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## Faller Packaging: Code of Conduct

This document outlines the values and principles that we, Faller Packaging Group, expect from our suppliers in order to align our cooperation with ethical standards, create value together, and meet the requirements of our customers and stakeholders. We believe that conducting business ethically and responsibly is not only the right thing to do, but it is also critical to our success. As a partner of Faller Packaging, we expect you to share our commitment to sustainable and responsible business practices, including maintaining a positive and respectful work environment and complying

with all applicable laws and regulations. Our Code of Conduct serves as a guide for making ethical decisions in the course of our daily work, and we encourage you to familiarise yourself with its contents.

Together, we can maintain the trust and confidence of our clients, partners, and stakeholders as we continue to build strong and successful relationships. We believe that by working together towards these common goals, we can achieve mutual benefits and contribute to a sustainable and responsible future for all.

"It is Faller Packaging's corporate culture that connects us all. It is this that makes our company a community. On this basis, we bear responsibility for society and the environment of which we are a part. That is why all our actions are guided by the principle of sustainability and the pursuit of a future worth living. Thank you for making your contribution to the success of this community every day. Simply Better, Always Ahead and Together."

Dr. Michael Faller

Dr. Daniel Keesman



# Suppliers are expected to ...

- ... act in full compliance with all applicable laws, rules, and regulations.
- ... have processes and systems in place to identify and control risks in all areas addressed by this document.
- ... ensure that their business activities align with the expectations outlined in this document by implementing appropriate management systems, including policies, objectives, processes, training, and resources that adequately consider the organisation's impacts and opportunities.
- ... integrate these principles into a continuous improvement approach that detects deviations and improves performance over time.
- ... integrate, communicate, and apply these principles both in their own operations and towards their partners in the supply chain.
- encourage all employees to report concerns or illegal activities in the workplace without fear of retaliation, intimidation, or harassment. Suppliers must conduct investigations and take corrective actions as needed.

# **Key Principles**

The term "supplier" includes individuals or organisations that supply Faller Packaging and its subsidiaries, affiliates and divisions with services, raw materials, components, finished goods or other products.

This policy is not intended to supersede, replace or contradict any applicable legal or regulatory requirements or contractual obligations with Faller Packaging and its operating subsidiaries, affiliates and divisions. Each supplier is responsible for deciding how to comply with and demonstrate compliance with the principles and standards stated in this Code.

As part of an initial screening process when selecting new suppliers, as well as when requalifying existing suppliers, Faller Packaging strives to ensure compliance with this Supplier Code of Conduct by asking selected suppliers to complete a self-assessment questionnaire. In addition, Faller Packaging reserves the right to verify compliance with the Code during an on-site inspection or audit.



# **Respect for Human Rights**

### **Respect and Honesty**

- Suppliers are expected to conduct their business with integrity, transparency, and honesty.
- Suppliers are expected to respect the rights, dignity, and privacy of all individuals and are dedicated to treating them with fairness and equality.
- Suppliers are expected to not tolerate discrimination, harassment, or any other form of inappropriate behaviour.
- Suppliers are expected to maintain an open and respectful dialogue with all stakeholders, including their employees, customers, suppliers, and partners
- Suppliers are expected to be dedicated to building long-term relationships based on mutual trust, respect, and shared values.

### **Labour and Human Rights**

- Suppliers are expected to respect human rights and labour rights in all their operations and supply chain.
- Suppliers are expected to prohibit any form of forced labour, child labour, or human trafficking.
- Suppliers are expected to provide a safe and healthy working environment for all their employees and contractors, and promote the well-being of their workers.
- Suppliers are expected to respect the freedom of association and the right to collective bargaining of their employees and contractors and comply with applicable labour laws, and regulations relating to labour relations and freedom of association.
- Suppliers are expected to ensure that they do not engage in any form of discrimination, harassment, or abuse.

## **Diversity and Inclusion**

- Suppliers are expected to promote diversity and inclusion in all their operations and supply chain.
- Suppliers are expected to ensure no engagement in any form of discrimination based on gender, race, ethnicity, religion, sexual orientation, or any other personal characteristic.
- Suppliers are expected to promote and support diversity and inclusion in their workforce as well as supply chain, and ensure that they provide equal opportunities to all.
- Suppliers are expected to engage with their stakeholders to promote diversity and inclusion and to address any issues or concerns related to this topic.

# **Enforcement and Monitoring**

- Suppliers are expected to ensure that this code of conduct is communicated internally and that they understand as well as comply with it.
- Suppliers are expected to have set up a robust monitoring and enforcement system to detect and address any violations of this code of conduct.
- Suppliers are expected to ensure regular internal and external audits of compliance with this code of conduct.
- Suppliers are expected to take appropriate corrective action in case of any non-compliance with this code of conduct.

# **General Business Practice**

### **Regulation Compliance**

 Suppliers are expected to act in full compliance with all applicable laws, rules, and regulations related to e.g. ethics, anti-corruption, fraud, conflicts of interests and anti-bribery.

### **Fair Competition**

- Our suppliers are expected to compete fairly and honestly in the marketplace, and not engage in anti-competitive practices.
- Suppliers must comply with all applicable laws and regulations relating to fair competition, including those related to antitrust and competition.
- We expect our suppliers to ensure that their employees and management avoid conflicts of interest that may compromise their impartiality or integrity

### Fraud and Money Laundering

- We expect our suppliers to have procedures in place to prevent and to detect fraud and to manage and investigate suspected cases of fraud.
- Suppliers are expected to prevent money laundering and terrorist financing, and comply with all applicable anti-money laundering laws and regulations.



# **Environmental Business Practice**

## **Environmental Management**

- Suppliers must have clear policies and procedures for sustainability management and reporting, and ensure that these are integrated into their overall management system.
- Suppliers are expected to conduct regular environmental impact assessments to identify and mitigate any negative impacts of their activities on the environment.
- We expect our suppliers to use sustainable materials and packaging throughout the supply chain, and to minimise the use of non-renewable
- Our suppliers must set ambitious goals for sustainability, and regularly assess and report on the progress towards these goals.
- Suppliers are expected to implement measures to reduce their carbon footprint and greenhouse gas emissions, such as energy-efficient practices, use of renewable energy sources, and implementation of carbon offset programs to mitigate the impact on climate change.
- Our suppliers are expected to regularly review and update their  $sustain ability strategy and action plan, based on the {\it results} of sustain ability$ performance assessment and stakeholder engagement.
- Suppliers must ensure that they comply with all applicable environmental laws and regulations.

### Sustainable Innovation, Technology and Supply Chain

- Our suppliers must ensure that the products and services they provide are designed with sustainability in mind and that they have a positive impact on the environment and society.
- Suppliers are expected to invest in research and development of sustainable products and packaging, and seek out innovative technologies and materials that can help reduce the environmental impact.
- We encourage our suppliers to collaborate with other stakeholders and  $industry\,partners\,to\,share\,knowledge\,and\,expertise\,to\,accelerate\,progress$ towards sustainability goals and to provide feedback into innovation and technology strategy.
- Our suppliers must ensure continuous improvements for identifying and addressing any sustainability risks or issues in their supply chain.

# **Circular Economy**

- Suppliers are expected to strive to reduce waste, emissions, and resource consumption throughout their operations and supply chain.
- Suppliers are expected to design their products and packaging with circularity in mind, and ensure that they are recyclable, reusable, or biodearadable.
- Suppliers are expected to implement circular economy practices such as closed-loop systems, product take-back programs, and waste reduction initiatives.





# Stakeholder Wellbeing

# Working Conditions and Occupational Health and Safety

- Suppliers are expected to provide fair and reasonable working conditions for their employees, including reasonable working hours, breaks, and compensation
- Suppliers are expected to comply with all applicable labour laws and regulations relating to working conditions.
- Suppliers are expected to provide a safe and healthy workplace for their employees, contractors, and other stakeholders throughout their operations and supply chain.
- Suppliers are expected to comply with all applicable occupational health and safety regulations and standards.
- Suppliers are expected to ensure that their products and packaging comply with all applicable health and safety regulations and standards.
- Suppliers are expected to provide adequate training and protective equipment to all employees and contractors to ensure their health and safety.
- Suppliers are expected to implement measures to prevent accidents, injuries, and illnesses in the workplace, and to mitigate their impact if they
- Suppliers are expected to ensure that there are emergency response plans and procedures in place to respond to any health and safety incidents.

### **Dangerous Goods and Waste Handling**

- Suppliers are expected to handle and dispose of dangerous goods and waste in a safe and responsible manner, and comply with all applicable laws and regulations.
- Suppliers are expected to have policies and procedures in place to identify, assess, and manage the risks associated with handling dangerous goods and waste.

# Data Protection and Confidentiality, and Information Security

- Suppliers are expected to protect the confidentiality and security of personal and sensitive information, and comply with all applicable data protection and privacy laws and regulations.
- Suppliers are expected to have policies and procedures in place to protect information assets from unauthorised access, use, or disclosure.

# **Transparency and Reporting**

- Suppliers are expected to be transparent in their operations and supply chain, and provide accurate and complete information to their customers.
- Suppliers are expected to have systems in place for tracking and reporting environmental and social performance, and for monitoring progress towards sustainability goals.
- Suppliers are expected to provide transparent and reliable information about their sustainability performance to relevant stakeholders, and ensure that the sustainability reporting is accurate, credible, and verifiable.
- Suppliers are expected to regularly report on their sustainability performance and strive for progress using globally recognised reporting frameworks, such as the Global Reporting Initiative (GRI) or the Sustainability Accounting Standards Board (SASB).

### Whistleblower

- Suppliers are expected to have a whistleblower policy and process in place to enable employees to report concerns and complaints related to ethics, compliance, or misconduct.
- Suppliers are expected to protect whistleblowers from retaliation, and investigate and address reported concerns and complaints promptly, systematically, and impartially.

## **Animal Welfare and Biodiversity**

- We expect our suppliers to ensure that they do not engage in any form
  of animal cruelty or abuse in their operations or supply chain and support
  the adoption of animal welfare standards and practices throughout their
  supply chain.
- We expect our suppliers to respect biodiversity and take measures to minimise their impact on ecosystems as well as wildlife, for instance, through sustainable material selection, reducing pollution and waste, as well as protecting the landscape.
- We expect our suppliers to ensure that their suppliers and contractors meet the same animal welfare and biodiversity standards that they apply to their own operations.





4 countries



8 locations



1.400 employees

## Faller Packaging Group

## Headquarter

August Faller GmbH & Co. KG

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# **Business Unit Folding Cartons**

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### Business Unit Labels

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## **Packaging Nordics**

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August Faller GmbH & Co. KG / Postfach 180 / D-79175 Waldkirch
Compliance declaration to be signed by the supplier
Dear Partner,
Enclosed you will find our Supplier Code of Conduct with the request to read through and sign it
We expect all Faller Packaging Group suppliers to understand and comply with this Supplier Code of Conduct.
If we become aware of any actions or conditions that do not comply with our Supplier Code of Conduct, we reserve the right to take corrective action and/or terminate our relationship with you
By signing this document, you acknowledge that you have read and understood the Supplier Code of Conduct and agree to comply with the principles and policies set forth therein.
Kind regards
August Faller GmbH & Co. KG
Date, Place Signature Supplier