

I. General regulations

1. Validity

This code of conduct is valid for all branches and production sites of the company Gaplast GmbH.

2. Laws, standards and ethic behaviour

The company Gaplast GmbH adheres to the valid laws and standards of the respective countries it is active in. It takes guidance from the general ethic values and principles, especially integrity, righteousness as well as human dignity.

3. Business partners, authorities and consumers

The company Gaplast GmbH practices according to the generally recognised business practices of fairness and honesty. It deals truthfully with authorities. Standards protecting consumers are adhered to.

The company Gaplast GmbH avoids conflicts of interest, whether internal or external, if they can influence the business relationship in an unobjective way. Unavoidable conflicts are disclosed to the business partner without being asked.

4. Trade secrets

Trade secrets of business partners will be treated strictly confidentially by company Gaplast GmbH and their employees. Passing on confidential information to third parties or making this information publicly available is forbidden. This continues to be the case for company members even after the employment has been terminated.

5. Reporting and transparency

Internal and external reports and documents of the company, in particular also financial information, represent complete, appropriate and timely as well as comprehensible representations about the company Gaplast GmbH. They are prepared in accordance with recognized accounting principles as well as appropriately recognised control systems.

6. Responsibility in the supply chain

The company is aware that responsible behaviour is becoming increasingly important within supply chains. The selection of our suppliers takes into account, as far as possible, whether they are also committed to acting responsibly and apply either this or an equivalent code of conduct.

II. Antitrust and competition law guidelines

1. Antitrust law

The company Gaplast GmbH is committed to a fair competition. Laws protecting fair competition, particularly antitrust law and other competition regulating laws are adhered to.

Collusion on prices or other conditions, sales areas or customers as well a misuse of market power contradict the principles of the company.

2. Bribery, bribability and corruption

The company Gaplast GmbH opposes bribery and corruption and does not tolerate such behaviour. The employees are to take care not to create personal dependencies or obligations towards customers or suppliers. In particular, employees are not allowed to accept or make gifts which, under reasonable contemplation, could influence business decisions.

In case gifts are part of a country's custom, it is important to note that no binding dependencies are created and local legal standards are adhered to.

Contravention will routinely have legal consequences.

3. Money laundering

The company complies with the legal obligations to prevent money laundering and does not participate in transactions that serve to conceal criminal or illegally acquired assets. Before entering into business relationships, the company checks the identity and seriousness of its business partners. When making payments to or from business partners, it looks for warning signs of money laundering. Business processes are dutifully documented.

III. Global guidelines

1. Human Rights

Internationally recognised human rights¹ are supported explicitly and consistently.

Equally, in the case of disciplinary measures, all company personnel are to be treated with dignity and respect. Such measures must only take place in accordance with the current national and international standards and internationally recognised human rights¹.

2. Child Labour

Child labour and any kind of exploitation of children and adolescents is rejected. The corresponding laws are adhered to.

3. Forced labour

Any kind of forced labour, debt bondage, slave work or slavery or similar situations are rejected. Company members must not be forced to work through means of violence or intimidation, neither directly nor indirectly.²

4. Wages

All employees in full time employment shall receive a fair salary covering at least their basic needs. The wages are to be paid in a practical way (bank transfer) and payroll accounting has to be made available to a reasonable extent.³

The right of employees to freedom of association, freedom of assembly and collective bargaining in as far as this is legally admissible and possible in the respective country, shall be respected.⁴

5. Working hours

Working hours correspond to valid national laws, industry standards or relevant ILO conventions. Extra work has to be done on a voluntarily basis.⁵

6. Health and employment protection

The national and international regulations for securing health and safety at work are adhered to. Relevant systems to avoid risks for health and safety are to be set up.⁶

7. Environmental protection

The company adheres to the goals of sustainable environmental protection. Environmentally friendly production methods are aimed for in this context. In accordance with the principles of the Rio Declaration on Environment and Development of the United Nations⁷, the company deals responsibly with natural resources.

IV. Ethical and social principles

1. Non-discrimination

The company Gaplast GmbH opposes discrimination on employment or occupation, in particular a discrimination because of race, ethnic or national origins, colour of skin, gender, or mental and physical disability, age, creed, membership of a trade union or any other personal traits.⁸

2. Molestation

The company Gaplast GmbH disapproves of physical, psychological or sexual violence.

3. Freedom of opinion

The right to freedom of opinion and free expression of opinion is warranted.

4. Privacy

Privacy is respected.

V. Observance of the code of conduct

1. Measures

The company Gaplast GmbH presents the code of conduct to company members in a suitable form and given intervals and ensures that it is adhered to.

references:

1 General Declaration of Human Rights – UN-Doc. 217, UN Human Rights Charter.

2 See. ILO Conventions 29 and 105

3 See. ILO Conventions 26 and 131

4 See ILO Convention 87 of 1948 and 98 of 1949

5 See ILO Conventions 1 and 14

6 See ILO Convention 155

7 27 principles of the Rio Declaration on Environment and Development, decided upon by the United Nations Conference on Environment and Development (UNCED), Rio de Janeiro, 1992

8 See ILO Conventions 100, 111, 158 and 159