

Code of Conduct for WP Business Partners



Preamble

We, the members of WP, a leading international manufacturer of plastic packaging, consider this Code of Conduct a joint guideline for our activities and our decision-making processes within WP.

As a globally active company, we feel obligated to behave responsibly in every possible way. At the same time, it is understood that we display moral behavior towards our employees, business partners, customers, government authorities and other persons involved in our business activities.

WP expects all its business partners to share and apply the principles that are expressed in this Code of Conduct. Furthermore, WP expects its business partners to replicate these standards further down to their employees and supply chain and make sure that they know these regulations. Should the Contractor involve any third party when fulfilling its contractual obligation towards WPG, the Contractor shall ensure the third party's compliance with the Code of Conduct.

WPG shall be entitled to monitor the Contractor's compliance with the Code of Conduct at any time. In order to do so, the Contractor shall provide all necessary and appropriate information and documentation upon WPG's request in due time. Upon WPG's reasonable request, the Contractor shall additionally provide WPG with an opinion of an independent third party with sufficient expertise showing that the Contractor is in compliance with the Code of Conduct.

In the event that the Contractor and/or any third party involved by the Contractor is in breach with any of the provisions of the Code of Conduct and does not effectively cure such breach within a reasonable time set by WPG, WPG shall be entitled to terminate individual orders and/or the contractual relationship with the Contractor as such. In case of a serious violation of the Code of Conduct by the Contractor and/or any third party involved by the Contractor, WPG shall be entitled to terminate individual orders and/or the contractual relationship with the Contractor with immediate effect. The same shall apply if Contractor does not comply with its information obligation herein. Any termination hereunder shall be made in writing to be effective. Any rights under the contract between WPG and the Contractor shall remain unaffected.

The Contractor shall indemnify and hold harmless WPG in full from and against all costs, expenses, losses or obligations incurred by WPG in connection with claims of any third party including but not limited to the Contractor's employees, other party's employees and authorities, regarding any breach of the Code of Conduct by the Contractor and/or any third party directly/indirectly involved by the Contractor.

1. General

This Code of Conduct is based on national and international regulations, and reflects WP's standards and values. It applies to all business relationships of the WP group and its partners. WP' expects its business partner to share the principles set out in this Code of Conduct and to ensure that their employees, subcontractors and representatives comply with the provisions of this Code of Conduct.

WP's business partner shall communicate the principles set forth in this Code of Conduct internally and to their contractors and encourage appropriate training for managers and employees. WP's business partners are expected to implement the necessary measures to identify and manage risks in the areas covered by this Code of Conduct.

2. Compliance with Applicable Law

Doing business with distributors, suppliers and agents all around the world, it is of substantial value for us to only work with reputable business partners who comply with applicable laws and the provisions in their contracts with

the company. We expect our business partners to adhere to the all applicable laws, regulations at national and international levels, generally accepted standards of social responsibility and basic principles of integrity. We expect all business partners to comply with this Code of Conduct even if it demands higher standards than applicable law.

3. Human Rights

WP protects and preserves the human rights and obligates itself to maintain moral principles for intercultural interaction at all locations of WP. WP expects that its business partners respect the internationally recognised human rights.

The foundation of this Code of Conduct is the “International Bill of Human Rights”. The “International Bill of Human Rights” must be supported and respected. WP does not accept violations of these rights and will intervene in the case of adverse events, and expects the same from its business partners. Business partners must avoid causing or contributing to adverse human rights impacts and address such impacts internally when they occur.

4. Product Safety and Quality

Product safety is the basis for our comprehensive product responsibility. It is also vital for the WP's reputation and success.

WP's business partners are expected to develop, produce and market products in compliance with applicable laws, regulations and standards. WP' business partners shall monitor their products in the market and follow-up on observations regarding safety in line with legal obligations, and make sure that responsible authorities are informed about product issues based on the applicable local laws. WP's business partners will obtain all necessary permits and registration. In addition, WP'S business partners are required to take the necessary actions and give proper instructions to ensure safe and proper use of the products.

5. Environmental Protection and Protection of Resources

As a company acting on the world market and employing more than 3,000 people worldwide, WP takes a significant social responsibility. WP wants to live up to this responsibility and therefore we pledge: Our words shall be consistent with our actions – any time and any place. It is therefore essential, that WP's business partners comply with the applicable environmental laws and regulations.

In particular, WP's business partners shall make sure that natural resources, such as energy, water, and materials, are used in a responsible and economical manner. WP expects that each individual employee of the contractors to act accordingly.

Economic issues are to be ranked behind the protection of human health and the environment. Negative impacts on the health of others and the environment must be avoided to the extent possible. WP expects that the business partners instruct their employees to preserve our natural resources by using them efficiently and thoughtfully. If possible, the use of water and energy should be reduced. In addition, WP's business partners are responsible for seeing that emissions, noise and odors are prevented and the smallest-possible amount of waste is produced.

6. Employee rights

WP's business partner shall comply with all statutory requirements regarding the employment of its employees and observe all respective obligations resulting from the respective local laws and/or binding tariff agreements with trade unions, other employee representatives or obligations based on agreements declared generally applicable by law as amended from time to time. This applies in particular but not limited to all statutory provisions or binding tariff provisions dealing with minimum wages (e.g. in Germany resulting from the German Minimum Wages Act and Sec. 8 of the German Employee Posting Act), all provisions regarding labour and work permits, all laws and provisions dealing with tax and social security deductions and contributions and all statutory and tariff regulations regarding minimum conditions of employment. WP's business partner shall duly account and settle the remuneration claims of its employees and make all deductions and contributions in due time as required by local laws and, as the case may be, by respective tariff agreements.

Furthermore, WP's business partners must respect internationally recognised human rights and international labour standards and comply in particular (but not limited to) with the following:

No forced labour

There is a strict prohibition of slavery and forced or compulsory labour (including bonded labour and involuntary prisoner labour) in all companies of WP's business partners.

No child labour

There is a strict prohibition of child labour in all companies of WP's business partners. The minimum age for permission to work (according to the applicable regulations) must be observed.

Diversity and no discrimination

WP does not tolerate any kind of discrimination. We expect that all of our business partners' employees interact in a respectful fashion. WP's business partners must comply with applicable laws and regulations on working conditions.

WP in particular does not tolerate any discrimination because of political party affiliation, race, skin color, gender, sexual orientation, marital status, pregnancy, religion, political opinion, nationality, ethnical background, social heritage, social status, disability, age, trade union membership, and all other attributes protected by applicable laws. Any personnel-related decisions, such as hiring or promotions, must be free of discrimination.

It is strictly forbidden to violate a person's dignity, be it verbally or physically.

Threatening employees who would like to report on misconduct in good faith with consequences or browbeating them is strictly forbidden and will not be tolerated.

Minimum wages and working hours

WP's business partners must observe the applicable laws with respect to the payment of minimum wages. Compensation paid to employees will comply with applicable national wage laws.

Working hours correspond at least to the respective national legal standards or the minimum standards of the respective national economic sector.

Freedom of association

WP's business partners must respect the right of workers employed to establish or join trade unions and representative organisation of their own choosing.

Occupational health and safety

As a matter of course, WP provides a risk-free and healthy work environment for its employees through adherence to the applicable laws and regulations on occupational health and safety. The same is expected of our business partners. WP's business partners' management is in charge of ensuring employees' health and safety and must take necessary measures to restore safety standards or to improve them, if necessary. Employees are to be protected from any health hazards. Management also ensures that the employees who work in a facility are carefully selected and properly trained.

Data Privacy Protection

We guarantee the highest level of diligence and absolute confidentiality when handling our employees' personal data and expect from our business partners the same. WP's business partners shall adhere to all applicable statutory regulations in the compilation, filing, processing and transmission of personal data. All human resources staff of the business partners shall be held to observe data privacy protection standards with diligence and accuracy.

7. Dealing in our Competitive Environment

WP's policy is aimed at the promotion of fair competition. We strictly adhere to applicable laws and regulations relating to competition and anti-trust legislation. The same is expected from our business partners.

WP's business partners will not enter into discussions or agreements with competitors on competitive conditions including but not limited to prices, price changes, discounts, sales volumes or margins, customers or markets.

WP's business partners will also ensure that all discussions or agreements with distributors, suppliers or customers are strictly in line with the global antitrust and competition laws. All business activities must comply with the applicable competition and anti-trust laws in all aspects and all over the world.

8. Trade Compliance

WP complies with applicable trade regulations, including sanctions, export and import controls, customs law and anti-boycott provisions and expects its business partners to do the same. WP's business partners will conduct their business in line with fair competition and in accordance with the applicable anti-trust laws.

Further, WP expects from its business partners to comply with all valid and applicable laws when importing and exporting goods and services.

We comply with anti-boycott laws. In particular we do not support the Arab League's boycott of Israel and expect our business partners to do the same.

9. Anti-Bribery and Corruption

WP's business partners are expected not to practice and/or tolerate any form of bribery, corruption, extortion and/or embezzlement and shall comply with the **WP Anti-Bribery and Anti-Corruption Policy** which can be sent to you on demand and as amended.

WP's business partners and their employees shall not directly or indirectly, offer, promise, give or demand anything of value for reasons of obtaining business or for any improper advantage. All business partners of WP shall furthermore avoid any actions that might lead to the perception of improperly influencing someone's business or being improperly influenced by third parties due to any kind of advantage granted.

WP's business partners are expected not to offer WP employees gifts, cash or any other kind of personal benefit resulting from the relationships with WP's business partners.

WP's business partners shall apply specific caution when dealing with public officials. Facilitation payments to public officials are strictly forbidden.

10. Anti-Money-Laundering

WP's business partners shall only maintain business relationships with partners whose integrity they rely on. WP expects from its business partners that they monitor and ensure that the relevant legal provisions with respect to money laundering are not violated.

11. Privacy and Intellectual Property

WP's business partners will safeguard and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and valid intellectual property rights are protected.

The Business Partner is expected to maintain adequate security standard to ensure that all personal data of employees, contractors and/or other third parties is compiled, filed, processed, transmitted and destroyed in compliance with applicable laws, and to ensure the utmost care and strict confidentiality, in particular but not limited to with respect to the General Data Protection Regulation (GDPR) (EU) 2016/679.

Issued by the board of management of WP, 31.07.2018