide training and information and support to employees regarding compliance with the anti-corruption policy and applicable laws on the subject • Maintaining effective internal control systems and conducting regular audits to monitor compliance with the anti-corruption policy and to detect and correct potential breaches. • Review, analyze and express an opinion on the approval of individual transactions or cooperation with potential business partners • Analysis of individual transactions of payments • Setting rules on entertainment and gifts to ensure that none of these activities influence business decisions and are not perceived as attempts at corruption • Analysis of requests for charitable donations, sponsorships, and other forms of financial support • Analyze requests for third party involvement • Vetting of business partners including suppliers, consultants and agents to identify and minimize corruption risks • Identifying compliance procedures and responding to escalations • Prevention, detection and reporting of corruption cases • Ensuring protection for employees who report corruption or suspected corruption so that they are not subject to any form of discrimination, retaliation or negative consequences as a result of their actions • Keeping abreast of changes in anti-corruption legislation locally and internationally to ensure continued compliance with applicable legal requirements and to adapt its operations, policies and procedures • Conducting regular corruption risk assessments, analyzing potential risks and vulnerabilities in the business and implementing appropriate corrective measures and controls to reduce the risk of corruption

If an employee violates the anti-corruption policy, he or she will be subject to disciplinary action, which may lead to legal, civil or disciplinary consequences, including dismissal, financial penalties and criminal liability under applicable law.

3. Terms and definitions

Corruption: This is an act aimed at obtaining an unfair advantage, advantage through dishonest, fraudulent or unethical and unlawful conduct of a person who exercises authority or a person of public trust (e. g. a public official), which involves the misuse of influence. Corrupt activities include activities such as giving, receiving, offering and soliciting bribes, nepotism, bribery and the use of confidential information to gain advantage, as well as activities contrary to the rules of fair competition.

Conflict of interest: These are situations where one's professional or personal obligations or personal or financial interests do not allow the fair and ethical performance of one's duties.

Gratification: Making a payment to a civil servant or a public administration body, thanks to which routine, non-discretionary official operations will be ensured and expedited.

4. Policy Details

The purpose of the Anti-Corruption Policy is to establish rules and standards of conduct at August Faller aimed at preventing and responding to activities that may bear the hallmarks of corruption. The company is committed to the dogma of transparency and zero tolerance for corruption, and a set of rules has been established to avoid unacceptable behavior that may constitute cases of corruption.

4.1. Key principles and requirements of the policy

The most important principles that must be observed and adhered to by all participants are listed below:

- It is prohibited to engage in interactions or transactions that are inconsistent with in violation of applicable anti-corruption policies, laws, or to conceal another prohibited payment.
- You must not pass on, give, offer or accept any value or gift to a third party as an improper inducement to obtain a business advantage.
- Reasonable, proper expenditures should be made. Each transaction should be legal, have a legitimate purpose and appropriate market value.
- Comply with the monetary limits set out for food and drink, travel, gifts and event funding.
- You should only do business with legitimate and qualified entities and persons about whom you must be well informed. Before entering into any business relationship, ensure that potential partners comply with anti-corruption policy requirements and identify any risks associated with our business partners.
- Each employee is responsible for his or her role in the business. This obliges you to analyze relevant information and not allow a transaction that violates or may violate the law or the anti-corruption policy.
- Employees must accurately document all transactions to ensure transparency, enable informed decision-making and confirm the legitimacy of business activities.
- The company must have a clear policy on donations, sponsorships and other forms of financial support to ensure that such activities are not used as a means of corruption. All acts of

donation and sponsorship must be transparent, justified and in accordance with applicable regulations.

- Employees must comply with anti-money laundering legislation, follow appropriate procedures and report suspicious transactions.

4.2 Compliance and Monitoring

The company ensures that activities are carried out to disseminate information to employees and business partners on the Anti-Corruption Policy and the consequences of breaching the policy, supported by August Fallers Code of Conduct.

New employees are trained on the procedure upon receiving a new position, while all employees are regularly trained on the procedure of the Anti-Corruption Policy, as part of the Code of Conduct Training. The relevant department manager is responsible for overseeing the organization of training and delegating employees to attend training in a timely manner. The responsible department is also in charge for monitoring the effectiveness of this procedure and reviewing its implementation and assessing its suitability and effectiveness. To this end, regular internal audits are conducted to monitor compliance with the anti-corruption policy and to detect and correct potential breaches.

The responsible person will regularly monitor and evaluate the company's anti-corruption policy to ensure compliance with applicable laws and industry standards and best practices. Where non-compliance is identified, the company will take appropriate corrective action. The Compliance Officer is responsible for reviewing, updating and implementing changes to the anti-corruption procedure. All changes made must be approved by the company's management and communicated appropriately to all employees and business partners.

A corruption risk assessment is also carried out on a regular basis, by analyzing potential threats and vulnerabilities in the business and implementing appropriate corrective measures and controls to reduce the risk of corruption.

The company has a procedure in place for filing corruption complaints and a procedure for conducting investigations in response to complaints. All complaints will be taken seriously and conducted in a confidential, fair and lawful manner.

The company provides protection for employees who report incidents or suspicions of corruption so that they are not subjected to any form of discrimination, retaliation or negative consequences as a result of their actions.

4.3 Review and update

The company undertakes to carry out a regular annual review and, based on this review, will keep its anti-corruption procedure up-to-date to ensure that it is in line with applicable laws, industry best practices and company needs. Consequently, after each update, employees will be communicated through training. If necessary, the company also declares the introduction of new procedures, tools or measures to reinforce staff in their anti-corruption activities.

5. Appendices

MM 1.20 Corporate policy of Faller Packaging

FR-86 Whistleblower Guideline

6. Effective date by the CEO

05.08.2023



Date/Signature Dr. Daniel Keesman

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