

# Code of Conduct

for employees and business partners of

**Marzek Etiketten+Packaging GmbH**

and its affiliated companies

**Marzek Kner Packaging Kft.**

**Marzek-Dnipropack LLC.**

Traiskirchen, 2023-09-14

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## Preamble

The Marzek Group produces sales-promoting labels and packaging for thousands of small businesses, wineries and international industrial companies throughout Europe. It supplies the FMCG industry in particular with high-quality packaging materials and offers customized logistics solutions.

Acting responsibly and lawfully is firmly anchored in the Marzek Group and forms the basis for the long-term corporate success. Trust, mutual appreciation and tolerance are the foundation of the Marzek Group corporate culture.

This Code of Conduct defines the legal framework relevant for the Marzek Group and applies to the cooperation with all **employees, business partners** and **public authorities** at all locations and for all business units.

The Marzek Group expects its business partners to comply with all applicable laws, rules and regulations in the countries in which they operate or do business and also to take measures appropriate to ensure compliance with such laws, rules and regulations. In case that a business partner violates these principles and fails to comply with or implement the required remedial measures, the Marzek Group reserves the right to review the establishment or continuation of the business relationship with that business partner.

For reasons of better readability, the simultaneous use of the language forms male, female and diverse (m/f/d) is dispensed with in the following. All personal terms apply equally to all genders.

## I. Fairness and respect in interacting with each other

The Marzek Group is particularly committed to the principles of the Global Compact and the United Nations Universal Declaration of Human Rights, the United Nations International Bill of Human Rights and the ILO (International Labour Organisation) Fundamental Principles. Additionally, the Marzek Group expects all business partners to comply with these requirements, to observe the relevant laws and the legal system in the respective countries. At the individual locations organizations have to respect the fundamental rights of workers in accordance with the corresponding national laws and recognize the core labour standards published by the International Labour Organisation (ILO). Furthermore, the Marzek Group expects its business partners to respect the rights of third parties and to minimize possible interference with these rights in compliance with all international standards.

### Discrimination

The diversity and uniqueness of the employees are the basis for the performance and represent the innovative strength. Accordingly, interactions with each other are characterized by appreciation, respect, mutual understanding, openness and fairness. Discrimination and harassment are not tolerated by any means.

Therefore, the Marzek Group also expects its business partners to create a working environment that is free from any kind of discrimination in every respect. No employee may be discriminated against, given preferential treatment or harassed on the basis of personal characteristics such as gender, skin colour, religion, nationality, political or other convictions, ethical origin, physical disability, age, sexual orientation and identity or other personal characteristics.

### Data protection, protection of freedom of expression, personal rights and privacy

The Marzek Group consistently complies with data protection regulations and observe them when handling the personal data of customers, employees and business partners. Personal data is only collected, processed or used if it is legally permitted, or the involved person agrees to it. What matters are the reasonable storage of personal data and the transparency of data processing.

The Marzek Group also expects its contractual partners to take the protection of personal data seriously and to comply with all relevant data protection laws. The processing of personal data without an appropriate legal basis is **strictly prohibited**. Furthermore, the Marzek Group expects its business partners to adequately manage all their information systems in which confidential information or data of the Marzek Group is stored. It is also expected to take appropriate technical measures to protect unauthorized access to any data.

The right “freedom of expression”, the “protection of personal rights” and “privacy” are highly important matters for the Marzek Group and are also expected from business partners to be respected.

### Forced labour

The Marzek Group expects its business partners to prohibit any kind of forced, compulsory labour and human trafficking in their companies as well as to refrain from becoming involved in any such activities. All work must be performed on a voluntary basis. Subject to any statutory termination notice periods, employees must be at liberty to terminate their employment at their discretion. Forced labour means any types of debt bondage. The Marzek Group expects its business partners to prohibit any and all coercive actions, such as the withholding of identification documents, passports, educational certificates, work permits or security deposits as conditions for employment.

## Child labour

In this context Marzek Group expects its business partners to prohibit and refrain from any kind of child labour in their companies.

## Freedom of association

The Marzek Group expects its business partners to respect the rights of its employees, to form an employee representation body, and to engage in collective bargaining in accordance with the relevant national laws.

## Compensation and working time

The Marzek Group adhere to the respective nationally applicable statutory or industry-standard maximum working hours and expect business partners to also comply with the respective national laws pertaining to working time. If no national laws exist, the international standards published by the ILO shall apply. Business partners are also expected to pay their employees a compensation that conforms with the relevant national laws and the legally prescribed minimum wage and benefits to be guaranteed by the employer.

This also applies to the use of external personnel and contractors by the business partner, irrespective of the type of contract (e.g. contract for work and labour or personnel leasing).

## Health and safety at work

Occupational safety and health management have the highest priority at the Marzek Group. To avoid health hazards and to reduce the risk of accidents, occupational health and safety regulations must be strictly observed.

The Marzek Group expects its business partners to conform with the relevant national occupational health and safety regulations as well as to assure humane working conditions to prevent accidents and work-related illnesses in the best possible way. This includes the identification, assessment plus reduction of actual and potential accident as well as health risks. Furthermore, prevention should be fulfilled by the ascertainment and investigation of incidents, training and induction of employees in a manner understandable for them. It should be ensured that the provisioning of suitable work equipment and personal protective equipment, as well as adequate precautionary and emergency response actions.

## II. Responsibility towards nature and the environment

The Marzek Group takes responsibility for the consequences on environment. In the procurement activities, the Marzek Group naturally also takes ecological aspects into account.

### Environmental and climate protection

For many years, the Marzek Group has been systematically improving the energy and climate efficiency of the production processes and, together with customers and business partners, striving for efficient solutions to further reduce CO<sub>2</sub> emissions. In doing so, the Marzek Group has set ambitious goals. For example, the Marzek Group wants to reduce absolute CO<sub>2</sub> emissions in relation to business volume by 25% by the end of 2030 compared to the base year 2015. The long-term goal for the Marzek Group is to be completely climate neutral by 2050.

Therefore, the Marzek Group sustainability activities also extend to the reduction of CO<sub>2</sub> emissions over the entire life cycle of the products - from development and production to recycling. The Marzek Group also pays attention to resource-saving production, building technology, vehicle fleet, waste and energy management in all departments. Innovative eco-materials such as grass, stone, wood, hemp and grape paper have been used for label production for years. But of course, recycled materials, compostable organic films and resources from renewable raw materials as well as from internationally certified sustainable forestry are also used.

The Marzek Group expects its business partners to conform with the relevant national energy and environmental laws, regulations and standards. Business partners are also expected to install and apply an adequate environmental and energy management system. The Marzek Group also expects resources, e.g. energy, water and raw materials, to be consumed efficiently and responsibly while utilizing technologies aimed at preventing and reducing waste, CO<sub>2</sub>, wastewater contaminations, and emissions of hazardous substances. The Marzek Group encourages its business partners to also implement the fundamental rules and principles set out in the Group Environmental and Energy Policy. The Marzek Group expects all business partners to assure transparency with respect to their own emissions as well as upstream activities. Business partners are further expected to implement effective measures aimed at reducing their direct and indirect CO<sub>2</sub>-emissions in accordance with the Paris Climate Agreement, to work on continuous improvements, and to further advance the use of renewable and alternative energy sources.

### III. Integrity and good business practice

The Marzek Group is firmly committed to all measures to combat bribery and corruption to ensure fair competition. The Marzek Group expect the same from all business partners.

#### Preventing corruption and bribery

The Marzek Group expects its business partners to implement a zero-tolerance policy regarding corruption and to comply with the conventions of the United Nations (UN) and the Organization for Economic Cooperation and Development (OECD) for combating corruption. The applicable anti-corruption laws and regulations, including those that deal with bribery in foreign countries must be met. All business partners must reject any form of corruption, bribery, theft, embezzlement, fraud or extortion and must not tolerate any illegal payments or granting of other benefits to individual persons, companies or public officials with the objective of influencing decision-making processes. In particular, the business partner must under no circumstances grant or accept – neither directly nor indirectly through third parties – any bribes, payoffs, kick-back payments or other illegal payments, incentives, courtesies or other advantages or valuable benefits in exchange for business opportunities, the expedition or simplification of official acts (bribes or facilitation payments) or related to business activities of companies of the Marzek Group.

#### Invitations and gifts

The Marzek Group expects its business partners to refrain from misusing invitations and gifts for the purpose of influencing business partners, customers or public officials. Any invitations and gifts extended to Marzek Group employees or related persons must be appropriate in terms of occasion and value, i.e. they are of minor value and can be interpreted as an expression of generally accepted local business customs. All business partners are in the same way expected to not request any undue benefits from Marzek Group employees.

#### Preventing conflicts of interest

The Marzek Group expects its business partners to make decisions concerning their business activities with Marzek Group on the basis of exclusively objective criteria. Conflicts of interests with private affairs, commercial or other activities, including those of relatives and other related persons or organizations, are to be prevented right from the beginning.

#### Fair competition – compliance with anti-trust and competition law

The Marzek Group expects its business partners to uphold fair competition and comply with the applicable anti-trust and competition laws. Business partners shall neither be involved in anticompetitive agreements with competitors in breach of anti-trust law, nor shall they abuse a potentially existing dominant market position nor be involved in any other anticompetitive practices.

#### Preventing money-laundering and terrorist financing

The Marzek Group expects its business partners to comply with the applicable statutory obligations pertaining to the prevention of money-laundering and terrorist financing, and to refrain from becoming directly or indirectly involved in any money-laundering activities or terrorist financing.

## Trade compliance

The Marzek Group expects its business partners to strictly comply with the relevant international and national foreign trade regulations, including in particular regulations concerning export controls and embargoes, and to refrain from being involved in any illegal business dealings with persons, companies or organizations that are subject to sanctions.

## Requirements for supply chains and due diligence obligations

The Marzek Group values constructive cooperation with its business partners. In the same way that the Marzek Group is committed to treating its employees, customers, business partners and neighbors responsibly and fairly, the Marzek Group expects business partners to also act in accordance with the principles and rules set out in this Code of Conduct. The Marzek Group expects its business partners to comply with the relevant requirements for supply chains and due diligence requirements in their respective countries, to assure that all of the principles and requirements described in this Code of Conduct are also endorsed and observed by their affiliated companies, and to make reasonable efforts in their upstream supply chain to ensure their own business partners comply with the fundamental principles set out in this Code of Conduct. "Affiliated companies" in this context means companies in which the business partner holds a direct or indirect economic interest of at least fifty percent (50%), or in which the business partner directly or indirectly holds at least fifty percent (50%) of the voting rights.

## Quality standards and management of product risks

The Marzek Group expects its business partners to, at all times, meet the technical and statutory requirements pertaining to the quality of products and processes. Any detected defects or shortcomings must be corrected immediately and the cause must be investigated and eliminated permanently. Business partner processes shall, as a general rule, be continuously monitored and improved with the objective of improving their performance in terms of function, costs and timeliness.



## IV. Implementation of the Code of Conduct

Every employee of the Marzek Group is obliged to know and comply with the Code of Conduct and to observe it in his or her daily work. Managers are particularly required to implement the Marzek Group's Code of Conduct in their area of responsibility by informing their employees about its contents and significance and by ensuring compliance with its provisions. Culpable violations of the law by employees will not be tolerated and may result in sanctions under labour law.

### Reporting of potential misconduct

Legitimate whistleblowing reports can help counteract violations at an early stage and limit the damage for the Marzek Group, the employees and business partners. Reports can be made by all Marzek Group employees, as well as business partners, customers and other third parties – anonymously if required. If there are concrete indications of a potential violation that could potentially affect the Marzek Group, it is requested to report them using the implemented whistle-blower system. Reports can be made in writing by mail to [report@marzek.com](mailto:report@marzek.com)

All Marzek Group employees as well as business partners, customers and other third parties/stakeholders can use this system – anonymously if required – to report information about violations of the ILO core labour standards and principles they become aware of.

The Marzek Group protects the interests of whistle-blowers by providing them secure reporting systems, as well as by the commitment to treat the information received confidentially and to use all means to protect whistle-blowers who act in good faith against disadvantages resulting from reporting their suspicions. The Marzek Group will also protect the interests of the data subject about whom information is provided by a whistle-blower. The Marzek Group expects its business partners to comply with their legal obligations, if any, to install a whistleblowing system.

### Compliance with the Marzek Code of Conduct

The Marzek Group requires its business partners to accept this Code of Conduct, to complete the self-assessment questionnaire based on this Code of Conduct or to present equivalent alternatives. The Marzek Group will regularly review the business partners' compliance with the principles and requirements set out in this Business partner Code of Conduct as part of a due diligence process aimed at identifying, reducing and preventing supply chain risks. Any violation of the principles and requirements set out in the Marzek Group Code of Conduct will be considered a significant breach of contract by the business partner. If there are suspicions that the principles and requirements described in the Marzek Group Code of Conduct are not observed (e.g. negative reports in the media), the Marzek Group reserves the right to demand information about the relevant circumstances from the business partner. The Marzek Group further has the right to terminate individual or all contractual relations for good cause and without a notice period with business partners, who demonstrably fail to observe the Marzek Group Code of Conduct or fail to strive for or implement improvement measures within a reasonable grace period set by the Marzek Group.

Traiskirchen, 2023-09-14



Dr. Johannes Michael Wareka, Group CEO  
Marzek Etiketten+Packaging GmbH

## Declaration

With reference to all existing and future agreements  
between

**Marzek Etiketten+Packaging GmbH**  
A-2514 Traiskirchen, Marzek-Strasse 2

as well as its affiliated companies

**Marzek Kner Packaging Kft**; Békéscsaba / Hungary

**Marzek-Dnipropack LLC**; Kiev / Dnipro / Ukraine

and business partner

Company name:

Address:

By signing this document, the business partner agrees to fully accept and be bound to the above stated EXPECTATIONS ON THE BUSINESS CONDUCT OF BUSINESS PARTNERS (Code of Conduct) as an integrated amendment to all existing and future agreements and contracts.

Place, Date: \_\_\_\_\_

\_\_\_\_\_  
Signature Business Partner