

August Faller GmbH & Co. KG is committed to maintaining a culture with the highest standards of integrity and responsibility in the conduct of its business activities and ensures that it operates in full compliance with all competition laws. The company does not tolerate violations of competition laws. This Policy provides August Faller GmbH & Co. KG with an overview of key antitrust principles.

In its dealings with business partners or third parties, the company is committed to exercising the highest degree of mutual respect and compliance with all applicable antitrust laws. High quality, reliability, innovation and non-infringement of the interests of other companies are considered to be the main factors which determine the following.

August Faller is committed to promoting and protecting competition that complies with the laws protecting intellectual property and marketing rights.

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 fair competition 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 the fair competition policy. Employees are prohibited from engaging, permitting the engagement of other employees, approving or tolerating behavior that violates or may violate the company's fair competition 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 fair competition policy in all markets in which the company operates • Complete the required training based on the code of conduct • Prevention, detection and reporting of unfair competition cases • 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 fair competition policy in all markets in which the company operates • Complete all training in the required procedures for assuming the role of manager • Ensuring strong leadership and commitment to promoting an fair competition culture

	<ul style="list-style-type: none"> • Confirm or certify compliance with the fair competition policy upon request • Prevention, detection and reporting of unfair competition cases • Take care and ensure that employees and business partners comply with the fair competition policy.
<p>Third Parties</p>	<ul style="list-style-type: none"> • Read, understand and act in accordance with the requirements and regulations contained in code of conduct all markets in which the company operates • Complete the required training on code of conduct • Prevention, detection and reporting of unfair competition cases • Confirm or certify compliance with the fair competition policy upon request
<p>Compliance Officer</p>	<ul style="list-style-type: none"> • Update the requirements and provisions of the fair competition policy • Provide training and information and support to employees regarding compliance with the fair competition policy and applicable laws on the subject • Maintaining effective internal control systems and conducting regular audits to monitor compliance with the fair competition policy and to detect and correct potential breaches. • Review, analyze and express an opinion on the approval of individual transactions or cooperation with potential business partners • Analysis of individual transactions of payments • Setting rules on entertainment and gifts to ensure that none of these activities influence business decisions and are not perceived as attempts of unfair competition • Analysis of requests for charitable donations, sponsorships, and other forms of financial support • Analyze requests for third party involvement • Vetting of business partners including suppliers, consultants and agents to identify and minimize unfair competition risks • Identifying compliance procedures and responding to escalations • Prevention, detection and reporting of unfair competition cases • Ensuring protection for employees who report unfair competition so that they are not subject to any form of discrimination, retaliation or negative consequences as a result of their actions • Keeping abreast of changes in fair competition legislation locally and internationally to ensure continued compliance with applicable legal requirements and to adapt its operations, policies and procedures • Conducting regular corruption risk assessments, analyzing potential risks and vulnerabilities in the business and implementing appropriate corrective measures and controls to reduce the risk of unfair competition

If an employee violates the fair competition 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

Competition: The mechanism by which market participants pursue their interests by making offers that are more favorable than others, e.g., in terms of price, quality, delivery terms and other characteristics that affect the decision to make a transaction.

Competitor is a company that provides services or products that compete with the other company's offerings.

Potential competitors those companies that may, in the short term, begin to compete with their services or products with those offered by the Group, should also be treated as competitors.

Collusive tendering is a practice of competitors acting in concert, aimed at distorting the essence of the tendering process. It consists of an agreement between the participants in a tender (either between the participants or between the participant and the organizer) as to what conditions a bid must meet in order to win the tender (i.e., which of the competing companies will submit the winning tender). Collusive tendering is always illegal.

Market breakdown are allocating territories, customers or markets between a company and other units, companies.

4. Policy Details

The purpose of the fair competition policy is to establish rules and standards of conduct at August Faller aimed at preventing and responding to activities that may bear the hallmarks of unfair competition. The company is committed to the dogma of transparency and zero tolerance for unfair competition, and a set of rules has been established to avoid unacceptable behavior that may constitute cases of unfair competition.

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:

- It is forbidden to set prices for products and services sold to August Faller customers and prices for products and services purchased from business partners, both formally and informally. All prices are set independently of competition.
- There is a prohibition on market sharing - a prohibition on dividing territories, customers or markets between August Faller and other companies. Any agreement with competitors not to compete for specific customers, in a specific product or in a specific geographic area is prohibited and treated as a criminal offense.
- It is forbidden to agree with persons outside August Faller on the terms on which the company will participate in tenders.
- It is forbidden to agree with competitors on the terms of bids submitted to consumers, to withdraw bids or not to submit bids by agreement with a competitor

- It is forbidden to directly and indirectly communicate sensitive information, i.e. information that is commercially relevant with competitors
- Employees are required to obtain information only by legal means
- All contacts with competitors should be properly documented so that they do not raise any doubts about compliance with the principles of fair competition policy and the law
- Legal advice should always be sought in case of any doubt regarding compliance with the law and fair competition policy
- Any conduct by a competitor that suggests to be or is inconsistent with this policy and the law must be reported immediately
- You should only do business with legitimate and qualified entities and persons about whom you must be well informed. Before entering into any business relationship, ensure that potential partners comply with the fair competition policy requirements and identify any risks associated with our business partners.
- Each employee is responsible for his or her role in the business. This obliges you to analyze relevant information and not allow a transaction that violates or may violate the law or the fair competition policy.
- Employees must accurately document all transactions to ensure transparency, enable informed decision-making and confirm the legitimacy of business activities.

4.2 Compliance and Monitoring

The company ensures that measures are in place to disseminate information to employees and business partners about the Fair Competition Policy 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 fair competition policy 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 fair competition policy and to detect and correct potential violations.

The responsible person will regularly monitor and evaluate the company's fair competition 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 risk assessment of unfair competition 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 the risk of unfair business activities relating to competition.

The company has a complaints procedure and an investigation procedure in place in response to complaints of unfair competition moves. All complaints will be taken seriously and dealt with in a confidential, fair and lawful manner.

The company provides protection for employees who report incidents or suspected breaches of fair competition rules so that they are not subjected 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 fair competition 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 fair competition 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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