

### **Declaration of principles**

Business success and respectful interaction are fundamental at Vacuplast GmbH. Our value system underpins our commitment to respectful engagement and future achievements. We regard the protection, promotion, and defense of human rights not merely as obligations but as integral components of our corporate responsibility. We adhere to applicable laws, align with internationally recognized standards, and ensure that risks and violations concerning human rights and environmental protection are identified, evaluated, and proactively mitigated in a timely manner.

We equally promote and practice both industrial and social entrepreneurship. Vacuplast GmbH is committed to taking responsibility for all individuals who engage with us, for society, and for the preservation and protection of the environment.

# **Compliance and Accountability at Vacuplast GmbH**

We regard compliance as a crucial metric for integrity and sustainable entrepreneurship. This Code of Conduct delineates our principles and guidelines for fostering a trusting relationship. By articulating our code of conduct, we guarantee that Vacuplast GmbH and its partners engage in legal and responsible operations.

We adhere to established national and international standards, guidelines, and conventions, particularly the UN Global Compact, the OECD Guidelines for Multinational Enterprises, and the pertinent conventions of the International Labor Organization (ILO). We compete through quality, consistent values, and sustainable business practices.

Compliance represents a shared objective.

All legal transactions with Vacuplast GmbH are founded upon this "Code of Conduct" –
fostering a sustainable and successful partnership.

#### Code of ethics

Compliance aims to assist Vacuplast GmbH and its partners in achieving sustained success. Consequently, our partners explicitly commit to upholding the following principles in all collaborative efforts.

### Mutual respect and the advancement of diversity

We emphasize equitable treatment and the advancement of diversity and tolerance, as we firmly believe that diversity is integral to exceptional productivity, innovative solutions, and enduring economic success. Our partners uphold non-discrimination in all forms and adhere to the relevant standards for the protection of human rights, particularly the unequivocal prohibition of slavery, as well as child and forced labor.

Discrimination against individuals based on origin, age, religion, ethnicity, sexual orientation, gender, or health status is unacceptable. Our partners are dedicated to fostering a workplace that is devoid of any form of harassment or discrimination.

### **Human-centric working conditions**

We foster a work environment that prioritizes individuals. Our partners provide their employees with the essential freedom of association (the establishment of employee representatives) and comply with the legal and contractually mandated standards for safety and health protection in the workplace.

Our partners ensure equitable, appropriate, and legally compliant compensation, disbursing it punctually.

#### **Sustainability and Environmental Stewardship**

We emphasize responsible and sustainable entrepreneurship. Our partners are committed to environmental protection. Sustainability and the prudent use of natural resources are integral to every technical, social, and economic decision and action undertaken by our partners. The use of substances that pose hazards to the environment and public health must be strictly avoided. "Greenwashing" is regarded as a significant breach of these principles and will not be tolerated under any circumstances.

# Transparency, Adherence, and Accountability

Our partners uphold transparent financial, accounting, and business records that accurately and comprehensively represent all transactions and interactions, adhering to applicable laws and established accounting standards.

We foster a culture of professional excellence and anticipate that our partners adhere to all pertinent product safety regulations. This specifically encompasses legal requirements regarding the safety, labeling, and packaging of products, as well as the management of



hazardous materials and substances. Our partners comply with the relevant quality standards and are committed to the ongoing enhancement of their products in alignment with the principles outlined in this declaration.

### **Responsible Business Practices**

Our partners maintain a compliance management system and adhere to relevant legislation. They are dedicated to fair competition practices and prohibit the formation of cartels. Corruption, bribery, and anti-competitive behavior are unacceptable methods for executing projects. We categorically reject any form of influence that contravenes applicable laws or ethical standards.

Illegal activities, including money laundering, breach of trust, fraud, and delaying bankruptcy, must be strictly avoided, as must adherence to export controls and related regulations, including embargoes and sanctions.

# Intellectual property rights and data privacy

We uphold the intellectual property rights of others and do not condone any unauthorized use of patents, know-how, trade secrets, or other protective rights. Our partners are dedicated to managing third-party company assets in a legally compliant and responsible manner while safeguarding business and trade secrets.

Furthermore, our partners guarantee that personal data is managed responsibly and in accordance with data protection regulations.

# Responsibility throughout the supply chain

We assume responsibility across our entire value chain and expect the same from our partners. This entails upholding a high standard of integrity and committing to responsible and sustainable business practices within their own supply chains. They are tasked with ensuring that their suppliers adhere to this minimum standard.

#### **Protection of Whistleblowers and Ethical Integrity**

We prioritize the protection of our whistleblowers. Our partners adhere to the legal standards for whistleblower protection and facilitate secure, confidential reporting in oral, written, or personal formats. All incoming reports are handled promptly, confidentially, and securely.

### Compliance assessments and audits

We are authorized to verify compliance with these principles by our partners and their contractual affiliates at any time. This verification may occur as part of appropriate audits to ensure adherence to the code of conduct. In cases of misconduct, our partners are required to provide information regarding their measures in the relevant areas, maintain their documentation, and remain available for inquiries at all times. Any identified misconduct is reported through an internal whistleblower system. The positive compliance status assured by our partners serves as the foundation for any collaboration. Any deterioration or violation of the principles must be rectified within a reasonable timeframe and at no expense to Vacuplast GmbH.

#### **Zero tolerance**

In instances of violations of our principles, we implement appropriate measures, which may encompass claims for damages, extraordinary contract termination, and notification to the relevant authorities. Our partners are accountable for their supply chain and indemnify Vacuplast GmbH against any claims from third parties that may arise due to breaches of the aforementioned principles.



**COMPLIANCE AT VACUPLAST** 

DENISE ZEZULA, B.A. MANAGEMENT