

# SUPPLIER CODE OF CONDUCT



**SÜDPACK**

# Preamble

The Supplier Code of Practice applies to the signing company, its management, and its employees and shall serve as the basis for all business relationships of the signing company.

The ethical guidelines described in this Supplier Code of Practice are based on the principles of the UN Global Compact, the conventions of the International Labour Organisation (ILO), the Universal Declaration of Human Rights of the United Nations, the UN

Conventions on the Rights of the Child and on the Elimination of All Forms of Discrimination, and the OECD Guidelines for International Companies.

The following points form minimum standards and are intended to prevent situations that could query the integrity of companies and their employees. The signing company observes the principles of the Global Compact and works towards achieving them in its management.

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# LEGAL AND REGULATORY FRAMEWORK







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# GENERAL PRINCIPLES, LAW AND REGULATIONS

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The signing company undertakes to fulfil its social responsibility in all corporate activities and to observe the applicable laws and other relevant regulations of the countries in which it operates in all business actions and decisions. Business partners are to be treated fairly. Contracts are adhered to, consi-

dering changes in the framework conditions.

The signing company ensures that the confidential information of all its staff and business partners will be protected, employees' privacy respected and intellectual property safeguarded against misuse.





# ETHICAL BUSINESS PRACTICES



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# PROTECTION AGAINST CORRUPTION

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**When dealing with business partners (customers, suppliers) and state institutions, the interests of the company and the private interests of employees on both sides are strictly separated.**

Actions and (purchase) decisions are made free of irrelevant considerations and personal interests. The applicable anticorruption regulations are to be complied with. Among other things, the following points are to be observed:

- **Offences related to public officials:**

The granting of personal advantages (most of all monetary advantages such as payments and loans including the granting of small gifts over a longer period of time) by the signing company and its employees to public officials (such as civil servants or employees in the public sector) with the aim of obtaining advantages for the signing company or its employees or third parties is not permitted.

- **Offences in the course of business:**

Personal benefits in kind in return for preferential treatment in business transactions may not be offered, promised, granted or approved. Also, personal

benefits of value may neither be demanded neither accepted in dealing with business partners. The signing company must determine to its employees that they cannot be promised any corresponding benefits. The management and employees of the signing company may not offer, promise, demand, grant or accept any gifts, payments, invitations or services in business transactions that are granted with the intention of improperly influencing a business relationship or which could endanger the professional independence of the business partner. This is generally not the case with gifts and invitations that are within the scope of normal business hospitality, custom and courtesy.

The signing company may issue a binding policy for accepting and granting gifts as well as invitations to hospitality and events. In such a policy, exceptions regarding to appropriate lowvalue and symbolic gifts, appropriate business lunches and appropriate events of the company itself as well as events of business partners (customers, suppliers) can be regulated.



# CONDUCT TOWARDS COMPETITORS (ANTITRUST LAW)

The signing company respects fair competition. Therefore, the signing company shall comply with applicable laws that protect and promote competition, including the applicable antitrust laws and other laws regulating competition. When dealing with competitors, these regulations specifically prohibit agreements and other activities that influence prices or conditions, all-

ocate sales territories or customers or impede free and open competition in an inadmissible manner. Furthermore, these regulations prohibit agreements between customers and suppliers aimed at restricting the freedom of customers to determine their prices and other resale conditions (price and condition determination) autonomously.





# CONFIDENTIALITY AND BUSINESS INFORMATION

The signing company obligates its employees to observe trade and business secrets. Confidential information and documents must not be disclosed to third parties or

otherwise made available without authorization, unless authorized to do so or unless the information is publicly available.





**EMPLOYEE**



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# PROHIBITION OF FORCED AND CHILD LABOR

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## **The signing company rejects any form of forced labour.**

The signing company observes the United Nations regulations on human rights and children's rights. The signing company specifically undertakes to comply with the Convention on the Minimum Age for Admission to Employment (Convention 138 of the International

Labour Organisation) and the Convention on the Prohibition and Immediate Elimination of Child Labour (Convention 182 of the International Labour Organisation). If a national regulation on child labour provides for stricter standards, such standards are to be observed as a matter of priority.



# COMPLIANCE WITH HUMAN RIGHTS

The signing company undertakes to comply with internationally recognized human rights.





# ANTI -DISCRIMINATION

The signing company undertakes to oppose any form of discrimination within the framework of the applicable rights and laws. This specifically applies to discrimi-

nation against employees on the grounds of gender, race, disability, ethnic or cultural origin, religion or belief, age or sexual orientation.





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# FAIR WORKING CONDITIONS AND MINIMUM PAY

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The signing company respects the right of its employees to freedom of association within the framework of the applicable laws and rights. The company treats its staff fairly and with respect. Care is taken to create a workplace that is free from abuse and harassment of any kind.

The signing company shall ensure that at least the working conditions, including the minimum wage,

to which the employees are entitled under the applicable rights and laws are granted. This obligation specifically includes the obligation to pay remuneration claims in good time. If the signing company uses third parties (subcontractors/suppliers) for the performance of its tasks, such third parties are to be carefully selected and contractually obligated to comply with the applicable rights and laws.







HEALTH AND  
ENVIRONMENTAL  
PROTECTION







# HEALTH PROTECTION

The signing company guarantees occupational safety and health protection at the workplace within the framework of national

regulations. The signing company supports continuous further development to improve the working environment.

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# ENVIRONMENTAL PROTECTION

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The signing company is sustainably committed to the goal of environmental protection for present and future generations. Laws enacted to protect the environment are to be observed. The signing company supports environmentally conscious actions of its employees and strives for continuous improvement of environmental impacts such as reduction of emissions, waste and fossil fuels.







# IMPLEMENTATION







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# SUPPLY CHAIN COMPLIANCE

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The signing company is required to communicate the principles of this Supplier Code of Conduct to its direct suppliers, and to encourage them to comply with the Supplier Code of Conduct. Furthermore,

the signing company is required to recommend to its suppliers that they encourage their suppliers to comply with the Supplier Code of Conduct.











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# COMPLIANCE

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The signing company is at liberty to introduce more farreaching codes of conduct for itself and its employees with higher ethical requirements. The signing company undertakes to make its employees aware of the contents regulated in this Code of Conduct for Suppliers and of the resulting obligations.

In the event of blatant infringements of this Code of Conduct

and/or its principles, SÜDPACK reserves the right to take appropriate action.

Ochsenhausen, im März 2021



A. V. Klaus Pöpperl  
Direktor QHSE

# NAME AND SIGNATURE OF SUPPLIER

We hereby confirm that we have received, read, understood and accepted the Supplier Code of Practice of SÜDPACK Verpackungen GmbH & Co. KG.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Company stamp







# Answering Questions and Reporting Violations

**SÜDPACK provides a suitable structure for answering questions about the Code of Conduct and for receiving notices of rule violations.**

Any employee who has questions about the Code of Conduct or is unsure how to apply and interpret it can at any time contact:  
**[Compliance@suedpack.com](mailto:Compliance@suedpack.com)**

- The Corporate Compliance Officer
- The local Compliance Officer
- The Management Board of the local company or the Group Management Board
- The responsible line manager

You can find a list of contacts for individual SÜDPACK companies in our Intranet.

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