

## Code of Conduct (CoC) of the Panther Group for employees

### Preface

As a family company with a long tradition, Panther Packaging GmbH & Co. KG and its subsidiaries - hereinafter referred to as the Panther Group - enjoy an excellent reputation among business partners and employees and attach great importance to legally compliant and ethically impeccable behavior. With this Code of Conduct, we acknowledge our responsibility in the business and social environment and towards our employees.

### 1. Purpose and application

This Code of Conduct (CoC) outlines the minimum standards that the Panther Group requires of itself and its employees to comply with in addition to the Panther-Philosophy with regard to compliance with all laws and ordinances regulating their business activities.

### 2. Management systems

The Panther Group has set up appropriate management systems to enable compliance with this CoC and all other applicable laws and regulations. This means that

- 2.1 all applicable laws, ordinances and contractual provisions are properly applied and communicated,
- 2.2 the Panther Group ensures, that its employees, its own suppliers and sub-suppliers adhere to this CoC.

### 3. Human rights and employment rights

#### 3.1 Human rights

The employees of the Panther Group shall be obliged,

- 3.1.1 to act in mutual dealings with tolerance, appreciation and openness,
- 3.1.2 to respect human rights and not to take part in human rights abuses in their sphere of influence,
- 3.1.3 to prevent the destruction of the natural basis of life through environmental pollution
- 3.1.4 to record its effects on human rights properly whenever the need for such a measure is agreed,
- 3.1.5 to have put in place appropriate remedial mechanisms in case human rights abuses occur.
- 3.1.6 not to unlawfully violate land rights,
- 3.1.7 not to violate the prohibition of an action or mission in breach of duty that is directly capable of impairing a protected legal position in a particularly serious way and whose illegality is obvious when all relevant circumstances are considered judiciously.

#### 3.2 Employees' fundamental rights

The Panther Group commits in line with the Panther Philosophy,

- 3.2.1 not to employ any employees under 15 years of age or below the minimum age according to national legislation, whichever is the higher (in accordance with ILO [International Labour Organization] Convention 138 concerning child labour),
- 3.2.2 to guarantee that any employment of young persons above the minimum age but below 18 years of age does not endanger their education, health, safety and moral welfare,
- 3.2.3 not to use any forms of involuntary labour,
- 3.2.4 not to discriminate against employees,
- 3.2.5 to treat all employees fairly and with respect.

#### 3.3 Working hours/Wages

The Panther Group undertakes to maintain fair working conditions, that at least meet the legal requirements and

- 3.3.1 to pay his employees at least the statutory minimum wage together with the overtime payments fixed by national laws,
- 3.3.2 to apply working hours conforming to statutory requirements,
- 3.3.3 to grant all employees at least the statutory rest periods and to ensure that employees have sufficient opportunities to relax.

### 4. Occupational safety

The Panther Group is committed to maintaining the safety and health of its employees as the top priority

- 4.1 to comply with all applicable statutory occupational safety regulations,
- 4.2 to have his own occupational safety guideline, to demonstrate the management's commitment to occupational safety, and to allocate responsibility for occupational safety within his organisation,
- 4.3 to ensure that operational control mechanisms, such as rules and procedures, exist and are communicated to all employees,
- 4.4 to have put in place procedures for preparedness in cases of emergency and for a response to these,
- 4.5 to raise his employees' awareness on issues of occupational safety, to improve the safety culture through open communication, and to ensure, that his employees have received adequate and appropriate occupational safety training,
- 4.6 to measure and monitor his occupational safety performance and hazards in the occupational safety area by means of properly conducted workplace inspections and audits,
- 4.7 to report and investigate all occupational safety incidents.

### 5. Effects on the environment

The Panther Group is committed to sustainability and environmental compatibility and to that

- 5.1 to comply with all environmental requirements defined in relevant laws, regulations and environmental permits,
- 5.2 to assign responsibility for environmental issues within the organisation and to use the resources and raw materials required as carefully as possible,
- 5.3 to ensure that his employees possess appropriate and adequate specialist knowledge and experience with regard to environmental matters, and the resources, to enable them to fulfil their responsibilities effectively,

- 5.4 to ensure that written instructions are present covering all processes with potential impacts on the environment, and that the relevant information is brought to the attention of all the employees involved,
- 5.5 to work proactively to prevent emergencies occurring, and to ensure the ability to respond adequately and appropriately to such events, by analysing, investigating and implementing suitable preventive and corrective measures,
- 5.6 to handle environmental contraventions and complaints systematically and, to bring them to the attention of employees and external stakeholders, insofar as the Panther Group is affected.

### 6. Responsible business practice

The Panther Group and its employees are committed to the highest ethical and moral integrity and

- 6.1 to conduct the business in unrestricted compliance with all applicable cartel and competition laws,
- 6.2 to avoid situations, in which there is a conflict of interest between the external organizations, suppliers etc. and the Panther Group
- 6.3 to act in conformity with all applicable anti-corruption laws by, among other things, refusing to accept or offer bribes, financial inducements or items of value in order to obtain or retain orders, inappropriate profit or advantage,
- 6.4 to act in accordance with all rules and regulations regarding the safety requirements of products and services provided, including the rules established by the Panther Group,
- 6.5 to record and disclose transparently and precisely the details of his business activities, corporate structure, financial situation and business development in accordance with the applicable laws and regulations.

This means, among other things, that

- 6.6 employees of the Panther Group not having their travel and accommodation costs paid for by suppliers when visiting suppliers, conferences, reference systems, etc.,
- 6.7 employees of the Panther Group are not allowed to accept gifts, hospitality or expenses, that could be considered unfounded or inappropriate in relation to possible business transactions.

### 7. Data protection and documentation

The Panther Group is committed

- 7.1 to document and store all business transactions, agreements and contracts in accordance with legal and internal requirements,
- 7.2 to secure confidential information and to comply with the highest security standards to protect these documents.

### 8. Enforcement

- 8.1 The managers of the company are obliged to encourage their employees to comply with this CoC.
- 8.2 If the Panther Group determines that employees are not meeting the requirements and expectations set out in this CoC, the Panther Group will offer and make available information that will help to avoid such violations of the CoC.
- 8.3 Within the framework of the complaints procedure, knowledge of possible violations of human rights risks can be pointed out.