Code of Conduct of Flöter Verpackungs-Service GmbH

Corporate policy for responsible, ethical and sustainable conduct

1. Scope and Responsibilities

This Code of Conduct sets out the fundamental rules of conduct for Flöter Verpackungs-Service GmbH (FLÖTER). It applies to all employees and management and provides the basis for lawful conduct and compliance with applicable requirements.

All employees must comply with applicable laws, internal regulations and work instructions relevant to their duties. Questions or uncertainties must be discussed with the relevant supervisor or management.

In addition to this Code of Conduct, the FLÖTER Declaration on FSC Core Labour Requirements, Occupational Health and Safety Policy, Quality Policy and Environmental Policy apply in their respective current versions.

2. Principles

FLÖTER develops sustainable packaging solutions and stands for quality, innovation and sustainability. We aim to meet our customers' requirements with well-designed, needs-based, resource-efficient and environmentally friendly solutions. We value high quality standards and the continuous development of our products and processes.

Our cooperation with customers, business partners and colleagues is characterised by respect, fairness and reliability. We take responsibility for our actions, address differing opinions constructively and work together to find appropriate solutions to challenges.

Legality and Integrity

We comply with applicable laws and internal requirements. We make business decisions objectively, transparently and responsibly. We act honestly, reliably and in the company's interests. Personal interests must not improperly influence business decisions. We raise potential conflicts of interest openly and at an early stage.

Respect and Fairness

We treat one another with respect, appreciation and fairness. We respect every individual's dignity and rights and interact courteously, objectively and considerately. We take differing opinions seriously and resolve conflicts openly, respectfully and constructively. We do not tolerate discrimination, bullying, harassment, intimidation or degrading behaviour.

Communication and Cooperation

We believe in teamwork and open, honest and respectful communication. We bring together our employees' individual strengths, different experiences and perspectives,

share important information promptly and clearly, and support one another. In this way, we contribute together to achieving our corporate objectives.

Quality and Reliability

We develop sustainable packaging solutions that reliably protect goods during storage and transport. We work carefully, meet our quality requirements and comply with technical specifications. We raise errors, quality defects and difficulties early so that we can find suitable solutions together.

Open Approach to Errors

We address mistakes openly and constructively. We raise errors promptly and objectively, take responsibility and work together to identify causes and preventive measures. Our focus is not on assigning blame, but on learning and continuously improving our processes.

Continuous Improvement and Initiative

We constructively question existing processes and contribute ideas to improve our products, processes and working conditions. We take suggestions for improvement seriously and assess their feasibility objectively. Every employee contributes to the company's development through initiative and responsible action.

Confidentiality, Company Property and Information Security

We treat company information, customer data and trade secrets confidentially. We use equipment, machinery and IT systems properly and protect them and our data against damage, loss and unauthorised access. We report security incidents and IT risks immediately to the responsible contact.

3. Environmental Protection

FLÖTER aligns its packaging solutions and operations with applicable environmental requirements. Our environmental management system is certified to ISO 14001 and provides the basis for systematically addressing environmental requirements and continuously improving environmental performance. We follow our Environmental Policy (VA 70-102) and its environmental objectives.

Resource Conservation and Environmental Regulations

We avoid unnecessary material consumption, scrap and waste. We use energy and water sparingly. We separate and dispose of waste in accordance with company procedures. We handle environmentally relevant materials properly and comply with applicable environmental regulations. We report identifiable savings opportunities, environmental hazards and violations to the responsible contact.

Environmentally Responsible Packaging Solutions

When developing and selecting our packaging solutions, we consider appropriate material use, the required protective function and technical requirements. We also consider material efficiency, recyclability and the use of alternative materials (e.g. biodegradable materials).

We ensure that our packaging solutions reliably protect goods and are suitable for their intended use. We regularly examine opportunities to optimise material use without compromising protection. We make factual, verifiable statements about environmental properties or material savings.

4. Occupational Health and Safety

The safety and health of employees are a high priority at FLÖTER. FLÖTER is committed to complying with applicable occupational health and safety regulations and promoting safe and healthy working conditions. Our systematic occupational health and safety management system in accordance with ISO 45001 aims to prevent workplace accidents, work-related illnesses and avoidable hazards. We follow our Occupational Health and Safety Policy (AD 60-108).

Working Safely

We comply with all safety regulations, operating instructions and training requirements. We use machinery and equipment only for their intended purposes and within our authorisation. We do not bypass or disable protective devices and wear the prescribed personal protective equipment.

Orderliness and Hazard Prevention

We keep work areas, traffic routes, escape routes and emergency exits clear and store materials and goods safely. We report damaged equipment, unsafe storage, trip hazards and other risks immediately.

In the event of immediate danger, we stop work in accordance with company procedures and inform the responsible persons. We do not ignore safety-related malfunctions.

Accidents and Health

We immediately report workplace accidents, injuries and near misses through the designated company channels. We support incident investigations and contribute to appropriate improvement measures.

We raise ergonomic concerns and recurring physical strain. Management and the responsible personnel ensure that necessary protective measures, training and risk assessments are implemented in accordance with legal requirements. We consider employees' feedback and suggestions to continuously improve safety and health protection.

5. Human Rights

FLÖTER respects human dignity and internationally recognised human rights. Fair treatment and compliance with applicable employment laws form the basis of our cooperation. We are committed to complying with the FSC Core Labour Requirements as set out in our Declaration on FSC Core Labour Requirements.

Equal Treatment

We make employment decisions based on objective criteria such as qualifications, performance and the requirements of the role. We do not tolerate disadvantage based on personal characteristics, particularly sex, origin, religion, age, disability or sexual identity.

We do not tolerate discrimination, harassment, bullying, intimidation or abuse of professional authority. We handle conflicts respectfully and objectively and address inappropriate behaviour.

Fair Working Conditions

We comply with applicable rules on working hours, rest periods and employee rights. We do not accept child labour, forced labour, human trafficking or exploitative employment.

We respect employees' legally protected rights, including freedom of association. We ensure that no one is disadvantaged for exercising their legal rights.

We all contribute to a fair working environment. We report indications of serious human rights violations or unlawful working conditions to the responsible contact.

Pay and Remuneration

We ensure fair, transparent and legally compliant remuneration for our employees. We observe applicable statutory and contractual provisions, particularly regarding minimum wages, working hours and social benefits. Remuneration reflects the relevant duties, requirements and responsibilities. We ensure objective and non-discriminatory pay.

In addition, our company remuneration system offers employees the opportunity, subject to defined conditions, to share in the company's economic success.

6. Business Ethics and Compliance

FLÖTER acts according to the principles of honourable business conduct: lawfully, honestly, fairly and responsibly. We take responsibility for our decisions and maintain relationships based on trust. We stand for reliability, diligence and integrity in our dealings with customers and business partners.

Honest Business Conduct

We ensure that information about our products, services, delivery capabilities and technical characteristics is accurate and verifiable. We honour our agreements and commitments. We communicate difficulties in order processing or service delivery promptly. We value open and transparent communication with customers and business partners.

Responsibility in the Supply Chain

We seek long-term, trusting relationships with suppliers and business partners. In addition to quality, economic efficiency and reliability, we consider social and environmental aspects. We expect our business partners to comply with applicable laws and fundamental ethical standards. We take indications of possible breaches seriously and address them with our business partners when necessary.

Competition and Data Protection

We comply with applicable competition laws and refrain from unlawful agreements or other anti-competitive conduct. We do not improperly obtain or use confidential information belonging to other companies.

We handle personal data and confidential business information in accordance with applicable regulations and internal access permissions.

Foreign Trade and Legal Requirements

We comply with applicable foreign trade regulations, including export controls, as well as tax and customs requirements. We observe legal provisions to prevent money laundering and terrorist financing. If we are uncertain or suspect a violation, we contact the customs officer or management.

Conflicts of Interest

We make business decisions based on objective criteria and in the company's interests. We disclose potential conflicts of interest arising from private interests or personal relationships to the responsible supervisor or management.

Corruption and Records

We do not tolerate bribery, the acceptance of bribes or improper benefits. For gifts, invitations, hospitality and other benefits, we follow our separate Anti-Corruption Policy. In cases of doubt, we consult the responsible contact in advance.

We maintain complete, accurate and traceable business records, reports and accounting entries. We do not manipulate records, knowingly provide false information or conceal relevant facts.

7. Reporting Violations

Reporting Channels and Contacts

All employees are encouraged to raise potential violations of this Code of Conduct, applicable laws or internal company regulations, as well as identified risks and concerns, at an early stage.

Reports may be submitted to the relevant supervisor or directly to management.

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

If a report concerns management itself, employees may alternatively contact Ms Heike Schneider (Commercial Director).

For matters relating specifically to quality, environmental protection, occupational safety, IT security or customs and foreign trade law, the established internal reporting channels and responsibilities must also be observed.

In the event of immediate danger to people or the environment, the necessary protective measures must be taken without delay in accordance with company procedures, and the responsible persons must be informed.

Violations of this Code of Conduct may result in disciplinary measures under employment law, up to and including termination of employment.

Confidentiality and Protection of Whistleblowers

We encourage employees and business partners to report possible violations of laws, internal rules or this Code of Conduct. We handle reports confidentially, objectively and in accordance with applicable legal requirements. People who report possible violations in good faith or assist in investigating them must not suffer any disadvantage as a result. We do not tolerate intimidation, discrimination or other retaliation.

Review and Measures

Management ensures that incoming reports are appropriately reviewed and necessary measures are initiated. The relevant specialist personnel are involved as appropriate.

Statutory reporting procedures and existing legal rights remain unaffected.