

# Code of Conduct

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## Preface by the management

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Dear colleagues,

All4Labels Global Packaging Group is one of the world's leading label manufacturers and a pioneer in digital printing solutions. Our product portfolio ranges from labels, flexible packaging and sleeves to tubes and special products. Passion for our products is the strong bond that holds us all together. This passion has been the foundation of our success for many years. While building a good reputation can take a lifetime, one careless moment can be enough to irreparably damage our company. We have set ourselves the goal of setting an example as a company acting with integrity. This is synonymous with sustainable business development and the long-term development of competitive advantages for All4Labels. Therefore, it is incumbent on all of us to place integrity at the centre of our business activities for the benefit of our company, customers and investors alike. We count on you to support our journey by fully integrating the principles set out here into your daily work. Therefore, please read it carefully, make sure that it is observed in your working environment and let us know if you notice anything unusual in your work. We are proud to work together with you in achieving our slated aim. This is because all of you play a decisive role in the success of All4Labels as employees marked by integrity and open-mindedness.



**Adrian Tippenhauer** CEO



**Ulrich Michel** CFO



**Günther Weymans** COO



**Peter Voortmans** CPO/CDO

## **Commitment to integrity**

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This Code of Conduct is actively met by all employees throughout the company – from the production line to the management. It applies to all employees and managers of All4Labels, regardless of their position, responsibilities or location, including all subsidiaries and affiliates, controlled by All4Labels.

We undertake to observe the applicable laws and regulations, internal company guidelines, instructions and directives and to act accordingly. In addition, All4Labels is committed to the application of our high ethical standards by other stakeholders such as customers, suppliers, partners and contractors. This Code of Conduct is published so that it is always available to our employees, managers and the other stakeholders mentioned above.

## Human rights

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All4Labels respects the principles of the United Nations Universal Declaration of Human Rights and has a zero-tolerance policy towards any breach there of in all our activities within the company and throughout the supply chain. This policy extends to modern slavery, forced labour and the employment of children below the legal minimum age.

## Diversity & equal opportunities

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All4Labels is an international company with production facilities in various countries and a considerable head count. We trust in success through this diversity. We respect the right of all people to freedom of thought, opinion, expression, religion, peaceful gathering as well as equal treatment, regardless of ethnic origin, age, nationality, gender or sexual orientation. We expressly oppose any form of direct or indirect discrimination in all areas of the company and in all decisions.

## Safety, health & environment

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All4Labels and all of its employees are jointly responsible for protecting people and the environment and for ensuring that the sites we operate are safe and liveable places. Protecting people and the environment and conserving resources have long been our elementary corporate goals. All4Labels is committed to sustainable business with corporate social responsibility, to creating safe and healthy working conditions and to striving for continuous progress in the areas of safety, health and environment.

Each one of us is committed to

- compliance with the relevant legal provisions and internal instructions;
- execution of his or her work without posing any danger to himself or herself, third parties or the environment;
- immediate reporting of any accidents, incidents or other hazardous conditions to the competent operational authorities so that dangers can be averted and damage limited as quickly and efficiently as possible.

## Conflicts of interest

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All4Labels respects the personal interests and private lives of our employees. Nevertheless, our fair and objective decisions in connection with professional activities of All4Labels must not be influenced by personal interests or relationships. Therefore, we attach great importance to avoiding conflicts between personal and business interests, or even their semblance. In any case, our employees immediately notify their supervisor of any circumstances outside the business environment that could possibly influence our business decisions. This includes personal and business relationships and obligations of employees towards suppliers, competitors or other business partners.

Likewise, in accordance with applicable securities trading laws, we do not at any time use material, non-public information (insider information) about All4Labels and its customers, suppliers, business partners or competitors to trade for our benefit or share it with family members, partners or friends.



## **Bribery & corruption**

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All4Labels has a zero-tolerance policy against any form of bribery or undue influence. This means that no bribes, kickback payments or any other kind of service in return may be offered, paid or accepted either directly or through third parties. It is also prohibited to make facilitation payments or allow others to pay bribes on our behalf. Before making or accepting a gift or invitation, you must ensure that the value is within reasonable limits consistent with All4Labels' internal policies and standards and cannot be considered as undue influence on a business decision. Dealing with representatives of the government or governmental organisations involves specific risks which must be dealt with appropriately.

## Money laundering

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All4Labels is strongly committed to complying with all laws relating to the prevention, detection and reporting of money laundering activities and only conducts its business with customers and business partners, who carry out legitimate business activities and use legitimate financial resources. No employee may, solely or with other employees, commit acts that violate domestic or foreign regulations concerning money laundering. The Finance department must be promptly consulted in the case of any doubts about the admissibility of transactions involving the transfer of cash.

## **Fair competition**

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All4Labels is fully committed to fair, free and undistorted competition in strict compliance with international competition and antitrust laws. Therefore, we do not enter into any arrangements or agreements with competitors or business partners, who may be capable of influencing market behaviour in an inadmissible manner.

## **Export controls & sanctions**

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All4Labels ensures compliance with all regulations governing the import and export of goods, services and information. Regardless of a delivery process, transactions with countries, companies or persons on sanctions lists are generally prohibited.

## Reporting

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All4Labels builds on strong values: reliability and honesty, credibility and integrity. Therefore, we attach great importance to transparent and genuine reporting and communication of the company's business transactions to employees, customers, business partners, investors, the public at large and government institutions. Each employee ensures that both internal and external reports, records and other documents of All4Labels are prepared in accordance with the applicable legal rules and standards, thus being consistently complete, accurate, timely and systematic.

## Data protection

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The protection of confidential, secret and personal data is one of the principles we follow when dealing with employees, applicants, customers, suppliers and other third parties. Personal data is only collected, processed and used under the applicable data protection laws and the associated requirements. In the process, the rights of opposition, rectification, blocking and deletion are respected.

## Protection of company property

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The company property and other resources of it made available to the employees are means to achieve the common objectives. Waste or misuse of company resources damages the performance of All4Labels and affects us all. Therefore, all managers and employees are obliged to protect All4Labels' assets from loss, damage or misuse in the course of their work and to handle them with honesty, responsibility and integrity. Any company property may only be used for business purposes, unless special regulations allow personal use. In this context, IT security is of particular importance. All employees are requested to use all electronic information systems in a respectful, ethically and legally compliant manner and to implement the available security measures/procedures to protect all data.

## Communication

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The reputation of All4Labels is essentially determined by the behaviour, demeanour and actions of each employee. Inappropriate behaviour may cause considerable damage to the company even in specific cases. Therefore, we work actively to ensure that our public relations work preserves the reputation of All4Labels. This applies especially to the use of digital forms of communication, such as social media. In this context, we respect and observe the principles of freedom of expression, the right to information, the independence of the media and the protection of personal rights.



## Sanctions

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The Code of Conduct combines current legal and company regulations. The obligation to comply with the principles listed here arises either directly from the laws, company regulations, corporate guidelines and directives or as a subsidiary obligation from the employment contract. Intentionally violating the guidelines, inciting others to violate them, knowingly submitting false reports and information, and obstructing or failing to cooperate with investigations into possible violations will have employment consequences up to and including termination of employment under the applicable provisions. In addition, violations of the law may result in criminal and civil proceedings.

## Information

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If you have any questions or comments in connection with violations of laws, guidelines, the Code of Conduct or other instructions, please contact the following persons:

- the superior;
- the HR department;
- the Compliance Team or
- the ombudsman

You can report your information openly or anonymously, personally, electronically, in writing or by telephone.

The ombudsman has been instructed by the management to assist employees in compliance matters while maintaining their anonymity.

The ombudsman is an external body subject to strict requirements.

Information given anonymously or under the pledge of secrecy to the ombudsman will be passed on by the same to All4Labels in such a way that the anonymity of the employee is preserved.

The applicable laws must be observed for notifications; in particular, anyone who knowingly claims untrue facts in relation to another may be liable to prosecution. All information provided is duly checked and, where appropriate, investigated.

All4Labels will not retaliate against employees who report violations. Furthermore, we do not tolerate any attempts to prevent employees from making such disclosures.



**All4Labels Management GmbH**

**Corporate Compliance Office**

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