

Company policy of the Axxum-Group



Version 2.0
from 18.01.2022



YOUR PERSONAL
SUPPLY CHAIN

Scope

The specifications of our corporate policy set 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 carrying these corporate guidelines into the respective companies and divisions and monitoring compliance with them.

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

If, despite conscientious consideration, the policy is in conflict with a law, the law shall have the binding effect.

This policy applies to all members of the Axxum-Group:

- Axxum GmbH, 42389 Wuppertal, DE
- AKF GmbH, 20539 Hamburg, DE
- AMCO Industrieservice GmbH & Co KG, 42389 Wuppertal, DE
- Axxum Innovation, 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, 18.01.2022

Place, Date

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ORIGINAL SIGNED

Managing Director

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1. Business ethics

1.1 Entrepreneurial Thinking & Acting

Each of our employees is required to act in the interests of the company. Everyone's interests must be considered. 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 all group members.

1.2 Customer Satisfaction

The satisfaction of our customers is our highest priority. We can only be successful, if our customers are 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 guidelines and contractual agreements is our top priority.

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

1.4 With each other and not against each other

The employees of the Axxum-Group take care to treat each other fairly and respectfully during and outside working hours. New employees are carefully introduced to the processes and special features of the company. We expect our employees to behave in a lawful, respectful and tolerant manner towards our fellow human beings. Every employee is part of us and thus always contributes to the external image of our company.

1.5 Communication

We maintain transparent and open communication 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 notice boards 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 permanent and sustainable compliance with our corporate guidelines by all employees of the Axxum-Group as a basis for the secure maintenance and long-term success of our group members. Managers are to be explicitly trained on the contents of this policy. 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 personnel department or the management or, if available, the works council must be contacted 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.

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 work together to find a solution that does not compromise the interests of our company.

1.7 Financial Responsibility

We implement a system of financial and accounting processes to be followed and undertake, for example, to accurately record, maintain and regularly report on monthly financial statements for the entire Axxum-Group. In addition, we also carry out the internal controls required by law to maintain correct and transparent accounting. Material annual financial statements and the consolidated financial statements are audited by auditors.

2. Social Responsibility

2.1 Working Hours

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

2.2 Wages & Benefits

The Axxum-Group remunerates its employees in accordance with the applicable statutory and company regulations. 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, willingness to perform and motivation and must always be in line with our social responsibility for the workforce.

2.3 Discrimination

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

2.4 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). UN and EU sanctions are implemented.

We also respect the principles of the 1998 International Labour 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.

2.5 Modern Slavery

We expressly and fully declare our opposition to forced labour, child labour or other forms of modern slavery and to the observance of human rights within our sphere of influence and that of our business partners. We reject any form of forced and/or child labour.

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 regarding forced labour and child labour. If our standards are not met, this prevents cooperation or leads to termination of the business relationship. Any violations and anomalies must be reported immediately and without exception.

2.6 Corruption, Bribery & Extortion

We do not tolerate any form of corruption, bribery or extortion. No gifts or gratuities that could lead to a conflict of interest will be accepted. Neither bribes nor other illegal payments are offered, made or accepted. Possible incidents, including attempted influence peddling, are consistently pursued.

2.7 Fair Competition

There are no agreements on business policy and prices with competitors or other independent parties. These are determined completely independently. Customers, suppliers, service providers or other parties are always treated fairly. Antitrust and competition regulations are complied with.

2.8 Freedom of Association and Right to Collective Bargaining

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

2.9 Data Protection

We implement the data protection regulations in accordance with the General Data Protection Regulation (DSGVO) for the protection of personal data. We are supported in this by an external data protection officer in order to implement all provisions correctly and completely in dealing with internal and external personal data. All employees who meet personal data are trained in data protection issues. Details on the data protection organisation can be found in our data protection policy. This is available internally on the intranet and on our website.

The regulations on company and business secrets must be observed. Every employee is obliged 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.

3. Occupational health and safety

3.1 Occupational Safety

As an employer, the Axxum-Group ensures safety and health protection in the workplace within the framework of the statutory provisions and supports the continuous improvement process, to prevent occupational accidents. All entrepreneurs, managers 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 health and 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 react 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 health and safety specialist of the respective company supports the compliance with and continuous improvement of our occupational health and safety in the company. The legally required deployment times of the occupational safety specialist and the company doctor 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 property
- 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 employer for the purpose of accident prevention must be followed. Instructions contrary to safety regulations must not be followed
- Machines on which our employees work are operated safely. This means that we adhere to the manufacturer's technical documentation. Furthermore, all employees who operate the machine must be instructed not only on safe operation, but also on all risks, hazards, protective measures and rules of conduct

- Before starting work, all employees need the necessary instruction (general safety instruction; instruction on the activities to be carried out) from their supervisor, any necessary occupational health 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 keep a register of hazardous substances at each site
- The road traffic regulations apply on our company premises and parking areas.
- Always be aware of forklift or transport traffic on the premises

3.2 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 staff as part of a risk assessment at the respective workplace and must be used properly by all employees.

3.3 Health Protection & Ergonomics at the Workplace

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

3.4 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 addiction, 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.

3.5 Fire Protection

The applicable regulations and laws for fire protection must be strictly adhered to. This includes the implementation of both technical and organisational measures. The fire protection organisation 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 organisation 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 the 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.

4. Environmental Protection & Sustainability

In our company, we consider the relevant normative, legal and other binding obligations in all decisions. In addition, we are guided by the current environmental management standards, maintain these in our companies and constantly improve their effectiveness. This application ensures that contractually agreed requirements are met and that all organisational, 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, profitable production is to be balanced 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 minimised through continuous improvement processes
- Regular balancing of individual consumers by means of continuous measurements and random sample measurements 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 assessed (e.g. waste balances, energy and environmental key figures, carbon footprints) and improved
- The integration of environmental thinking and the development of a 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 to other employees by the management level and all senior employees. All 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, reducing energy consumption and 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, organisational and technical possibilities and by means of well thought-out processes.

4.1 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 must be made in such a way that emissions are reduced or avoided. This applies in particular to investments in buildings and technical equipment. Our procedures and processes must also always comply with applicable regulations, requirements and limit values with regard to emissions. We have already created product carbon footprints for various products, which serve as a basis for further reduction.

4.2 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, continuously 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 to investments in buildings and technical equipment, for example.

4.3 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 for the use of materials and to avoid environmental pollution. We treat our operating resources, equipment and buildings with care in order to ensure their long-term use, unless there are economic reasons to the contrary. We also protect our human resources through our practised occupational health and safety, which goes beyond the legal requirements. We offer career prospects for our young employees.

5. Summary

All information, guidelines and behavioural patterns mentioned 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 with questions or suggestions. Suggestions for improvements to the guideline as well as optimisation 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 policy.