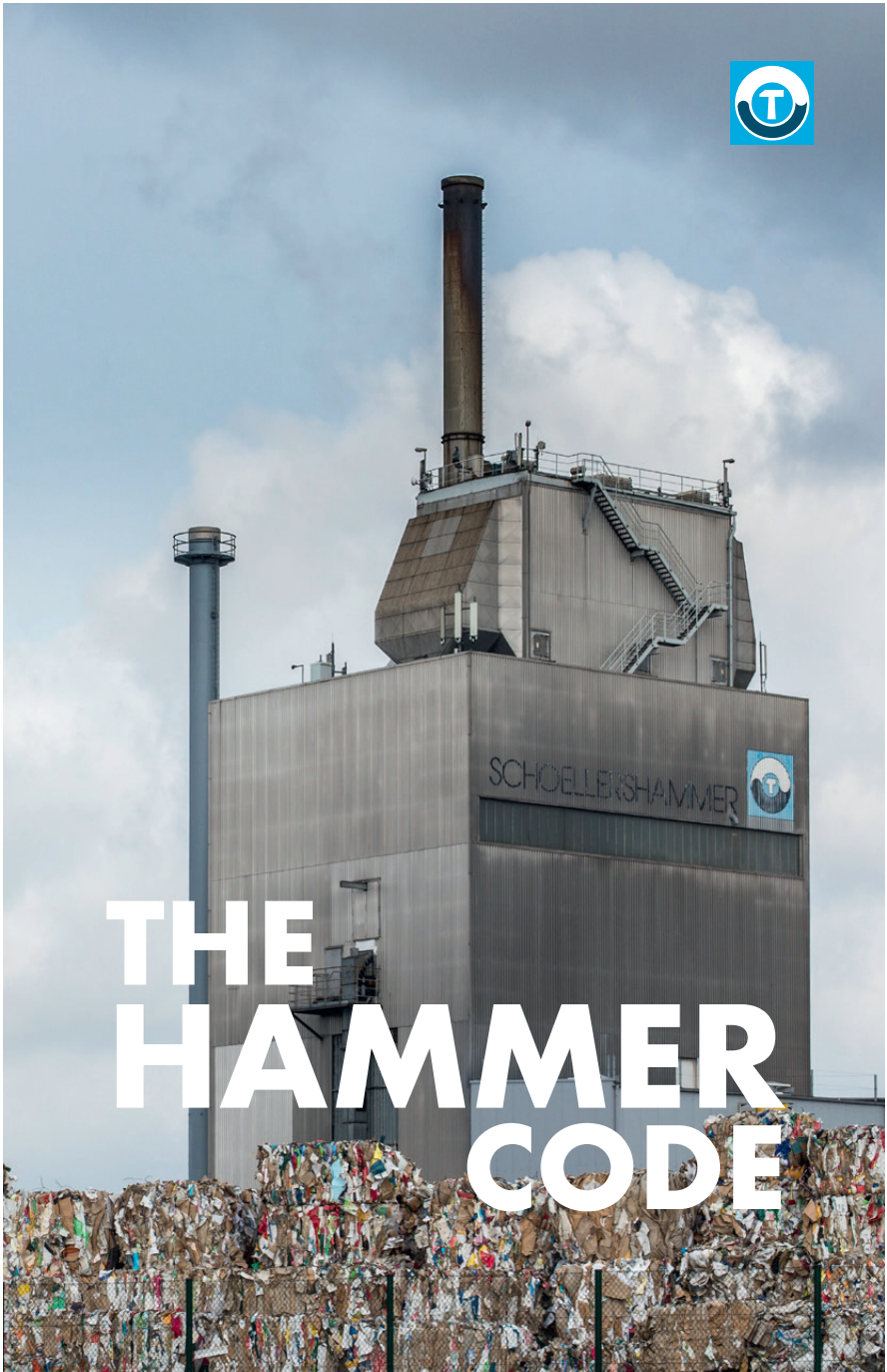




# THE HAMMER CODE





SCHOELLERSHAMMER

# CODE OF CONDUCT

SCHOELLERSHAMMER GmbH & Co. KG is a family business now in its seventh generation. Integrity and respect for people and the natural environment are the cornerstones of our corporate policy.

Schoellershammer is founded on values that must be lived in our everyday life, so we are therefore establishing this Code of Conduct which incorporates the most important values and principles of the company.

The Code of Conduct does not seek to replace any legislation, company policies or agreements. In case of doubt, the regulations that provide greater protection for our stakeholder groups and better serve the interests of the general public shall apply.

The shareholders, advisory board, management and employees of SCHOELLERSHAMMER GmbH & Co. KG shall uphold the following principles.



The Advisory Board  
represented by the Chair  
Wolfgang K. Meusburger



Bernd Scholbrock  
– Manager –



The Works Council  
represented by the Chair  
Markus Haas



Armin Vetter  
– Manager –



Alexander Stern  
– Manager –

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# 01 VALUES AND PRINCIPLES

We align our economic activities with ethical values and principles. These include, in particular, personal integrity, the implementation of fair working conditions, respect for human rights and environmental protection.

# 02

# LAWFULNESS AND INTEGRITY

We comply with all valid legislation and legal norms.

In particular, we comply with the regulations and prohibitions relating to corruption, bribery, fraud and blackmail. We do not present or accept gifts, invitations, payments or other benefits that could influence our business relationships.

Schoellershammer shall ensure transparent and comprehensible accounting. We will endeavour to prevent any fraudulent or deliberately misleading accounting practices.

We manage the assets entrusted to us professionally and with due care and attention, and shall use them exclusively for activities that serve the corporate purpose. No company installations or property will be used for private purposes without express authorisation.

# 03

# ANTI-TRUST AND COMPETITION LAW

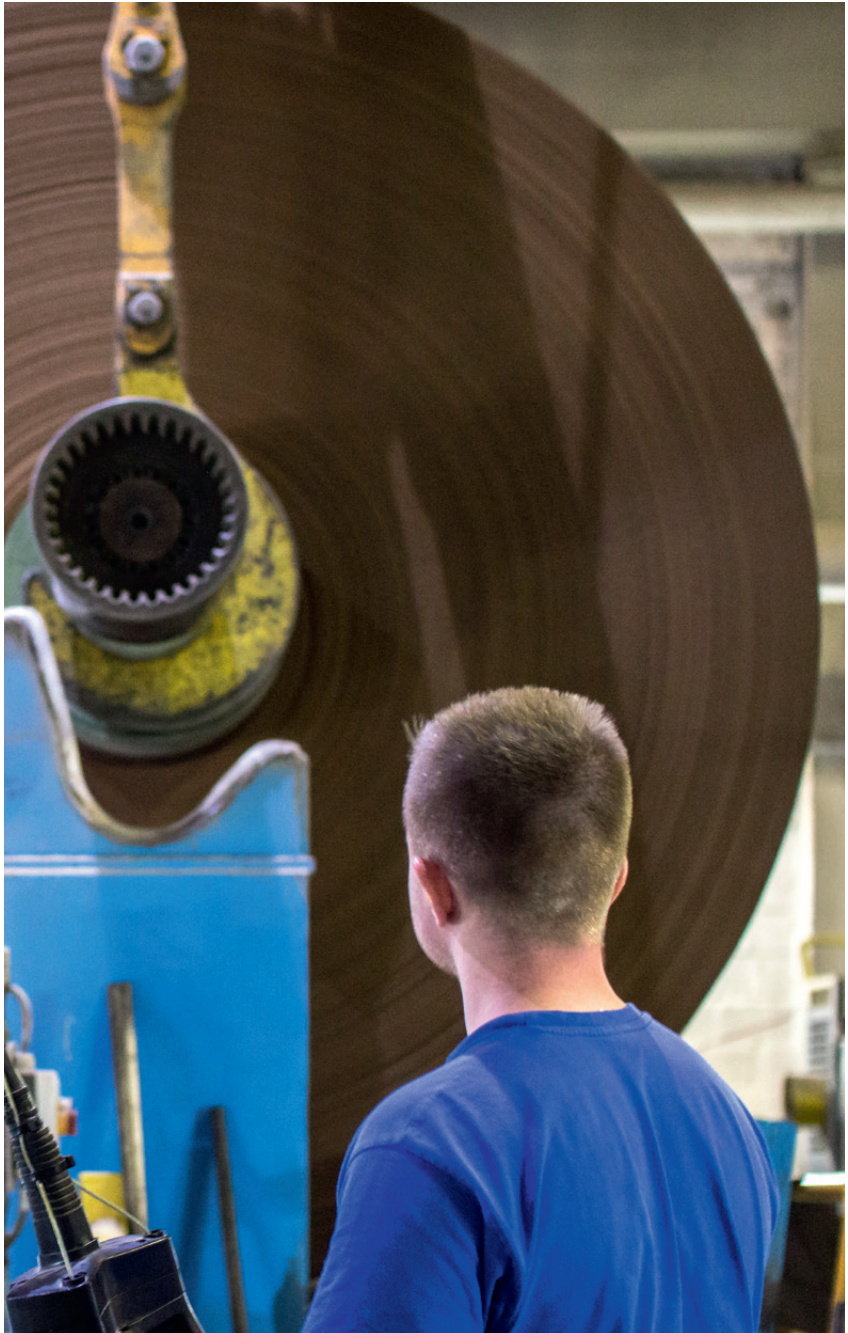
Schoellershammer is committed to fair competition and shall comply with all the relevant competition laws. These include, in particular, domestic and foreign anti-trust laws and laws against unfair competition.

At Schoellershammer we cultivate a climate of fair and cooperative relationships, and support each other in attaining our goals. We promote the professional development of our employees and respect their desire to achieve a work-life balance.

We uphold equal opportunities and oppose any discrimination based on social or ethnic origin, gender, age, nationality, political opinion, religion, sexual identity or disability.

# 04

## WORKING CONDITIONS





# 05 RIGHTS OF EMPLOYEES

Schoellershammer respects the employees' rights to freedom of association and the right to co-determination and collective bargaining through its respective representatives and shall ensure this right is not impaired.

Schoellershammer complies with statutory maximum working hours. Overtime is on a contractual and voluntary basis, and will be remunerated or compensated by time off in lieu.

Schoellershammer pays its employees the legal or collectively agreed minimum wage, whichever is higher.

We comply with youth protection legislation.

# 06

## HEALTH AND SAFETY AT WORK

At Schoellershammer, we provide a safe, healthy and clean working environment and take all the necessary measures to avoid accidents and hazards to health, and train our employees accordingly. We expect our employees to comply with all the safety regulations, even when under time pressure.

Alcohol and drugs are prohibited in the workplace for reasons of health and safety at work. Employees are not allowed to work if their perception or performance is impaired by medication or intoxicating substances.

Schoellershammer guarantees that products have no negative effects on the health of consumers, and complies with the relevant legislation and guidelines.

All our papers are approved for food contact under the German Federal Institute for Risk Assessment (BfR) recommendation XXXVI, and comply with EU Directive 94/92/EG with respect to the heavy metal content.

# 07 CUSTOMER HEALTH AND SAFETY

# 08

# DATA PROTECTION AND CONFIDENT- IALITY

We protect personal data against unauthorised access, and comply with the General Data Protection Regulation when collecting, processing or using personal data. We communicate these requirements both internally and externally to our business partners.

The disclosure of any confidential information and the publication of such is prohibited.

# 09 SUPPLIERS

Schoellershammer works exclusively with suppliers who comply with the company's quality, transparency, social and environmental standards.

Suppliers are required to sign the Schoellershammer supplier code when accepting orders, shall adhere to the company's principles and shall also communicate such requirements to their own suppliers.

The Schoellershammer quality management system is certified in accordance with DIN EN ISO 9001. We also require our suppliers to implement a systematic approach to quality assurance.

# 10 ENVIRON- MENTAL PROTECTION

Schoellershammer considers environmental protection as an important corporate objective.

As an energy-intensive company, we implement an active environmental policy to reduce the consumption of raw materials, energy and water in order to cut CO<sub>2</sub> emissions. This also includes our logistics operations.

Schoellershammer's energy commitment is certified in accordance with DIN EN ISO 50001.

We use 100% recovered paper for the production of our flutings and liners. Our products and supply chain are FSC certified.

We all work together to protect the environment, use resources sparingly and to minimise the environmental impact. We expect the same from our suppliers.



# 11

# SOCIAL RESPONSIBILITY AND HUMAN RIGHTS

We treat colleagues, business partners and residents with the appropriate care and respect, and we will always seek consensual solutions to any disputes.

We uphold human rights and do not accept any forms of child or forced labour.



Schoellershammer is committed to the United Nations Universal Declaration of Human Rights, to the core labour standards of the International Labor Organization (ILO) and to the principles of the United Nations Global Compact (UNGC).

# 12 INTER- NATIONAL STANDARDS

We undertake to comply with the principles set out in this Code of Conduct, and the management shall investigate any violations.

# 13

## COMPLIANCE WITH THE CODE OF CONDUCT

# 14 CONTACTS

The Code of Conduct was developed by the Management team in consultation with the Advisory Board and the Works Council. In the event of potential violations of this Code of Conduct, please contact the following persons:

**ALEXANDER STERN**

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Phone: +49 2421 557177  
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Chair of the Works Council



**THANK YOU!  
HAMMER-TEAM**