

**MAILHAMMER-
HÖGL** 84079 Bruckberg - Dammstraße 1a
**PALETTEN
SÄGEWERK e.K.** 
EXPORTVERPACKUNGEN



CLIENT CONDITIONS -

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A. Principles and mission statement

The appearance of Mailhammer-Högl e.K. is essentially characterized by its appearance, actions and behavior of each and every one of us. Unlawful or inappropriate behavior by even one employee can already cause significant damage to the company.

Each employee is required to pay attention to the reputation of Mailhammer-Högl e.K. in the respective country, to maintain and promote it.

The Business Conduct Guidelines therefore provide binding rules for responsible conduct by employees (To simplify the rules of the Business Conduct Guidelines, the word "employees" is used as a neutral term for both men and women) within the company and in dealings with external parties, in particular customers and business partners.

They are intended to help overcome ethical and legal challenges in day-to-day work. Every employee can contact the relevant supervisor at any time with questions and comments in connection with the Business Conduct Guidelines.

The Business Conduct Guidelines apply to all employees of Mailhammer-Högl e.K. worldwide. The Business Conduct Guidelines are the globally uniform internal basis for our conduct and business actions. Third parties cannot derive any rights from these rules of derive.

B. Basic Behavioral requirements

1. Law abiding behavior

Compliance with the law is a top priority for our company. Every employee must comply with the statutory provisions of the legal system within whose framework he or she is acting. Violations of the law must be avoided at all costs, in particular violations punishable by imprisonment, fines or penalties. Every employee must expect disciplinary consequences in the event of a violation - irrespective of the sanctions provided for by law - because of the violation of his or her duties under the employment contract.

2. Responsibility for the reputation of Mailhammer-Högl e.K.

The reputation of Mailhammer-Högl e.K. is essentially shaped by the appearance, actions and behavior of each employee. Inappropriate appearance, action or behavior of even one employee can already cause considerable damage to the company.

It is therefore a contractual obligation for every employee to take care of the public image of Mailhammer-Högl e.K.. The fulfillment of its tasks must be oriented to this in all respects.

3. Mutual respect, honesty and integrity

We respect the personal dignity, privacy and personal rights of each individual. We work with individuals of different ethnic origin, culture, religion, age, regardless of disability, skin color, sexual identity, world view and gender.

In accordance with our corporate principles and the labor laws of the countries in which we operate, we do not tolerate discrimination based on these characteristics, sexual harassment or other personal attacks on individuals.

These principles apply both to internal cooperation and to conduct toward external partners. We make decisions regarding personnel, suppliers, customers, business partners, etc. exclusively on the basis of appropriate considerations, never for other, extraneous motives such as discrimination or coercion.

We are open and honest and stand by our responsibilities. We are reliable partners and only make promises that we can keep. We expect our employees to behave honestly.

4. Leadership, responsibility and supervision

Integrity and compliance begin at the top of the company. Every manager has organizational and supervisory duties to fulfill.

Every manager bears responsibility for the employees entrusted to him or her.

These must earn recognition through exemplary personal behavior, performance, openness and social competence. Among other things, this means that every manager must always emphasize the importance of ethical behavior and compliance in day-to-day business, make it an issue, and promote it through his or her personal management style as well as training. Likewise, it is the task of a manager to set clear, ambitious and realistic goals and to hold himself or herself to them in an exemplary manner.

A manager must give his or her employees as much personal responsibility and freedom of action as possible, while at the same time making it clear that compliance with the law and Mailhammer- Högl e.K. guidelines is the top priority under all circumstances and at all times. The manager is also available to employees in the event of ambiguities regarding compliance with legal provisions, questions or professional and personal concerns.

However, the manager's responsibility does not relieve employees of their own responsibility. We must work together to comply with the law and the Mailhammer-Högl Guidelines. The following list of specific leadership responsibilities is intended to give employees an idea of the guiding and supporting actions they can expect from a leader.

The manager is responsible for ensuring that no violations of the law occur in his or her respective area of responsibility that could have been prevented by appropriate supervision. Even if individual tasks are delegated, the manager retains responsibility.

5. Quality of products and services

The market success of our products and services is inextricably linked with associated with their consistently high quality. The quality policy of Mailhammer-Högl e.K. sets itself the goal of supplying products of special quality that meet our high requirements and the high demands of our customers in terms of functionality, handling,

product safety, reliability and economic efficiency and ensure their processes. Every employee, not only those involved in production, is committed to these goals in their work. In addition, every employee is obliged to eliminate and report quality defects. Promoting quality awareness is a permanent management task.

C. Dealing with business partners and third parties

1. Observance of competition law and antitrust law

Fair competition is a prerequisite for free market development and the associated social benefits. Accordingly, the requirement of fairness also applies to competition for market share. Violations of these rules are subject to severe penalties.

Every employee is obliged to comply with all rules of fair competition. In particular, employees may not engage in discussions with competitors in which prices or capacities are agreed. Agreements with competitors to refrain from competition or to submit bogus bids in response to invitations to tender are also not permitted.

We grant our suppliers fair contractual conditions and appropriate consideration, but we also expect them to live up to their behavior and to behave fairly and correctly toward employees and suppliers.

2. Offering and granting benefits

We fight for orders with the quality and price of our innovative products and services.

No employee may offer, promise or grant unjustified benefits to public officials in connection with business activities - directly or indirectly - or approve such benefits. No monetary payments or other benefits may be made in order to influence official decisions or to obtain an unjustified advantage. The same applies with regard to unjustified advantages vis-à-vis persons in the private sector.

Promotional gifts to employees of business partners must be selected in such a way as to avoid any appearance of dishonesty or impropriety on the part of the recipient. In case of doubt, the recipient must be asked to obtain prior approval for the receipt from his/her superior.

Employees who enter into contracts with consultants, brokers, agents or comparable third parties must ensure that these also do not offer or grant any unauthorized benefits.

3. Requesting and accepting benefits

No employee may use his or her official position to demand, accept, procure or be promised personal benefits for himself or herself, family members or third parties that he or she would not receive without them. This does not include accepting occasional gifts of nominal value. Invitations to meals or events from business partners may only be accepted if the reason for and the scope of the invitation are

are appropriate and the refusal of the invitation would be contrary to the requirement of politeness. Other gifts are to be refused or returned.

4. Special rules for the award of contracts

Anyone who applies for a contract expects us to examine their offer fairly and without bias. Suppliers are to be selected solely on a competitive basis after comparing price, quality, performance and suitability of the products or services offered.

5. Donations

Mailhammer-Högl e.K. does not make any political donations (donations to politicians, political parties or political organizations). Donation requests will be processed by from a wide variety of organizations, institutions and associations. The following rules apply to the allocation of donations:

- Requests for donations from individuals are to be rejected on principle.
- Payments to private accounts are not permitted.
- Under no circumstances may a donation be made to persons or organizations which do not enjoy an impeccable reputation or whose objectives do not coincide with those of Mailhammer-Högl e.K..
- The donation must be traceable. The recipient of the donation and the specific use by the recipient must be known. Proof of the reason for the donation and the intended use must be available at all times.
- Donations should be tax deductible.
- Requests for donations are generally subject to the decision of the Board of Directors.

6. Anti-Money Laundering

Mailhammer-Högl e.K. has set itself the goal of only entering into business relationships with customers, consultants and business partners whose business activities are in accordance with legal regulations and whose financial resources are of legitimate origin. All employees are obliged to strictly comply with anti-money laundering laws.

Suspicious behavior by customers, consultants or business partners must be reported. All applicable record-keeping and accounting requirements for cash and other transactions and contracts must be complied with.

7. Trade Controls

Mailhammer-Högl e.K. controls and complies with all export control and customs laws and regulations that apply in the respective countries in which Mailhammer-Högl e.K. does business. Such regulations may apply in connection with direct or indirect exports or imports from or to sanctioned countries or in connection with third parties against whom, for example, suspicions are exist with respect to national security or are involved in criminal activity. Violations of these regulations and laws can result in drastic penalties, up to and including exclusion from simplified import and export procedures, i.e. the

Disruption of the seamless supply chain.

All employees involved in the import and export of goods and services are required to comply with all applicable economic sanctions, export control and import laws and regulations, as well as all policies and processes required by their business activities.

D. Avoidance of conflicts of interest

All employees are obligated to make their business decisions in the best interest of Mailhammer-Högl e.K. and not on the basis of personal interests. The following rules apply to avoid conflicts of interest or loyalty:

1. Disclosure obligation

Each employee shall disclose to his or her manager any personal interest (including family members or close personal friends) that may exist in connection with the performance of his or her official duties. Attempts by Business Partners, influencing Mailhammer-Högl employees, their family members or close personal friends through donations must be reported immediately.

2. Transparent procurement

No employee shall give or cause to be given any assignment to family members or close personal friends without the prior written approval of the appropriate supervisor.

3. Private commissioning

No employee may have private orders carried out by companies with which he is associated in his business activities for Mailhammer-Högl e.K.. if this could result in advantages for him that are not customary in the market. This applies in particular if the employee has direct or indirect influence on the commissioning of the company by Mailhammer-Högl e.K. or influence, or if he is involved in the processing of orders by this company on official business.

4. Use of Mailhammer-Högl e.K. - employees for private purposes

It is inadmissible that superiors or executives use the work performance of Mailhammer-Högl e.K. employees for private purposes under abuse of their right of direction.

5. Non-compete clause

An employee may not establish or operate, manage, or work for a business that is related to Mailhammer-Högl e.K. in whole or in is partially in competition.

6. Participation in third-party companies

Furthermore, the direct or indirect participation in an unlisted company that competes with Mailhammer-Högl e.K. in whole or in part is not permitted.

Prior written permission is required in the case of participation in a company that is a business partner of Mailhammer-Högl e.K.

is. Permission is granted by the Board of Management and documented in the personnel file. Permission is not granted or can be withdrawn again if the employee is involved with the respective company on official business.

An interest held by close relatives in a competitor company or another of the companies described above must be reported in writing by the employee to the Human Resources Department if he or she is aware of it and must be documented in the personnel file.

7. Secondary activities

Mailhammer-Högl e.K. must be notified in writing in advance of the commencement of any secondary employment for remuneration. The secondary activity can be forbidden if the health and safety of the employees at their workplace has high priority for Mailhammer-Högl e.K.. Each individual bears a joint responsibility to support Mailhammer-Högl e.K. in its efforts to create safe working conditions. Responsibility towards employees and colleagues dictates the best possible precautions against accident hazards and applies to:

- the technical planning of workplaces, facilities and processes,
- the safety management and
- personal behavior in everyday work.

The working environment must meet the requirements of health-oriented design. Every employee must pay constant attention to occupational safety.

E. Dealing with facilities

The equipment and facilities in offices, factories and workshops (e.g. telephone, copier, PC including software and internet/intranet, machines, tools) may only be used for business purposes, unless private use is expressly permitted to the employee. Under no circumstances may information be retrieved or passed on that incites racial hatred, glorification of violence or other criminal acts or has content that is sexually offensive against the respective cultural background.

F. Dealing with information

1. Records and reports

Open and effective communication includes accurate and truthful reporting. This applies equally to the relationship with investors, employees, customers, business partners as well as the public and all government agencies. Mailhammer-Högl e.K. is also committed to ensuring, through appropriate processes and controls, that transactions are conducted only as approved by management.

Mailhammer-

Högl e.K. must also take preventive measures against the unauthorized use of its property and ensure that cases of unauthorized use are detected. All Mailhammer-Högl e.K. employees must ensure that the books and records made by them in the course of their official activities or otherwise under their responsibility,

- are complete,
- are correct,
- Reflect truthfully each transaction or expense; and
- prepared in a timely manner and in accordance with applicable rules and standards, whether or not the information is intended for publication or submission to a governmental agency. Such books and records shall include all data, audit certificates, and other written documents necessary for financial reporting and compliance with disclosure requirements, as well as records collected for other purposes. This includes internal accounting records (including, but not limited to, expense reports).

2. Secrecy

For internal confidential or protected information of Mailhammer-Högl e.K., which should not get into the public, the requirement of secrecy applies.

Nonpublic information from or about suppliers, customers, employees, agents, consultants and other third parties must also be protected in accordance with legal and contractual requirements.

Confidential or proprietary information may include, in particular:

- Details of a company's organization and facilities, prices, sales, profits, markets, customers, and other business concerns,
- Information about manufacturing, research and development processes and
- Internal reporting figures.

The obligation to maintain confidentiality applies beyond the end of the employment relationship, since the disclosure of confidential information, regardless of when it occurs, can harm the business of Mailhammer-Högl e.K. or its customers.

3. Data protection and data security

Intranet and Internet access, electronic information exchange and Dialog, electronic business - these are crucial prerequisites for the effectiveness of each of us and for business success as a whole.

However, the advantages of electronic communication are associated with risks for the protection of privacy and the security of data.

Effective precautions against these risks are an important part of of IT management, the management task and also the behavior of each individual.

Personal data may only be collected, processed or used insofar as this is necessary for defined, clear and lawful purposes.

In addition, personal data must be stored securely and may only be transferred using the necessary precautionary measures. A high standard must be ensured in terms of data quality and technical protection against unauthorized access.

The use of data must be transparent for the data subjects, and their rights to information and correction and, if applicable, to objection, blocking and deletion must be safeguarded.

4. Insider rules

Insider information is concrete information about circumstances that are not publicly known, that relate to issuers of securities or to the securities themselves, and that are capable of significantly influencing the stock exchange or market price of the securities if they become publicly known.

Employees of Mailhammer-Högl e.K. who have insider information relating to another company as a result of their work (e.g. about customers, suppliers) may not trade in securities of these companies that are listed on the stock exchange or included in over-the-counter trading. They may also not give investment advice to third parties in this respect.

G. Environment, society, safety and health

1. Environment and society

The protection of the environment and the conservation of natural resources are corporate goals of high priority for us. Through appropriate leadership responsibility on the part of management and the commitment of employees, Mailhammer-Högl e.K. aims to conduct its business in an environmentally friendly manner and is constantly working to improve its eco-balance. Already in the development of our products, environmentally friendly design, technical safety and health protection are fixed targets. Each employee must contribute to these goals through his or her own behavior.

2. Health and safety

The prevention of accidents and protection against work-related health hazards is part of the company's duty of care. It is equally the duty of all employees to take responsibility for achieving the goals of occupational health and safety within the scope of their capabilities. Responsibility toward employees and colleagues demands the best possible precautions against accident hazards. This applies to the technical planning of workplaces, facilities and processes as well as to safety management and personal behavior in everyday work. The working environment must meet the requirements of a health-oriented design. Every employee must pay constant attention to safety and is obliged to actively eliminate and report safety deficiencies.

H. Complaints and Notes

Every employee has the right to make a personal complaint to his or her supervisor, the Human Resources Department or the Board of Management or to point out circumstances that indicate a violation of the Business Conduct Guidelines; this may also be done anonymously. The matter will be thoroughly investigated. Where necessary, appropriate action will be taken. Every tip-off will be treated confidentially within the framework of the statutory regulations. Whistleblowers may not be prosecuted for

of their reference do not suffer any unjustified disadvantages.
Employees should exhaust internal arbitration options.

1. Contact persons (Compliance Manager)

Every employee is called upon to review his or her own conduct in the light of the Business Conduct Guidelines and to ensure that these guidelines are observed. It should be noted that special statutory and internal company regulations specify the content of the individual topics addressed here. Each employee must familiarize himself/herself sufficiently with the statutory provisions and internal regulations relevant to his/her area of activity and observe them in his/her daily work. Any doubts must be eliminated. To understand guidelines, make difficult decisions or support the company in implementing the Business Conduct Guidelines, you may need help. You have various options in this regard:

- Talk to your supervisors.
- Check with the human resources department.
- Contact the Board of Directors.

2. Notification of a violation

If you become aware of a possible violation of the Business Conduct Guidelines, we encourage you to report it to one of the contact persons mentioned above (Compliance Manager).

In the interest of an open working atmosphere and to enable us to efficiently follow up on your report, we urge you to include your name when reporting a violation. If you are unable to do so, the contact persons will accept anonymous reports. Employees who in good faith report information about non-compliance with the Business Guidelines will not be discriminated against in any way. All reports of possible violations will be treated confidentially. Investigations will be initiated immediately in each case.

3. Measures

In the event of violations of the guiding clauses, the company will actively and takes appropriate measures to clarify the matter properly. The company will primarily attempt to resolve the matter by explaining the significance of the values to affected employees and thereby persuading them to change their behavior. However, it is also possible, in the case of violations of the Business Conduct Guidelines, to impose labor or implement disciplinary measures within the framework of the applicable regulations.

4. Duties of Compliance Managers:

- Consulting
- Risk assessment
- Implementation of trainings
- Creation of reporting channels for incidents

- Investigating incidents and helping to decide on possible sanctions against employees involved.
- Initiate organizational changes, if necessary, based on findings during incident investigations.
- Reporting (individual cases and annual report)

Mailhammer-Högl e.K. ensures the functionality of this business-Conduct Guidelines by ensuring that the necessary framework conditions are implemented and the required resources are made available.

The functioning and effectiveness of these guidelines are reviewed on a regular basis. Permanent monitoring with ongoing evaluation and reporting is intended to ensure the ongoing improvement of these Business Conduct Guidelines.

I. Implementation and control

The entire management of Mailhammer-Högl e.K. actively promotes the broad communication of the business conduct clauses and ensures their sustainable implementation. The compliance of the laws and the observance of the Business-Conduct-Guidelines are to be controlled regularly in all organizational units of Mailhammer-Högl e.K..

Management
Mailhammer-Hoegl ek