

Code of Conduct

Delkeskamp Verpackungswerke GmbH



Preamble

The code of conduct of Delkeskamp Verpackungswerke GmbH results out of the executive management's claim to encourage the use the available resources conservatively while exceeding legal regulations and respecting social, ethical and moral principles.

This code of conduct and the compliance with it also serve to protect the legitimate interest of the associates as well as the company's interests and continuation.

This is deeply integrated in the management guidelines and the sustainability directive of the group of companies.

Subject

DELKESKAMP is committed to the strict compliance with all requirements of German and European laws and regulations. This is controlled, monitored and guaranteed constantly by the authorities and official institutions as well as the corresponding organisations and accident insurance institutions.

Just as all contracts with the responsible union contractors as well as the respective agreements with company's employee representatives are obligatory for DELKESKAMP.

Commitments

Furthermore, DELKESKAMP commits to compliance with the following aspects:

- **Ban of discrimination freedom of association**

Any discrimination in recruitment, compensation, access to advanced training, termination of employment or retirement based on gender, age, religion, race, social background, disability, ethnical or national origin, nationality, political attitude or sexual tendency is prohibited.

In agreement with the respective national laws, the employees have the right to form and join associations and to perceive their interests. In addition, DELKESKAMP abides by the applicable regulations and recommendations from the ILO conventions.

- **Wages & salaries**

The level of wages and salaries as well as the social benefits at DELKESKAMP correspond to the legal regulations and the agreements with union contractors. They are paid according to the applicable laws.

Unauthorised deductions from wages or deductions made as sanction are not allowed under all circumstances. All employees are informed in detail and regularly about the composition of their wages.

- **Volume & hours of work**

The maximum permissible weekly working hours apply in accordance with the agreements with union contractors and/or national legislation.

The weekly working time may not exceed 60 hours including overtime. Emergencies and circumstances out of the ordinary are an exception.

Every employee has the right of at least one day off after six consecutive working days.

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- **Health and safety at the workplace**

DELKESKAMP follows distinct rules and procedures to ensure health and safety at the workplace. In particular, with regard to the provision and use of personal protective equipment, clean toilets and access to drinking water. There are also systems, processes and/or measures to comply with national legal health and safety regulations.

Potential safety risks are identified, evaluated and consequently avoided by taking appropriate actions. Impacts are minimised due to the introduction of emergency plans and reporting procedures.

The employees are instructed about potential security risks, the correct and safe behaviour as well as implementing relevant safety precautions. They must not be exposed to dangerous, unsafe or unhealthy situations.

Methods and conditions at the workplace that violate basic human rights are prohibited.

- **Child labour ban**

The use of child labour is prohibited. People under the age of 15 or people with compulsory school attendance may not be employed (Exception: with the consent of their parents, they can work for a maximum of 4 weeks during school holidays within one calendar year).

People under the age of 18 are not allowed to carry out work that could endanger the health and safety of young people. In this case, special measures must be taken to protect them.

- **Ban of forced and compulsory labour as well as disciplinary measures**

Any form of forced labour is prohibited, for example obtained by withholding social benefits, salary or documents of the employee. Prisoner work that violates basic human rights is also forbidden. Furthermore, the use of physical punishment as well as psychological or physical coercion and verbal assaults is banned.

- **Environmental matters**

Dealing responsibly with the environment is a fundamental part of the fabrication of our products. DELKESKAMP organises the processes in an environmentally conscious manner and commits to complying with laws and minimum regulations on climate and environmental protection. During production, negative effects on the environment are avoided and the natural resources are preserved.

In addition, DELKESKAMP obliges to support responsible forest management and to refrain from using illegally felled wood or wood products from obscure sources.

- **Management systems**

The existing management systems are sufficiently suitable to warrant that all demands are achieved. With regular external inspections, DELKESKAMP ensures that the current requirements, rules, and regulations are always met.

- **Business ethics or bribery and corruption**

We are committed to complying with all applicable national laws and other regulations at all times within the framework of our business activities.

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All business interactions are based on high integrity standards. There is no tolerance for bribery, corruption, blackmail, fraud and defalcation. All business processes are transparent and can be traced correctly.

Bribes or other means of obtaining an improper or inappropriate advantage are not permitted or to be accepted. Procedures to monitor and enforce these requirements are applied in order to guarantee that anti-corruption laws are adequately met (see also Corruption Directive).

- **Date protection**

DELKESKAMP obliges to preserve the data protection in accordance with the law in force. Personal data may only be collected, processed and used insofar as they are required for the determined, distinct and legal purposes.

This ensures a high standard and the employees are aware of the usage of their data, as well as the right of disclosure and correction, if necessary of objection, suspension and deletion.

The executive management is responsible for the comprehensive and correct implementation of the code of conduct.

A handwritten signature in blue ink, appearing to read "Stefan Delkeskamp".

Stefan Delkeskamp (CEO)

Delkeskamp Verpackungswerke

Further applicable documents:

Corruption Directive

Certificate Energy Management