



BE SAFE,  
Not SORRY!

# Greiner Code of Conduct



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# Foreword

In order to continue to be successful in the 21st century, Greiner, as a family business, must retain the trust and respect of its employees and business partners. This requires not only high-quality and innovative products and services, but also legally compliant, responsible and sustainable behaviour on the part of all Greiner employees and business partners.

”



**Saori Dubourg**  
CEO Greiner AG

As part of our responsibility as a Management Board member, we want to position ourselves clearly and unambiguously on the topic of compliance. As a family business, compliance is not just a legal necessity for us, but a central component of our corporate philosophy and culture.

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**Hannes Moser**  
CFO Greiner AG

The new Code of Conduct offers Greiner's employees and all business partners clear guidance and specific recommendations for action. To ensure that we all act in accordance with our values and legal requirements, each of us has a responsibility not only to know the rules, but also to actively live by them and encourage others to do so.

”



**Maximilian Wellner**  
Vice President Group Legal & Compliance

# Integrity and sustainability: key principles for future- orientated action



Greiner can look back on over 150 years of company history, characterised by a tireless spirit of innovation and trust. High compliance standards, integrity and adherence to ethical principles form the basis of the business relationships of Greiner and its divisions Greiner Packaging, Greiner Bio-One and NEVEON.

## Objective of the Greiner Code of Conduct

The aim of the Code of Conduct is to regulate the guidelines for Greiner's actions as a responsible company in accordance with national and international standards. Greiner undertakes to comply with all applicable laws and standards, clearly rejects corruption and bribery and is committed to international human rights, labour and environmental standards. It is also important to Greiner to go beyond mere compliance with the law and to practise ethics and respect for other people, their rights and cultures, as well as ecologically sustainable behaviour.

International regulations and standards support Greiner in the implementation of ethical business practices, in particular the following:

- The United Nations Universal Declaration of Human Rights
- The core conventions of the International Labour Organization (ILO)
- The United Nations Guiding Principles on Business and Human Rights (UNGP)
- The Guidelines for Multinational Enterprises on Responsible Business Conduct (OECD)
- The United Nations Global Compact (UNGC)

## To whom does the Greiner Code of Conduct apply to?

This Code of Conduct applies to all employees, temporary workers, executives, managing directors and board members of Greiner worldwide (hereinafter referred to as "employees").

The Code of Conduct covers all companies of the Greiner Group over which at least a controlling influence (majority shareholding or controlling influence) can be exercised. Greiner also endeavours to ensure that the Code of Conduct applies to all of Greiner's business partners, in particular but not exclusively to suppliers, consultants, representatives and other authorised agents acting on behalf of Greiner (hereinafter referred to as "Business Partners").

Greiner aims to ensure that the principles set out in this document are implemented in Greiner's contractual relationships

- by referring to and confirming the Code of Conduct or
- by explicitly recognising the guidelines standardised in this Code of Conduct and referring to an equivalent code of conduct of the business partner.

The Code of Conduct may be adapted to specific national and local laws, cultures and customs as long as these adaptations are in line with Greiner's corporate values. All adaptations must be approved by the Group Compliance Officer of Greiner AG ([office.compliance@greiner.com](mailto:office.compliance@greiner.com)).

## Compliance with the Code of Conduct by Greiner employees

This guideline summarises Greiner's principles of conduct and is intended to serve all Greiner employees as a decision-making aid and guideline for appropriate behaviour and actions in day-to-day business.

## Compliance with the Code of Conduct by Greiner managers

Integrity and compliant behaviour begin with the management of the company. Greiner's managers must ensure that no violations of applicable laws or the principles of this Code of Conduct occur in their area of responsibility. Greiner achieves its business results on the basis of integrity. This also includes managers emphasising the importance of correct behaviour in day-to-day business and setting a good example themselves. It is also important to Greiner that managers actively promote the topic of compliance within their organisation—e.g. through regular team meetings—and are aware of their responsibilities in this regard.

## Compliance with the Code of Conduct by Greiner's business partners

Greiner also expects its business partners to behave responsibly and in accordance with the law and the guidelines of this Code of Conduct in their day-to-day business activities. This also applies in the event that business partners assign third parties as subcontractors. In this case, the business partners must ensure that these guidelines are adhered to. This expectation applies even if this is not explicitly stated in individual guidelines or their content throughout this Code of Conduct.

## Violations of the Code of Conduct

Violations of the basic principles of this Code of Conduct by employees and business partners of Greiner will not be accepted. Should Greiner become aware of such violations, they will be investigated and appropriate consequences will be taken. These range from the joint rectification of grievances or disciplinary measures to the termination of the business relationship or employment.

## Reporting violations

Greiner is committed to living its corporate values and behaving in a legally and ethically impeccable manner. This is also expected of its employees and Greiner's business partners. If violations of this Code of Conduct are identified, the [tell-greiner.com](https://tell-greiner.com) whistleblowing platform is available in addition to personal reporting to the designated persons (see below). A report can be made at any time (personally or anonymously) via this platform. Greiner undertakes to investigate every report and, if necessary, to initiate the appropriate remedial measures under the protection of the person making the report. Further details and information can be found at [tell-greiner.com](https://tell-greiner.com).

## Contact us

If you have any questions about the Code of Conduct or how to report violations personally, employees can contact

- the **Local Compliance Officer (LCO)** of the respective Greiner company,
- the **Division Compliance Officer (DCO)** of the respective Greiner division or
- the **Group Compliance Officer (GCO)** of Greiner.

If these contact persons are not known, the Legal & Compliance Department of Greiner AG can be contacted at [office.compliance@greiner.com](mailto:office.compliance@greiner.com).

The whistleblowing platform [tell-greiner.com](https://tell-greiner.com) is available for business partners and employees.

# The ten guidelines of the Code of Conduct

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Greiner is committed to compliance with all legal standards and value-based action

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Greiner acts sustainably and is committed to protect the environment and the climate





# 1

**Greiner is committed to compliance with all legal standards and value-based action**

Greiner always acts in compliance with the law. This Code of Conduct serves as a guide and supports Greiner employees in making legally compliant, honest and ethically sound decisions in their daily work. Furthermore, Greiner aims to establish the Code of Conduct as a binding guideline for Greiner's business partners.

### **Greiner does not tolerate any violations of the law**

Strict compliance with laws and recognised standards is a fundamental principle of conduct that obliges Greiner's employees and business partners to comply with competition- and antitrust law, to strictly prohibit corruption and money laundering, to comply with tax- and export control regulations, to obtain the necessary official permits and to respect the rights of third parties, among other things. Employees of Greiner and its business partners are responsible for complying with the applicable laws in their respective areas of activity. It is also necessary for them to continuously review their actions for legality, responsibility and fairness.

If Greiner employees are unsure about which decision they should make with regard to these aspects, they can contact their manager, the Local Compliance Officer, the Division Compliance Officer of the respective Greiner division, the Group Compliance Officer or the Legal & Compliance department of Greiner AG at any time.

### **Greiner works constructively with the authorities**

Greiner maintains a cooperative and transparent relationship with all competent authorities and other sovereign bodies.

Greiner attaches great importance to compliance with the legally prescribed procedures in investigations and other official activities. The exercise of procedural rights is an essential and legitimate part of dealing with authorities.

In this context, Greiner employees must exercise increased care when dealing with authorities, especially when dealing with supervisory- and investigative authorities. In the event of legal issues, employees are obliged to contact the Legal & Compliance department of Greiner AG.

### **Tax and customs compliance**

Greiner complies with all applicable tax- and customs laws as well as reporting and disclosure obligations. Greiner follows internationally recognised transfer pricing principles for intra-group service relationships and does not engage in aggressive tax planning and structuring. Greiner's employees help to ensure that tax- and customs compliance is an important corporate responsibility at Greiner.

### **Strict prohibition of money laundering and fraud**

Greiner requires its employees to comply with the relevant legal obligations to prevent money laundering and fraud.

### **Compliance with sanction regulations and trade restrictions**

Greiner complies with the applicable sanctions regulations and general import and export restrictions.

### **Accounting and reporting**

All of Greiner's records and reports must be accurate and truthful. In accordance with the principles of proper accounting, data entries and other records must always be complete and correct as well as timely and system-compliant.







# 2

**Greiner respects its employees and honours human rights**

### **Respect for employees**

Greiner respects its employees as essential partners for business development. This is particularly evident in the observance of the following principles, which Greiner also expects its business partners to comply with.

### **Respect for human rights**

Respect for human rights is a fundamental element of a modern society. Greiner is committed to prioritising human rights in the conduct of its business. Greiner categorically rejects any form of human rights violations.

The respect and protection of human rights includes in particular the guarantee of fair working conditions, the rejection of forced and child labour, the support of freedom of opinion and speech and the protection of the privacy of Greiner employees and its business partners.

### **Compliance with labour law regulations**

Greiner undertakes to comply with all applicable labour and social legislation. It is particularly important to emphasise that no illegal work, forced, bonded or child labour is tolerated and that a fair remuneration policy is observed.

The minimum age for employees must correspond to the national minimum age for employment.

It goes without saying that the withholding of employees' identity documents is also not tolerated. Greiner pays attention to regulated working hours, compliance with the maximum permitted working hours and a healthy work-life balance.

### **Freedom of association, dialogue and co-determination**

Greiner welcomes diversity and promotes a culture of social dialogue and open communication. The right of Greiner employees to freedom of association and collective bargaining must be respected. They have the right to form trade unions without discrimination, to join trade unions of their choice and to conduct collective bargaining with the employer on their behalf.

Furthermore, employee representatives must not be discriminated against. Their employment contracts shall not be terminated in retaliation for exercising their rights, exposing any grievances, participating in trade union activities or reporting suspected violations.







# 3

**Greiner ensures health and safety  
in the workplace**

### Health & safety in the workplace

Greiner and its business partners bear a great responsibility for employees and society. In order to avoid health hazards, occupational health and safety regulations must be complied with at all times. At the same time, Greiner is committed to active health promotion.

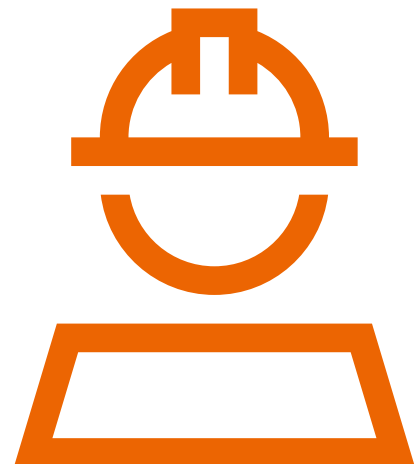
Greiner complies with the applicable legal requirements for health and safety in the workplace. Greiner works actively to identify and rectify safety deficiencies. Workplace conditions are continuously improved to ensure and protect the health and safety of all employees.

Greiner relies on a wide range of measures such as risk identification and assessment, the development of protective measures, a training programme and the provision of personal protective equipment.

The various principles and measures are described in detail in the Group-wide Health & Safety Policy.

### Continuous improvement

Greiner endeavours to continuously improve working conditions. This includes the regular review and updating of occupational safety guidelines, the structured identification of risks and optimisation potential and the clear assignment of responsibilities. Greiner employees are encouraged to actively participate in this process and to make suggestions for improving occupational health and safety. They are also called upon to withdraw from danger or risk areas at all times and to look out for each other. The aim is to jointly create a working environment in which everyone feels safe.







# 4

**Greiner is actively committed to equal opportunities**

As a responsible family business, Greiner is committed to an open and inclusive environment in which every person is heard, respected and valued—both inside and outside the company. The personal dignity, privacy and personal rights of every individual must be respected. Greiner expects this from both its employees and its business partners.

### **Promotion of equal opportunities**

### **Promotion of equal opportunities**

No one may be disadvantaged, harassed or favoured because of personal characteristics such as gender, age, origin, social status, sexual orientation, religion, ideology or mental or physical abilities. Everyone has the right to be protected from this and to be able to report misconduct accordingly (anonymously if necessary). In this context, Greiner expects its managers to fully fulfil their role model function.

**Zero tolerance for discrimination and harassment**

Greiner rejects all forms of discrimination, harassment and bullying without exception. All persons are to be treated fairly and respectfully. This applies throughout their entire professional career. In this context, Greiner complies with all applicable standards and laws. To emphasise these principles and demonstrate a clear commitment, Greiner supports overarching networks and initiatives, such as the UN Women's Empowerment Principles and the Diversity Charter.





# 5

**Greiner is committed to fair and free competition**

It is Greiner's basic understanding that all business activities are conducted in a fair, ethical and transparent manner in order to maintain and promote the trust of all Greiner stakeholders. Greiner also expects this from its business partners.

### **Compliance with competition and antitrust law**

Greiner is committed to a free market and the promotion of fair competition and observes all applicable competition rules.

Any behaviour between competitors that could have a negative impact on competition is prohibited. This includes, in particular, the allocation of territories and/or customers, agreements or the exchange of information on prices or price components, supply relationships and their conditions, as well as on capacities or supply behaviour. The same applies to the exchange of information on market- and participation strategies. Not only written agreements, but also verbal agreements or tacitly agreed behaviour are prohibited.

It is a matter of course for Greiner and its employees not to participate—either directly or indirectly—in anti-competitive, monopolistic or unfair business practices, in particular cartels.

### **Transparent supplier and customer relationships**

Agreements with customers and/or suppliers are always made and documented completely and clearly. Suppliers are selected exclusively on an objective basis, after price, quality, performance and suitability of the products or services offered have been compared.

Environmental and social criteria should also be taken into account in the decision-making process wherever possible.

### **Standards of behaviour in the absence of applicable laws**

Greiner does not apply any anti-competitive or competition-distorting practices, even in countries without applicable competition law.







# 6

## Greiner rejects corruption

Corruption is the improper granting or acceptance of an advantage for private gain.

Greiner does not tolerate corruption and undertakes to conduct business only in a fair and ethical manner, to refrain from bribery, not to act in an unauthorised manner towards public officials (see below for definition) and to comply with all applicable national and international regulations (e.g. UK Bribery Act, US Foreign Corrupt Practices Act) to prevent corruption.

Greiner also expects this from its business partners.

### **No solicitation or acceptance of benefits**

Greiner employees may not accept or offer gifts or other benefits from companies or persons with whom they do business. Exceptions to this rule are occasional gifts in line with general business practice, customary hospitality or other benefits of low value that cannot influence business decisions from the outset. The prerequisite is always that these are permissible under the respective national legal provisions. It should be noted that the sum of several individual benefits that are permissible in themselves must also be assessed in the proportionality test.

Offering, granting, demanding or accepting sums of money (or non-cash benefits such as vouchers) is always prohibited.

Contracts with third parties, purchase orders or consultancy agreements may not be used as a means of accepting or offering unauthorised payments or other unjustified advantages.

Bribes or other unjustified advantages may not be offered, promised or granted to anyone, either directly or indirectly.

### **Which persons are public officials?**

Different regulations apply in the countries in which Greiner operates. Therefore, the term “public official” may be defined differently. Greiner undertakes to observe the local definitions. The following definition of “public official” is intended to help you deal with them correctly: Public officials are in particular persons who perform sovereign tasks, e.g. politicians, civil servants, judges, employees of public authorities, professors at public universities as well as employees of public institutions, e.g. hospitals or testing institutes with sovereign tasks.

### **Behaviour towards public officials**

No cash benefits or other advantages may be offered or granted to public officials.

An advantage is any benefit that makes the recipient better off or is useful to them, for example: cash payments, vouchers (non-cash benefit), valuables, services, invitations to events or restaurant visits, job placement, the awarding of honours, etc.

A personal benefit is also deemed to be a benefit to related parties (e.g. relatives) of public officials.

### **Prohibition of (other) illegal benefits**

Greiner and its employees do not make any illegal donations to candidates for public office or to political parties or other political organisations. All donations must comply with the disclosure requirements of the relevant legal system.







# 7

**Greiner treats its own and third-party property responsibly**

The handling of the property of Greiner and its business partners is crucial for maintaining Greiner's trustworthiness.

Greiner's property includes both tangible (physical) and intangible (non-physical) assets, such as business information, business and trade secrets, expertise and industrial property rights. This also includes inventions and patents, which are of particular importance for Greiner's long-term success.

### **Respect for company property**

All Greiner employees treat the company property of Greiner and its business partners responsibly and behave in a manner that employers can expect. Damage or loss must be reported immediately to the responsible department, in case of doubt to the Legal & Compliance Department of Greiner AG.

### **Confidentiality and responsible handling of the intellectual property of third parties**

Confidential information and business- and trade secrets of Greiner must be kept secret. This obligation also applies to business partners and former employees of Greiner.

Confidential information is all internal information, data and matters of Greiner that are not publicly known. Non-public information of Greiner's business partners must also be protected in accordance with the statutory and/or contractual provisions.

Third-party knowledge may only be used by Greiner to the extent permitted by law or known from public sources. Industrial property rights of third parties (patents, trademarks, etc.) must be respected and may only be used with the consent of the respective property right holder.







# 8

**Greiner calls for the separation of business and private interests**

The private interests of employees and the interests of Greiner must be kept strictly separate. Greiner also expects this from its business partners.

Any private commercial use of information obtained in the course of professional activities is prohibited (including, but not limited to, "insider information").

#### **Avoidance of conflicts of interest**

Conflicts between professional and private interests must be avoided. If this is not possible, conflicts of interest must be disclosed to the responsible manager. In such cases, Greiner employees must obtain the prior written consent of the responsible manager before continuing the conflicting activity.

Greiner refuses to allow its business activities to be influenced by personal relationships or interests. Rather, decisions—including in particular the awarding of contracts—are made exclusively on a sound factual basis and in accordance with the principle of impartiality. Secondary activities must not be detrimental to the existing employment relationship.

#### **Behaviour in the private sphere and in social media**

Greiner employees must be aware that negative behaviour in the private sphere can also have a detrimental effect on Greiner. The use of social media or communication via social media may only reflect the personal opinion of employees. Official statements about the company are the responsibility of the management or explicitly authorised persons at Greiner, e.g. the communications department. For this reason, the unauthorised use of Greiner logos (or other Greiner identification features) is also not permitted or the consent of Greiner must be obtained in advance (in case of doubt, from the Communications Department of Greiner AG).





# 9

**Greiner handles personal data responsibly**

All employees and business partners of Greiner may trust that Greiner will respect their personal rights. Greiner expects the same from its business partners. Greiner undertakes to comply with all applicable national and international data protection regulations and to take appropriate data security measures.

### **Lawfulness of data processing**

Greiner collects, processes or uses personal data only to the extent permitted by law and necessary for Greiner's internal purposes.

Greiner respects the rights of data subjects, in particular by providing clear information about the use of data.

Personal data must be stored securely and only for as long as necessary. It may only be passed on with due care. Where necessary, Greiner

concludes appropriate contracts with co-operation partners to ensure that they comply with data protection regulations. A high standard must be ensured with regard to data quality and technical protection against unauthorised access. Data protection through technology design and data protection-friendly default settings is already taken into account in procurement and development processes.

### **Clear processes and comprehensive training**

Greiner has also established clear procedures for reporting and dealing with data protection breaches.

Greiner conducts regular training and awareness-raising measures for employees to ensure that they understand and comply with data protection policies and procedures.

The various principles and measures are described in detail in the Group-wide data protection policy.







# 10

**Greiner acts sustainably and is committed to protect the environment and the climate**

Greiner is committed to complying with national and international regulations to protect the environment. In connection with the climate crisis, Greiner has set itself scientifically recognised targets—so-called “Science Based Targets”. Greiner takes care to act sustainably and also expects its business partners to take specific measures to protect the climate and the environment and to comply with national and international regulations and standards.

Greiner employees are called upon to support the development and dissemination of environmentally friendly technologies and products and to promote measures and innovations to protect the climate.

### **Environmental protection**

Greiner attaches great importance to issues such as decarbonisation, the circular economy and resource efficiency. Accordingly, care is taken in the development and manufacture of products and its other activities to minimise greenhouse gas or other harmful emissions and to reduce the consumption of resources such as energy, water and materials.

In addition, renewable resources are to be utilised wherever possible and damage to health and the environment caused by the products and their manufacture is to be avoided. An important example of this is the non-use of substances that are harmful to health.

### **Water**

With regard to water, Greiner expects employees to use this resource responsibly. This applies above all in areas of the company where water consumption or the type and intensity of water use is a significant and therefore environmentally relevant parameter. The same applies in regions characterised by water scarcity or water stress.

### **Waste and recycling**

In the development, manufacture and utilisation phase of products and in other activities, Greiner takes into account the avoidance of waste, reuse, recycling and the safe and environmentally friendly disposal of residual waste. Waste should be disposed of properly and via certified providers at all times.

### **Responsible procurement**

Greiner ensures that no raw materials are used in its products that are produced or extracted in conflict or high-risk areas or that finance armed groups that violate human rights. Furthermore, Greiner is committed to responsible procurement by favouring business partners with EcoVadis certification and recycled products where this is technically possible and/or economically viable.



# Concluding remarks

The principles set out in this Code of Conduct are derived from Greiner's corporate values. It is therefore of the utmost importance to Greiner that these rules are understood, practised and adhered to by all target groups.

Compliance with the applicable laws and the Code of Conduct must be regularly reviewed in all Greiner organisational units.

All Greiner employees are offered the necessary training and care is taken in their day-to-day work to ensure that all Greiner employees can turn to the Greiner Compliance Officer ([office.compliance@greiner.com](mailto:office.compliance@greiner.com)) with their questions and problems in confidence.

## Any questions?

As a Greiner employee, please do not hesitate to contact

- the **Local Compliance Officer** (LCO) of the respective Greiner company,
- the **Division Compliance Officer** (DCO) of the respective Greiner division or
- the **Greiner Group Compliance Officer** (GCO)

personally.

In addition, the Greiner compliance team can also be contacted at any time by business partners at the e-mail address [\*\*office.compliance@greiner.com\*\*](mailto:office.compliance@greiner.com).

The whistleblowing platform [\*\*tell-greiner.com\*\*](https://tell-greiner.com) is also available.

For questions about equal opportunities, please contact [\*\*diversity@greiner.com\*\*](mailto:diversity@greiner.com).

The Greiner sustainability team can be contacted on sustainability issues at [\*\*sustainability@greiner.com\*\*](mailto:sustainability@greiner.com).



# For business partners

The business partner hereby confirms

- the contents of this Code of Conduct or
- at least the guidelines standardised in this Code of Conduct (if an equivalent Code of Conduct exists—the equivalence must be confirmed in writing by Greiner, whereby an e-mail fulfils the written requirement in this respect)

and

- to comply with all applicable and valid laws, in particular the US Foreign Corrupt Practices Act of 1977 (as amended) and the applicable antitrust, competition and anti-corruption laws.

Greiner has the right to verify compliance with the provisions of this Code of Conduct and all applicable laws and regulations at the business partner's premises during business hours itself or through third parties. Greiner shall bear the costs of this. The business partner's trade and business secrets shall be protected.

In the event of non-compliance, Greiner reserves the right to terminate the existing business relationship or agreement with the business partner at any time and with immediate effect by written notice.

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Confirmed by

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Place, date

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Name of

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Company / Function

## Greiner Code of Conduct 2025

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