

A conflict of interest arises when the personal, social or financial interests of an employee, a cooperating company or other organization conflict (or even appear to conflict) with the ability to act in the best interests of the August Faller company. All company stakeholders must discharge their responsibilities to the company on the basis of what is in the best interests of the company, regardless of personal considerations or affiliations.

August Faller adheres to the principle of eliminating situations that may create or threaten to create Conflicts of Interest and, to this end, takes measures that are as effective as possible to prevent Conflicts of Interest from arising.

All conflicts of interest must be disclosed and resolved in accordance with this procedure and in compliance with applicable laws and regulations.

1. Scope/area of application

This procedure applies to all employees, in every sites of August Faller GmbH & Co. KG, incl. all international sites, regardless of their position, as well as contractors, suppliers, consultants, agents and other persons acting on behalf of the company.

This conflict of interest policy applies in all countries where August Faller does business, along with the need to comply with local laws. In the event of discrepancies caused by conflicts between local laws and the principles contained in this document, the stricter rules must be applied.

2. Responsibilities

All employees, officers, directors of August Faller and persons acting on behalf of the company, as well as persons doing business with the company, are required to comply with all conflict of interest laws. Employees are prohibited from engaging, permitting the engagement of other employees, approving or tolerating behavior that violates or may violate the company's conflict of interest policy. Persons in managerial positions have both personal responsibility and responsibility for subordinate employees.

A breach of this policy constitutes a breach of employee duties.

The group indicated below are responsible for the following:

Employees	<ul style="list-style-type: none"> • Read, understand and act in accordance with the requirements and regulations contained in the policy against conflicts of interest in all markets in which the company operates • Complete required training based on the code of conduct • Prevent, detect and report incidents of conflict of interest • Confirm or certify compliance with this policy upon request.
Managers	<ul style="list-style-type: none"> • Read, understand and act in accordance with the requirements and regulations contained in the policy against conflicts of interest in all markets in which the company operates • Complete all training in the procedures required to take on the role of manager • Provide strong leadership and commitment to promoting a culture of conflict of interest

	<ul style="list-style-type: none"> • Confirm or certify compliance with the conflict of interest policy upon request • Preventing, detecting and reporting incidents of conflict of interest • Ensuring compliance with the conflict of interest policy by employees and business partners • Participate in the resolution of conflicts of interest and potential conflicts of interest situations • Responding promptly when informed of a conflict of interest or its appearance and treating information disclosed by a colleague with sensitivity, respecting in particular privacy concerns.
<p>Third Parties</p>	<ul style="list-style-type: none"> • Read, understand and act in accordance with the requirements and regulations contained in the Code of Conduct in all markets in which the company operates • Complete the required training on base of the code of conduct • Prevent, detect and report conflicts of interest • Confirm or certify, upon request, compliance with the conflict of interest policy
<p>Compliance Officer</p>	<ul style="list-style-type: none"> • Update the requirements and records of the conflict of interest policy • Provide training, information and support to employees on compliance with the conflict of interest policy and applicable conflict of interest legislation • Maintaining effective internal control systems and conducting regular audits to monitor compliance with the conflicts of interest policy and to detect and correct potential violations of the policy • Reviewing, analyzing and expressing an opinion on the approval of individual transactions or cooperation with potential business partners with respect to the risk of conflicts of interest • Reviewing business partners, including suppliers, consultants and agents to identify and minimize the risk of conflicts of interest • Definition of compliance procedures and response to escalations • Preventing, detecting and reporting incidents of conflict of interest • Ensuring that employees who report conflicts of interest or suspected conflicts of interest are protected so that they are not exposed to any form of discrimination, retaliation or negative consequences as a result of their actions • Conducting regular conflict of interests risk assessments, analyzing potential risks and vulnerabilities in the business and implementing appropriate corrective measures and controls to reduce the risk of conflict of interests. • Responding promptly when informed of a conflict of interest or its appearance and treating information disclosed by a colleague with sensitivity, respecting in particular privacy concerns.

If an employee violates the conflict of interest policy, he or she will be subject to disciplinary action, which may lead to legal, civil or disciplinary consequences, including dismissal, financial penalties and criminal liability under applicable law.

3. Terms and definitions

Conflict of interest is a situation in which an employee or other business associate makes decisions or deliberately acts on behalf of the company in a way that benefits or is likely to benefit him or his associates, and where the interests of an employee or business associate influence or may influence adversely his judgement, decision-making or the performance of his duties.

Potential conflict of interest is a situation which gives rise to a risk of a conflict of interest.

Actual conflict of interest is a situation where a conflict of interest already exists.

4. Policy Details

The purpose of this procedure is to protect the interests of August Faller against damage which may be caused by the actions taken by employees and other associates in situations where there is a risk of a conflict of interest or where such a conflict has already arisen. The procedure also aims, through its provisions, to ensure the transparency of employees' actions and the motivation of their business decisions.

Conflicts of interest arise when business partners place their personal interests above those of the company and when those personal interests improperly influence, or can be perceived to improperly influence, their judgement, decisions or business actions.

Making judgments, decisions or actions when there is a conflict of interest can impede the objective performance of work for the company and can have legal, reputational and regulatory consequences. August Faller respects the rights and choices of its employees and does not wish to interfere in their personal lives. However, as part of their employment, Associates have a contractual obligation of loyalty to August Faller.

4.1 Key principles and requirements of the policy

The most important principles that must be observed and adhered to by all participants are listed below:

- Associates are required to assess for themselves whether a situation is a potential threat or risk of a conflict of interest.
- If you are unsure whether a conflict of interest or a potential conflict of interest situation exists, you must consult with your operational manager or legal partner to obtain information on the appropriate course of action.
- Associates are required to disclose any actual, potential or perceived conflict of interest situation to their operational manager immediately (as soon as they become aware of it)
- Companies working with August Faller are required to update their declaration of interest annually or immediately disclose any conflict of interest or potential conflict of interest as soon as it arises.

- Disclosures of conflicts of interest or potential conflicts of interest made in the course of the recruitment process must be discussed by the Hiring Manager before any offers of employment are made.
- Any conflict of interest must be resolved with the Operations Manager to eliminate or reduce the associated risks. Most conflicts of interest can be resolved in a simple and mutually acceptable way through open dialogue between the parties involved.
- Failure to disclose an interest, incomplete or inaccurate disclosure or improper management of a conflict of interest may constitute misconduct or a breach of the terms and conditions of employment (in the case of employees) or terms and conditions of cooperation and may result in disciplinary action by August Faller.

4.2 Compliance and Monitoring

The Company ensures that measures are in place to disseminate information to employees and business partners about the conflicts of interest and the consequences of its violation, supported by the August Fallers Code of Conduct.

New employees are trained on the procedure when they receive their new position, while all employees are regularly trained on the conflict of interest procedure as part of their Code of Conduct training. The relevant department manager is responsible for overseeing the organization of training and sending employees to training in a timely manner. The responsible department is also in charge for monitoring the effectiveness of this procedure and reviewing its implementation and assessing its suitability and effectiveness. To this end, regular internal audits are conducted to monitor compliance with the policy against conflicts of interest and to detect and correct potential breaches.

The responsible person will regularly monitor and evaluate the company's conflict of interest policy to ensure compliance with applicable laws and industry standards and best practices. If non-compliance is identified, the company will take appropriate corrective action. The compliance officer is responsible for reviewing, updating and implementing changes to this procedure. All changes made must be approved by the company's management and properly communicated to all employees and business partners.

A conflict of interest risk assessment is also carried out on a regular basis, analyzing potential risks and vulnerabilities in the business and implementing appropriate corrective measures and controls to reduce these risks.

The company has a procedure for reporting conflicts of interest or potential conflict of interest situations and for investigating complaints. All complaints will be taken seriously and dealt with in a confidential, fair and lawful manner.

The company provides protection to employees who report a conflict of interest or potential conflict of interest so that they are not exposed to any form of discrimination, retaliation or negative consequences as a result of their actions.

4.3 Review and update

The company undertakes to carry out a regular annual review and, based on this review, will keep its conflict of interests procedure up-to-date to ensure that it is in line with applicable laws, industry best practices and company needs. Consequently, after each update, employees will be

communicated through training. If necessary, the company also declares the introduction of new procedures, tools or measures to reinforce staff in their conflict of interests policy activities.

5. Appendices

MM 1.20 Corporate policy of Faller Packaging

FR-86 Wistleblower Guideline

6. Effective date by the CEO

05.02.2023



Date/Signature Dr. Daniel Keesman

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