

# Code of Conduct

## Foreword

In an ever-changing and increasingly competitive world, it is essential that we in the Kläger Group concentrate on the things that are important to us. Our values of creativity, openness, responsibility and entrepreneurial spirit are the backbone of our operation. They serve as the guiding principle for our business operations and remind us what the Kläger Group stands for as a medium-sized, family-run business, now in the 3rd generation.

The companies in the Kläger Group are members of the GKV (German Association of the Plastics Converters), the IKW (German Cosmetic, Toiletry, Perfumery and Detergent Association) and the VCI (Association of the German Chemical Industry). We are committed to compliance with legal and ethical principles, both within our own organisation and as part of continual improvement in the supply chain.

## BUSINESS ASSOCIATES, AUTHORITIES AND CONSUMERS

We are committed to compliance with national and relevant international laws, recognised standards and guidelines, as well as consumer protection standards.

We observe laws for the protection of fair competition, particularly the cartel law and other laws regulating competition.

We guarantee the protection of confidential data.

Illegal agreements regarding prices or other conditions, sales territory or customers, or abuse of market forces, contravene the principles of our company.

We guarantee compliance with data protection regulations.

## LABOUR STANDARDS

We take great care to provide a safe, healthy and hygienic work environment, and take the necessary measures to avoid accidents and injury to health.

Our working hours correspond to the current national law.

We guarantee that the salaries we pay to our employees are at least equivalent to the statutory minimum wage, or to the minimum wage mandated within our industry. We pay the mandated social contributions.

We promote the professional skills of our employees at all levels through appropriate training and professional development programmes.

## HUMAN RIGHTS AND BASIC RIGHTS

We treat our employees with dignity and respect.

The company will not tolerate any form of discrimination. Equal opportunities and non-discrimination are essential elements of our corporate policy.

We expect our suppliers and business associates to share these values and to commit to compliance with them.

## **ENVIRONMENTAL PROTECTION**

The Kläger Group strives to increase resource and energy efficiency during the manufacture and sale of our products, and to minimise negative effects on the environment. We pledge to comply with the applicable legal requirements and international standards.

The companies in the group have implemented processes and systems that guarantee the safety of handling, transport, storage, recycling and reutilisation, and of the management of raw materials, other materials and waste.

## **PRODUCT STEWARDSHIP**

We comply with all applicable laws, legal requirements and standards of product safety. We strive to always offer our customers safe, high-value products of perfect quality.

Products must not have defects or dangerous features that could be damaging to health or property.

## **PROTECTION FROM CORRUPTION & BRIBERY**

We do not tolerate bribery or corruption in any form, neither from public officials nor in our dealings with business associates.

Gratuities in the form of invitations or gifts are permitted subject to certain conditions, as part of an advertising campaign or to serve the purpose of promoting business relationships, or in order to introduce products or services. Such gratuities may only be accepted or permitted if they serve a legitimate commercial purpose and do not represent a favour in return for an undue advantage. The gratuity must not be of a disproportionately high value and, in order to prevent corruption and bribery, must not exceed the limits of normal business practice or disproportionately exceed the recipient's normal living standard.

When accepting or giving gifts or invitations, the internal regulations must be followed, particularly the approval procedures.

## **RAISING CONCERNS & REPORTING VIOLATIONS**

Concerns about conduct in the workplace can often be resolved through constructive dialogue between the parties involved or with a designated contact person.

However, it can be better to address certain topics – particularly those concerning illegal business practices – outside the local work environment and in confidence. Employees who report actual or suspected misconduct in good faith will not experience retaliation.

While the information provided is being processed, the rights of all parties involved will be protected, and the decision on whether to take disciplinary action will be based on fairness, appropriateness, confidentiality and transparency of the procedure.

Persons of contact in the local work environment are supervisors, management and board members.