

# CODE OF CONDUCT

for Business Partners of  
ETIMEX Primary Packaging GmbH



## Preface

The management of the Etimex Group has developed a model for the Group that describes what our corporate group stands for. This model is supported by all executives and employees.

It is important to us as a company to clarify what expectations we place on our employees, managers, and executives. Our Code of Conduct therefore defines the principles of ETIMEX Primary Packaging GmbH in Dietenheim as well as its sister company ETIMEX Technical Components GmbH, including Etimex s.r.o in Hranice na Moravě, Czech Republic (hereinafter collectively referred to as “Etimex”) in the context of dealing responsibly with people, the environment, and security. Etimex and the business partner agree upon the applicability of the following regulations for a code of conduct for their cooperation. This Code of Conduct is deemed the basis for all of our business relationships. The business partner

agrees to comply with the principles and requirements contained in this Code of Conduct to the extent reasonable and objectively possible.

The business partner is called upon to likewise contractually obligate its subcontractors to comply with the standards and regulations set forth in this Code of Conduct. The business partner indicates to Etimex its willingness to participate in audits. A serious violation of this Code of Conduct may be reason and cause for Etimex to suspend or even to terminate the business relationship.

Dietenheim, in January 2024



Marc Vogt

Managing Director  
ETIMEX Primary Packaging GmbH

# I. Requirements that Etimex imposes on itself and on business partners

## 1. Compliance with laws

Etimex strictly complies with the respectively applicable laws, guidelines, and regulations, acts with integrity and always properly. Etimex also expects this of its business partners.

## 2. Human rights & ILO core labor standards

Etimex feels obligated to the principles of respectful, fair, and loyal dealings with each other, respects each person as an individual, and opposes any and all discrimination of persons in hiring and employment. Thus, all people have an equal claim to human rights, equal opportunity, equal treatment, freedom of thought, freedom of speech, and to demand their rights.

Within the framework of legal requirements, Etimex obligates itself and its business partners to comply with

occupational safety laws, and furthermore to comply with international minimum standards, as they are particularly set forth in the ILO core labor standards ([www.ilo.org](http://www.ilo.org)), the UK Modern Slavery Act 2015, and in the Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz*). It is understood that employees must be regularly instructed as to human rights and working conditions.

## 3. Prohibition of child labor

Etimex does not employ any persons who cannot prove a minimum age of 15 years, insofar as local law does not prescribe any lower or higher age limit. Child labor is not permitted to be used in any phase of production. Our business partners are required to comply with the recommendation arising from ILO Convention 138 on the minimum age for employment of children.

#### 4. Modern slavery and forced labor

Etimex does not tolerate any form of modern slavery. Etimex agrees in accordance with Article 54 of the British “Modern Slavery Act” to follow ethical principles and to distance itself from any and all forms of modern slavery, human trafficking, illegal employment, and forced labor. All work must be voluntary, and the employees must be able to terminate their work or the employment relationship at any time. In addition, no unacceptable treatment of employees is permitted to occur, such as psychological hardship, or sexual or personal harassment.

#### 5. Women’s rights, minority rights, and indigenous peoples

Etimex and its business partners respect the equal rights of men and women pursuant to Article 3 Paragraph 2 of the German Basic Law, including the corresponding relevant legal and regulatory requirements. Moreover, all legal and regulatory requirements regarding the equal treatment of employees are complied with.

Compliance with equal rights, protection of minorities and indigenous peoples shall represent a significant criterion, among others, for the cooperation of the business partner with its customers and suppliers.

#### 6. Compensation and working conditions

Etimex and its business partners fill all employment positions in the company in compliance with all ethical principles. When selecting personnel, only personal qualifications are the decisive hiring criterion. This criterion is applied without discrimination and prejudice.

Reasonable compensation is paid, and the legally stipulated national minimum wage is guaranteed. We comply with the nationally statutorily specified maximum working hours. Overtime is only permitted if it is provided on a voluntary basis and does not exceed the respective legally permitted number of hours per week.

#### 7. Freedom of association

Etimex and its business partners respect employees’ right to freedom of

association, to joining unions, to appealing to employee representatives, or to membership in works councils in accordance with locally applicable laws. It must be possible for employees to communicate with the company's management openly and without fear of reprisals or harassment. Employees who exercise these rights will be neither advantaged nor disadvantaged.

## 8. Promotion of equal rights, diversity, and inclusion

Discrimination of employees, particularly with regard to race, ethnic and social origin and position, gender, skin color, religion or ideology, disability, age, sexual orientation, genetic features, or assets, is not permitted in any form whatsoever and will not be tolerated. Personal dignity, privacy, and the personal rights of each individual are respected.

Equal rights, diversity, and inclusion are of vital importance. Etimex and its business partners create a work environment where all people feel respected, accepted, supported, and valued, so that they can participate to the full extent in decision-making processes and development opportunities within the

company.

## 9. Employee health and safety

The safety and well-being of each person working for Etimex or its business partners takes the highest priority. Etimex and its business partners therefore both equally create a safe and healthy working environment and never accept compromises when it comes to job safety, even if this results in time pressure, cost pressure, or deadline pressure from customers. The business partner is encouraged to work towards certification under DIN EN ISO 45001.

Necessary precautionary measures are taken against risks, accidents, damage to health, and occupational illnesses that may result in connection with the job activity by developing and using reasonable job safety systems. In addition, employees are regularly informed of and trained in applicable health protection and safety standards as well as safety measures in order to exclude or at least minimize the risk of injury.

Any unsafe work that Etimex or its business partners observe must be stopped.



Each manager is responsible for ensuring that each employee is offered a safe and healthy workplace. The employees are given access to sufficient quantities of drinking water as well as access to clean sanitary facilities.

## 10. Complaint mechanism

Both Etimex and its business partners are responsible for establishing an

effective complaint mechanism (“reporting system”) at the plant level in their respective companies. Reporting channels for informants (known as whistleblowing) shall be set up according to law so that informants as well as persons who are the object of the report or are affected by the report are protected from reprisals or retaliatory measures such as termination.

## II. Ethical behavior in business dealings

### 1. Prohibition of corruption and bribery

Corrupt practices, including bribery, are illegal, wrong, and prohibited. They distort markets, undermine social justice, and promote many other types of criminality.

Offering, promising, or giving someone something of value to achieve an undue advantage or to unduly influence someone else is illegal.

Demanding or accepting something of value that could endanger the integrity or loyalty of Etimex employees, or their business partners is illegal and prohibited.

Bribes are illegal regardless of whether the recipient is a public official or a private individual. Public officials, however, are subject to a greater risk of corruption and are often subject to stricter laws and regulations. Kickbacks (small bribes) that are paid to accelerate routine government services are likewise illegal and prohibited. Etimex and its

business partners never participate in bribery or other corrupt practices, neither directly nor through third parties.

Every form of criminal or unethical influence on the decisions of customers and other business partners must be opposed. Action will be taken against corruption in the corporate group as well as against any form of personal enrichment to the detriment of the corporate group.

The highest standards of integrity shall be used as the basis for all business activities. A zero-tolerance policy shall be enforced on the prohibition of all forms of bribery, corruption, extortion, and embezzlement. Procedures for monitoring and enforcing the standards shall be used to ensure compliance with the anti-corruption laws.

## 2. Data protection, data security, and intellectual property

Confidential information as well as personal data of employees shall be protected. The business partners will work together with Etimex to conclude corresponding agreements on confidentiality and to ensure adequate protection of confidential information received. When entering, storing, processing, transmitting, and forwarding confidential information, the respectively applicable laws on data protection and information security as well as government regulations shall be complied with. Intellectual property shall be protected and secured against abusive use.

Data protection and data security should be ensured if possible, using certifications (e.g., TISAX or ISO/IEC 27001) and employee training.

## 3. Fair competition and anti-trust law

Etimex and its business partners comply with the applicable regulations of competition and anti-trust law as well as the precept of fair competition. When working with competitors, the applicable

anti-trust laws particularly prohibit arrangements and other activities that influence prices and terms, as well as arrangements between customers and supplier by means of which customers are to be limited in their freedom to autonomously set their prices and other terms when reselling. Such procedures shall be condemned and prohibited.

## 4. Financial responsibility

Etimex and its business partners each comply with the regulatory responsibilities of their companies in the area of finance. This includes, among other things, properly inputting, maintaining, and reporting on the business documentation, including but not limited to financial accounts, quality reports, time recording, expense reporting, and filings to customers or regulatory agencies. Books and record entries are properly maintained in conformity with applicable law and generally accepted accounting principles.

## 5. Counterfeits

Etimex and its business partners agree to use, implement, and uphold effective methods and processes to detect and minimize the risk of introducing counterfeit parts and materials into their



supply chains. When counterfeits are discovered, the materials should be isolated and the original parts manufacturer, the recipient of counterfeited products, and/or any relevant criminal prosecution agencies should be notified.

## 6. Conflicts of interest

Business decisions at Etimex and its business partners are made solely in the company's interest. Conflicts of interest with private interests or other economic or other activities, also by dependents or other closely related persons or organizations should be avoided from the beginning. Even the appearance of a conflict of interest is problematic when this gives rise to the impression that a person's objectivity or independence could be impaired.

In order to prevent adverse consequences for Etimex, Etimex expects of its business partners that they avoid all conflicts of interest that negatively affect the business relationship with Etimex. Etimex's business partners are therefore obligated to immediately disclose actual or even only apparent conflicts of interest with Etimex or its employees and to resolve them as quickly as possible.

## 7. Export controls and economic sanctions

Export controls and economic sanctions relate to restrictions on the export or re-export of goods, software, services, and technology, as well as to applicable restrictions of trade with specific companies, regions, companies, or organizations and individuals. The purpose of sanctions is to modify the behavior of another nation, for instance in order to protect human rights or to avoid the use of military force.

Etimex and its business partners each have risk mitigation processes in connection with trade sanctions and compliance with foreign trade controls.

Etimex and its business partners agree to comply with all respectively applicable foreign trade laws, sanction and embargo decrees, and statutory guidelines, particularly legal and regulatory requirements, as well as to strictly comply with applicable export controls and economic sanctions.

## III. Requirements for environmental protection and sustainability in the supply chain

### 1. Environmental protection / energy efficiency / renewable energies

Etimex and its business partners strictly comply with applicable laws on environmental protection and internationally recognized environmental standards.

Etimex strives to reduce detrimental effects on the environment. Etimex is aware that it is necessary to operate within planetary limits. Etimex also promotes sustainability in its production and products, deals sparingly with resources, and minimizes environmental burdens in order to continuously improve environmental protection. Etimex itself complies with the following principles and therefore expects that its business partners likewise comply with them:

The use and consumption of resources during production, and the generation of waste of all kinds, including water and energy, shall be reduced, or avoided.

This occurs either directly at the point of origin or by means of procedures and measures, for instance by changing the production and maintenance processes or changing procedures in the company, by using alternative materials, economization, recycling, or by reusing materials. In the spirit of sustainability, Etimex as well as its business partners ensure that, in addition to production development, the products themselves deal sparingly with raw materials and natural resources and are reusable whenever possible.

Etimex and its business partners therefore monitor and document each use of energy and make an effort to improve energy efficiency, minimize energy consumption, and implement renewable energies so that greenhouse gas emissions are reduced.

In the sense of joint responsibility for the environment, the business partner is called on to develop and maintain a substantive environmental management

system pursuant to DIN EN ISO 14001 and a systematic energy management system pursuant to DIN EN ISO 50001. The existence of the ISO 14001 and ISO 50001 certificates enters into the assessment of the business partner. Inquiries about elements relevant to the environment may be a component of an audit by Etimex.

## 2. Conflict minerals

Etimex and its business partners will each establish processes for the conflict minerals tin, tungsten, tantalum, and gold, as well as other natural resources such as cobalt, in conformity with the guiding principles of the Organisation for Economic Cooperation and Development (OECD) on compliance with the due diligence standard to promote responsible supply chains for minerals from conflict and high-risk regions. Smelting and refining without adequate, audited due diligence processes should be avoided.

## 3. Biodiversity, animal welfare, land use, soil quality, and deforestation

In their business activities, Etimex and its business partners will comply with all

relevant legal and regulatory requirements with regard to biodiversity, animal welfare, land use, soil quality, and deforestation.

## 4. Eviction, land rights, forest rights, water rights

Eviction as well as deprivation of land, forests, and waters in the acquisition, development, or other use of land, forests, and waters shall be avoided. All relevant national and international legal and regulatory requirements in this respect should be complied with and implemented.

## 5. Water quality, water consumption, and water management

Etimex and its business partners will operate their plants in full compliance with all applicable laws, regulations, and industry guidelines on water protection, water consumption, water quality, and wastewater. Wastewater from operations, manufacturing processes, and sanitary facilities shall be typed, monitored, tested, and treated when necessary. In addition, measures should be implemented to reduce generation of wastewater. Measures for sustainable

protection and assurance of water quality shall be arranged at the plants.

## 6. Waste and hazardous materials

Etimex and its business partners commit ourselves to a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste. Chemicals or other materials representing a hazard if released into the environment shall be identified and managed in such a way that safety is guaranteed when dealing with these substances, including transport, storage, use, recycling, or reuse, and when they are disposed of. Optimizations of machines will be expedited with high priority and carried out in order to bring any rejects down to almost zero. Material recycling and waste avoidance will be examined in detail at each award of contract and order acceptance and optimally implemented.

## 7. Air quality and air emissions

Etimex is committed to alleviating climate change and reducing greenhouse gas

emissions in order to limit global warming to 1.5 °C. Etimex and its business partners are implementing consistent sustainability management for this purpose.

Therefore, general emissions from operations (air and noise emissions) as well as greenhouse gas emissions shall be typed before their release, routinely monitored, checked, and treated when necessary in order not to permanently impair air quality. Exhaust gas purification systems shall be monitored.

The goal is to find economical solutions for minimizing any and all emissions.

Possible incidents relevant to the environment shall be reported to the responsible offices immediately and suitable measures taken to remediate and improve.

## IV. Implementation and interaction with this Code of Conduct

### 1. Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz), compliance with this Code of Conduct, and consequences in case of violations

In order to secure the supply chain with regard to expectations related to human rights and the environment, compliance with the provisions set forth here is indispensable to the business relationship between Etimex and its business partners.

Etimex expects of its business partners that they analyze risks related to human rights and the environment at their own company and in their supply chain to an appropriate extent within the scope of adequate risk management and establish preventative or remedial measures to an appropriate extent to avoid violations.

### 2. Reports of legal violations

Etimex would like to encourage its business partners to immediately report any and all legal violations in Etimex's area of responsibility as soon as they are observed, or it is highly likely that they will occur. Business partners need not fear any disadvantages insofar as the corresponding report was made to the best of their knowledge and with honest intent.

### 3. Additional regulations

Etimex is entitled to revise this Code of Conduct at any time. Business partners shall each review modified versions at Etimex's request and not refuse their consent without reason.

The current version of the Code is available on the Etimex website.

The Code is available in several languages. In case of doubt, the German version will govern.



#### 4. Designation of social gender

For better readability, the present Code of Conduct foregoes the simultaneous use of feminine and masculine language forms. The generic masculine is used, also for designations of titles, whereby all genders are equally meant.

#### 5. Acknowledgment and acceptance

By acknowledging and accepting this Code of Conduct, the business partner agrees to act responsibly according to the principles described in this Code of Conduct while complying with all laws applicable to the business partner.



# Acknowledgement

Herewith acknowledges \_\_\_\_\_ (company name),  
that they have understood the Code of Conduct for Suppliers and are committed to fully  
complying with it.

Company name: \_\_\_\_\_

Address: \_\_\_\_\_

Name: \_\_\_\_\_

Job title: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_