



Code of Conduct
Eurofoil – Paper Coating GmbH



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Eurofoil Code of Conduct

INTRODUCTION

Eurofoil has subscribed to a Business Code of Conduct of the highest standards

The Code of Conduct is a decisive basis for our business activities and determines our company's conduct in sustainable business and promotes a desirable corporate culture. By acting at all times at Eurofoil with ethics and integrity, we achieve and preserve the good reputation of our company, which benefits all aspects of our business activities. We want to ensure that Eurofoil is an esteemed employer to its employees and trustworthy business partner to our customers and suppliers.

The Code serves as a guide to conduct.

The Code does not answer every question or determine the correct course of action for every conceivable situation but instead provides employees with a guide to conduct when performing their duties for Eurofoil.

Area of application

The principles contained in the Code and its Annex apply to all Eurofoil employees, including temporary staff and trainees, and to contractual partners.

To ensure that everyone is familiar of the Code, it is stored on the Eurofoil intranet website <http://eurofoil.com> and is made available to all employees and business partners.

WHAT TO DO IN CASE OF BREACH AND HOW TO REPORT PRESUMED BREACHES; ENFORCEMENT

GENERAL RULES AND REPORTING DUTY

All management executives and other supervisors are responsible for ensuring that their employees are familiar with, and adhere to, the Code of Conduct.

Eurofoil will protect the anonymity of any employee who reports presumed misconduct. It is a corporate principle that any employee who, in good faith, reports a possible breach has no cause to fear any adverse effects on their employment.

A breach of this Code can result in appropriate disciplinary measures as far as dismissal.

When implementing the Code, it is necessary to comply with applicable law, regulations of local authorities and in-house rules.

BUSINESS STANDARDS

ACTING IN EUROFOIL'S BEST INTERESTS

Employees must refrain from doing all acts and may not participate in any agreements that conflict directly or indirectly with their responsibilities towards Eurofoil or could be interpreted in such a way.

PROMOTING A DESIRABLE WORKING ENVIRONMENT

Protecting human rights

Eurofoil, as a company, is obliged to the principles of sexual equality, respect for human rights and the individual right of self-determination and seeks to provide a working environment that is free of all discrimination, intimidation or harassment. Our employees must ensure by their conduct that customers, suppliers and colleagues are treated with respect, fairness and dignity.

Adequate protection of employee privacy

We are obliged to respect the privacy of our employees. For this reason, we store, process and transfer your personal data only to the extent permitted by law in the course of business activities.

Proper use of e-mail and internet

Each employee shares responsibility for the maintenance and protection of Eurofoil data, files, software and hardware. Eurofoil employees are responsible for all electronic data and files that they send. When sending e-mails, they should exercise the same degree of care and circumspection and apply the same precautions and ethical principles as they would for hand-written correspondence.

Company systems, in particular Internet, Intranet, telephone or e-mail may be used for business purposes only.

No alcohol or drugs at the place of work

Eurofoil employees are prohibited from consuming, possessing or dealing in drugs or alcohol on the business premises. Moreover, it is not permitted to perform work for the company under the influence of drugs or alcohol on or off the business premises. This can result in appropriate disciplinary measures as far as dismissal.

Environment, health and work safety

We conduct our business always while taking responsible care of the environment and comply with the applicable environmental protection statutes and regulations. Employees are obliged to report any incident observed that could cause harm to the environment without delay.

The carrying of weapons of any kind on the grounds of Eurofoil or while performing work on behalf of the Company is prohibited.

SAFEGUARDING COMPANY RESOURCES

Using company resources

Employees are responsible for all cash and physical resources entrusted to them. It is prohibited to use, issue or sell company resources or property for personal purposes without proper approval.

Protection of confidential information and intellectual property

The disclosure to third parties of confidential information of value to our business is prohibited.

Confidential information is generally understood as being business or technical information that is not normally available to the entire workforce or third parties and which was possibly developed by or specially acquired by Eurofoil. Information contained in personnel records or customer documents is also confidential.

Such information may only be given out in accordance with applicable statutes and with the approval of the responsible management. If necessary, a confidentiality agreement must be signed before beginning discussions on confidential company matters.

Confidential information and intellectual property must be protected.

Bookkeeping and documentation

Eurofoil undertakes to keep sufficiently precise written records so that all transactions and expenses made in the name of Eurofoil are complete, precise and truthful.

All books of account and documents must be available for checking.

Bribery and corruption

Compliance with anti-bribery and corruption law is mandatory. Employees of Eurofoil may not offer, grant or accept gifts, payments or other benefits that would represent an inadmissible advantage for the person or for the company.

FAIR TREATMENT OF THIRD PARTIES

Sale and procurement

Eurofoil acts with integrity, fairness and decency in all business transactions.

This applies to the sale and purchase of services, merchandise and tangible items.

Responding to inquiries from the press and other areas

Eurofoil has put certain procedures and principles in place for dealing with press inquiries and other areas wishing to obtain information about us via legal channels. Press inquiries are always answered by the management board. All legal matters should be forwarded in advance to a legal adviser.

SAFEGUARDS

Signatures and confirmation

All Eurofoil employees confirm by their signature that they have received and read the Code of Conduct and thereby agree to comply with its rules.



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