



# CoC Code of Conduct

Corporate Code of the Mayr-Melnhof Group

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# Code of Conduct

## Corporate Code

Mayr-Melnhof Karton AG and its subsidiaries (the Mayr-Melnhof Group) pursue responsible management guided by the principles of integrity, honesty and transparency. Mutual trust as the principal concept offers the basis for joint, constructive cooperation within the company and with business partners. In order to meet the exacting demands in the best possible way, the Mayr-Melnhof Group places high demands in terms of responsible conduct and integrity on its employees, customers, suppliers, service providers and other contractual partners. The present corporate Code of Conduct of the Mayr-Melnhof Group is based on the fundamental values of the Group which also comprise the universal principles of the UN Global Compact. The Code is both a framework and a guideline for sustainably, responsible action within the Group. With this code, MM documents its orientation to the principles of Corporate Social Responsibility in the meaning of sustainable Corporate Citizenship as well as its pursuance of responsible management geared to long-term sustainability. Respective guidelines have been added to the following principles where applicable to support the implementation of the principles.

## Compliance with laws

We comply with all applicable laws and regulations of the countries where we do business and observe their social norms.

## Human rights

We commit ourselves to observing the human rights within our sphere of influence and reject any form of forced labour in our companies and the companies of our business partners.

## Child labour

We reject child labour, irrespective of local legislation, throughout our company and in the companies of our business partners. Throughout our Group of companies we follow the international standards (ILP Conventions C 138 and C 182) and we keep records that show that all members of our workforce are of the minimum age required by law.

## Mutual respect, non-discrimination, promotion of diversity

We commit ourselves to creating a working environment throughout our Group of companies that is characterised by honesty and mutual respect. We see the diversity of our employees as an asset that enables us to fulfil our tasks in an even more creative and better way. We reject any discrimination and harassment for reasons of gender, race, skin, religion, age, national/ethnic descent, disability or sexual orientation. Employees and job applicants are assessed following the principle of non-discrimination.

## Employee development

We develop the potential of our workforce systematically for the future of our company. In doing so, we pay attention to the development of the technical as well as social and methodological skills of our employees.

## Relationship to employees and employees' representatives

We respect our workforce's right of freedom of association. We strive for long-term, constructive dialogue with the employees' representation both at local level and in the regional federation of companies.

## Working hours and remuneration

In all the companies of the Group, we comply with the applicable regulations concerning working time. We acknowledge the entitlement of our workforce to adequate remuneration and observe the legal stipulations of the individual countries.

## Health and safety

We promote the vitality and safety of our employees by ensuring (creating) a healthy, safe and humane working environment. The individual standards for safety and health at the workplace are observed. Appropriately suitable measures, such as continued evaluation and training, are geared to continuously improve health and safety at the workplace.

## Drugs, alcohol

We expect our employees to fulfil their tasks and take their decisions with a clear mind and without being impaired in their capacities by alcohol or drugs. This principle is to the benefit of our employees' wellbeing and the productivity of the company.

## Conflicts of interests, fight against corruption

We always act in the best interest of Mayr-Melnhof Group and separate the interests of the company strictly from private interests. We aim to avoid even the mere appearance of conflicts of interests. We take decisions based on reasonable business aspects in line with laws and standards. In our business relations, we always act perfectly in line with the respective regulations against corruption, bribing, fraud and money laundering. We commit ourselves to refusing gifts or donations and/or to entering into participations that could trigger a conflict of interests. Neither bribes nor other illegal payments and donations may be accepted, offered or made.

### Guideline: Acceptance of gifts, granting of benefits

In the framework of their business activities, employees of Mayr-Melnhof Group must neither directly nor indirectly demand, offer or grant unjustified benefits. Only common or usual hospitality is excepted from this rule; occasional token gifts of demonstrably low value are also exemptions. A strict measure is to be used for assessment. If in doubt, the Compliance Officer shall be consulted.

## Competition, conduct on the market

We commit to unrestricted, fair competition with our competitors, business partners and other market participants. We undertake to comply with the laws on restriction of competition that apply in the countries where Mayr-Melnhof Group does business.

### Guideline: Relationships to competitors, customers, associations

Any form of agreement with competitors and concerted conduct aiming at or resulting in a restriction or avoidance of competition are prohibited. The general rule applies that no information must be passed on, accepted or exchanged in any competition that permits conclusions about current or future market conduct.

Customers shall not be restricted by employees of the Mayr-Melnhof Group in any way in their free design of supplier relations and prices.

Work in associations and participation in their events shall only be allowed for permitted purposes. Any comparison with competitors and/or the exchange of information shall always comply with the applicable legislation.

If employees of the Mayr-Melnhof Group find themselves in circumstances that are dubious in terms of anti-trust legislation, negotiations shall be discontinued immediately; they shall leave the location and inform the Compliance Officer.

## Protection of assets and sensitive information

Employees of the Mayr-Melnhof Group are responsible for protecting tangible and intangible assets of the company within their fields of activity. Tangible assets include in particular plots of land, buildings, products, stock and equipment of any kind. Intangible assets include know-how, technologies, industrial property rights as well as all other information that is important and valuable for Mayr-Melnhof Group and as such are worthy of protection. Each member of the workforce is under obligation to handle these resources owned by the company responsibly and to use them for company purposes only.

### Guideline: Handling confidential information

Employees of the Mayr-Melnhof Group are obliged to maintain strict confidence on all company matters that are not explicitly destined for the general public. This provision also applies to information that was received in confidentiality from third parties. Confidential information must not be used for one's own benefit, nor for the benefit of third parties. Corporate management shall be notified in confidence of any material changes in the risk situation that are observed or become noticeable.

### Insider information

People having insider knowledge are prohibited by law from dealing with the relevant securities. The in-house Compliance Guidelines of Mayr-Melnhof Karton AG provide instructions on the responsible handling of insider information. Confidentiality zones as well as vesting periods have been established to protect insider information.

### Information technology

The Mayr-Melnhof Group attaches great importance to legally and ethically correct use of information systems and to proper IT security. All members of the workforce are called upon to make regular use of all IT security arrangements that are available for the protection of the data of Mayr-Melnhof Group.

### Financial integrity

To preserve the high degree of trust that shareholders, employees, business associates and the public place in us, the reporting of the Mayr-Melnhof Group shall be correct and truthful at all times and must comply with the applicable legislation. Accounts and records are kept in accordance with the legal, official and fiscal provisions and regulations and in line with internationally recognised standards of accounting.

## Responsibility for our environment

The Mayr-Melnhof Group effects its performance taking into account the environment at all steps of production as well as in downstream and upstream activities. We have opted for foresight and precaution, the use of environmentally friendly technologies and continuous, systematic enhancement of the environmental efficiency of our company. Observing applicable environmental legislation and regulations is a minimum requirement. We strive for close cooperation with our business partners in our perception of ecological responsibility and we promote initiatives for higher responsibility towards our environment.

## Business associates

We expect our business partners to meet all legal provisions and industry standards in their cooperation with the Mayr-Melnhof Group at all times and encourage them to introduce and implement similar principles of responsibility at their companies wherever possible.

## Relationships to media, shareholders

Fostering good relationships to our shareholders and the media plays a significant role in maintaining the impeccable reputation of Mayr-Melnhof Group. Hence we always endeavour to respond as quickly as possible to inquiries and concerns. Inquiries from investors and media concerning the company and its business activity are to be passed on without delay to the Head of Investor Relations / Corporate Communications. Employees must not disclose any proprietary or non-public information without authorisation of the Board.

## Implementation

We expect each employee to feel personally responsible for observing this Code of Conduct. The Mayr-Melnhof Group is committed to offering its employees the support and consulting required for ongoing implementation of this Code of Conduct. The employees are called upon to contact their superiors or the management responsible if they have questions, encounter any conflicts or alleged infringements. Furthermore, the Compliance Officer of the Group, who is an independent person in a position of trust, is available for consultation. Reprisals against employees who point out infringements will not be tolerated as a matter of principle.

The Management Board of Mayr-Melnhof Karton AG

### Legal disclaimer

This Code of Conduct represents a principal attitude of the Mayr-Melnhof Group. It cannot be regarded, however, as the basis for demanding a specific line of conduct from the Mayr-Melnhof Group, nor for substantiating contractual claims against the company.

### Compliance Hotline

Mr. Stephan Sweerts-Sporck, Compliance Officer, is available at any time for confidential consultation at +43 1 50136 91180 or +43 664 834 00 92 (cell phone), stephan.sweerts-sporck@mm-karton.com.