

Company policy

aXum-Group

**Version 7.0
from 25.06.2025**

Scope of application

The requirements of our corporate guidelines 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 role model function, all managers have the task of communicating these corporate guidelines to the respective companies and divisions and monitoring compliance.

The guideline does not replace process descriptions or work and procedural instructions, nor does it replace inter-company laws or standards.

If, despite conscientious examination, the directive conflicts with a law, the law has the binding effect.

This guideline applies to all companies of the AXXUM-Group:

- Axxum GmbH
- Axxum Innovation GmbH
- AXXUM Packaging Hamburg GmbH
- AXXUM Packaging Schleswig-Holstein GmbH
- AXXUM Packaging Berlin Brandenburg GmbH
- AXXUM Packaging Rhein-Ruhr GmbH & Co KG
- AXXUM Packaging Hessen GmbH
- AXXUM Packaging Main-Neckar GmbH & Co KG
- AXXUM Packaging Austria GmbH
- AXXUM Packaging Czech Republic s.r.o.
- AXXUM Packaging Slovakia s.r.o.
- AXXUM Packaging Hungary Kft.
- AXXUM CL Industries Niedersachsen GmbH & Co KG
- AXXUM CL Steel Westfalen GmbH & Co KG
- AXXUM CL Steel BE BV
- CON-PAC BV
- CON-PAC LOGISTICS BV

Translated document – for official release, see the original document in German

Management AXXUM

Table of contents

1.	Business ethics.....	4
1.1	Entrepreneurial thinking & acting.....	4
1.2	Customer satisfaction.....	4
1.3	Compliance with law & order	4
1.4	Together & not against each other	4
1.5	Communication.....	4
1.6	Gender-appropriate language.....	5
1.7	Conflicts of interest	5
1.8	Suppliers.....	5
1.9	Whistleblower protection	5
2.	Sustainability.....	5
2.1	Social responsibility.....	5
2.1.1	Working hours	5
2.1.2	Wages & social benefits.....	5
2.1.3	Discrimination.....	6
2.1.4	Human rights	6
2.1.5	Modern slavery.....	6
2.1.6	Corruption, bribery & extortion	6
2.1.7	Gifts & invitations.....	6
2.1.8	Fair competition.....	6
2.1.9	Freedom of association & right to collective bargaining	6
2.1.10	Data protection.....	6
2.1.11	Occupational safety.....	7
2.1.12	Personal protective equipment.....	8
2.1.13	Health protection & ergonomics in the workplace	8
2.1.14	Alcohol & drug consumption	8
2.1.15	Fire protection	8
2.2	Environmental protection.....	8
2.2.1	Reduction & avoidance of emissions	9
2.2.2	Energy efficiency	9
2.2.3	Careful use of resources	10
2.3	Economic success.....	10
2.3.1	Financial responsibility.....	10
2.3.2	Sustainable supply chain.....	10
2.3.3	Management systems	10
2.3.4	Innovation management.....	10
2.3.5	Digitization	10
3.	Summary.....	11

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 must 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. We can only be successful if our customers are successful. The needs and wishes of our customers and the market therefore determine our strategy and daily decisions. We strive for long-term and economic business relationships and thus secure the jobs of our employees.

1.3 Compliance with law & order

Compliance with applicable laws, regulations, binding obligations, internal guidelines and contractual agreements is our top priority in everything we do.

We must respond swiftly and appropriately to lawsuits, legal proceedings or investigations concerning 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. The professional and personal suitability for the tasks and responsibilities assigned to them is ensured in the case of managers and holders of entrepreneurial duties.

1.4 Together & not against each other

The employees of the AXXUM-Group ensure that they treat each other fairly and respectfully during and outside of working hours. New employees are carefully introduced to the processes and operational peculiarities. 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 with our customers and business partners as well as internally with our employees. All employees have access to the contents of this company policy and other guidelines and specifications 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 aim is to ensure permanent and sustainable compliance with our corporate guidelines by all employees of the AXXUM-Group as a basis for the secure preservation 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 guideline or contradictions with other internal provisions, laws or regulations, the respective supervisor, the HR department or the management or, if available, the works council must be contacted so that our guidelines can be implemented and lived in a permanent, consistent and sustainable manner. In case of doubt, laws and external regulations always take precedence over internal guidelines. Our company policy is available for external parties to download from our website (<https://www.axxum.eu/impressum>). It must also be communicated to our business partners.

1.6 Gender-appropriate language

We are committed to using gender-appropriate language in our internal and external communications. This includes the primary use of neutral terms (e.g. employees, contact persons) and, if this is not possible, the stylistic use of the gender asterisk (e.g. warehouse specialist, authorized signatory).

1.7 Conflicts of interest

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

1.8 Suppliers

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

1.9 Whistleblower protection

The Whistleblower Protection Act (HinSchG) came into force on July 2, 2023. It implements the EU Whistleblowing Directive of 16.12.2019. The HinSchG regulates the protection of persons who obtain information about past or potential misconduct in connection with their professional activities and report this information to the reporting offices provided for in the HinSchG. A whistleblower system has been implemented for this purpose, which allows employees or third parties to report, even anonymously (<https://axxum.compliance.one>). Further information can be found in the Whistleblower Policy.

2. Sustainability

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

2.1 Social responsibility

2.1.1 Working hours

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

2.1.2 Wages & social benefits

The AXXUM-Group remunerates its employees in accordance with the applicable statutory and company regulations (e.g. 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, willingness to perform and motivation and must always be in line with our social responsibility for the workforce. Our employees can contact designated contact persons at any time if they have questions or concerns about working conditions such as working hours, compensation, or social benefits. We ensure that our grievance mechanism is accessible to all employees, that confidentiality is maintained, and that those who report concerns are expressly protected from any retaliatory measures.

2.1.3 Work-life-balance

We aim to create a family-friendly working environment. To this end, we offer flexible working time models and the option of mobile working. We have established clear structures for pregnant employees based on a legally required risk assessment, which ensure that targeted protective measures are put in place at an early stage.

2.1.4 Discrimination

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

2.1.5 Human rights

Respect for fundamental human rights is also a top priority for us (in accordance with the Universal Declaration of Human Rights (UDHR) of 1948). UN and EU sanctions 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. We do not accept violations of human rights either in our own operations or along the supply chain.

2.1.6 Modern slavery

We are expressly and fully opposed 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. We reject any form of forced and/or child labor.

When using temporary workers or cooperating with companies for the placement of workers, official permits, residence and work permits must always be checked. When using service providers, suppliers and subcontractors, an assessment is made with regard to forced and child labor. If our standards are not met, this prevents cooperation or leads to the termination of business relationships. Any violations and anomalies must be reported immediately and without exception.

2.1.7 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, including attempts to exert influence, are consistently pursued.

2.1.8 Gifts & invitations

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

2.1.9 Fair competition

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

2.1.10 Freedom of association & right to collective bargaining

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

2.1.11 Data protection

We implement the data protection regulations in accordance with the General Data Protection Regulation (GDPR) for the protection of personal data. We are supported in this by an external data protection officer in

order to correctly and fully implement all provisions relating to the handling of internal and external personal data. All employees who come into contact with personal data are trained in data protection issues. Details on 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 trade and business secrets must be observed. Every employee is obliged in writing to protect trade secrets, even beyond existing employment relationships. Trade secrets include information about customers and business partners, their products and the associated production processes.

2.1.12 Information security

We have established an information security management system (ISMS) in accordance with ISO/IEC 27001 to protect all information relevant to the company. This forms the basis for the systematic and risk-based handling of information and for ensuring confidentiality, integrity, and availability. All employees are obliged to comply with the information security requirements. Training courses and internal regulations support the implementation and understanding of the security requirements. Violations of the information security guidelines may result in consequences under labor law. Further details on information security are documented in our information security policy and available on the intranet.

2.1.13 Occupational safety

As an employer, the AXXUM-Group guarantees safety and health protection in the workplace within the framework of the statutory provisions and supports the continuous improvement process, in particular to prevent accidents at work. Management, executives and employees are obliged to comply with 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 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 location in order to be able to react appropriately and, above all, quickly to identified risks. Specified processes, e.g. for dealing with accidents at work, 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 health and safety measures within 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, the environment or property
- Constant caution and mutual consideration are prerequisites for safe working.
- 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 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 require the necessary instruction (general safety instruction; instruction on the activities to be carried out) by the manager, any necessary occupational health check-ups and any necessary written authorizations
- We are committed to handling hazardous substances in an environmentally friendly manner and store them in suitable locations. We also keep a register of hazardous substances at each site
- The road traffic regulations apply on our company premises and parking lots

- Attention must always be paid to forklift and transport traffic on the company premises

2.1.14 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.

2.1.15 Health protection & ergonomics in 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 make the working environment easier for our employees. This applies to our workflows and processes as well as the equipment in the workplace. This includes, for example, the use of ergonomic office equipment and measures to prevent long-term stress, e.g. through job rotation.

In the event of a pandemic, we as a group of companies minimally fulfill the legal specifications and requirements and always act in the interests of protecting our employees from infection.

2.1.16 Alcohol & drug consumption

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

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

2.1.17 Fire protection

The applicable regulations and laws for fire protection must be strictly adhered to. 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 safety regulations A (emergency and alarm plan), B (information for all employees) and C (information for employees who perform a fire safety task). The organization includes, for example, the provision and training of fire protection and evacuation assistants, alarm functions, fire prevention equipment, the designation and maintenance of escape and rescue routes and the regular inspection of extinguishing agents and equipment. Preventive fire protection measures must always be implemented and violations of applicable regulations must be rectified immediately. The fire safety 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 these in our company and continuously 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 resources to meet our environmental requirements. We are constantly working to achieve our qualitative, social and economic goals. Based on our shared responsibility towards people and the environment, we aim to harmonize

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 through continuous improvement processes
- Regular adjustment of individual consumers by means of continuous measurements and spot checks reveals irregularities at an early stage.
- The production of high-quality products is continuously examined for potential savings.
- 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 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 must be avoided or reduced to a minimum.
- Environmental impact, resource conservation and energy saving are taken into account when planning facilities and construction projects.
- Environmental impacts in terms of use and disposal are taken into account during procurement.

The principles listed are applied in all departments and are communicated to other employees by the management level and all senior 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 our corporate strategy. We are aware that our activities consume natural resources and can have a negative impact. It is therefore our duty to reduce the consumption of energy and resources to the minimum possible within the scope 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 reducing emissions beyond the applicable regulations. This includes, for example, using 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, for example. 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.

2.2.2 Energy efficiency

We carry out regular energy audits within the Group in accordance with national standards, such as DIN EN 16247-1. On the basis of defined specifications, such as the Energy Services Act (EDL-G), current, continuously or temporarily measured, verifiable operating data on energy consumption and load profiles are regularly recorded and evaluated. This is the basis for an in-depth, regular review of the energy consumption profile of buildings or groups of buildings, operating processes or systems, either on the basis of a life cycle cost analysis or a simple amortization calculation for smaller projects. These energy audits result in measures to improve energy efficiency, which are reviewed as part of the continuous improvement process and, if appropriate, implemented. When making 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.

2.2.3 Careful use of resources

Our group of companies focuses on the careful use of resources. We endeavor to find and use sustainable sources as alternatives when using materials and to avoid environmental pollution. We treat our operating resources, equipment and buildings with care in order to ensure their long-term use, provided there are no economic reasons to the contrary. We also protect our human resources by practicing 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 that must 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 ensure correct and transparent accounting. Significant annual financial statements and the consolidated financial statements are audited.

2.3.2 Sustainable supply chain

AXXUM requires long-term relationships with suppliers and business partners who act sustainably in order to ensure the company's long-term economic success. This enables the company's growth and competitiveness to be constantly increased. The entire group of companies ensures that all suppliers represent the same sustainable interests.

2.3.3 Management systems

The AXXUM companies undertake to act in accordance with the management systems introduced and to promote 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 controlled. All staff are encouraged to actively participate in continuous improvement.

The following management systems have already been introduced or are being planned:

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

2.3.4 Innovation management

We see innovation as the core of our economic success. We therefore foster a culture that promotes transparent and open communication and encourages the contribution of potential improvements and the creation of commercially successful products. To this end, we 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 analogue processes and products to digitalized technologies. In doing so, they ensure our ongoing economic success and the targeted further development of our business model, taking into account the opportunities offered by digitalization.

We focus on the three fields of action

- Digital customer experience
- Operational excellence

- Digital products

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

3. Summary

All of the information, guidelines and codes of conduct set out 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 line manager, 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. Those responsible will be held accountable for violations of and deliberate disregard for our guidelines. We also expect our suppliers to comply with the sustainability requirements set out in this company policy.

