



Code of Conduct employees



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

Code of ethics

Fundamental Principles of Collaboration

The fundamental principles of our collaboration establish the framework for our interactions, work processes, and business management. Our compliance management system is grounded in our collective values and will only thrive if these values are embodied in every facet of the business.

We foster a culture of transparency, enthusiasm, and initiative, expecting each individual to assume personal responsibility and consistently strive toward the company's objectives. The engagement of pertinent colleagues in decision-making processes and projects is integral to our operational approach.

The success derived from collaborative efforts is our shared objective. We serve as role models for our peers and acknowledge that errors may occur. Nevertheless, it is crucial that we communicate these transparently and collaborate to rectify them. Leadership that aligns with our values is a fundamental aspect of our organizational culture.

The collaboration among management, executives, team leaders, and colleagues is founded on mutual respect, goodwill, camaraderie, integrity, and trust. We cultivate an environment where everyone feels valued and can enhance their skills. We embrace and uphold diversity as both an opportunity and a responsibility, recognizing that it fosters greater productivity, creativity, and sustained economic success. Factors such as origin, age, religion, ethnic and

cultural differences, sexual orientation, gender, or health conditions do not result in any disadvantages.

Any form of violence, discrimination, or inappropriate disadvantage - such as bullying, threats, or sexual harassment - is strictly prohibited and will not be tolerated.

Integrity and Accountability

Accounting and financial reporting

We uphold all financial, accounting, and business records with the highest level of accuracy, accurately reflecting all transactions and business relationships. These records adhere to relevant laws and established accounting and reporting standards.

Quality

Our commitment to the continuous enhancement of products and services is grounded in the regular assessment and refinement of our internal processes and concepts. We encourage the ongoing development of our employees and anticipate their active engagement in continuous training initiatives.

Conflicts of Interest

We make all decisions with the company's best interests in mind. In the event of potential conflicts of interest—whether arising from personal matters or the activities of relatives or close associates—we conduct ourselves with professionalism and transparency, addressing these issues openly.

Corruption Prevention

We adhere to all applicable laws, as well as internal and external regulations, standards, and guidelines. Our dedication to fair competition precludes corruption, bribery, fraud, and cartel agreements. We denounce any form of concessions or advantages that contravene legal provisions or are unethical. Gifts or invitations are accepted and extended solely in accordance with our internal guidelines.

Legal Compliance

Unlawful actions—whether in the form of breach of trust, fraud, embezzlement, or delaying bankruptcy—must be rigorously avoided. Our commitment also encompasses the prevention of actions directed against colleagues, partners, or the organization.

Safeguarding property and confidential information

The personal use of company property, including work materials, equipment, or facilities, is permitted solely with explicit approval. All employees are required to treat company property with diligence and to promptly report any damage or loss. Company credit cards are to be utilized exclusively for business-related expenses.

We safeguard business and trade secrets, along with confidential information, treating them with the highest level of discretion. Confidential information may only be utilized in accordance with the "need-to-know" principle and is secured against unauthorized access.

Accountability for data protection and social responsibility

Data Protection

We are dedicated to managing personal data with the utmost responsibility and ensuring that all employees adhere to data protection regulations. Each individual bears the responsibility of safeguarding the data of the individuals involved and participating in training programs.

Sustainability, Environment, and Society

Our responsibility encompasses our influence on society and our obligations to it. We are dedicated to upholding human rights and environmental stewardship, guided by the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises. We operate in alignment with the International Bill of Human Rights and the Declaration of the International Labour Organization (ILO).

Violations of sustainability principles, particularly the prohibitions against slavery, forced labor, and child labor, will not be tolerated under any circumstances. The prudent use of resources, energy efficiency, and the advancement of sustainable innovations are paramount to our mission.

Conduct in public and social settings

We uphold the right to freedom of expression and the safeguarding of personal rights; however, detrimental conduct in one's private life can adversely affect the company. All employees are required to uphold the company's reputation. Discriminatory remarks or actions, even in personal contexts, will not be tolerated, particularly if there is a discernible link to the company. This policy extends to social media usage, which must consistently align with company guidelines. Official statements on behalf of the company may only be issued by authorized individuals. Any unauthorized use of the company's logo or other identifying elements is strictly prohibited.

Code of Conduct and Compliance Policy

Each individual is required to act in accordance with the aforementioned principles and to consistently assess whether their conduct aligns with compliance standards. In cases of uncertainty, affected parties are encouraged to reach out to managers or compliance officers.

Zero tolerance

We maintain a zero-tolerance policy regarding violations and treat all reports with utmost seriousness. Sanctions, including employment law repercussions or contract terminations, may be imposed in cases of breaches of the Code of Conduct, irrespective of hierarchy or functional level.



COMPLIANCE AT VACUPLAST