Anti-Corruption Policy

Policy on the Prevention of Bribery and Corruption

1. Purpose, Principles and Scope

This Anti-Corruption Policy sets out binding rules for preventing bribery and corruption at Flöter Verpackungs-Service GmbH (FLÖTER). Its purpose is to prevent improper influence on business decisions and ensure integrity in business conduct.

This policy applies to all employees and management. Everyone concerned must comply with the following requirements and consult their responsible supervisor or management in good time if uncertain.

FLÖTER maintains a zero-tolerance policy towards bribery and corruption. Business decisions must be made independently, objectively and in the legitimate interests of the company. Improper benefits must not be offered, promised, granted, requested or accepted.

Compliance with this policy is mandatory for all employees.

2. Prohibition of Bribery and Corruption

FLÖTER prohibits all forms of bribery and corruption. Employees and management must not directly or indirectly offer, promise, grant, request or accept improper benefits to influence business decisions or the conduct of others.

This prohibition applies to public officials as well as customers, suppliers and other business partners. It covers both monetary payments and other benefits capable of securing improper preferential treatment.

Facilitation and expediting payments to authorities, public officials or other bodies are expressly prohibited, regardless of their amount or intended purpose.

Third parties must not be used to facilitate bribery or corruption indirectly. Employees must neither participate in such activities nor arrange for others to carry them out.

If there is any doubt as to whether conduct is permissible, the responsible supervisor or management must be consulted before taking action.

3. Gifts, Invitations and Other Benefits

Gifts, invitations and other benefits must not influence business decisions or create the appearance of improper influence.

Offering and accepting gifts and invitations of minor value that are customary in a social context may be permissible if done transparently, if appropriate in nature and scope, and if not linked to a specific business decision. Prior approval from management is required for amounts exceeding EUR 35 per person.

Cash and cash-equivalent benefits, in particular vouchers with monetary value, are generally prohibited.

Donations and sponsorships must serve legitimate purposes only and must neither improperly influence business decisions nor be used to obtain unjustified advantages.

Invitations to business meals or events must have a legitimate business purpose and be appropriate in type, frequency and value. Invitations or benefits that appear inappropriate or could create an obligation to reciprocate must be declined.

In cases of doubt, approval must be obtained from the responsible supervisor or management before accepting or granting a benefit.

4. Dealings with Customers, Suppliers and Business Partners

FLÖTER maintains business relationships based on fairness, transparency and compliance with applicable laws. Business decisions must be based on objective criteria and must not be influenced by improper benefits or personal interests.

Employees must not directly or indirectly request improper consideration from business partners or offer it to them. Arrangements or agreements intended to secure unjustified preferential treatment are likewise prohibited.

Suppliers and service providers must be selected and commissioned on the basis of transparent, objective criteria. Personal relationships must not improperly influence selection decisions.

If there are indications of corrupt conduct by a business partner or employees receive corresponding demands, the responsible supervisor or management must be informed. Employees must not comply with such demands.

5. Conflicts of Interest

Employees must avoid situations in which personal interests or relationships influence their business decisions or could create the appearance of such influence.

Potential conflicts of interest, particularly those arising from personal relationships with customers, suppliers or other business partners, must be disclosed without delay to the responsible supervisor or management. This also applies where employees or persons close to them could derive a personal benefit from a business decision.

Conflicts of interest must be handled transparently. The responsible supervisor or management will determine appropriate measures to prevent improper influence on business decisions.

6. Reporting Suspected Violations

Employees are expected to report actual or suspected violations of this Anti-Corruption Policy promptly. This also applies to requests for improper benefits or relevant observations in the business environment.

Reports may be submitted to the responsible supervisor or directly to management:

Marc Rapp, Managing Director
Email: marc.rapp@login-ci.commarc.rapp@login-ci.com

Daniel Koch, Managing Director
Email: daniel.koch@floeter.comdaniel.koch@floeter.com

Reports will be reviewed confidentially and appropriately. Employees who report a suspicion in good faith or assist in its investigation must not suffer any disadvantage as a result. Knowingly false allegations are prohibited.

Confirmed violations may result in appropriate employment-related or other legal consequences.