

WPV-Verhaltenskodex (Code of Conduct)

Relating to Social Responsibility of the Paper, Board, Cardboard and Film Converting Industry

Preamble

WPV represents the German paper, board, cardboard and film converting companies through its 6 member associations. Within the scope of its business activities, the member companies of the WPV organization explicitly admit its social responsibility worldwide (Corporate Social Responsibility). This "WVP-Code of Conduct relating to social responsibility" (hereinafter called "CoC") acts as a guideline in the industry, especially regarding working conditions, social and environmental compatibility as well as transparency, trustful cooperation and dialogue. The WPV Code of Conduct is in compliance with the UN Global Compact.¹

By means of the available WPV Code of Conduct, which is a voluntary agreement, the member companies intend to guarantee especially ethical and moral action as well as competition and antitrust correct behavior (Compliance). This also includes the support of fair and sustainable treatment of suppliers and customers as well as own corporate members.

The WPV Code of Conduct is designed as a self-commitment. The certification of the participating companies is performed by the WPV or its member associations, respectively.

By providing this CoC, the WPV supports the companies in reacting to different framework conditions in a global market and to rise to challenges and social expectations.

The WPV Code of Conduct applies to the signing / acceding company, its corporate management as well as its employees and is intended to create a basis for all business relationships of the signing / acceding company.

In all business decisions the economical, social and ecological consequences should be taken into consideration and a reasonable balance of interests should be ensured. In doing so, the companies always focus on the principles of the UN Global Compacts¹. Within the limits of their possibilities, the companies voluntarily contribute to sustainable development of the society in the locations where they operate. The same applies to the social relationships within the value chain. All business partners have to be treated in a fair manner. Contracts are to be adhered to, as far as the framework conditions do not fundamentally change. The generally valid ethical values and principles are to be considered. This is valid especially for human dignity.

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¹ cf. Global Compact of the United States: www.globalcompact.de/index.php?id=14

The following numbers I to IV constitute minimum standards and are intended to prevent situations that may call into question the integrity of the companies and their employees.

I. General regulations

1. Applicability

This Code of Conduct is in effect for all company's branches and production plants worldwide.

2. Rules, standards and ethical practices

The company complies with the applicable laws, standards and other legislations of the respective countries in which it operates. It gears its activities towards universally held ethical values and principles, especially integrity, honesty, respect of human dignity, openness and non-discrimination based on religion, ideology, gender and ethnicity.

3. Business partners, authorities and consumers

The company operates in accordance with the generally accepted commercial practices of fairness and honesty. It has a cooperative and trustful relationship with authorities and consumer protecting standards are noticed.

4. Trade secrets

Trade secrets of business partners are treated confidentially by the company and its members. Communication of confidential information to third parties or making them publicly available is prohibited. This also applies to company members after termination of the employment relationship.

II. Antitrust and competition law regulations

1. Antitrust law

The company is committed to fair competition. Competition supporting laws and particularly antitrust laws are observed.

Inadmissible agreements on prices or other conditions, sales areas or customers as well as abuse of market power are rejected.

2. Bribery and corruption

The company rejects bribery and corruption and does not tolerate such behavior. In a suitable way, it supports transparency, dealing with integrity and responsible leadership and accountability in the company.

The applicable corruption law has to be observed. Infringements are basically avenged.

III. Global guidelines

1. Human rights

Internationally recognized human rights² are expressively supported.

2. Child labor

Child labor or any other means of exploitation of children and youths are rejected.

² cf. Universal Declaration of Human Rights - UN-Doc. 217, so-called UN Human Rights Charter: www.un.org/depts/german/grunddok/ar217a3.html

3. Forced labor

All forms of forced labor, bonded labor, serfdom and slave labor or slavery as well as similar situations are rejected. Company members must not be forced to work, either directly or indirectly, through the use of force and/or through intimidation.³

4. Remuneration

All employees should get fair wages, which should be at least sufficient to cover the employee's basic needs. The remuneration is to be paid in a practical manner (cash, cheque, transfer), a payroll has to be provided in a reasonable scope.⁴

5. Working time

Working times are in accordance with the national law, the industry standard or the relevant ILO conventions. Additional work has to be performed on a contractual basis.⁵

6. Health and occupational safety

The national as well as international regulations for the protection of health and occupational safety are considered. Conditions avoiding risks for health and safety are to be created. ⁶

7. Environmental protection

The company consideres the objectives of a sustainable environmental protection and acts in an environmentally responsible manner in all locations. Environmentally and resources friendly production methods are aimed. In accordance with principles of the Rio Declaration of the United States⁷, the company responsibly treats natural resources.

IV. Ethical and social principles

1. Discrimination

The company rejects a random discrimination due to employment, especially concerning race, ethnic or social origins, skin color, gender, mental or physical disability, age and creed, membership of a worker's organization or other personal features⁸.

2. Harassment

The company disapproves physical, psychological or sexual violence as well as verbal harassment.

3. Freedom of opinion

The right to freedom of conscience and freedom of expression are guaranteed.

4. Privacy

The privacy is respected.

³ cf. ILO conventions 29 and 106: www.ilo.org/dyn/normlex/en/f?p=1000:1:0::NO:::

⁴ cf. ILO conventions 16 and 131: www.ilo.org/dyn/normlex/en/f?p=1000:1:0::NO:

⁵ cf. ILO conventions 1 and 14: www.ilo.org/dyn/normlex/en/f?p=1000:1:0::NO:

⁶ Vgl. ILO Konvention 155: www.ilo.org/dyn/normlex/en/f?p=1000:1:0::NO:

⁷ cf. Principles of the Rio Declaration on Environment and Development, decided by the United Nation Conference on Environment and Development (UNCED), Rio de Janeiro, 1992: www.un.org/depts/german/conf/agenda21/rio.pdf

⁸ Vgl. ILO-Konventionen 100, 111, 158 und 159: www.ilo.org/dyn/normlex/en/f?p=1000:1:0::NO:

V. Suppliers

The signing / acceding company is called upon to impart the principles of this WPV Code of Conduct to its direct suppliers, to foster the observance of the content of the WPV Code of Conduct at the best possible rate and to invite them to comply with the WPV Code of Conduct.

The signing / acceding company has also been called upon to advise its suppliers to ask their suppliers accepting the WPV Code of Conduct as well.

VI. Compliance with the Code of Conduct

1. Measures

The company has to bring this code of conduct to the attention of its members in an appropriate manner and at fixed intervals and ensures the compliance with it.

2. Certification

Precondition for a certification is a survey in the course of a self-declaration carried out by the WPV or its member associations.

The certified companies can be published by the WPV and its member associations in an appropriate manner. The participating companies are entitled to use the logo of the WPV CoC.

If the participating companies do not or do not any longer fulfill the conditions for certification, the certificate of the compliance-initiative will be withdrawn.

3. Contact persons

The signing / acceding company has to appoint a responsible contact person for the WPV Code of Conduct who can give binding information on the compliance with the WPV Code of Conduct. Through appropriate organizational preparations the signing / acceding company has to aim for the WPV Code of Conduct being complied with by the signing / acceding company as well as its management. This is achieved in particular by the implementation and maintenance of suitable controls and plausibility assessments.

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ANNEX

United Nations Global Compact

The ten principles

The principles set out in the UN Global Compact are based on an international consensus with regard to

- the Universal Declaration of Human Rights
- the International Labor Organization Declaration of Fundamental Principles and Rights
- the Rio Declaration on Environment and Development and ...
- the United Nations Convention Against Corruption

The Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labor standards, the environment, and anti-corruption:

Human rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights and ...

Principle 2: make sure they are not complicit in human rights abuses.

Labor standards

Principle 3: Businesses should uphold the freedom of association and the effective

recognition of the right to collective bargaining and further for \dots

Principle 4: the elimination of all forms of forced and compulsory labor,

Principle 5: the effective abolition of child labor and ...

Principle 6: the elimination of discrimination in respect of employment and occupation

Environmental protection

Principle 7: Businesses should support a precautionary approach to environmental

challenges.

Principle 8: undertake initiatives to promote greater environmental responsibility and ...

Principle 9: encourage the development and diffusion of environmentally friendly

technologies.

Fight against corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.