

Company policy of the Axxum Group



Version 4.0
from 20.06.2022



YOUR PERSONAL
SUPPLY CHAIN

Scope

The specifications of our corporate policy define a uniform minimum standard and framework for our actions and serve as a guideline. The contents are binding for our Group members.

In addition to their function as role models, all managers have the task of communicating this corporate policy to the respective companies and business units and monitoring compliance with it.

The guideline does not replace process descriptions or work and procedural instructions, supra-company laws or standards.

If, despite conscientious consideration, the policy conflicts with a law, the law shall have the binding effect.

This policy applies to all contractors of the Axxum Group :

- Axxum GmbH, 42389 Wuppertal, DE
- Axxum Innovation GmbH, 42389 Wuppertal, DE
- AKF GmbH, 20539 Hamburg, DE
- AMCO Industrieservice GmbH & Co KG, 42389 Wuppertal, DE
- Cargopack GmbH & Co KG, 71706 Markgröningen, DE
- Con-Pac BVBA, 9060 Zelzate, BE
- Con-Pac Geel BVBA, 2440 Geel, BE
- Con-Pac Logistics BVBA, 9060 Zelzate, BE
- Con-Pro Industrie-Service GmbH & Co KG, 31224 Peine, DE
- Günter Püschmann GmbH & Co KG, 42389 Wuppertal, DE
- Püschmann s.r.o., 602 00 Brno, CZ
- Arthur Hitscher & Sohn GmbH, 21493 Schwarzenbek, DE
- HITSCHER Hungária Kft, 7630 Pécs, HUN
- REPACK Industrieverpackung + Service GmbH, 50999 Cologne, DE
- REPACK GmbH, 8181 St. Ruprecht an der Raab, AT
- REPACK s.r.o., 949 01 Nitra, SK

Wuppertal, 12.07.2022

Place, date

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ORIGINAL SIGNED

Management

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1. Business Ethics

1.1 Entrepreneurial thinking & acting

All our employees are required to act in the interests of the company. The interests of everyone must be taken into account. Neither the company nor the employees may be harmed by decisions. The principle of equal treatment and fairness must be upheld and all decisions and actions must contribute to the long-term success of the Group.

1.2 Customer satisfaction

The satisfaction of our customers is our top priority. Only if our customers are successful, we can also be successful. The needs and wishes of our customers and the market thus determine our strategy and daily decisions. We strive for long-term and economic business relationships, thus securing the jobs of our employees.

1.3 Compliance with law & order

In all our actions, compliance with applicable laws, regulations, binding obligations, as well as internal requirements and contractual agreements is our top priority.

We must respond promptly and appropriately to lawsuits, legal proceedings or investigations involving us in order to protect the company and those responsible. Employees who are threatened with legal action, other legal proceedings or an investigation in a business matter must contact the management immediately. In the case of managers and bearers of entrepreneurial duties, the professional and personal suitability for the tasks and responsibilities assigned to them shall be ensured.

1.4 With each other & not against each other

The employees of the Axxum Group pay attention to a fair and respectful interaction with each other during and outside working hours. New employees are carefully introduced to the processes and operational characteristics. We expect our employees to behave in a lawful, respectful and tolerant manner towards our fellow human beings. All employees are part of us and therefore contribute to the external image of our group of companies at all times.

1.5 Communication

We maintain transparent and open communication in our dealings with our customers and business partners as well as internally with our employees. All employees have access to the contents of this corporate policy as well as to other policies and guidelines via notices and our Axxum intranet. This includes all valid central documents of the Axxum Group. These can be viewed or downloaded as required.

Our goal is a permanent and sustainable compliance with our corporate guidelines by all employees of the Axxum Group as a basis for a secured maintenance and long-term success of our group of companies. Managers are to be explicitly trained on the contents of this guideline. In the event of individual ambiguities regarding the contents of the guidelines or contradictions with other internal regulations, laws or ordinances, the respective supervisor, the HR department or the management or, if available, the works council must be approached so that our guidelines can be implemented and lived permanently, without contradictions and sustainably. In case of doubt, laws and external regulations always take precedence over internal guidelines. Our corporate policy is available for download to external parties via our website (<https://www.axxum.eu/impressum>). It must also be communicated to our business partners.

1.6 Conflicts of interest

We respect the personal interests and private lives of our employees. However, personal or own financial interests must not influence business decisions. Therefore, we avoid situations in which personal or own financial

interests collide with the interests of our company or our business partners. If such conflicts of interest exist, we disclose them and jointly seek a solution that does not compromise the interests of our company.

1.7 Suppliers

Our guideline is to be communicated to our suppliers in particular and they are to be obligated to comply with it. For monitoring purposes, we will integrate the topic into our supplier management in the future during the annual supplier evaluation and supplier audits.

2. Sustainability

Our company strives to act sustainably and in this regard is guided by the three pillars of sustainability: social responsibility, environmental protection and economic success. To this end, all employees are obligated to limit or minimize the negative impact on the sustainability of the company as well as unnecessary waste as best as possible.

2.1 Social responsibility

2.1.1 Working hours

The respective statutory provisions and company regulations on working hours as well as industry standards must be complied with.

2.1.2 Wages & Benefits

The Axxum Group remunerates its employees in accordance with the applicable statutory and company regulations (including MiLoG). Statutory social benefits are granted without exception and are part of our self-image of corporate and social responsibility. Performance-related remuneration components are agreed with our employees. They contribute to fairness, motivation and willingness to perform and must always be in line with our social responsibility for the workforce.

2.1.3 Discrimination

We do not accept any form of discrimination against employees. This includes discrimination or stigmatization, e.g. based on gender, origin, disability, religion, age, pregnancy or sexual orientation.

2.1.4 Human Rights

Respect for fundamental human rights is also a top priority for us (in accordance with the Universal Declaration of Human Rights of 1948). Sanctions of the UN and EU are implemented.

We also respect the principles of the 1998 International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work in accordance with national laws and practices. <http://www.ilo.org/berlin/arbeits-und-standards/kernarbeitsnormen/lang--en/index.htm> We do not accept violations of human rights, either in our own operations or along the supply chain.

2.1.5 Modern slavery

We expressly and fully declare our opposition to forced labor, child labor or other forms of modern slavery and to the observance of human rights within our sphere of influence and that of our business partners. Any form of forced and/or child labor is rejected by us.

When using temporary workers or cooperating with companies for the placement of workers, official permits, residence permits and work permits must always be checked. When using service providers, suppliers and subcontractors, an assessment is made with regard to forced labor and child labor. If our standards are not met,

this will prevent cooperation or lead to termination of the business relationship. Any violations and anomalies must be reported immediately and without exception.

2.1.6 Corruption, Bribery & Extortion

We do not tolerate any form of corruption, bribery or extortion. Neither bribes nor other illegal payments are offered, made or accepted. Possible incidents, which also includes attempted influence peddling, will be consistently pursued.

2.1.7 Gifts & Invitations

Gifts or invitations are strictly prohibited whenever they may have a conflict of interest or the appearance of influencing a particular business relationship or decision-making. This applies to employees and managers as well as to all persons who perform functions on behalf of the company.

2.1.8 Fair competition

There are no agreements regarding business policy and prices with competitors or other independent parties. These are determined completely independently. There is always fair treatment of customers, suppliers, service providers or other parties involved. Antitrust and competition regulations are complied with.

2.1.9 Freedom of association and collective bargaining

We respect the right of our employees to freedom of association and collective bargaining.

2.1.10 Privacy

We implement the data protection provisions in accordance with the General Data Protection Regulation (DSGVO) for the protection of personal data. We are supported by an external data protection officer to ensure that all provisions relating to the handling of internal and external personal data are implemented correctly and completely. All employees who come into contact with personal data are trained in data protection issues. Details on the data protection organization can be found in our data protection policy. This can be accessed internally via the intranet and our website.

The regulations on company and business secrets must be observed. Each employee is obligated in writing to maintain company secrets, even beyond existing employment relationships. Trade secrets include information about customers and business partners, their products and the associated production processes.

2.1.11 Occupational safety

As an employer, the Axxum Group ensures safety and health protection in the workplace within the framework of legal regulations and supports the continuous improvement process, in particular to prevent occupational accidents. Management, executives and employees are obliged to follow and implement occupational health and safety. Necessary measures to prevent accidents and protect our employees are implemented. In return, we expect our employees to fully comply with our occupational safety principles. All employees are instructed before starting work and at regular intervals. This also applies to employees who change jobs within the company. Emergency planning specifies procedures for each site in order to be able to respond appropriately and, above all, quickly to identified risks. Established processes, e.g. for dealing with occupational accidents, are defined and communicated in the form of procedural instructions.

The occupational safety specialist of the respective company supports compliance with and continuous improvement of our occupational safety and health protection in the company. The legally required deployment times of the occupational safety specialist and the company physician are regularly checked and adjusted if necessary.

Principles:

- All employees must behave in such a way that they do not endanger or damage themselves or others or the environment or material assets.
- Constant caution and mutual consideration are prerequisites for hazard-free work.
- All employees must support and comply with all safety measures. Instructions issued by the company for the purpose of accident prevention must be followed. Instructions contrary to safety must not be followed
- Machines on which our employees work are operated safely. This includes that we adhere to the technical documentation of the manufacturer. Furthermore, all employees who operate the machine must be instructed not only on safe operation, but also on all risks, hazards, protective measures and the rules of conduct.
- Before starting work, all employees require the necessary instruction (general safety instruction; instruction on the activities to be carried out) by the manager, any necessary occupational medical check-ups and any necessary written instructions.
- We are committed to handling hazardous substances in an environmentally sound manner and store them in suitable places provided for this purpose. In addition, we maintain a hazardous substances register at each site
- The road traffic regulations apply on our company premises as well as parking areas
- Always pay attention to forklift or transport traffic on the company premises

2.1.12 Personal protective equipment

To ensure the safety of our employees, contractors and third parties, the wearing of personal protective equipment (PPE) is mandatory at all operational workplaces. This serves to protect all employees and is selected by our specialist personnel as part of a risk assessment at the respective workplace and must be used properly by all employees.

2.1.13 Health protection & ergonomics at the workplace

We strive to continuously expand health-promoting measures in order to maintain and promote the long-term health of our employees, especially older employees. We focus on ergonomic solutions to facilitate the working environment of our employees. This applies to our workflows and processes as well as workplace equipment. This includes, for example, the use of ergonomic office equipment and measures to prevent permanent stress, e.g. through job rotation.

In the event of a pandemic, we as a group of companies comply minimally with the legal requirements and requirements and always act to protect our employees from infection.

2.1.14 Alcohol & drug use

The consumption of alcohol and/or drugs before and during working hours is strictly prohibited. In cases of suspicion, we reserve the right to carry out voluntary checks to prove fitness for work, for the protection of our own health and that of our employees and the general public. In the event of excessive consumption or addictions, help will be offered upon request.

Smoking is only permitted in specially designated areas and only during break times. These can be found in the respective fire protection regulations of the companies.

2.1.15 Fire protection

The applicable regulations and laws for fire protection must be strictly observed. This includes the implementation of both technical and organizational measures. The fire protection organization of the companies is

regulated in the respective fire protection regulations. These consist of fire protection regulations A (emergency and alarm plan), B (information for all employees) and C (information for employees who perform a fire protection task). The organization includes, for example, the provision and training of fire protection and evacuation assistants, alarm functions, fire prevention equipment, designation and keeping clear of escape and rescue routes, and regular inspection of extinguishing equipment and facilities. Preventive fire protection measures must always be implemented, and violations of applicable regulations must be remedied immediately. The fire protection officer of the respective company supports compliance and continuous improvement.

2.2 Environmental protection

In our company, we take into account the relevant normative, legal and other binding obligations in all decisions. In addition, we are guided by the current environmental management standards, maintain them in our companies and constantly improve their effectiveness. This application ensures that contractually agreed requirements are met and that all organizational, commercial and technical activities that have an impact on our environmental performance are planned, controlled and monitored.

Our goal is to continuously improve our environmental performance. We provide all the necessary means to meet our environmental requirements. We are constantly working to achieve our qualitative, social and economic goals. Out of a shared responsibility towards people and the environment, we aim to balance profitable production by improving energy and environmental performance and avoiding or reducing energy waste and negative environmental impacts. The following principles and strategic goals therefore apply to our group of companies:

- The use of resources in production is successively minimized through continuous improvement processes
- Regular balancing of individual consumers by means of continuous measurements and random sampling reveals irregularities at an early stage.
- The production of high-quality products is continuously examined for possible savings potential.
- Technical innovations are always based on the latest state of the art.
- Environmental protection in the company is continuously evaluated (e.g. waste balances, energy and environmental indicators, carbon footprints) and improved
- The incorporation of environmental thinking and the development of sound environmental awareness are communicated to all employees in their daily work.
- In addition to our own employees, we also try to involve our customers and business partners in our efforts.
- Waste and environmentally harmful emissions are to be avoided or reduced to a minimum.
- The environmental impact, resource conservation and energy saving are taken into account in the planning of facilities and construction projects.
- Environmental impacts with regard to use and disposal are taken into account in procurement.

The listed principles are applied in all departments and are communicated by the management level and all senior employees to the other employees. All our employees are involved in our sustainability efforts and have the right and duty to work towards eliminating circumstances that cause unnecessary energy consumption and negative environmental impacts.

In our company, lowering energy consumption and reducing negative environmental impacts is an important part of the corporate strategy. We are aware that our activities consume natural resources and can have a negative impact. Therefore, it is our duty to reduce the consumption of energy and resources to the possible minimum within the framework of economic, organizational and technical possibilities and by means of well thought-out processes.

2.2.1 Reduction & avoidance of emissions

In addition to the legal requirements, we also want to contribute to a reduction of emissions beyond the applicable regulations. This includes, for example, the use of lower-emission or climate-neutral materials. Replacement or new investments are to be made in such a way that emissions are reduced or avoided. This applies in particular to investments in buildings and technical equipment, for example. In our operations and processes, too, we must always ensure compliance with applicable regulations, requirements and limits with regard to emissions. We have already drawn up product carbon footprints for various products, which serve as a basis for further reduction.

2.2.2 Energy efficiency

We regularly conduct energy audits within the Group in accordance with country-specific requirements, such as DIN EN 16247-1. On the basis of defined specifications, such as the Energy Services Act (EDL-G), current, continuous or intermittently measured, verifiable operating data on energy consumption and load profiles are regularly recorded and evaluated. This is the basis for an in-depth, regular audit of the energy consumption profile of buildings or groups of buildings, operating processes or facilities, either on the basis of a life cycle cost analysis or a simple payback calculation for smaller projects. These energy audits result in measures to improve energy efficiency, which are reviewed and, if appropriate, implemented as part of the continuous improvement process. In the case of replacement or new investments, attention must be paid to the use of energy-efficient alternatives. This applies in particular, for example, to investments in buildings and technical equipment.

2.2.3 Careful use of resources

Our group of companies is oriented towards the careful use of resources. We strive to find and use sustainable sources as alternatives in the use of materials and to avoid environmental pollution. We treat our operating resources, equipment and buildings with care in order to ensure long-term use, unless there are economic reasons for not doing so. We also protect our human resources through our practiced occupational health and safety, which goes beyond the legal requirements. We offer career prospects for our young employees.

2.3 Economic success

2.3.1 Financial responsibility

We implement a system of financial and accounting processes to be followed and are committed to, for example, accurately recording, maintaining and regularly reporting on monthly financial statements for the entire Axxum Group. In addition, we also perform the internal controls required by law to maintain accurate and transparent accounting. Material financial statements and the consolidated financial statements are audited.

2.3.2 Sustainable supply chain

For the sustainable and economic success of the company, Axxum requires long-term relationships with suppliers and business partners who act sustainably. This enables the company's growth and competitiveness to be steadily increased. The entire corporate group ensures that all suppliers represent the same sustainable interests.

2.3.3 Management systems

The Axxum companies are committed to act in accordance with the implemented management systems and to drive their continuous improvement and further development. In doing so, we observe all relevant normative, legal and other requirements, specifications and binding obligations. The information required or needed by our management systems must be documented and managed. All personnel are required to actively participate in continuous improvement.

The following management systems have already been introduced or are in the planning stage:

- ISO 9001 | Quality Management
- ISO 45001 | SGA Management
- ISO 14001 | Environmental Management
- ISO 27001 | Information Security Management

2.3.4 Innovation Management

We see innovations as the core of our economic success. We therefore foster a culture that promotes transparent and open communication and encourages the contribution of potential for improvement and the creation of commercially successful products. To this end, we specifically take up innovative ideas from employees, customers, suppliers and external third parties in a structured evaluation process and implement them efficiently in accordance with the rules of economic efficiency.

2.3.5 Digitization

The Axxum companies are committed to transferring analog processes and products to digitalized technologies. In doing so, they ensure our ongoing economic success and the targeted further development of our business model to include digitization opportunities.

We focus on the following three fields of action

- Digital customer experience
- Operational excellence
- Digital products

To ensure successful digital transformation, we create the basic requirements in the form of IT systems, infrastructure and scalable processes.

3. Summary

All of the information, requirements and behaviors outlined in these guidelines are binding for our employees at all levels of the company. We therefore ask you to observe them and to contact your respective supervisor, the management or the works council at any time if you have any questions or suggestions. Suggestions for improvements to the guidelines as well as optimization measures of a strategic and operational nature can be made at any time within the framework of our QM system. In the event of violations and deliberate disregard of our guidelines, those responsible will be held accountable. In addition, we expect our suppliers to comply with the sustainability requirements set out in this corporate guideline.