
CODE OF CONDUCT OF POLY-CLIP



Excellence in Clipping



FROM THE SAUSAGE TIP TO THE PEAK OF EXCELLENCE THROUGH CLEAN PERFORMANCE SINCE 1922!

Dear employees,

We are valued by our customers* for our entrepreneurial philosophy and innovative quality solutions. That's why our products and services are so successful and in demand worldwide. Our philosophy has always included the conduct of an honorable businessman - a matter of course for us as a family business. In this Code of Conduct, we would like to lay this down in principles that demonstrate our commitment in particularly important areas for Poly-clip.



Frank Niedecker
Partner and
Managing Director



Alexander Giehl
Managing Director

OUR COMMITMENTS:

We are a committed family business. We would like to set out this commitment in our new Code of Conduct in the context of good corporate governance. It is particularly important to us that we have self-



responsible, often long-standing, and highly qualified employees who can think for themselves.

The Code of Conduct is based on this, from anti-corruption to customs and trade regulations, and instead of many rules and prohibitions with a raised finger, it explains the background to why individual topics are so important and gives examples of where this can play a role in the everyday lives of all employees.

Hattersheim, September 2023

ANTICORRUPTION

Our commitment:



We do not tolerate any form of bribery or corruption. We will not offer or promise anything of (im)material value or accept, solicit, or agree to anything of this nature in order to improperly influence decisions. Nor will we circumvent this by using third parties to commit such acts.

Why is this important to us?



To continue to be an innovative and reliable partner to our customers, we fight corruption. It undermines trust in companies and governments, reduces access to public services and hinders innovation.

How do we exemplify this?



- ✦ No gratuities to (foreign) public officials to do business or get approvals (faster).
- ✦ No facilitation payments to speed up the processing of goods or to give us other advantages.

DATA PROTECTION AND IT SECURITY AND USE



Our commitment:

The security of information and the exchange of information is of great importance in all business processes. We protect our business data from unauthorized access by third parties by applying high technical and organizational security standards and comply with the applicable data protection regulations.



Why is this important to us?

Handling data responsibly and securing it technically helps us to maintain the trust of our employees, customers, and suppliers.



How we put this into practice:

- ✦ We back up our data daily.
- ✦ The data is only used for its original purpose.
- ✦ Cyber security is one of our top priorities.

DIVERSITY AND RESPECT



Our commitment:

Diversity is our strength. We respect our colleagues with all their different backgrounds, values, and lifestyles.



Why this is important to us:

The strength of a family business lies in the long-term, trusting loyalty of its employees to the company in a good working atmosphere.



How we put this into practice:

- ✦ Our employees all have the same opportunities.
- ✦ We employ people with severe disabilities.
- ✦ We show consideration for colleagues who are pregnant, raising children and/or caring for (elderly) family members.

SECURITY



Our commitment:

Confidential information is treated as such.



Why this is important to us:

Protecting our intellectual property is the basis for our success. If we break a confidentiality agreement, we lose our reputation, and our customers lose confidence in us and may take legal action against us.



How do we put this into practice?

- ✦ Protection concepts for our more than 1,000 patents and other property rights.
- ✦ We conclude non-disclosure agreements to protect our contractual partners

MONEY LAUNDERING



Our commitment:

We only work with clean means and flows of payment.



Why is this important to us?

Money laundering harms everyone because the money being laundered comes from criminal acts. We counteract this.



How do we put this into practice?

- ✦ We do not accept cash payments from customers.
- ✦ We do not use any suspicious or unusual payment methods

BUSINESS CONTINUITY



Our commitment:

We stand for reliability and trust towards customers and suppliers - at peak times and especially in times of crisis. We know and value our suppliers, most of whom are based within a 300 km radius of us and maintain a business relationship based on partnership. Our customers are reliably served worldwide.



Why is this important to us?

The world is becoming increasingly unpredictable - a blocked shipping route, for example, can lead to shortages of raw materials and goods worldwide. We take precautions to ensure that we can meet our customer obligations even in such cases.



How do we put this into practice?

- * No exclusivity with suppliers, a second supplier exists whenever possible.
- * Long-term partnerships with suppliers.
- * Functional warehousing.

BUSINESS PARTNER



Our commitment:

We select business partners with integrity in the supply chain according to objective criteria and place a strong focus on regional business partners.



Why is this important to us?

Our success and our continued existence as a company depend on the trust of our customers and the public in us and our supply chain. Failures in the supply chain can be attributed to Poly-clip.



How do we exemplify this?

- ✦ Over 90% of the suppliers for our materials currently come from Germany.
- ✦ We visit and know our suppliers.

CONFLICTS OF INTEREST



Our commitment:

We ensure that our business judgment is not influenced by personal interests. Where possible, we try to find a fair balance of interests.



Why is this important to us?

This is how we ensure the trust of our stakeholders in correct decisions far removed from personal cliques.



How we put this into practice:

- ✦ We have rules in place to separate private and business issues.

ANTITRUST AND COMPETITION LAW



Our commitment:

We only participate in fair competition and compete based on the quality and continuous innovation of our products. We do not engage in agreements or practices that violate competition laws.



Why is this important to us?

Poly-clip thrives on its innovations. Competition is a driver of this innovation and leads to a greater choice of high-quality products at competitive prices for the benefit of customers and society.



How do we put this into practice?

- ✦ We do not discuss prices or price components with competitors.
- ✦ We do not exchange information on prices or sales areas at trade fairs or similar.

PRODUCT SAFETY



Our commitment:

We offer safe, high-quality products that focus on effectiveness, efficiency, and hygiene.



Why is this important to us:

We are one of the world's leading manufacturers of clip closure solutions. We can only maintain this hard-earned position if our products are of the right quality.



How we put this into practice:

- ✦ Certified quality management: ISO 9001, ISO 22000, Halal, ISEGA, EAC certification.
- ✦ We train our employees regularly and use modern production methods and equipment. We also have our own global Poly-clip Academy

SAFETY AND HEALTH IN THE WORKPLACE



Our commitment:

Our employees make Poly-clip what it is. That's why we create safe and healthy workplaces.



Why this is important to us:

To deliver top performance, the conditions for employees must be right. Anyone who feels unwell or even at risk will not stay with Poly-clip and will not keep the company at the forefront of the industry as a quality and technology leader.



How do we put this into practice?

- ✳ Energy efficiency in our new buildings for an environment with a better quality of life at work.
- ✳ Ergonomic working (e.g., height-adjustable desks).
- ✳ Safety clothing.
- ✳ Sustainable air conditioning/ventilation in the office area and production halls.

CORPORATE SOCIAL RESPONSIBILITY (CSR)



Our commitment:

At Poly-clip, we take our corporate social responsibility seriously. Our packaging solutions have always been sustainable, material-saving and more CO2-friendly than many alternatives. We are continuously working towards becoming CO2 neutral.



Why is this important to us?

As part of society, we want to contribute to a livable present and future so that our children and grandchildren can grow up in a world worth living in.



How do we put this into practice?

- * Our clips produce 81% less greenhouse gases than thermoformed packaging.
- * From 2009 to 2019, we reduced our air kilometers by 76%.

MIRROR TEST/SELF-REFLECTION



Our commitment:

We examine each of our actions to determine the extent to which they meet our high standards.



Why this is important to us:

Especially in the culture of trust of a family business, not every action can and should be governed by guidelines. Instead, each of us has a sense of what is right and what is wrong.

How do we put this into practice?

If one of the following questions is answered with "No", we refrain from the intended action or decision.



- ✳ Is my decision or action lawful?
- ✳ Is it in line with our values?
- ✳ Is the decision made in the interests of Poly-clip and is it free from personal interests or the interests of third parties?
- ✳ Does the action or decision stand up to public scrutiny or representation, for example as a newspaper report?
- ✳ Would an objective outside person consider the behavior to be appropriate?
- ✳ Would I report the decision to my boss without hesitation?

WORK-LIFE-BALANCE



Our commitment:

We are aware of our responsibility for achieving a work-life balance and act consistently to make this possible.



Why is this important to us:

We want employees who do not have to choose between career and family but can combine both at Poly-clip.



How we implement this in an exemplary manner:

- ☀ Mobile working and various working time models.
- ☀ Employees who temporarily need time off or other support due to unforeseen family events are supported whenever possible.
- ☀ We pay the standard wages of IG Metall.

CUSTOMS AND TRADE REGULATIONS



Our commitment:

Poly-clip satisfies customer needs around the world. This is done in compliance with the respective customs and trade regulations.



Why is this important to us?

Violations may result in customers not receiving our products (on time) and us losing them as customers. Simplified procedures can be omitted in the event of violations.



How do we put this into practice?

- ✳️ We ensure that we are not violating embargoes.
- ✳️ Country-specific certification for the import of our machines, such as EAC (Eurasian Conformity).

WE THINK IN TERMS OF GENERATIONS, WE ARE RESPONSIBLE FOR THIS

We are all personally responsible for complying with our Poly-clip Code of Conduct and our associated guidelines and laws and for developing further sensitivity to problematic behavior. It is important for leaders/managers to show strong leadership and actively set a positive example and work towards the requirements of the Code of Conduct.

In the event of uncertainty, we ourselves are responsible for seeking advice from the relevant compliance function at an early stage:

Ms. Angelika Jung

Chief Compliance Officer (CCO)
compliance@polyclip.de

Ms. Mirijam Noll

Compliance Officer
compliance@polyclip.de

or another support function at an early stage.

Violations of this Code of Conduct and the associated guidelines and laws may result in claims for damages and criminal prosecution against Poly-clip in particular. These could jeopardize the company's continued existence, meaning that jobs could be at risk. All employees must therefore take this Code of Conduct to heart and live by it in their everyday work. For their own protection, the protection of colleagues and the company.

Become a protective shield: report to our Compliance Officer in confidence by e-mail or telephone if you recognize situations or behavior that (could) contradict this Code of Conduct. It is also possible to make an (anonymous) report via our whistleblower system, which offers all employees and external persons a tool to ensure law-abiding behavior within the company and to uncover violations.

[Poly-Clip Hinweisgebersystem](#)

IN / OUT OF FORCE OR SOCIAL IMPLEMENTATION IN COUNTRIES PLUS REVISION / IMPROVEMENT

This Code of Conduct was drawn up by the management and comes into force on 01.01.2025. It must be adopted by the following Poly-clip subsidiaries:

- ☀ Poly-clip System GmbH & Co. KG
- ☀ Poly-clip System Consumables GmbH
- ☀ Poly-clip System Deutschland Vertriebs- und Service GmbH
- ☀ Quota GmbH
- ☀ OOO „Poly-clip System“, Russland

It applies to all Poly-clip business units and employees there and replaces the Code of Conduct dated November 1, 2016.

Frank Niedecker
Partner and Managing Director

Alexander Giehl
Managing Director



Poly-clip System GmbH & Co. KG

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