



CODE OF CONDUCT

# CODE OF CONDUCT (COMPLIANCE)

#### What is the WEIG Code of Conduct?

It is a set of guidelines for all staff and all companies in the WEIG Corporation, intended to help them to behave in accordance with the applicable laws and generally recognised ethical standards.

#### Why do we need a Code of Conduct?

- It assures the company that the rules are known about and adhered to, and prevents contraventions of the law.
- Our business partners, customers, suppliers and service providers expect us as an internationally active company to have defined guidelines like these in writing.
- It allows the staff to be sure about how they are permitted or required to behave. All staff have access to a contact person who is obligated to maintain confidentiality.

#### What is in the Code of Conduct?

The guidelines include all areas in which staff are active and have contacts. The following are some examples of where the guidelines provide help:

- Dealing with business partners:
  - Suppliers (e.g. accepting gifts)
  - Customers (e.g. granting benefits)
  - Competitors (e.g. behaving within competition law)

- Associations (e.g. behaving within competition law)
- · Dealing with public interest groups:
  - · Authorities (e.g. public orders)
  - · Societies (e.g. making donations)
- · Dealing with colleagues and staff:
  - · Leadership (e.g. assigning tasks clearly)
  - Discrimination (e.g. adhering to personality rights)
  - Safety at work (e.g. wearing protective clothing)
- · Dealing with information:
  - Confidentiality (e.g. production and development processes)
  - Financial data (e.g. truthful recording)
  - Privacy (e.g. storage of personal data)
- · Dealing with conflicts of interest:
  - Secondary employment (e.g. approval guidelines)
  - Private interests (e.g. private commissioning of business partners)
- Dealing with company property:
  - Use (e.g. exclusively for company purposes)

# When does the Code of Conduct come into force?

Because the guidelines relate to existing laws that are already in force, there is no specific date on which they become applicable

#### Who is your contact person?

Michael Buchner has been appointed Code of Conduct Officer. Unless expressly exempt, he is obligated to retain absolute confidentiality and is available to answer any questions you may have.

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## PRFAMBEL

As an internationally active family company, the WEIG Group is one of Europe's leading companies for the development, production and sale of recycled cartonboard, paper recycling and cartonboard converting.

The way we act towards our customers and suppliers, our staff and the public is always guided by the principles of integrity, honesty and loyalty. This responsible way of acting is a key factor in the long-term success of our medium-sized company, which is managed by the owning family.

If we are to ensure our efficiency and economic success in the future, it is essential that all laws, regulations and guidelines, as well as contractual obligations and obligations that we voluntarily place upon ourselves, are adhered to. With this **Code of Conduct** (Compliance), the WEIG Group is making a commitment to a clear set of guidelines that we hope will help us to continue to act in line with all laws. The objective is to avoid situations which challenge the integrity of the behaviour of WEIG Group staff. This **Code of Conduct** offers orientation for this and encourages each individual member of staff to act on his own responsibility.

This **Code of Conduct** applies equally to all companies in the WEIG Group. Foreign subsidiaries can take the relevant national statutory and economic conditions into account. This **Code of Conduct** is supplemented by special guidelines for specific topic areas, in particular the **Purchasing Code of Conduct**, the **Competition Code of Conduct** and the **Privacy Policy**.

These guidelines are intended as aids, but are not able to reflect everything involved in the topic of compliance, nor answer every possible question. If a member of staff is unsure about how to behave correctly in a specific situation, he can contact the Compliance Officer.

Dipl.-Ing. Xaver Weig

Dipl.-Kfm. Moritz J. Weig

## A. THE BASIC PRINCIPLES FOR OUR BEHAVIOUR

#### 1. Adherence to laws

We will adhere to all laws, regulations and guidelines, as well as contractual obligations and obligations that we voluntarily place upon ourselves.

Acting responsibly means first and foremost acting within the law. It goes without saying for the WEIG Group that all our staff act in accordance with the applicable legislation.

Alongside the statutory regulations, each member of staff must also adhere to all voluntary codes of conduct, basic principles and other behavioural guidelines of the WEIG Group (hereinafter referred to as "Guidelines").

In particular, transactions must not be made if they would represent an infringement of

- the applicable laws in the relevant country,
- regulations and guidelines,
- existing contractual obligations,
- this Code of Conduct or
- any other WEIG Group behavioural guidelines.

A member of WEIG Group staff who decides against a transaction in favour of adherence to the law and legislation will not suffer any financial or other disadvantage as a result of this decision.

Any member of staff who infringes these guidelines must anticipate disciplinary consequences as a result of violation of the obligations from his employment contract, regardless of the sanctions provided for in law. Infringements will be punished regardless of the offender's hierarchical position.

# 2. Responsibility for the standing of the WEIG Group

We will constantly pay attention to, maintain and promote the public standing of the WEIG Group.

The way every single one of us appears, acts and behaves is the key factor to shape the standing of the WEIG Group. Illegal or inappropriate behaviour from even one member of staff can cause significant damage to the WEIG Group.

The consequences of a violation may include:

- · a significant loss of reputation,
- · financial penalties and fines,
- · compensation claims,
- exclusion from public bids for tender.

#### 3. Environmental Protection

We want to make a significant contribution to sustainability and using resources sparingly.

By concentrating on recycled paper, we are doing our bit for the sustainable development and re-use of an important raw material.

Through appropriate leadership responsibility on the part of management and the commitment of the staff, the WEIG Group hopes to organise its business in an environmentally-friendly way and is constantly working on improving its production conditions and processes. The WEIG Group operates its business premises in such a way that a negative impact on the environment is avoided as far as possible. We have pledged to constantly reduce our energy consumption and heat requirements.

Every member of staff should make sure that processes are developed and implemented according to the basic principle of sustainability.

## B. DEALING WITH BUSINESS PARTNERS

The quality of our products is a crucial factor in our success. We gain the trust of our customers by behaving honestly and fairly, and make every effort to provide exactly what our customers need and want

#### 1. Suppliers

We expect our suppliers to adhere to the statutory provisions and to share all the basic values of the WEIG Group. In addition, the WEIG Group expects its suppliers to apply the principles defined with regard to responsibilities towards third parties and the environment and in the **Purchasing Code of Conduct** and the **Competition Code of Conduct**:

- Adherence to all applicable laws
- Lack of corruption
- Observance of the human rights of their staff
- · Adherence to laws against child labour
- Acceptance of responsibility for the health and safety of their staff
- Adherence to the relevant national laws and international standards on environmental protection
- Demand that these basic principles are also implemented and adhered to in the company's own supply chain

#### 2. Competition

Fair competition is essential for free market development and the social benefits associated with it. The requirement for fairness therefore also applies to the competition for market share.

Every member of staff is obligated to adhere to the rules of fair competition and to observe the **Competition Code of Conduct**, as relevant in his business division.

Please note that the applicable rules may vary from country to country and from case to case.

There are particular types of behaviour that can lead to a violation of competition law. For example, staff are not permitted to:

- discuss prices, production performance, capacity, sales, bids for tender, profit, profit margins, costs, distribution methods or any other factors that define or influence the company's competitive behaviour with competitors with the aim of inducing the competitor to behave in a similar way;
- enter into agreements with competitors regarding non-competition, limitation of business relationships with suppliers, the submission of bogus bids as bids for tender or the sharing of customers, markets, fields or production programmes;

- influence the re-sale prices of our customers or attempt to instigate this in order to limit the export or import of WEIG Group products;
- obtain competition-relevant information through industrial espionage, bribery, theft or bugging operations, nor to knowingly distribute incorrect information about a competitor or his products or services.

The WEIG Group sees reputable, independent associations and organisations as positive. Cooperation in business and employer associations and participation in their events is always conducted in keeping with the laws regarding competition and cartels. The information exchanged at association meetings is limited to publicly accessible information.

#### 3. Anti-Corruption

We base our day-to-day business on the principle of transparency and will adhere to all applicable laws against corruption.

#### 3.1 Granting undue advantage

We acquire orders fairly by the quality and price of our products, and not by offering others impermissible advantages.

No member of staff may offer, promise or grant officials any unjustified advantages in connection – directly or indirectly – with business activities, nor permit such advantages. No monetary payments or other services may be provided in order to influence official decisions or to obtain an unjustified advantage. The same applies with regard to unjustified advantages towards persons in the private economy.

Every offer, promise, donation and gift must be in line with the applicable laws and the guidelines of the WEIG Group and must avoid any appearance of dishonesty and inappropriateness.

Such offers, promises, donations and gifts may therefore not be made if they could be understood as an attempt to influence an official or to bribe a business partner in order to gain business advantages for the WEIG Group. Staff must always refrain from giving gifts if they could be seen as an attempt to exert unfair influence over the recipient.

For these reasons, the following rules are to be followed in particular:

- Every advantage granted must be transparent.
- Gifts and dinner invitations may only be made under adherence to all applicable laws, regulations and guidelines.
- Invitations and gifts may only be directed or delivered to the recipient's business address.

# B. DEALING WITH BUSINESS PARTNERS

The line manager must be informed of advantages granted and invitations to entertainment events that go beyond a normal business dinner.

The definition of the term 'official' includes representatives or staff at all levels of authorities or other public institutions, agencies or legal entities, as well as civil servants and the staff of state-run companies and public international organisations. The term also includes candidates for political office, official representatives and staff of political parties, and political parties themselves.

Furthermore, all staff are forbidden to grant monetary payments or other advantages indirectly (e.g. to a consultant, agent, broker, business partner or other third party) if the circumstances suggest that this could, in whole or in part, directly or indirectly

- be passed on to an official in order to influence official action or to obtain an undue advantage, or
- be granted to a person in the private economy in order to obtain an unjustified business advantage.

Staff responsible for commissioning consultants, agents, partners in joint venture companies or other business partners must, to a reasonable extent:

- ensure that such third parties are aware of these WEIG Group guidelines for fighting corruption;
- work towards adherence to these WEIG Group guidelines for fighting corruption by such third parties;
- check the qualification and reputation of such third parties carefully;
- agree suitable contractual provisions in order to protect the WEIG Group.

This applies particularly when such third parties are in contact with officials on behalf of the WEIG Group.

Every acquisition decision made by the WEIG Group – be it the acquisition of a majority or minority share in another company, the acquisition of significant assets in another company or the formation of a joint venture – must be preceded by a compliance audit.

#### 3.2 Gifts and other benefits

No member of staff may use his official position to demand, accept or obtain advantages or have them approved.

The following are generally not permitted:

- · Cash gifts
- Cash-like benefits such as vouchers or tickets with a value of more than EUR 25

The following are permitted:

- Generally common and occasional gifts (e.g. calendars, bottles of wine) with a value of less than FLIR 25
- Invitations to dinners or events of proportionate scope, as long as the local conventions and guidelines of the WEIG Group are respected

All gifts and invitations to dinners or events in excess of this shall be refused. Should gifts with a value of more than EUR 25 be delivered despite this, they shall be handed over to the Compliance Officer. He will decide whether the gift should be donated to a charity or given away in a prize draw within the company. In individual cases, the Compliance Officer can approve the gift as an exception, provided the gift is within a generally common scope and was not made for inappropriate purposes.

# B. DEALING WITH BUSINESS PARTNERS

#### 4. Money laundering

It is a declared objective of the WEIG Group only to maintain business relationships with reputable customers, consultants and business partners whose business activities are in line with the statutory provisions and whose financial resources come from legitimate sources. The WEIG Group does not intend to be exploited for illegal purposes and does not support any kind of money laundering.

Money laundering refers to the process of concealing the origin of financial resources originating from criminal activities such as terrorism, the drugs trade or bribery. This is done by smuggling 'dirty' money into the legal financial and economic cycle in order to give it the appearance of respectability and to conceal the actual origin or the identity of the owner.

All our staff are obligated to follow the laws regarding fighting money laundering strictly. It takes the vigilance of all members of staff to recognise and prevent suspicious forms of payment or customers or other transactions that could indicate money laundering. Staff must report any suspicious behaviour on the part of customers, consultants or business partners. In addi-

tion, all staff are obligated to adhere to all applicable regulations regarding recording and accounting for cash and other transactions, as well as contracts.

#### 5. Foreign trade

The WEIG Group follows all export control and customs laws, as well as regulations that apply to our business activities in the relevant countries.

In general, export controls are in place for the transfer of

- · goods and services,
- · hardware and software, and
- technology and certain information

across national borders, including via e-mail.

Export control laws may be applied in connection with direct or indirect exports from or to sanctioned countries or in connection with third parties against whom there are, for example, suspicions regarding national security, or who are involved in criminal activities.

Violations of these laws and provisions may lead to drastic penalties, such as financial penalties or official exclusion from simplified import and export processes (meaning interruption of the seamless supply chain).

All staff involved in the import and export of goods, services, hardware, software or technology are obligated to adhere to all applicable laws and provisions regarding economic sanctions, export controls and imports, and to all guidelines and processes contingent upon their business activities.



# C. DEALING WITH AUTHORITIES AND THE PUBLIC

We make every effort to work well together with all authorities and state offices.

#### 1. State orders

We always act transparently, honestly and correctly in all business relationships and in dialogue with government-, federal-, state- and district institutions or state-run companies.

We adhere to all laws and provisions regarding state procurement, including legislation prohibiting unduly influencing officials.

#### 2. Donations

Donations and sponsor money may only be granted within the scope of the relevant legal system and in line with the internal provisions applicable to this field. Political donations and contributions to political parties must be decided and disclosed by the Executive Board.

All donations must be transparent. This means, for example, that the identity of the recipient and the planned use of the donation must be known. The reason behind and purpose of use of the donation must be legally justifiable and documented.

Donation-like remuneration, i.e. payments that appear to be granted as remuneration for a service but significantly exceed the value of the actual service, violate the principle of transparency and are forbidden.

Donations that are not permitted include:

- donations to individual persons and profit-making organisations;
- · donations to private accounts;
- donations to organisations whose objectives are not reconcilable with the company principles of the WEIG Group;
- donations that damage the reputation of the WEIG Group.

#### 3. Sponsoring

All sponsoring activities must be transparent, recorded in the form of a written contract, designated for a reputable commercial purpose and reasonably proportionate to the counter-value offered by the event organiser.

Sponsoring refers to contributions in the form of money or material value made by the WEIG Group for an event that is organised by a third party and that thus in return offers the opportunity to advertise WEIG Group brands, such as through use of the logo, mentioning the name WEIG in an opening or closing speech, participation of a speaker in a podium discussion or the receipt of free entrance tickets for the event.

Sponsoring contracts that offer the WEIG Group advertising opportunities, as well as contributions paid to sector associations or membership fees paid to organisations that serve the business interests of the WEIG Group, are not considered donations.

Contributions may not be promised, offered or made in order to obtain unlawful business advantages for the WEIG Group or to pursue an inappropriate purpose.

Sponsoring for events that are held by individual persons or organisations whose objectives are not compatible with the corporate principles of the WEIG Group, or events that damage the reputation of the WEIG Group, is not permitted.



## D. DEALING WITH COLLEAGUES AND STAFE

A good atmosphere at the company is a significant key to our success.

#### 1. Management

Integrity and adherence to statutory provisions start at the top of the company. This **Code of Conduct** therefore applies equally to all management levels and project teams.

Every manager must fulfil certain organisational and supervisory obligations. Every manager bears responsibility for the staff entrusted to him. He must gain recognition and acceptance through exemplary personal behaviour, performance, openness and social skills. This means, for example, that every manager must constantly emphasise the importance of ethical behaviour and adherence to these guidelines in everyday business, make this a key topic and promote it through his own personal management style and through training measures. His role also includes creating clear, ambitious and realistic goals and holding himself to them in order to act as an example.

The manager is responsible for ensuring that, in his field of responsibility, no violations of the law that could have been prevented through appropriate supervision occur. He retains responsibility even when

individual tasks are delegated.

He must allow his staff as much personal responsibility and freedom to act as possible, while also making clear that adherence to the law and to the guidelines of the WEIG Group is the top priority at all times and in all circumstances. Staff can also approach the manager if they are unclear on anything relating to adherence to statutory provisions, or have any questions or professional or personal concerns.

However, this responsibility does not exempt the staff from their own personal responsibility. We need to work on adhering to the law and to the guidelines of the WEIG Group together. The list of specific management tasks below is intended to give staff an idea of which leadership and supportive actions they can expect from a manager.

In particular, the obligations of a manager include:

carefully selecting staff based on personal and specialist qualifications and suitability – the obligation of care increases with the importance of the task the member of staff is to undertake (known as the selection obligation),

- setting tasks precisely, fully and bindingly, in particular with regard to adherence to statutory provisions (known as the instruction obligation),
- clearly communicating the importance of integrity and adherence to statutory provisions in day-to-day business and instructing staff that violations of the law will not be tolerated and will result in disciplinary measures (known as the communication obligation).
- 2. Discrimination

A reputable working environment requires that no one is discriminated against. We therefore respect the personal dignity, privacy and personality rights of every individual and treat every member of staff with fairness and respect.

We work together with people of different ethnic backgrounds, cultures, religion, and ages, regardless of disability, skin colour, sexual orientation, ideology and gender.

In accordance with our basic company principles and the labour laws applicable in each case, the following in particular will not be tolerated:

 Discrimination by origin, religion, gender, nationality, sexual orientation, age or physical or mental disability

- · Sexual harassment of any kind
- Other personal attacks on individual persons

These basic principles apply to both working together internally and to behaviour towards external partners. We make decisions regarding staff, suppliers, customers, business partners etc. exclusively on the basis of factual considerations and never for other, irrelevant motives such as discrimination or coercion.

## D. DEALING WITH COLLEAGUES AND STAFF

#### 3. Safety in the workplace

The health and safety of the staff in their workplace is a major priority for us. We have committed ourselves to setting up and operating our business premises in such a way that our staff encounter a safe workplace.

Every individual shares responsibility for supporting the WEIG Group in its efforts to create safe working conditions. Responsibility towards staff and colleagues demands the best possible precautions against accident hazards and applies to:

- safety management and technical planning of workplaces, facilities and processes;
- personal behaviour during normal daily work

The line manager or plant manager responsible must be informed immediately of any safety violations or safety risks.

In particular, safety at work means that

- safety rules in the workplace are adhered to.
- the working environment meets the requirements of health-orientated design,
- the required protective clothing is provided and worn.

## F. DEALING WITH CONFLICTS OF INTEREST

WEIG Group staff are obligated to make their business decisions in the best interests of the WEIG Group and not based on personal interests.

#### 1. Conflicts of interest

It is important that all staff recognise and avoid any conflicts of interest that may occur as part of their professional activities at the very start.

Conflicts of interest occur when members of staff purse their own activities or personal interests at the expense of the interests of the WEIG Group. Other points of conflict can grow out of business relationships with or investment in a competitor or customer of the WEIG Group, as well as where staff take on secondary employment that prevents them from fulfilling their role at the WEIG Group in accordance with their obligations.

Every member of staff must inform his line manager of any personal interest that could exist in connection with the execution of his official activities.

In particular, transactions in the name of the WEIG Group with

- · family members,
- spouses,
- · friends, or
- companies that belong to a member of one of the aforementioned groups

without the prior permission of the line manager are forbidden.

The WEIG Group expects its staff to avoid conflicts of interest in their private lives, too. Staff who wish to execute private orders from companies with whom they deal as part of their professional activities for the WEIG Group must be aware of the following:

- Staff who award contracts for the WEIG Group must inform their line manager of private business relationships with business partners of the WEIG Group with an order volume of over EUR 5.000.
- Private commissioning of business partners of the WEIG Group should always be conducted in writing.
- It must always be ensured that the business partner issues a written invoice.

#### 2. Competition with the WEIG Group

Any kind of activity that could represent a competition situation with the WEIG Group is forbidden.

While employed at the WEIG Group, a member of staff may not manage a company or work for a company that is in competition with the WEIG Group, and may not pursue any activities that compete with the WEIG Group.



## F. DEALING WITH CONFLICTS OF INTEREST

In particular exceptional cases, it is possible that the member of staff may be given written permission in advance.

#### 3. Secondary employment

The manager responsible must be informed of the acceptance of any secondary employment and written permission must be gained.

The following exceptions apply:

- Work in a society for which an expense allowance is paid
- Occasional work as an author
- Presentations and comparable occasional activities

Permission to pursue secondary employment cannot be granted if the employment is in conflict with the interests of the WEIG Group. Secondary employment can be forbidden if the member of staff is officially involved with the company in question. Permission already granted can be retracted if such reasons exist.

#### 4. Shares in third-party companies

Staff who directly or indirectly hold or acquire a share in a competitor company must inform the Human Resources department of this if the shares give them the opportunity to influence the management

of this company. In general, the opportunity to influence management can be assumed when the share exceeds a proportion of 5% of the total capital.

Staff who directly or indirectly hold or acquire a share in a business partner of the WEIG Group or a company in which a company in the WEIG Group holds shares must also inform the Human Resources department of this if the member of staff is officially involved with the company in question or will hold a mandate in the company. For shares in companies listed on the stock exchange, this only applies if shares amounting to over 5% of the total capital are held.

Once it has been informed of shares held in third-party companies, the WEIG Group can take suitable measures in order to eliminate any conflict of interest.

## F. DFALING WITH COMPANY PROPERTY

In its offices and business premises, the WEIG Group has a great deal of systems and equipment such as telephones, photocopiers, computers, software, internet/intranet, machinery and other work equipment such as e-mail and answerphone systems. These may only be used for company purposes and not for personal use. Exceptions and payment, if applicable, can be organised locally, provided that the use of the equipment

- · is not linked with any illegal activities,
- does not cause any conflict of interest or the appearance of such a conflict,
- does not lead to appreciable additional costs, disruption to the business of the WEIG Group or other negative consequences for the company, such as through a conflict of interest regarding the professional duties of the member of staff

On no account may information that supports or incites racial hatred, glorification of violence or other criminal acts, or whose content is sexually indecent given the relevant cultural background, be accessed or passed on.

No member of staff is permitted to use devices owned by the WEIG Group to produce recordings, files, image or sound documents or duplicates without the permission of the line manager where this is not immediately linked to the professional activities of the member of staff.

# G. DEALING WITH INFORMATION

#### 1. Recordings and financial integrity

Open and effective communication includes correct and truthful reporting. This applies equally to relationships with staff, customers, business partners, the public and all state offices.

The company is obligated to use appropriate processes and checks to ensure that transactions are only executed in the form approved by the management. In addition, the WEIG Group must take preventative measures against unauthorised use of its property and ensure that cases of unauthorised use are recognised. All WEIG Group staff must ensure that the books, files and recordings produced by them as part of their official activities or under their responsibility in any other way

- · are complete and correct,
- reflect every transaction and all expenditure faithfully and
- are produced on time and in accordance with the applicable rules and standards,

regardless of whether or not the information is intended for publication or submission to a state office.

These books and recordings include all data, audit certificates and other written documentation necessary for financial re-

porting and fulfilment of disclosure obligations, as well as documents that are collected for other purposes. This also includes all internal accounts (including expense accounts).

#### 2. Confidentiality

The principle of confidentiality applies to internal confidential or protected information of the WEIG Group that is not intended for public knowledge.

Non-public information from or about suppliers, customers, staff, agents, consultants and other third parties must also be protected in accordance with the legal and contractual requirements.

The following in particular may be confidential or protected information:

- Details of the organisation and facilities of a company, prices, turnover, profit, markets, customers and other business matters
- Information about production, research and development processes
- · Figures from internal reporting
- Business secrets

The obligation to maintain confidentiality applies beyond the end of the employment relationship, as the disclosure of confidential information, regardless of when it occurs, could harm the business of the WEIG Group or its customers.

If you have any questions or concerns in connection with how personal data is handled, please contact the Privacy Officer for advice.

#### 3. Privacy

Personal data may only be collected, processed or used where this is necessary for defined, clear and legal purposes.

In addition, personal data must be stored securely and may only be transmitted under the necessary precautions. A high standard must be guaranteed for data quality and technical safeguarding against unauthorised access. The use of data must be transparent for the persons affected. Their rights to information and, if applicable, to objection, blocking and deletion must be observed.

Every member of staff shall adhere to laws and regulations regarding the storage and use of employees' personal data and the data of third parties, such as customers or business partners.

You can find more information on privacy in our **Privacy Guidelines**.



### H. IMPLEMENTATION OF THIS CODE OF CONDUCT

The management of the WEIG Group actively promotes communication of this **Code of Conduct** throughout the company and ensures that it is implemented.

#### 1. Violations

The WEIG Group takes violations of this **Code of Conduct** very seriously.

All WEIG Group staff are obligated to behave in accordance with this **Code of Conduct**.

A violation of this **Code of Conduct** and of laws and regulations that are the subject of this **Code of Conduct** can have significant consequences.

In particular, a violation may result in:

- internal disciplinary measures such as an official warning;
- · termination of the employment contract;
- · the offence being reported to the police.

#### 2. Questions and complaints

It is legitimate for staff to have concerns or questions regarding existing business behaviour.

The first person to talk to about such matters is usually the member of staffs line manager. In addition, questions and concerns can also be discussed with the Compliance Officer appointed by the WEIG Group.

The Compliance Officer

- is the contact person for all questions related to this Code of Conduct.
- supports the implementation of this
  Code of Conduct and
- monitors adherence to this Code of Conduct.

The Compliance Officer will treat all questions, information and suggestions strictly confidentially and pursue them in the way required for the matter in question. If requested, the member of staff can receive information on how his information has been treated and which measures, if any, have been implemented as a result.

No member of staff who asks the Compliance Officer for advice or informs him in good faith of incorrect behaviour by other members of staff must fear any disadvantage as a result – with the exception of any sanctions resulting from any violations of this **Code of Conduct** he himself has committed. Reprisals and discrimination suffered in this context will not be tolerated

#### 3. Your contact person

The Compliance Officer at the WEIG Group and your contact person for any questions in connection with this Code of Conduct at the time this brochure was printed:

#### Mr Michael Buchner

Polcher Straße 113 D-56727 Mayen Phone +49 (2651) 84-175 Fax +49 (2651) 84-44175 compliance.beauftragter@weig-karton.de

Please keep up to date with any changes to this role.

#### Note:

The WEIG Code of Conduct is an internal document. Third parties cannot use it as a basis to derive any claims, nor to demand a particular type of behaviour.

We have used the masculine form as a neutral term in order to simplify the language in our report. We ask for your understanding.

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# Legal notice:

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