

## Company Policy

Name	Code of Conduct
Number	UR-FT-01
Responsibility	Dr. Marco Holst
Distribution List	All associates of Foiltum Holding GmbH and its subsidiaries
Version	01.07.2023

### 1. INTRODUCTION

This Code of Conduct / Code of sets out the most important principles for all companies belonging to Foiltum Holding GmbH and provides information on how we conduct ourselves in our daily work and how we should act.

#### 1.1 Corporate policy

The corporate policy of all companies belonging to Foiltum Holding GmbH is focused on the long-term further development of existing business relationships and on exploiting growth potential with new products in accessible market niches.

To this end, we regularly and systematically review and evaluate our business environment for potentials, opportunities and risks. We want to pursue our corporate goals based on legally compliant corporate governance out of responsibility for sustainable corporate development towards our shareholders, associates, but also our business partners and our environment. In this Code of Conduct, we commit ourselves to compliance with internationally applicable ESG standards about the environment, social standards and legal provisions as a requirement for ourselves as well as for our business partners. The management mission statement we have developed describes our aspirations and expectations for success-oriented cooperation among all associates.

Due to the location of our company close to the city, we see ourselves as having a special responsibility for a site-related environmental policy involving the responsible authorities as well as transparency towards the interested public. Our environmental, energy and climate policies are formulated in important guiding principles.

We see ourselves as responsible for the topic of occupational safety. Safety in the workplace is a priority for us! By actively involving our associates and through a working group on occupational safety, hazard analyses, regular inspections and preventive examinations of our associates, risks are to be identified and minimized at an early stage.

To meet the high process and product requirements of our customers in the long term, we are committed to high quality standards. In our quality policy, we have described the guidelines of our understanding of quality, which are the basis for the lowest possible error rates, a high delivery capability, the improvement of existing products and the development of new products and applications.

In the course of holistic corporate management, we regularly review the organization for compliance with evolving legal principles and laws, identify any need for action, and ensure legal compliance by means of suitable organizational measures.

#### 1.2 Corporate goals

- Increase in customer satisfaction.
- Improvement of the sustainable earnings situation
- Investment in new products and technologies
- Further development of our associates' skills and promotion of motivation and identification with the company
- Improving occupational safety and health protection and safeguarding the company's foundations
- Promotion of environmental protection through responsible and climate-friendly use of resources

### 1.3 Business model

The business model of all companies belonging to Foiltum Holding GmbH is to supply the world market as a market leader with the thinnest lead and tin foils, which are manufactured with the highest precision. We also convert our foils into rolls and sheets, cut, laminate, structure and emboss provided pre-material or other materials according to customer specifications.

## 2. CORE VALUES

We believe in good corporate governance and are convinced that a company that is successful in the long term and operates sustainably, makes an important contribution not only to society, but also to associates, owners, customers, suppliers and other stakeholders.

We want our stakeholders to perceive us as open-minded, pragmatic, competent, committed, long-term oriented and professional. We want to be a company that people turn to with confidence to work or invest there and do business with.

All companies belonging to Foiltum Holding GmbH have four core values that are linked to our business model and guide us in our daily operations.

We are:

#### a) Entrepreneurial

- We focus on business opportunities and cost efficiency.
- We dare to make decisions even when we don't have all the facts on the table.
- We are motivated, solution and action oriented.
- We are innovative, open to new ideas and driven by the mindset of never giving up.

#### b) Respectful

- We adapt to every context and situation.
- We help our colleagues.
- We meet each other at eye level in all our interactions.
- We respect the competence of others and are open and curious to learn more.

#### c) Long-term oriented

- We focus on long-term success.
- We invest in people and long-term relationships.
- We develop our business to ensure long-term competitiveness.
- We are sustainable and strive to still be relevant in 100 years.

#### d) Professional

- We make fact-based decisions, based on essential information.
- We invest time to develop, always striving for improvement.
- We are honest and transparent.
- Our goal is to set clear expectations and deliver on our promises.

## 3. SCOPE AND APPLICATION

This Code of Conduct applies to all associates (staff and consultants) and board members of Foiltum Holding GmbH and its subsidiaries, regardless of their location.

The Code of Conduct reflects the principles of internationally recognized conventions and agreements for the environment, human rights, working conditions and corruption, such as

- The UN Global Compact (<https://unglobalcompact.org/what-is-gc/mission/principles>),
- The UN Declaration of Human Rights (<https://www.ohchr.org/en/press-releases/2018/11/30-articles-30-articles-universal-declaration-human-rights>),
- The ILO Declaration on Fundamental Principles and Rights at Work (<https://www.ilo.org/declaration/lang-en/index.htm#:~:text=The%20ILO%20Declaration%20on%20Fundamental,our%20social%20and%20economic%20lives.>)
- And the OECD Guidelines for Multinational Enterprises (<http://mneguidelines.oecd.org/guidelines/>).

However, it is the materiality analysis of all companies belonging to Foiltum Holding GmbH that forms the basis for the content of the Code of Conduct.

The Managing Director of Foiltum Holding GmbH or its subsidiaries bears overall responsibility for the implementation of the Code of Conduct within the company. He creates an appropriate structure and process to ensure that all associates are familiar with the latest version of the Code of Conduct, understand it and can act accordingly. This responsibility includes regular training on the content of the Code of Conduct.

The Managing Director and other Senior Managers must lead by example and be guided in their leadership by our Core Values and the Code of Conduct. Likewise, they are responsible for advising on issues related to the Code of Conduct and ensuring the availability of managers to answer associates' questions about the application of the Code.

Each employee is responsible for complying with the Code of Conduct and for asking questions on his or her own initiative if the interpretation or application of this Code of Conduct is not considered clear. Additional assistance with interpretation is also available in the "Guidance" section below.

All companies affiliated with Foiltum Holding GmbH wish to work exclusively with suppliers, agents, consultants and other partners who themselves act in a manner consistent with the principles of this Code of Conduct. Foiltum Holding GmbH has therefore also drawn up a Code of Conduct for Suppliers for all companies affiliated with Foiltum Holding GmbH and communicates these principles to its cooperation partners. The principles of the Code of Conduct for Suppliers are also applied when evaluating current and potential partners.

#### **4. ORIENTATION GUIDE**

The Associates of all companies affiliated with Foiltum Holding GmbH have been entrusted with the responsibility to use their best efforts and common sense to decide what behavior is best in a given situation. In some situations, it may appear that the Code of Conduct does not provide sufficient guidance on how to handle a situation. In such cases, it may be helpful to test these statements to determine whether a situation or action conforms to this Code of Conduct:

- I consider this to be legally and ethically correct.
- I have no problem telling my boss, colleagues or third parties about my action.
- I would have no problems as a colleague, stakeholder or business partner with the situation that occurred.
- If the situation were to become public, this would not have a negative impact on the trust, reliability or credibility of all companies affiliated with Foiltum Holding GmbH, its management, or its associates.

If the answer to all these statements is affirmative, the situation or action that occurred is most likely in compliance with this Code of Conduct. If there is still uncertainty as to whether the situation that has occurred follows the Code of Conduct of all companies affiliated with Foiltum Holding GmbH, please contact your direct supervisor.

#### **5. COMPLIANCE**

All associates affiliated with Foiltum Holding GmbH are responsible for reporting circumstances that may be in conflict with the Code of Conduct or any criminal activity to his or her immediate supervisor. If for any reason you find it uncomfortable to speak with your supervisor, or if despite filing a report or complaint you feel that your concern has not been taken seriously, you may contact a member of the management of Foiltum Holding GmbH or its affiliate at any time.

All associates must have the opportunity to submit information. A report made for good cause and in accordance with the purposes of the Code of Conduct must never result in retaliation or other negative consequences for the person who submitted the information.

Violations of this Code of Conduct will result in disciplinary action, including termination and/or legal action for more serious deviations.

The Code of Conduct was adopted by the Executive Board in cooperation with the shareholders. Amendments and exceptions can only be issued by the Executive Board.

Compliance with the Code of Conduct is assessed as part of the annual internal control follow-up. The Code of Conduct itself is also reviewed annually to ensure that it is adapted both to the requirements and expectations of the outside world and to the development of our own organization and business activities. The Code of Conduct is adapted when deemed necessary.

### 5.1 The relationship of the Code of Conduct to laws, regulations and other guidelines

All companies belonging to Foiltum Holding GmbH must comply with the applicable laws and regulations in all countries in which the company operates, without exception. In certain situations, for example in countries with weak legislation or control, the requirements of the Code of Conduct may be higher than those of local laws and local customs and practices. In such cases, we must always comply with this Code of Conduct and our own policies. The reverse relationship applies in cases where local laws or regulations are stricter than our Code of Conduct. Similarly, subsidiaries are free to apply a stricter code than this Code of Conduct.

## 6. BUSINESS PRINCIPLES

### 6.1 Business ethics and corporate governance - no tolerance for corrupt behavior

All companies belonging to Foiltum Holding GmbH may under no circumstances - directly or indirectly - accept, grant or demand bribes or inadmissible or inappropriate benefits, services and incentives. Any form of nepotism is also excluded. It is prohibited to make so-called acceleration payments, i.e. payments to a government or government official with the aim of speeding up a process or routine procedure. The risk of corruption must therefore be assessed in every business relationship based on factors such as business activity, locations and representatives of the business partner.

### 6.2 Caution with gifts and benefits

Gifts, rewards and benefits must always have a clear business purpose. All companies affiliated with Foiltum Holding GmbH must not offer or grant any improper payment or other compensation to any person or organization for the purpose of persuading the person or organization to establish or maintain a business relationship with our company. We do not directly or indirectly solicit or accept any form of improper payment or other compensation intended for the purpose of establishing or maintaining a business relationship.

No employee shall provide any compensation or benefits or make or receive any gifts or offers that may be considered an improper benefit. An improper benefit is something that may influence the recipient's business decision.

### 6.3 Preventive measures against money laundering, terrorist financing and financial crime

All companies belonging to Foiltum Holding GmbH will actively combat financial crime and prevent their own business from being used for money laundering. Therefore, we will exercise caution when entering new business relationships or new transactions. We will always identify the counterparty of a business transaction and watch out for suspicious activities.

### 6.4 Trade sanctions and embargoes

All companies affiliated with Foiltum Holding GmbH comply with applicable international sanctions programs of the European Union, the United Nations and other applicable sanctions authorities, as well as other relevant export control laws.

### 6.5 Impartiality and conflicts of interest

The associates of all companies affiliated with Foiltum Holding GmbH must act in the best interests of the company. All business relationships must be impartial and business decisions must be made without regard to private relationships or benefits. Activities that may lead to a conflict of interest between an employee's personal interests and business activities or give the appearance of such a conflict of interest must therefore always be avoided or require a vote / resolution with the shareholders.

If an employee intends to enter into an agreement with a party, where there is a risk that the situation may be considered or appear to be a conflict of interest, a decision must always be made by an independent party higher up in the company.

### 6.6 Healthy competition

Our success must be based on our professionalism and fair and free competition in all areas of our business. We do not exchange information with, nor enter into agreements or memoranda of

understanding with our competitors, customers or suppliers that improperly influence the market and violate applicable competition law.

#### 6.7 Product quality and customer satisfaction

All companies belonging to Foiltum Holding GmbH supply products and services of consistently high quality and reliability, where product safety is of paramount importance. We provide our customers with accurate product information and only make commitments regarding our products and services that we can live up to. Satisfied and loyal customers are fundamental to our reputation. When making a strategic choice, we take the path that we are convinced will deliver the best results for the customer.

#### 6.8 Responsible taxpayer

In all countries in which the companies belonging to Foiltum Holding GmbH do business, the tax laws and tax regulations of each country must be complied with. We act as a responsible taxpayer and do not engage in unethical tax planning.

#### 6.9 Transparent and accessible communication

All companies belonging to Foiltum Holding GmbH provide correct, relevant, fact-based and fast information about the activities, development and financial situation of the respective company at the right time. All stakeholders are to be treated equally and our communication is in accordance with applicable laws and agreements.

Anyone who communicates in their professional role on social media always represents the company belonging to Foiltum Holding GmbH and the Storskogen Group. Therefore, all communication must comply with our values and be consistent with our communication on other channels. All associates must draw a clear line between private and professional presence on the Internet and social media.

associates must treat all confidential information with great care and with the security required by law and contract.

Business-related questions are handled by the management of the respective Foiltum Holding GmbH company and can be addressed to [gl@eppsteinfoils.de](mailto:gl@eppsteinfoils.de). For questions regarding the Storskogen Group, reference can be made to [info@storskogen.com](mailto:info@storskogen.com).

#### 6.10 Accounting and reporting

All financial transactions shall be accounted for in accordance with generally accepted accounting principles.

#### 6.11 Political commitment

All companies affiliated with Foiltum Holding GmbH observe political neutrality. We do not make political donations or become involved in political parties. Neither the name of Foiltum Holding GmbH or its affiliated companies, nor funds under the control of the respective company may be used to promote the interests of political parties or candidates.

#### 6.12 A good employer and neighbor

The success of Foiltum Holding GmbH and all affiliated companies requires, that we are an attractive employer offering exciting career and development opportunities in safe and healthy workplaces. We therefore create a good working environment in physical, mental and social terms. Success is also based on good and long-term relationships with key players in our business environment, including authorities, suppliers and employee organizations.

#### 6.13 Equality and diversity

The relationship with and between the associates of all companies belonging to Foiltum Holding GmbH is based on mutual respect. We are committed to an inclusive work culture and are convinced that diversity contributes to this. Associates are therefore hired, promoted and compensated solely on the basis of their qualifications for the job and without regard to national or social origin, age, gender, transgender identity or expression, sexual orientation, ethnicity, religion or other belief, political affiliation, marital status or disability that does not interfere with the performance of job duties.

All companies affiliated with Foiltum Holding GmbH are committed to an equal workplace with great diversity within the company. We reject discrimination in any form. Under no circumstances may an employee be subjected to corporal punishment or other forms of physical, sexual, psychological punishment, harassment or coercion. We vigorously prevent violations in this regard.

#### 6.14 Human rights

All companies belonging to Foiltum Holding GmbH ensure that people's fundamental rights and freedoms are respected and protected. This means that, as a minimum, we follow the internationally recognized principles contained, among others, in the UN Global Compact (<https://unglobalcompact.org/what-is-gc/mission/principles>) and the UN Declaration of Human Rights (<https://www.ohchr.org/en/press-releases/2018/11/30-articles-30-articles-universal-declaration-human-rights>). In addition, this includes conducting human rights due diligence to identify, prevent, mitigate and take responsibility for negative human rights impacts within our own organization and supply chain. Risks are prioritized depending on the size of the company and other circumstances. We act responsibly and decisively when we learn that our own business activities or one of our business relationships is related to a potential or actual violation of human rights and fundamental freedoms.

Child labor and/or forced labor are strictly prohibited in all business areas of all companies affiliated with Foiltum Holding GmbH. Furthermore, we do not accept that child labor takes place at suppliers, their subcontractors or partners.

#### 6.15 Health and safety

We continuously work to ensure a good working environment from a physical, mental and social perspective. As a minimum, we strictly comply with national health and safety laws and health and safety regulations resulting from concluded agreements and/or collective bargaining agreements. It is the responsibility of the Managing Director to ensure that all associates are aware of and follow the applicable health and safety rules, policies and processes in their work area and receive the necessary training and protective equipment. It is the responsibility of each employee to comply with these rules and not to take any health and/or safety risks at work and to remedy or report any situations or conditions in the workplace that may pose such a risk.

#### 6.16 Compensation

All associates must be paid correctly and fairly based on individual performance and contributions to the success of the company. We strive to counteract inappropriate pay differentials between associates. Salaries and benefits paid must comply with applicable laws and collective bargaining agreements. In cases where no collective bargaining agreements exist, we follow current industry norms.

#### 6.17 Freedom of association

All associates of all companies belonging to Foiltum Holding GmbH have the right to freedom of association, i.e. associates can exercise their legal right, be members of organizations, build them or work for organizations representing their interests as associates.

#### 6.18 Society

All companies belonging to Foiltum Holding GmbH have a strong local base and are often located in a smaller town. We strive to leverage and develop locally available capabilities. Likewise, we work to ensure that our business contributes in a positive and sustainable way to the communities in which we operate.

#### 6.19 Reducing environmental impact and securing the future of businesses

All companies belonging to Foiltum Holding GmbH are convinced that a well-thought-out approach to environmental sustainability is a prerequisite for further growth, development and profitability. We therefore make great efforts to minimize the direct and indirect environmental impact of our business activities. This means incorporating an environmental perspective into key decisions to create long-term value for our customers, associates and shareholders, as well as for the community. We ensure that we systematically measure, track and report on our targets and results from relevant environmental aspects. We ensure that important environmental aspects are considered and followed up in strategies and processes. In addition to the fact that this can contribute to our efforts to reduce our environmental impact,



it can also help us find future business opportunities. Together with our customers, we can develop new and better solutions and products that also make a positive contribution to community development. Issues of high environmental relevance for us include the reduction of noise and air emissions and the prevention of water pollution. Impacts of our activities on the local environment are regularly reviewed and/or monitored.

#### 6.20 Resource efficiency and energy consumption

All companies belonging to Foiltum Holding GmbH must always strive for greater resource efficiency in terms of all types of resources and operating equipment and ensure that energy consumption is always optimized. Our experience is that these measures not only reduce the negative environmental impact on society, but almost always have a positive impact on costs and profitability.

Efficient use of energy, raw materials and resources (recycling, waste avoidance and proper disposal) makes it possible to sustainably reduce the burden on the environment and climate. Energy consumption, environmental and climate aspects of every new activity, product and process are considered in decision-making before they are introduced. Where environmental and climate impacts cannot be avoided, we reduce them.

Within the framework of existing permits and requirements, we maintain an open dialog with the relevant authorities on the environmental impacts we exert and on environment-related measures.

#### 6.21 Transportation and travel

To reduce carbon dioxide emissions, all companies belonging to Foiltum Holding GmbH strive to use the most environmentally friendly means of transport.

We try to reduce the number of business trips and increase the number of digital meetings. In addition to reducing the environmental impact of travel, this increases associates' personal sustainability by saving time in general, which we hope will lead to a better work-life balance. For work-related travel, each employee chooses the most appropriate mode of transportation for the purpose, considering environmental aspects in addition to cost, time, and safety considerations.

#### 6.22 Purchasing goods and services

All companies belonging to Foiltum Holding GmbH strive to select goods and services with a low environmental impact. Relevant environmental aspects must therefore be taken into account in purchasing and procurement.

#### 6.23 Waste

All companies belonging to Foiltum Holding GmbH strive to reduce the total amount of waste and maximize the amount of recycled material within the company. Every employee contributes to this work by considering the available opportunities for reuse, recycling and waste separation. Hazardous waste is handled in a manner that reduces the risk of environmental harm.

### 7. SUMMARY

All associates are responsible for reporting circumstances that may conflict with the Code of Conduct or criminal activity to his or her immediate supervisor. If for any reason you feel uncomfortable speaking with your supervisor, or if despite filing a report or complaint you feel it has not been taken seriously, you may contact a member of management at any time.

Eppstein, July 1<sup>st</sup>, 2023



**Dr. Marco Holst**  
Managing Director