

Mauser Packaging Solutions

Code of Conduct & Business Ethics Summary

The summary below is not the full Code of Conduct. The Code of Conduct should be read in full and understood in its entirety.

The Code is accessible in its entirety: www.mauserpackagingethicsline.com



COMMITMENT

We are committed to each other, our customers, working safely, the quality of our products and sustained global growth. We are committed to providing the safest and most diverse workplace in the industry; to our investors and stakeholders in achieving our goals and driving long-term financial growth. We are united in keeping our operations sustainable at every touch point from working environments to our products and services.

The words of the Code defines us. Despite our differences, we are one Mauser Packaging Solutions, one company united by common principles and a shared commitment to the highest standards of conduct.

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| Anti-Corruption and Bribery | The Company strictly prohibits offering or accepting bribes, as well as any other transaction that could be perceived as corrupt. A bribe is the giving or offering anything of value to an individual, particularly a government official or an official's family member in order to obtain or retain business. It does not have to be cash and it can be of minor value. Examples of bribes include payment to a government official to encourage a decision to award or continue business relations, providing lavish entertainment or granting special favors in return for special treatment. Charitable donations cannot be used as a pretense for bribes, and must not be made in violation of applicable laws or Company Policies. |
| Gifts and other Business Courtesies | The offer and receipt of gifts, hospitality, travel, and entertainment-related expenses (collectively, "business courtesies") can present certain risks for the Company, including potential violations of the anti-corruption laws. Employees should exercise caution and good judgment to ensure that no gifts, hospitality, travel or entertainment-related expenses create the expectation or appearance of impropriety. |
| Anti-Money Laundering | The Company strictly prohibits violations of any applicable anti-money laundering ("AML") laws and regulations. |
| Anti-Trust and Cartel Law | Employees must comply with all applicable laws and regulations regarding fair competition, antitrust, and cartel law. The strictest such laws prohibit certain agreements with competitors, and violations can lead to criminal charges for the company or its employees as well as significant damages liability. |
| Confidential, Proprietary, and Source Selection Information | Employees must strictly safeguard confidential information (whether or not it is considered proprietary or a trade secret) entrusted to them not only by the Company, but also by suppliers, customers and others related to our business. You should take steps to safeguard confidential information by keeping such information secure, limiting access to such information to those Employees who have a "need to know" in order to do their job, marking documents containing confidential information with the legend "CONFIDENTIAL – Mauser Packaging Solutions," avoiding discussion of confidential information in public areas, for example, in elevators, on planes, and on mobile phones. |
| Conflicts of Interest | Company policy prohibits conflicts of interest. A conflict of interest occurs when an individual's personal interest interferes in any way—or even appears to interfere—with the interests of the Company as a whole. A conflict situation can arise when an Employee or a member of his or her family takes actions or has interests that may make it difficult to perform his or her Company work objectively and effectively. Conflicts of interest also arise when an Employee or a member of his or her family receives improper personal benefits as a result of his or her position in the Company. |

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| Data Privacy | Employees must strictly comply with all applicable data privacy laws and regulations, including, but not limited to, the European General Data Protection Regulation, and other contractual requirements when processing personally identifiable information of other Employees and of anyone with whom we conduct business, including, but not limited to, suppliers, customers, consumers, and employees. |
| Fair Dealing | Every Employee should endeavor to deal fairly with each of our customers, suppliers, competitors and other Employees. No Employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practices. |
| Human Rights | We respect and support fundamental human rights for all people, and we are never complicit in human rights abuses or violations of applicable labor and employment laws. |
| International Trade | The Company must comply with all applicable economic and financial sanctions, export control regulations, anti-boycott measures, and other laws and regulations that impact international trade |
| Political Contributions | Employees and third parties acting on behalf of Mauser Packaging Solutions are not to commit or make any contribution (directly or indirectly) on behalf of Mauser Packaging Solutions to foreign or domestic political parties, party officials, candidates, or organizations or individuals engaged in politics. |
| Harassment | Any act or threat of violence, and any verbal or physical conduct by any employee or visitor that creates an intimidating, offensive, abusive or hostile work environment, is not tolerated. In addition, unwelcome sexual advances, requests for sexual favors, and other unwelcome verbal or physical conduct of a sexual nature are strictly prohibited. Failure to follow this standard could lead to disciplinary action up to and including termination of employment as well as criminal prosecution. |
| Protection and Proper Use of Assets | Proper and efficient use of Company, supplier, customer and other third party assets, such as electronic communication systems, information (proprietary or otherwise), material, facilities and equipment, as well as intangible assets, is each Employee's responsibility. Employees must not use such assets for personal profit for themselves or others. |
| Reporting Suspected Misconduct | Any Employee wishing to make a report with respect to any of these matters anonymously, or to discuss a sensitive issue or question, may contact the Ethics Hotline at the following link www.mauserpackagingethicsline.com or by calling the Ethics Hotline. Effective immediately, the Convercent Ethics Hotline is available to all Mauser Packaging Solutions employees and replaces all previously available ethics help lines, including the My Safe Workplace system. The Company has a policy of protecting the confidentiality of those making reports of possible misconduct to the maximum extent possible, consistent with the requirements necessary to conduct an effective investigation, and the law. In no event will there be any retaliation against someone for reporting an activity that he or she in good faith believes to be a violation of any law, rule, regulation, or this Code. |
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