



To all Employees

The integrity and good reputation of our company is in the hands of our employees. Fairness and honesty, law-abiding behavior and high compliance must determine how we treat each other in the company and how we deal with our customers and business partners. This Code is meant to prevent any situation which may jeopardize the integrity of our behavior and to create a framework which helps to prevent corruption and other violations of law.

A commitment to integrity is critical to how we conduct business and maintain our reputation in the regions where we do business. We all need to understand our responsibilities and ensure we are meeting them.

I ask you to join me in making a commitment to comply with our Code of Business Conduct and Ethics and to always demonstrate the highest standards of integrity and ethical conduct in all business activities.

Our responsibilities under the Code include the following:

- Understand the standards contained in the Code
- Comply with all standards contained in the Code
- Notify the Company if you believe a violation of the law or standards has occurred.

It is my hope that the Code will reinforce the importance of compliance and ethics issues and provide guidance to help make better ethical decisions each and every day.

Best regards

Dr. Markus Rall

Chief Executive Officer



Introduction to Our Code

All employees are required to:

- ❖ Conduct business fairly and honestly
- ❖ Report any violations or potential violations of the Code without fear of retaliation
- ❖ Prevent compliance violations and protect Dienst's reputation by acting in an ethical manner
- ❖ Comply with all laws, regulations and policies where we operate



Reporting Concerns

Integrity is at the core of Dienst's identity and reputation, and we are all responsible for performing with integrity in everything we do.

We are responsible for raising concerns about risk to the Company – ideally, before these risks become actual problems.

You are required to strictly adhere to the Company's Anti-Retaliation Commitment to encourage:

- \\ The reporting of any suspected illegal or unethical behavior
- \\ Full cooperation and participation in the investigation of any reported concern
- \\ Full compliance with the Code and all applicable laws and regulations

Dienst will not tolerate retaliation against anyone who in good faith raises a concern, reports misconduct or participates in an investigation.

Dienst must examine the concern, notify the result to the employee who lodged the concern and, if necessary, initiate sanctions.



Conflict of Interest

All employees are expected to avoid engaging in activities that conflict with, or have the appearance of conflicting with, the best interests of the Company. A conflict situation can arise when an employee takes actions or has interests that may make it difficult for the individual to perform work for the Company objectively and effectively.

The employees are not allowed to act for the Company in their own matters or in matters of people close to them. An example: Commissioning a company owned by the spouse. In such cases, the employee must inform his/her superior who will decide which employee is to process the business transaction for the company. Related persons within the meaning of this provision include, but are not limited to spouses, unmarried civil partners, as well as relations by blood or marriage in direct line (such as parents, parents-in-law, grandparents, children, children-in-law, grandchildren). Non-relatives may also be related persons in whom the close relationship creates a conflict of interest where close personal contacts exist. In case of doubt, be sure to inform your superior who may consult with the management circle, if necessary.

A conflict of interest may also arise should an intimate relationship develop between an employee and his/her superior. Be sure to report this to the Executive Management for the purpose of reaching a settlement.



Gifts and Invitations

Gifts and invitations in a business environment may sometimes be appropriate to promote good working relationships. However, you can give or accept gifts with a value of 10 euros or thereabouts, depending on what give-aways are kept in stock. It is also unacceptable to receive anything else of value from an actual or potential competitor, supplier or customer.

Occasional entertainment is allowed within customary limits (no luxury restaurant, no excessive alcoholic drinks etc.).

The key rules are:

- ❖ Gifts of money are prohibited.
- ❖ The appropriateness of giving or receiving invitations must be approved in advance by your divisional or functional Leadership
- ❖ Under no circumstances should any gift received violate this Code or applicable laws and regulations
- ❖ All gifts and invitations to any government official must be pre-approved by the Legal Department or Executive Management
- ❖ If gifts cannot be returned, the gift must be handed over to the company and sold or raffled, and the proceeds must be donated to a charitable organization



Competition and Antitrust

Competition and antitrust laws protect free enterprise and encourage fair and honest competition. At Dienst, we seek competitive advantages through superior performance, never through unethical or illegal practices. Stealing or illegally appropriating proprietary information or inducing disclosures by past or present employees of other companies is prohibited. If you improperly obtain proprietary information from competitors, suppliers or other third parties, you should treat that information as confidential and not use it for improper business purposes. In addition, you should promptly report the situation to the Executive Management.

You are expected to comply with applicable domestic and international antitrust and competition laws. Engaging in, conspiring to or agreeing to do any of the following actions is prohibited:

- ❖ Price Fixing – communicating with competitor(s) regarding prices, terms or conditions of sale, output or production
- ❖ Bid Rigging – agreeing with competitor(s) regarding bids to be submitted
- ❖ Group Boycott – agreeing with competitor(s) not to deal with

vendors or distributors, other competitors or customers

- ❖ Territory or Customer Allocation – agreeing with competitor(s) to split territories or customers
- ❖ Bribes or Kickbacks – offering to pay bribes or kickbacks in an attempt to do any of the above

The above list is not intended to be exhaustive, rather, an illustration of certain types of conduct that constitute illegal antitrust behavior.



Exports and Prohibited Transactions

Any activity that involves exporting commodities or transmitting technical data or software to another country may require a valid export license. An 'export' is defined as any method of conveying products or data to foreign individuals or companies, verbally or in writing, including with respect to sales, training and consulting product promotion. Regardless of the country in which you are working, the German Export Control Regulation apply to the following:

- ❖ Direct exports from Germany
- ❖ Re-exports of certain German-origin commodities and technical data from countries outside Germany to third countries
- ❖ German-origin parts and components used in the manufacture of a non German end-product for export or re-export
- ❖ Direct products not produced in Germany that result from technical data of German origin

A valid license may be needed even if a product is freely available in Germany or if its technical data or software is not proprietary.

Various countries worldwide, and the European Union, for example, maintain strict embargoes prohibiting, and lesser sanctions limiting, commercial transactions with specified countries, business entities, organizations and individuals. There are various embargo laws that place restrictions on trading with certain countries. It is your responsibility to ensure that we are not violating any of these laws or restrictions.



In the European Union these regulations and their application to foreign subsidiaries vary depending on the entity involved and the type of transaction. Their application is not limited to high technology trade but can extend to all types of transactions with listed countries, entities and individuals.

If you become aware of possible violations of applicable export control or embargo laws or have a concern regarding a particular country, individual or organization with which the Company is conducting business, you should seek advice from the relevant department.



Confidential and Proprietary Information

During your employment with Dienst, you may obtain confidential and/or proprietary information about the Company, its customers or suppliers.

Confidential information includes, but is not limited to, all non-public information such as:

- \\ Financial results
- \\ Prospects
- \\ Agreements
- \\ Forecasts regarding commodity prices
- \\ Potential corporate transactions
- \\ Commercial terms and conditions
- \\ Purchase and sales prices

Proprietary information, which includes know-how and other intellectual property, business, sales, marketing and service plans, engineering and manufacturing ideas and practices, designs, databases, records, salary and other compensation and benefit information, as well as any unpublished financial data and reports, must be protected from unauthorized use or disclosure. Unauthorized use or disclosure of Dienst's proprietary information is illegal and may result in the imposition of civil or criminal penalties.

It is the responsibility of every employee during and subsequent to their employment period to protect and not disclose confidential information except when disclosure is authorized by the Company or legally required. You should not discuss internal Company matters or developments with anyone outside of the Company except as required in the performance of your regular Company duties or under applicable laws.



Data Protection

In order to safeguard the privacy of Dienst employees, the following restrictions apply when evaluating and utilizing unlawfully acquired data and information about the conduct of employees:

Dienst will not collect, evaluate or otherwise use the following types of data and information regarding the conduct of employees:

- ❖ Data collected from private emails using company devices (PCs, other internet-compatible devices, smartphones etc.) or external devices. This applies to connection and content data.
- ❖ Telephone connection data for all calls, whether business or private, irrespective of which telephone equipment is used for this purpose.
- ❖ Data derived from the overt or concealed surveillance of employees using other technical measures, in particular by way of microphones and/or video cameras.

Other collection of information which fails to respect the privacy rights of employees. This includes, in particular, the following measures:

- ❖ Covert listening, observation or other surveillance of employees by persons.
- ❖ Covert searches or monitoring of employees' workplace, clothing or lockers.
- ❖ Overt searches of the aforementioned type without the express consent of the employee.



This ban applies particularly (but not exclusively) to questions about the company from the media or members of the press.

We must always respect and protect the information of our customers, suppliers and other employees with the same level of care that the Company takes to ensure the confidentiality is their own proprietary information.

Failure to follow these procedures may result in severe penalties to both the employee involved and Dienst. Unless you are expressly authorized to make a comment, all inquiries of this nature should be referred to our Company Owners and to the Executive Management at Dienst Verpackungstechnik GmbH.



Environmental, Health and Safety Sustainability

Dienst is committed to complying with all applicable environmental legal requirements and to protecting the environment. Employees are expected to comply with all applicable environmental legal requirements and report any incidents or conditions that might result in a violation of law or Company policy. Employees are also encouraged to support environmental programs in communities where we do business.

The Company strives to provide each employee with a safe and healthful work environment. Each employee is responsible for maintaining a safe and healthy workplace for all employees by following health and safety rules and reporting accidents, injuries and unsafe equipment, practices or conditions as stated in the Company's Environmental, Health and Safety Policy.

Violence or threatening behavior is not permitted under any circumstances in the workplace. Employees must report to work in a condition to perform their duties and must not be under the influence of illegal drugs or alcohol. We do not tolerate drug abuse or the abuse of alcohol or legally prescribed drugs in the workplace.

In addition, employees are required to adhere to all other health and safety policies on any of the Company's premises. Employees can obtain all information on the Company's health and safety policies from our Human Resources representative.

Sustainability is widely defined as "meeting the needs of the present without compromising the ability of future generations to meet their own needs." At Dienst, this means acknowledging that our decisions about what we consume, produce and waste has environmental and social impacts on today's society, as well as on future generations.



Diversity, Equal Opportunity and Respect

At Dienst, our objective is to create and maintain an environment that fosters collaboration, interaction, tolerance and respect. We believe the best way to deliver the highest quality products and services is to cultivate a strong, diverse and professional team. We value our diverse experiences, backgrounds, ethnicities, cultural orientation and beliefs and promote respectful and mutually beneficial relationships with customers, suppliers, employees and others.

The Company has adopted global labor standards which prohibit the Company from using any type of forced labor or child labor or engaging in abusive or corrupt business practices. In addition, the Company's Purchasing Terms and Conditions prohibit all of its suppliers and their subcontractors from using any type of forced labor or child labor or engaging in abusive or corrupt business practices for all regions in which Dienst operates.

It is the Company's policy to not interfere with its employees' rights to freedom of association. Further, the Company posture with respect to labor relations is that employees have the right to choose (or not) to affiliate with legally-sanctioned organizations without unlawful interference. Where trade unions are present, it is the Company's policy to deal with them fairly and conduct negotiations in a purposeful and non-adversarial manner.

We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any discrimination or harassment of any kind. We will ensure that employees never engage in actions or behaviors that entail harassment or bullying. Dienst clearly defines harassment as an unacceptable action, conduct or behavior that a reasonable person would find unwelcome, humiliating, intimidating or offensive.

Workplace harassment and bullying should not be confused with advice or counselling on work performance, or work-related behavior of an individual or a group, which might include critical comments about work performance.



In order to comply with this, we take responsibility to ensure that not only Dienst employees, but also customers and business partners are always be treated with respect and dignity.

Furthermore, we set some rules such as:

- No Dienst employee should ever make jokes or comments that are racial, ethnic, religious, sexual, or related to age, physical appearance or disability;
- No Dienst employee should ever distribute or display offensive material including inappropriate pictures and cartoons;
- No Dienst employee should ever spread malicious rumors or use Dienst resources to transmit derogatory, discriminatory, abusive or harassing material.

Sexual harassment, like any other form of harassment, is entirely prohibited. Sexual harassment is defined as an unwelcome action, conduct, or behavior of a sexual nature. It can be verbal, visual or physical. Sexual harassment may occur as a form of repeated incidents that taken alone would not be defined as harassment, or through one single sufficiently serious incident.

On the one hand, a direct and unsolicited sexual advance or improperly touching another person can constitute sexual harassment. On the other hand, making an isolated respectful comment about a colleague's clothing or asking a colleague once for a date is not sexual harassment. However, if these incidents are repeated, and continue after the individual has been asked to refrain from such actions, then this becomes sexual harassment, since the "unwelcome" nature of the action is then evident.

As far as possible, job advertisements must therefore be worded in such a way as to avoid any discrimination against employees or applicants. The required qualifications must be based exclusively on the requirement profile of the job vacancy to be filled. Questions that could result in discrimination are not permitted in the job interview. In the case of some placements and promotions, varying treatment may be justified where it is based on rational and logical considerations and in particular on a subjective impression of the applicant's capabilities and suitability for the position to be filled.



All employees have the right to make a complaint to the employer if they feel that they have been discriminated against by the company, their line manager or other staff, in relation to their employment relationship. The employer shall examine the complaint, notify the complainant of the result and, where appropriate, propose sanctions to remedy the situation. The company is not allowed to discriminate against employees for exercising their rights or against those who support the employee in doing so.

We would also like to draw your attention to the existing GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS set out by the United Nations [HR/PUB/11/04]. The Human Rights Council endorsed the Guiding Principles in its resolution 17/4 of 16 June 2011. Dienst fully adheres to these Principles. A full copy of the text is available in the canteen.

Where employees are in breach of existing agreements, the employer shall take steps to remedy the breaches without delay. The employer will observe the principle of proportionality when taking any measures under labor law.

Contact Compliance:

compliance@dienst-packsystems.de

Information and contacts

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