

CODE OF CONDUCT FOR ETHICAL BUSINESS PRACTICES AT DELBROUCK GMBH

Preamble

All employees and the management of Delbrouck GmbH undertake to comply with this Code of Conduct. It sets out the values, principles and behaviours that guide our business activities. The aim is to uphold ethical standards and create a working environment that promotes – and actively demands – integrity, respect and fair conduct. We take responsibility, within the limits of our respective capabilities and scope of action, by taking into account the legal, economic, technological, social and environmental implications of our business decisions and actions. In this way, we contribute to the social and economic development of the countries and regions in which we operate. This Code of Conduct is based on a shared understanding of responsible corporate governance, as expressed in the following guidelines. Our Code of Conduct forms the basis for our business practices and our performance in the area of sustainable development – and applies equally to our suppliers and their upstream supply chains. We expect all our business partners to share this basic understanding. This is not intended to confer any rights on third parties.

Compliance with laws and other regulations both at home and abroad

Delbrouck GmbH makes all business decisions in accordance with applicable laws and relevant regulations – both in Germany and abroad. Integrity and honesty are core values for us and form the basis of fair competition – including in our dealings with clients and suppliers.

Commitment of the management

Delbrouck GmbH is committed to acting in an economically, socially and environmentally responsible manner. We strive to conduct our business competently and ethically and to uphold fair competition in all the markets in which we operate. This includes strict compliance with applicable laws on antitrust, competition and market conduct. Unfair advantages over clients, suppliers or competitors must be avoided.

Conflicts of interest

Delbrouck GmbH expects its employees to be loyal to the company. All employees must avoid situations in which their personal or financial interests conflict with those of Delbrouck GmbH. It is therefore specifically prohibited to acquire a stake in competitors, suppliers or clients or to enter into business relationships with them in a private capacity, insofar as this may lead to a conflict of interest. Conflict situations must not be allowed to compromise the interests of Delbrouck GmbH. Such conflicts of interest can arise in many situations: for instance, no employee may accept any benefits – in whatever form – which, when viewed objectively, could reasonably be expected to influence business decisions or transactions at Delbrouck GmbH. Invitations must remain within the bounds of customary business hospitality. Employees must not, by virtue of their position at Delbrouck GmbH, gain any direct or indirect personal advantage through access to confidential information. All employees are obliged to promote the legitimate interests of Delbrouck GmbH as far as possible. Any situation that competes with the company must be avoided. Any actual or potential conflict of interest must be reported and discussed with the relevant manager.

Prohibition of corruption

Delbrouck GmbH maintains a strict zero-tolerance policy towards corruption, bribery and other unfair business practices. Any actions aimed at influencing business decisions through improper or unlawful means are expressly prohibited. Employees, managers, business partners and third parties working for or with Delbrouck GmbH are required to comply with these principles. Violations are thoroughly investigated and dealt with through legal channels. Employees of Delbrouck GmbH must not offer any benefits to business partners, nor receive or accept any such benefits from them, if this could impair an objective and fair business decision or even give the mere appearance of doing so.

Insider rules

All employees of Delbrouck GmbH are required to comply strictly with the applicable insider regulations. This applies in particular to employees who have access to confidential information about Delbrouck GmbH or about companies with which the company has business dealings that is not publicly available. Examples of inside information include strategic plans by senior management, the launch of new products or manufacturing processes, corporate transactions, turnover and profit figures, significant contracts or business relationships, key financial indicators, and major legal disputes. If an employee of Delbrouck GmbH becomes aware of such information, they must not disclose the inside information to any other person until the information becomes public knowledge. The use of material non-public information may constitute a breach of the law.

Fair working conditions

All employees of Delbrouck GmbH are responsible for ensuring a safe and healthy working environment. Safety regulations and practices must therefore be strictly adhered to. As a socially responsible employer, Delbrouck GmbH regards its employees as a valuable asset. It demands a high level of commitment from its employees and, in return, shares its commercial success with them. Delbrouck GmbH's HR policy helps to provide every employee with the opportunity for professional and personal development. We encourage open discussion, constructive criticism and new ideas.

Remuneration and working hours

Remuneration is determined in accordance with applicable laws and is supplemented by the relevant national minimum wage legislation. Employees are provided with clear, detailed and regular information about the breakdown of their pay. We comply with applicable laws and (international) labour standards regarding maximum working hours and ensure that:

- working hours, including overtime, do not exceed the relevant statutory limits
- the weekly working hours, including overtime, do not exceed 60 hours, even in exceptional cases, provided that no such provisions exist

Health and Safety

We safeguard the health of our employees by implementing appropriate health and safety measures (e.g. the implementation of an occupational health and safety management system) that adequately address the following areas:

- compliance with applicable laws and adherence to international standards regarding health and safety at work
- appropriate workplace design, safety regulations and the provision of suitable personal protective equipment
- implementation of preventive controls, emergency procedures, an incident reporting system and other appropriate measures for continuous improvement
- ensuring access to sufficient drinking water and access to clean sanitation facilities

We ensure that all our staff are properly trained.

Responsibility towards fellow human beings and society

Delbrouck is mindful of its corporate responsibility to respect human rights and rejects any form of violation of these rights, in accordance with the 10 principles of the UN Global Compact.

• Prohibition of child labour

We do not tolerate child labour. All employees must be at least 15 years old. We verify this by asking for proof of age. In countries that qualify for the exemption for developing countries under ILO Convention No. 138, the minimum age may be reduced to 14 years. We do not employ staff for hazardous work who, in accordance with ILO Convention No. 182, are under the minimum age of 18.

• Prohibition of forced labour

Forced labour, modern-day slavery or similar practices that deprive individuals of their liberty are prohibited. All work must be voluntary, and employees must have the option to terminate their employment.

• Freedom of association and collective bargaining

We respect employees' right to freedom of association, freedom of assembly, and the right to collective bargaining, insofar as this is legally permissible and feasible in the respective country in which we operate. If this is not permitted, we will seek appropriate compromises for our staff.

• Promoting diversity and equality of opportunity

We promote equal opportunities and do not tolerate discrimination. We treat everyone equally, regardless of gender, age, skin colour, ethnic origin, sexual identity and orientation, disability, religious affiliation, beliefs or other personal characteristics.

Environmental protection and sustainability

Delbrouck GmbH is ISO 14001-certified and operates an environmental management system for the manufacture of bottle crates for the beverage industry. As part of our environmental management system, we identify and evaluate relevant environmental aspects of our business operations. In doing so, we take into account, among other things, our energy and water consumption as well

as waste generation. The goal is to systematically identify and monitor relevant environmental aspects within the scope of our operational capabilities and to derive appropriate improvement measures.

• Energy management

Delbrouck GmbH tracks and documents energy consumption across the relevant business units. Based on the available data, opportunities to improve energy efficiency and reduce energy consumption are evaluated. Appropriate measures are implemented, taking into account technical, operational, and economic constraints.

• Water and wastewater management

Delbrouck GmbH records and monitors relevant water consumption as part of its environmental management system and explores ways to use water efficiently. Wastewater is treated and discharged in accordance with applicable legal and regulatory requirements. The relevant processes are monitored as part of the environmental management system.

• Waste and production materials management

In the manufacture of our bottle crates, we consider ways to prevent and reduce production waste. Any waste generated is sorted, treated, and sent for proper disposal or recycling in accordance with applicable legal and regulatory requirements. To the extent technically and product-specifically feasible, we review materials and production processes to ensure their efficient use.

Handling internal knowledge

All employees of Delbrouck GmbH are required to ensure the swift and smooth exchange of information within the company. Information must be passed on to the relevant departments in a correct and complete manner, unless there are overriding interests in exceptional cases, in particular due to confidentiality obligations. Relevant information must not be unlawfully withheld, distorted or disclosed selectively. Misrepresentation within the company or to external organisations or individuals is strictly prohibited. All financial statements, annual reports and business documents of Delbrouck GmbH must accurately reflect business events and transactions and comply with Delbrouck GmbH's accounting principles and internal accounting procedures.

Handling of assets

All employees of Delbrouck GmbH are responsible for handling the company's property properly and with care. Every employee is obliged to protect the property of Delbrouck GmbH against loss, damage, misuse, theft, misappropriation or destruction. Every employee is obliged to inform his or her superior immediately of any use of company assets that contravenes the above.

Confidentiality and data protection

Much of Delbrouck GmbH's business information is confidential or protected by law, meaning that there is a duty of confidentiality. This does not apply if the publication of the information has been authorised by Delbrouck GmbH or is required by law or regulation. The duty of confidentiality applies in particular to intellectual property. These include trade secrets, patents, trademarks and copyright, as well as business and marketing plans, drafts, business documents, salary data and

all other unpublished financial data and reports. All personal information relating to employees, customers, business partners, suppliers and other third parties is handled with care and treated as confidential by Delbrouck GmbH, in full compliance with data protection laws. The protection of this information must be handled with the utmost care.

Implementation and monitoring

The rules set out in this Code of Conduct form a core part of Delbrouck GmbH's corporate culture. Consistent adherence to these principles is essential. Every employee is responsible for ensuring this. If an employee has any concerns or complaints regarding the matters set out in this Code of Conduct, or is aware of a possible breach of the guidelines contained herein, they should immediately bring this to the attention of their line manager for clarification. This can also be done anonymously or in confidence. If an employee is not satisfied with the resolution, they may raise the matter or complaint not only with their line manager but also with senior management. Delbrouck GmbH does not permit any form of retaliation in response to complaints made in good faith under this Code of Conduct.

Responsibility

All employees and the management of Delbrouck GmbH are bound by the rules set out in this Code of Conduct. Breaches of this Code of Conduct will result in consequences. In serious cases, this may result in the termination of the employment contract. We communicate openly and in a dialogue-oriented manner with employees, customers, suppliers and other stakeholders regarding the requirements of this Code of Conduct and its implementation. We expect our suppliers to comply with the principles of this Code of Conduct or to apply equivalent codes of conduct. We also encourage them to ensure that the provisions of this Code of Conduct are upheld throughout their supply chains. We reserve the right to monitor our suppliers' compliance with this Code of Conduct both on a regular basis and on an ad hoc basis. This can take the form of, for example, questionnaires, evaluations or audits. If any doubts regarding compliance with this Code of Conduct remain, the supplier is requested to take appropriate remedial action and report the matter to their designated contact within our company. If necessary, the cooperation will be terminated.

Notifications & Breaches

We provide our employees and business partners with access to a secure mechanism for confidentially reporting potential breaches of the principles set out in this Code of Conduct.

If you have any information, you can contact the relevant authority directly or use our anonymous reporting system via our website: www.delbrouck.de.