

# Code of Conduct

WALTHER Faltbox Group  
Hoogeweg 136  
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Our Code of Conduct is the binding guideline for all employees of WALTHER Faltbox Group and our suppliers. It contains our shared values for acting ethically, with integrity and in compliance with regulations.

Compliance with the Code of Conduct is the personal responsibility of each and every individual. We do not tolerate violations of the Code of Conduct.

We are convinced that ethical and honest conduct is essential for our business activities. We therefore also expect our suppliers and business partners to comply with this Code of Conduct.

## 1. We take a personal stance

Together, we bear responsibility for good cooperation, the working and the physical environment as well as society. We treat all people as equals with fairness and respect.

### 1.1. Human Rights

We are fully committed to our human rights responsibilities and consider the relevant national and international legal requirements as a matter of course. We endorse and take into account the guiding principles of the UN Global Compact for business and human rights.

We firmly reject and take a stand against any form of physical or psychological violence. This also applies to any form of forced labour. We also reject child labour and any form of exploitation of children and young people.

### 1.2. Value-based Leadership

Value-based leadership enables us to build trust and shape change within the company. We promote a trusting, sincere and fair working environment and are open to different opinions. We expressly encourage the open exchange of views, constructive criticism, and ideas for improvement. We handle the tasks and responsibilities entrusted to us in an appropriate and responsible manner.

### 1.3. Diversity and Equal Opportunities

We select, hire and promote our employees based on their qualifications and abilities. We firmly reject discrimination in hiring or employment. We believe in partnership, tolerance, and mutual respect.

Diversity, equal opportunities, and equal participation are important principles for non-discriminatory and appreciative cooperation. We promote diversity in the workforce and are committed to an inclusive working environment.

### 1.4. Working Hours and Payment

We comply with the applicable national legal requirements regarding working hours and payment. We adhere to the permissible working hours, and any overtime is performed on a voluntary basis.

All employees receive at least the statutory minimum wage. This ensures that the wage for full-time employment is sufficient to cover basic requirements.

## 1.5. Error Culture

We comply with external and internal regulations at all times. As soon as we notice any problems, we address them openly. If we have questions or problems, we seek advice and strive for open communication within the team and with our management.

For us, one thing is certain: looking the other way is never the right approach. We work together to find a solution.

In addition to comprehensive prevention measures, we attach great importance to a positive error culture. Mistakes happen and can never be completely avoided. We do not want to deal with blame, but rather learn from mistakes, develop innovations, and use the knowledge gained to improve our processes.

## 1.6. Employee Representation

To us, the right to freedom of opinion and expression is a matter of course. We recognise the fundamental right of all employees to form trade unions and employee representative bodies and strive for open and trusting cooperation with employee representatives.

## 2. We take care of our working environment

Together, we create a healthy and safe work environment.

### 2.1. Occupational Health and Safety

WALTHER Faltbox Group offers a safe working environment. Our goal is to minimise health risks and ensure the protection and promotion of physical and mental health.

This requires the cooperation of all employees. We comply with occupational health and safety regulations and instructions. We do not endanger our own health and safety, nor that of our team or third parties. Production facilities and other machinery must comply with applicable safety standards at all times.

To ensure safe and proper working practices, we provide regular instruction and training. We support each other, do not look away and accept help.

### 2.2. Handling Hazardous Substances

We comply with all applicable laws and regulations on occupational health and safety and environmental protection when handling hazardous substances. This also includes examining the possibility of substituting a hazardous substance. We label hazardous substances, chemical and other substances to ensure their proper and safe handling, storage, use, and disposal.

### 2.3. Use of Company Assets

We respect the company's tangible and intangible assets and manage them wisely. We do not use company property for non-business purposes. Exceptions to this rule are only possible if internal guidelines or regulations expressly permit private use.

### 2.4. Security and Protection of Information, Knowledge, and Intellectual Property

Information must always be communicated correctly and completely. Relevant knowledge must not be unlawfully withheld, falsified, or selectively disclosed.

We are aware of the value of our company's expertise and protect it carefully.

The disclosure of confidential information or making it publicly available is prohibited. This applies to all employees, even after the end of their employment. We recognise the intellectual property of competitors, business partners and other third parties. Business secrets of business partners or other third parties are treated confidentially.

## 3. We are reliable partners

We are reliable partners for all stakeholders.

### 3.1. Compliance with Legal Requirements

We act appropriately to ensure compliance with all applicable laws and regulations. Decisions are always made in accordance with applicable national and international laws, internal regulations, and our corporate values. We respect consumer protection standards that apply to our products.

### 3.2. Conflicts of Interest

We act with integrity and transparency. Situations in which financial or personal interests could conflict with our professional activities must be disclosed at an early stage and avoided.

A potential conflict of interest already exists if the personal or financial interests of employees influence or could influence their professional decisions. If a conflict of interest is identified, we work together to find a transparent solution to avoid the potential conflict of interest. Un-avoidable conflicts of interest are disclosed without special request.

### 3.3. Gifts

We impress with our performance and our products. Gifts and invitations are only permitted within reasonable limits. Internal guidelines on accepting and giving gifts, invitations and business meals regulate which gifts are appropriate and which steps for review must be observed.

### 3.4. Prohibition of Corruption

Corruption means that someone abuses their professional position to gain an advantage for themselves or a third party, thereby harming others. Corruption is prohibited worldwide. Gifts such as invitations or presents can be an indication of corruption.

We do not tolerate corruption and attach great importance to objective, fact-based and fair decision-making. Violations will be dealt with by taking appropriate labour-law measures.

### 3.5. Prohibition of Money Laundering and Terrorist Financing

We ensure transparent and traceable payment flows. Incoming payments are immediately allocated to the corresponding services and recorded in the accounts.

We comply with the legal obligations for the prevention of money laundering and do not participate in transactions that serve to conceal criminal or illegally acquired assets.

We carefully check the identity of all persons with whom we wish to enter into a business relationship. We only maintain business relationships with reputable partners whose business activities comply with legal requirements.

### 3.6. Accounting and (Financial) Reporting

Transparency and accuracy are our top priorities when it comes to reporting. Internal and external reports contain a complete and comprehensible presentation of the company that is appropriate for the purpose. We strictly comply with the legal requirements for proper accounting and financial reporting. Our period-end closings are published on schedule and are prepared in accordance with national and international accounting standards.

### 3.7. Fair and Free Competition

Fair and free competition is protected by antitrust regulations that apply worldwide. We conduct our business exclusively on a performance basis and according to the principles of a market economy and free, unhindered competition.

There are no inadmissible agreements on prices, other conditions or customers, nor is there any abuse of a possible monopoly position on the market. We are happy to compete with our competitors and, in doing so, always adhere to our ethical principles in addition to the law.

### 3.8. Export Controls

We are aware of our social responsibility in fulfilling our export control and sanctions obligations and are firmly committed to complying with the relevant legal provisions.

### 3.9. Objectivity in Testing and Assessment

We value objective, comprehensible and transparent testing, both internally and when commissioning external parties. Tests must always be carried out with the necessary expertise and professional diligence. This applies to product testing as well as all other tests to which we subject ourselves.

## 4. We take social responsibility

We assume social responsibility and contribute to sustainable development through our activities as a company and through our products.

### 4.1. Data Protection

We attach great importance to the responsible, secure and transparent handling of data. We collect, process, use and store personal data only in accordance with legal requirements. The data is treated confidentially and carefully and protected in compliance with the applicable data protection laws. Our privacy policy (available on our website) provides comprehensive information about data processing and the rights of data subjects.

### 4.2. IT Security

We pay close attention to the security of our IT systems and have a comprehensive IT and data security concept in place. We use state-of-the-art technology, select secure storage solutions and have a redundant backup strategy. We regularly test our systems for security and develop them continuously to make them even more secure.

### 4.3. Donations

We are involved in a wide range of activities, particularly at a local level. To this end, we make monetary and in-kind donations for scientific, charitable, or cultural purposes. Donations are only made to institutions that are recognised as charitable or authorised to accept donations under special regulations.

### 4.4. Communication and Marketing

Intern sowie extern legen wir Wert auf einen achtsamen und respektvollen Umgang im Miteinander. Dies gilt insbesondere auch für die Kommunikation.

Informationen werden mit den jeweiligen Fachabteilungen abgestimmt und einheitlich und klar von zentraler Stelle kommuniziert.

## 5. We protect our environment

At WALTHER Faltbox Group, sustainability is an integral part of our corporate DNA.

### 5.1. Sustainability

We are mindful of the impact our actions have on society and the environment, avoid environmental pollution and waste, and make sustainable decisions, particularly in terms of procurement. We are continuously developing our corporate processes with ecological, social and economic aspects in mind.

### 5.2. Environmental Protection

With our products, we make a significant contribution to saving resources and using them sustainably. Right from the design stage, we focus on robust construction for a long service life, reparability, and easy recycling. In line with the principles of the United Nations RIO Declarations, we use our natural resources responsibly. The generation of waste, wastewater and emissions is minimised as far as possible.

We underline the demands we place on ourselves with a certified environmental management system in accordance with DIN EN ISO 14001:2015 and a certified energy management system in accordance with DIN EN ISO 50001:2018.

### 5.3. Climate Protection

Climate neutrality is one of the topics of the future that motivates and inspires us to become even better. We are actively contributing to slowing down climate change and preserving our planet.

Climate neutrality is a long-term goal for our company. To achieve this, we seek economical solutions to improve our energy efficiency, reduce energy consumption, and minimise greenhouse gas emissions. For us, reducing emissions takes precedence over offsetting residual emissions.

### 5.4. Environmentally Friendly Packaging

Our products are often the sustainable transport and packaging solution for our customers. We too are careful to use environmentally friendly packaging, both for the delivery of the goods we purchase and for delivery to our customers.

From an ecological point of view, the best packaging is the kind that can be avoided altogether. Reusable solutions and packaging made from recycled and recyclable materials are preferred over other solutions.

## 6. We are aware of our responsibility in the supply chain

As a supplier of transport solutions in our customers' global logistics processes, we are aware of our responsibility in the supply chain and support our customers in complying with applicable national and international regulations.

### 6.1. Provision of Information

Within the framework of various legal requirements, such as the German Supply Chain Act, it may be necessary to request information on compliance with human rights and environmental protection along the supply chain. As WALTHER Faltbox Group, we may be part of such a supply chain as a supplier. We undertake to support our business partners in the best possible way within the scope of our capabilities in fulfilling their obligations.

### 6.2. Selection of Suppliers

We work with our suppliers exclusively in accordance with the legal framework and our internal guidelines and principles. One of our internal guidelines is this Code of Conduct, which also applies to our suppliers.

We carefully select suppliers, service providers and partner companies based on objective criteria and take advantage of competition. In doing so, we strive for long-term cooperation based on partnership.

## 7. We support compliance with the Code of Conduct

Our Code of Conduct is the mandatory basis for ethical and compliant behaviour within WALTHER Faltbox Group. We are all responsible for adhering to these principles.

### 7.1. Dealing with Violations

We will protect any person who reports misconduct or violations of the Code of Conduct.

Anyone who violates these regulations will face appropriate consequences. We will immediately investigate any violations of laws or internal regulations. Depending on the severity of the violation, this may result in consequences under labour law, civil law or criminal law for the persons involved.

### 7.2. Contact

We offer support for questions regarding the Code of Conduct and compliance. For all communications and questions relating to compliance, we are available at the following email address:

[compliance@faltbox.de](mailto:compliance@faltbox.de)

In addition, reports can be submitted to the whistleblower system either by name or anonymously. The whistleblower system protects our companies, the whistleblowers and all persons who contribute to investigating and remedying misconduct and violations of rules. At the same time, the whistleblower system protects the interests of those involved. They are presumed innocent until a violation has been proven.

The whistleblower system is intended in particular for dealing with serious violations of rules and can be accessed via the following link:

[Whistleblower system](#)

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