

Code of Conduct ■

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Dear Colleagues and Readers,

in a globalized world, it becomes more and more important for the community to know the legal framework. Our everyday life is characterized by numerous regulations. There is barely any area of life which is free from state of influence, but why are we following all the rules and laws?

A community is only ‚successful‘ if it defines values and adheres to rules and laws. This is the basis for a smooth cooperation. Members of a community are therefore obliged to comply with rules and laws.

As a group of companies operating internationally, HUBER Packaging Group (hereinafter HUBER or HUBER Group) not only complies with the relevant national laws and regulations, but also maintains business relationships based on trust and honesty with all partners. Trust and honesty are the most important headstones of a corporate partnership. Even small obstacles become insurmountable barriers, if these basic conditions are not met.

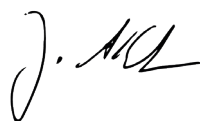
HUBER is committed to responsible business activities in all countries in which the HUBER Group operates. Global operations are in line with the United Nations Universal Declaration of Human Rights and agree with International Labor Organization (ILO) agreements and the Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

We wish to provide you with legal regulations for your actions at HUBER. Our Code of Conduct should serve as reliable guide for our daily actions. The Code of Conduct summarizes the rules of conduct for all employees and business partners of HUBER and serves to prevent violations of legal provisions. We expect you to comply with the Code of Conduct in your actions. Anyone who violates the Code of Conduct will damage the reputation of the company and can cause serious economic damage. We therefore urge you to ensure compliance with the Code of Conduct in your work environment, to openly address violations and thus to contribute to long-term success.

The Code of Conduct applies to all HUBER employees and business partners. You can find our valid Code of Conduct at:
<https://www.huber-packaging.com/english/company/code-of-conduct/>



Martin Lüer, CEO



Johannes Alberti, CFO

1. Business Ethics

1.1. Compliance with National Laws and Regulations

Legal conformity is the top priority. Therefore, compliance with laws and regulations is of paramount importance. HUBER adheres to the principles of corporate responsibility towards society. All employees must comply with the national laws of the various countries in which HUBER conducts business. Executives are a role model and ensure their employees always obtain to a lawful behavior. Executives must make it clear to their employees that compliance with laws and internal policies is always a top priority under all conditions. Violations of legal provisions may result in penalties for employees such as disciplinary actions, as well as liability for damages and even penal consequences.

1.2. Corruption

The HUBER Group does not tolerate any form of corruption, bribery, corruptibility or other unlawful granting of benefits. All HUBER employees have to refrain from actions that could damage the trust of our business partners and the public towards HUBER. Organs of the company and employees are prohibited from asserting improper benefits or paying or granting bribes to public officials or third parties for the purpose of obtaining and maintaining business or solicitation for contracts. All employees are obliged to comply with the legal requirements regarding antitrust law and insider trading.

Employees of HUBER are encouraged, not to offer, nor accept, gifts or favors to/ from suppliers, customers and other business partners. There are no reservations against small freebies (gifts, entertainment invitations) that are offered unsolicited and not frequently, as far as their acceptance or offer is not affecting decisions made in the name of HUBER. If the employee has concerns or is uncertain about the value of a gift, his supervisor should be informed or asked for advice.

2. Socially responsible Working Conditions

HUBER ensures good and safe working conditions and therefore adheres to the following working principles at all locations:

2.1 Respect for Human Dignity

Human dignity is, as the Federal Constitutional Court stressed in its law case again and again, the most important decision of the constitution. The constitution states assumes that human dignity is inherent to man by his mere existence. Human dignity can therefore not be taken from man, but his right of respect which every single person has as a legal personality and which belongs to him by virtue of his humanity can be violated. The protection of human dignity therefore means protection against violation of this right of respect. HUBER respects the human rights of its employees and ensures good and safe wor-

king conditions at all company sites.

2.2 Discriminatory Bans

The ban of discrimination prohibits people from being treated unequally for certain characteristics which leads to discrimination, i.e. discrimination or disparagement of individuals, without any objective justification. Especially, neither sex, race or ethnic origin, religion or philosophy of life, handicap, age or sexual identity may be used as distinguishing features.

At HUBER we offer employment to employees of different backgrounds. For this reason, it is important to observe non-discrimination. Sexual harassment, bullying and discrimination violate the personality and dignity of the affected employees. This is stated in the General Equal Treatment Act. At HUBER, we want to create a working atmosphere based on mutual respect and tolerance.



Therefore, no sexual harassment, bullying or discrimination in the workplace is tolerated.

Affected employees can contact their executives or the Human Resources department to have a confidential conversation.

2.3 Fair Remuneration and Prohibition of Forced Labor

Any form of forced labor is also rejected by HUBER. No employee may be forced into occupation. Any kind of physically abusive disciplinary action is prohibited. Working hours may not exceed the maximum of allowed working hours of national legislation.

The HUBER Group expects its business partners, as well as itself, to pay employees appropriate compensation. Especially, it is important to comply with the statutory provisions on the minimum wage.

2.4 Ban of Child Labor

Child labor is not tolerated by HUBER. The term „child“ refers to all persons under the age of 15 or school-age persons. This does not apply to our student interns and trainees. Holiday workers may not be adjusted by an age under 18. HUBER expects the ban on child labor to be respected.

2.5 Freedom of Association

HUBER respects the employees right of freedom of association, joining unions, appointing representation and collective bargaining. The national laws must be observed. The observance of the freedom of association is also expected of all business partners.

3. Health and Safety

3.1 Employees

The health and safety of HUBER's employees are particularly important to HUBER. We are committed to provide a safe and healthy work environment for our employees and business partners. HUBER Group companies have a comprehensive health and safety management in order to achieve continuous performance improvements in this area. All employees must adhere to regulations regarding protective equipment at work, such as safety shoes or ear protection. In addition, safety information regarding hazardous substances, fire and escape routes must be followed.

3.2 Product Safety

It is very important to HUBER that products are safe for their customers throughout the entire service life and for their operating and maintenance staff. The HUBER Group and its business partners will work closely together to achieve continuous performance improvement in this area.

Our goal - „Safety First“:

Our goal is to return home as healthy as we left.



4. Protection of Environment



Environmental protection is the safeguarding of the future and therefore of high priority. Protecting the environment means using raw materials and energy more efficiently, avoiding waste and constantly improving the recovery of the materials used - in short, using all resources responsibly.

We face this challenge as an industry and as a responsible company. In order to achieve its internal environmental goals, HUBER works closely with suppliers and customers to ensure that their own products have as little impact on the environment as possible over their entire life cycle.

5. Data Protection, Social Media, Secrecy

Numerous regulations on data protection (e.g. GDPR) as well as national and international privacy laws apply to HUBER. These not only regulate the handling of confidential or private information (personal data), but also their collection, storage, modification, transmission, blocking, deletion, publication and use. HUBER complies with the relevant regulations and laws of all countries in which we operate.

Due to the increasing importance of digital media and social networks, it is important to respect national and international data protection regulations. It should not be forgotten that electronic communications are for eternity and they are transmitted records of our communications. Any publication of communications may have a significant impact on HUBER's reputation. For this reason, we may not disclose HUBER's confidential information unless we have permission to do so.

Similarly, the confidentiality requirement applies to internal confidential or proprietary information. Every HUBER employee must submit a confidentiality statement.

The obligation of confidentiality applies beyond the end of the employment relationship. HUBER also respects the intellectual property rights of its business partners. Business secrets of HUBER must be kept and used strictly confidential. In the event of any uncertainty when dealing with personal data, the HUBER Data Protection Officer is available for questions.



6. Competition and Antitrust Laws

All competition rights and antitrust laws of all countries in which HUBER operates must be complied with. HUBER is committed to free undistorted competition and rejects any unlawful distortion of competition by companies. Especially, price fixing with competitors is prohibited.

7. Conflicts of Interest

The reputation of HUBER depends on employees recognizing conflicts of interest, judging them appropriately and derive true consequences of action. A conflict of interest is given, if there is a contradiction between the personal interests of the employees or a related person (e.g. spouse, child) and the interests of HUBER. A conflict of interest is for example given, if employees or business partners are getting favored based on personal sympathies or if business decisions are taken based on personal interests instead of the company's interest.

Already the appearance of such a conflict can be harmful for the reputation of HUBER. If employees recognize a conflict of interest or if they cannot exclude the possibility of a conflict of interest, the supervisor is the person to contact.

8. Import and Export Laws

HUBER expects from its business partners, as well as from itself, a strict attitude towards the valid import and export control laws for the transport and shipment of goods.

Closing Words

The reputation and image of a company is shaped by the behavior of each individual employee. Illegal behavior can cause significant harm to a company. For this reason, all HUBER employees are encouraged to comply with laws and regulations.

This Code of Conduct must be adhered to by all HUBER Group employees. The Code of Conduct is an integral part of the employment contract and must be handed out to every new employee and apprentice at the beginning of the employment relationship. Employees who violate binding behavioral rules are subject to disciplinary action; this goes up to the point of termination of the employment by an extraordinary dismissal.

If you have the impression that rules of conduct or legal requirements are not met, we encourage you to speak openly. Your contact person in this case is your supervisor or the Human Resources department.

All HUBER employees and business partners can access our Code of Conduct at any time via the following link: <https://www.huber-packaging.com/english/company/code-of-conduct/>

Inception of the Policy

The Code of Conduct of the HUBER Packaging Group comes into effect in July 2019 and replaces the previous Code of Conduct.

We live packaging.



www.huber-packaging.com

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