

Code of Conduct of Process-Pack International GmbH

Foreword by the Management:

In the eyes of the global food industry our group of companies, to which Process-Pack and its daughter companies belong, have a solid reputation for innovation, reliability and safety, and the actions and behavior of every single staff member make a vital contribution to this.

Respect for and compliance with the law and regulatory requirements and with our own internal rules (compliance) have been important in building the confidence that our customers, suppliers and business partners now show in our group of companies.

The Code of Conduct below sets out the general requirements, criteria and orientation for our everyday work and therefore helps to enhance our corporate image. It applies worldwide to all Process-Pack employees as well as to all affiliated undertakings.

Process-Pack is committed to its corporate social responsibility and makes a voluntary contribution to sustainable development that goes beyond legal requirements. At Process-Pack, Corporate Social Responsibility (CSR)/Environmental, Social und Governance (ESG) stands for responsible corporate action in our business activities, from ecological aspects to the relationship with our employees.

In cases where legislation or regulations in force in individual jurisdictions outside Germany contain more stringent requirements, these requirements must also be taken into account by the companies, their management and staff in the countries concerned. This Code of Conduct is / will be supplemented by guidelines containing specific recommendations for measures to be taken in individual business sectors and situations.

Together, we are committed to a policy of respect for the law and regulatory requirements and emphatically repudiate any form of conduct that is illegal or interferes with competition.

If you have any questions about this Code of Conduct, you are welcome to contact us, your supervisors or the person/system named in section 11 (Chief Compliance Officer (CCO), Local Compliance Managers (LCM), IT-Tool for (anonymous) tips) confidentially at any time.

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1. Legal Conduct and Compliance with Current Legislation

Process Pack International GmbH (hereafter called 'Process-Pack') sees integrity as being crucial for its continuing business success. For us, compliance with laws and regulations is a priority, and so we expect every employee to act in accordance with these. Non-compliance may lead not only to criminal or civil prosecution for individuals, but also to sanctions taken against our group of companies. If employees break the law or fail to comply with our internal guidelines, they will face disciplinary action in accordance with employment legislation.

2. Cooperation with Customers, Suppliers and Other Business Partners

2.1 Fair Competition

We are committed to fairness and integrity in our competition for market share. Process-Pack will not accept any order or contract that involves violating laws or regulations that are intended to ensure fair competition. In particular, cartels of any kind, such as agreements with competitors on prices, conditions, or the allocation of customers or territories, are prohibited. Also, if Process-Pack ever reaches a dominant market position in specific areas, it will not be abused.

2.2 Preventing Corruption

When competing for our customers' business we are conscious of the high quality of our products and services and of the reputation that our group of companies, to which Process-Pack belongs, has developed in the global food industry since 1922. The use of corrupt practices to generate business is strictly prohibited.

A brief overview of the most important requirements can be found here. Further requirements are set out in the global anti-corruption guideline.

A) Conflicts of interest

Private and professional interests must be kept separate. Avoidance through prevention is the best measure. Should a conflict of interest nevertheless arise, this must be resolved or minimized through transparency and documentation.

B) Gifts and benefits

Under the Anti-Corruption Policy, gifts and benefits in excess of € 10 are only permitted to a limited extent if they are made legally, to a reasonable extent and without unlawfully influencing decisions. Gifts of money are not permitted under any circumstances.

Particularly strict requirements or a zero rule apply to public officials and PEPs.

2.3 Protection of Intellectual Property and Commercial Secrets

In order to maintain and consolidate our technological leadership we need to improve our products and processes continuously. This includes protecting our technology through patents and other industrial property rights. We do expect from each of our employees an unconditional commitment to the protection of our intellectual property and know-how. All staff members are responsible for ensuring that no information relating to our intellectual property and know-how is divulged to third parties.

Similarly, we also respect the intellectual property rights of others just as we expect others to respect ours. No breach of the intellectual property rights of third parties will be tolerated.

Commercial secrets must be treated in confidence and subject to strict secrecy. They may be divulged to staff members only in connection with their authorized business activities.

2.4 Integrity Check

Employees who are responsible for the engagement of high risk business partners must take appropriate measures to ensure that

- the law abiding, the qualifications and reputation of third parties are carefully checked prior to entering into a business relationship and
- the interests of Process-Pack are protected by appropriate contractual conditions in written form.

A high-risk business partner is a business partner that poses a high risk of corrupt practices due to its geographical location, type of business or previous violations of compliance regulations. Critical types of transactions are above all goods and services whose value is difficult to measure.

3. Treatment of Employees

3.1 General Principles

Process-Pack bears responsibility for its entire staff. We respect the personal life of each individual employee. Outstanding performance by our employees is crucial to our commercial success. We work with people of differing ethnicities, cultures, religions and ages without regard to disability, skin color, ethnicity, sexual orientation or gender. Every employee is given the same opportunities and possibilities for personal development.

Hiring, compensation, terms and conditions of employment, and access to training and promotions are based solely on the requirements of the job. Process-Pack is committed to equal opportunities for women and men.

If we identify any difference in compensation between men and women, for example, we will actively address and correct them.

3.2 Occupational Health & Safety

Safety in the workplace and the physical well-being of our employees are absolute priorities for us. Workplace safety is guaranteed through compliance with occupational health and safety regulations and practices. Employees must immediately notify their superiors, the CCO or LCMs of any accidents, injuries or dangerous equipment, practices or working conditions. Compliance with occupational health and safety regulations is mandatory. Every staff member is called upon to report any hazards so that their causes can be eliminated.

3.3 Workplace Conduct

We will not tolerate any form of discrimination, sexual harassment or other abuse within our group of companies. All employees are treated equally both by their superiors and by their colleagues, regardless in particular of their ethnicity, skin color, gender, sexual orientation, religion, national or social background, personal circumstances, state of health or age.

Insulting, abusive or humiliating behavior by staff members or customers, whether of a verbal, physical or visual nature, is unacceptable. Speak out if you feel the behavior of a superior, another employee or a customer is offensive. PPI strongly encourages you to report any harassment to the local HR department, the CCO or the LCMs.

4. Environmental Protection

Process-Pack places importance on sustainability and innovation. In addition to compliance with laws and other standards, this means constant optimization of products and technologies in terms of responsible resource management, prevention of environmental damage, compliance with environmental laws and standards in development and production, and constantly strives to achieve new environmental protection improvements. In the development of products and technologies, Process-Pack aims to identify hazards and environmental risks at an early stage and to reduce resource consumption and increase efficiency, thereby improving its internal ecological footprint. In addition, each employee is responsible for reducing environmental impact by acting in an environmentally conscious manner in their day-to-day work.

5. Data Protection and Confidentiality

The requirements of all relevant national data protection legislation must be observed when dealing with personal data of any kind. This applies to the protection of all personally identifiable information on record, in particular personal information on customers, suppliers and business partners, as well as employees of the company, which is not in the public domain. In cases of doubt the relevant Data Protection Officer should be contacted.

6. Use of IT Systems and IT security

Process-Pack's IT facilities and IT systems may only be used for legitimate business purposes and in accordance with company agreements. Unauthorized use of e-mail, the internet and telecommunication facilities may have legal consequences, in particular employment law measures.

All staff members should bear in mind that e-mails constitute business records which may be regarded as evidence in court proceedings and, as a result, made known to the public.

Process-Pack may, if legally permissible and necessary for commercial reasons, access employees' e-mails and monitor their internet activities.

Process-Pack uses modern IT tools and has established internal processes to ensure good IT security.

7. Protection of Company Property

Company property may only be used for business purposes and in accordance with company and contractual agreements. All employees must ensure that any company property entrusted to them is treated properly and protected from loss, damage and theft.

8. Customs and trade regulations

Process Pack ensure that all transactions comply with national and international customs and trade regulations. We are committed to providing complete and accurate information for customs processing. Violations of customs laws can result in civil and criminal penalties. It is our responsibility to report all shipments to customs in a timely and accurate manner. We adhere to with controls and embargoes. To this end, we carry out ongoing reviews of the sanction's lists, for example.

9. Prevention of money laundering

We only work with clean means and flows of payment. It is our responsibility to carefully document transactions and ensure that all financial activities are transparent and traceable. We take our responsibility seriously and are committed to ensuring that our company is not misused for illegal purposes. To minimise this, we do not accept cash payments from customers and do not use suspicious and unusual payment methods.

10. Compliance with Code of Conduct

Every employee receives a copy of this Code of Conduct. The principles and rules of conduct set out in it reflect the reality of everyday working life within the company.

It is the responsibility of (local) management, including in their role as LCMs, to ensure that all employees are aware of and comply with this Code of Conduct.

Every employee is entitled and encouraged both to ask questions about this Code of Conduct and to report to his superior, the CCO or LCMs any breach or suspected breach of the Code which comes to his attention.

If you are in any doubt about the compliance of your actions, please ask your superior, the CCO or your LCM for advice. The following questions may help you to assess your actions and reach a decision:

- Do I consider my behavior to be legal?
- Would I accept similar behavior from a business partner or colleague?
- Are my actions sustainable and will they stand the test of time?
- Will my conduct also seem right and well-thought-through in retrospect?
- Do I want to read about my behavior in the newspaper?
- Would my conduct also have stood up to public discussion taking into account all of the circumstances?

11. Compliance organization, personal responsibility and whistleblowing tool

Process-Pack and its management regard the organization and perception of compliance as an important responsibility.

This means that, regardless of other requirements, every individual employee and the managements of the local companies are responsible for the implementation of this Code of Conduct and of the principles of compliance.

In cases of doubt regarding breaches or suspected breaches, every employee is called upon to seek clarification. Employees' superiors, the CCO and LCMs are available for this purpose.

It is also possible to submit (anonymous) information via a group wide IT tool at: <https://polyclip.hinweisgeber-systeme.de/>.

12. Development and Training of Employees

Training represents a significant component of the Process-Pack compliance program and makes it possible to ensure that all employees understand their responsibilities under this Code of Conduct. Employees receive one or more compliance trainings due to the amount of their risk exposure.

New employees are familiarized with the principles of conduct when they are recruited. The participation of these trainings has to be documented and filed.