



Code of
Conduct
Greiner AG

Preface

Creating values

Dear employees,

Greiner is a leader in the field of plastic and foam solutions. While we are at home in a huge range of different industries across our four divisions, we always develop and manufacture products that add value for our customers and enrich people's lives. As an internationally successful family business, we bear a great responsibility. The way we act and interact shows who we are and what we stand for.

We are Greiner: a workforce scattered all around the globe whose members are united by a company-wide system of values. This system of values is based on openness, respect, reliability, and the pursuit of excellence – and ultimately creates the framework for our Greiner Code of Conduct. This Code of Conduct provides guidance, supporting us in our efforts to achieve our company goals in a responsible and sustainable manner and helping to ensure the integrity of our actions for many years to come.

Acting in accordance with the highest standards of ethical conduct and in compliance with legal

and regulatory requirements is a top priority for Greiner. For this reason, adherence to the Code of Conduct is compulsory for every single member of our workforce and all of our suppliers. And, naturally, for us on the Management Board as well.

As the members of the Management Board, we will lead by example and ensure that the standards set out in our Code of Conduct are implemented and upheld throughout Greiner over the long term.

Greiner AG



Axel Kühner, CEO



Hannes Moser, CFO





Be
Safe.
Not
Sorry!

About our Code of Conduct

As a global company, we want to create lasting values that benefit all of us: our customers and business partners, the members of our workforce, and our group of companies.

Introduction

Purpose of this Code of Conduct

To ensure our continued success and growth as a group of companies in the 21st century, we need to preserve the trust and respect of our customers, business partners, and the members of our workforce. Beyond simply needing to offer good products and services, Greiner companies must also act in a responsible and sustainable manner.

The aim of this Code of Conduct is to lay down the guidelines for Greiner's actions as a responsible group of companies in accordance with national and international standards.

Application of the Code of Conduct

This Code of Conduct applies to all Greiner's hourly and salaried employees, supervisors, managers, directors, and board members worldwide, to all other service providers, and to advisers, representatives, and other authorized parties acting in Greiner's name (collectively referred to in this document as "the Greiner workforce"). Greiner comprises all the businesses over which it is able, at a minimum, to exercise a controlling influence.

We will not tolerate any violations of the fundamental principles of this Code of Conduct on the part of Greiner suppliers. If we become aware of such violations, we will take action to stop our suppliers committing these violations.

Since different laws and regulations apply in the countries where Greiner operates, amendments and additions may be made to this Code of Conduct on a country-by-country basis in consideration of specific national and local laws, cultures, customs, and practices.

However, these individual amendments and additions must be in line with the standards of this Code of Conduct unless divergence is absolutely necessary due to local law.

Any amendment or addition will require approval from Greiner AG.



Compliance with the Code of Conduct

This document summarizes Greiner's rules of conduct and is intended to support every member of the Greiner workforce in their decisions and provide guidance to ensure appropriate conduct and behavior in the performance of their professional duties. In issuing these standards, Greiner's aim is to fulfill its legal and social responsibilities. Every action and decision taken by members of the Greiner workforce in the course of business must be in line with the principles of this Code of Conduct at all times.

Introduction

Reporting Code of Conduct violations

At Greiner, we strive to live by our values and conduct ourselves in keeping with the highest legal and ethical standards. We expect the same from the members of our workforce, our suppliers, and our business partners. If you are aware or learn of any violations of this Code of Conduct, please report these anonymously via our tell-greiner.com whistleblowing system. Reports detailing violations can also be submitted anonymously using the whistleblowing system.

If you have any questions about the Code of Conduct (CoC) or would like to report violations directly, you are also welcome to contact the local compliance officer (LCO) for your branch, the division compliance officer (DCO) for your division, or Greiner's group compliance officer (GCO).

Greiner compliance guidelines

1

We are committed to compliance with all legal standards and to operating our business in keeping with our values.

2

We respect the members of our workforce as essential partners in ensuring the commercial development of our group of companies.

3

We promote fair and free competition.

4

We are opposed to any form of corruption.

5

We are committed to handling our own property and the property of others responsibly.

6

We separate professional and private interests.

7

We want to keep the negative social and environmental impacts of our business activities to an absolute minimum.

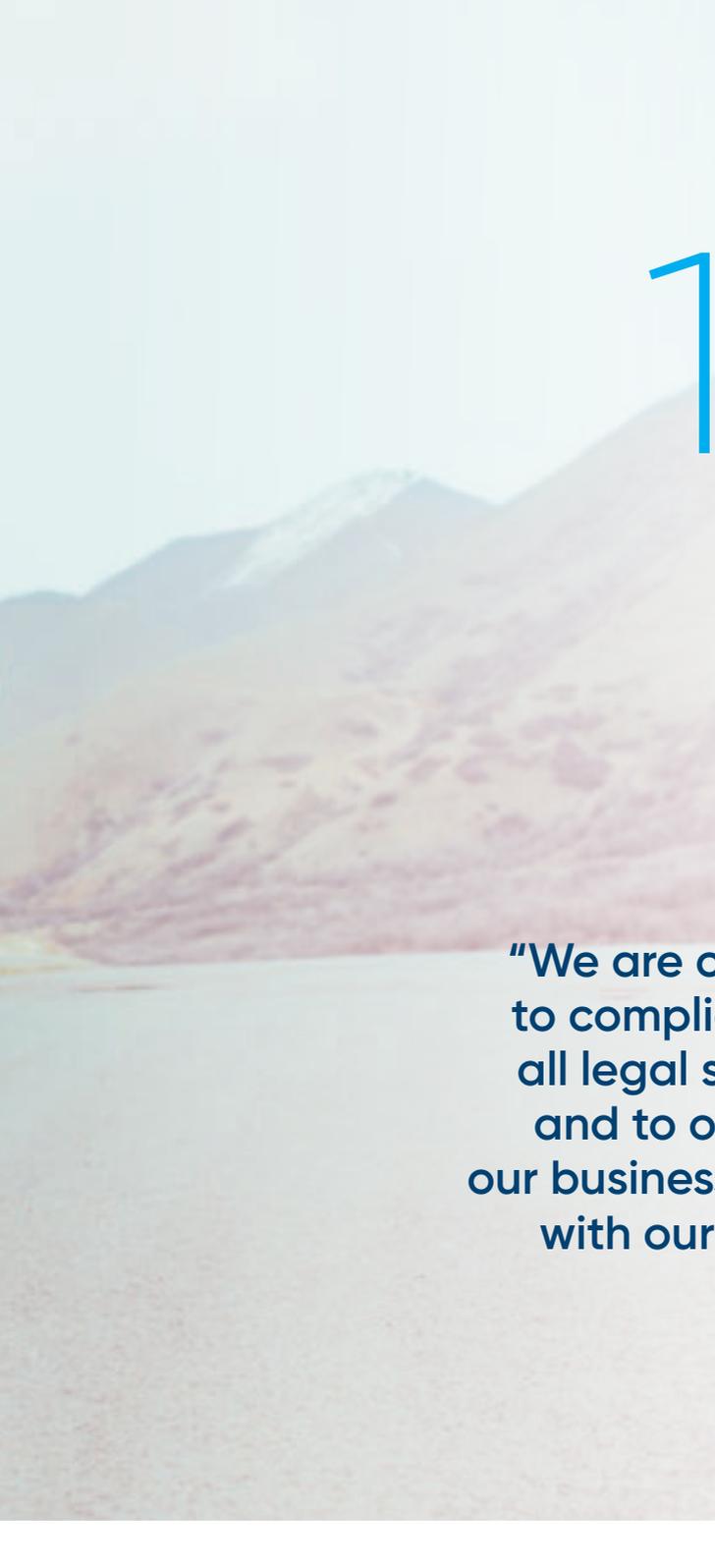
8

We handle personal data, confidential business information, and trade secrets responsibly.





1



“We are committed to compliance with all legal standards and to operating our business in keeping with our values.”

Compliance
with laws
and acting in
keeping with
our values

Guideline 1

We comply with national and international laws, rules, and regulations in every jurisdiction where Greiner conducts business. This Code of Conduct supports the Greiner workforce in this respect and is intended to give them a reliable framework for making decisions as they perform their day-to-day work.

Greiner does not tolerate any violations of the law

While strict compliance with the law is a basic standard of behavior, the Greiner workforce will never be satisfied by simple compliance with legal requirements. Beyond merely complying with legal provisions, the members of the Greiner workforce strive to incorporate values, ethics, and respect for other people and cultures into their activities.

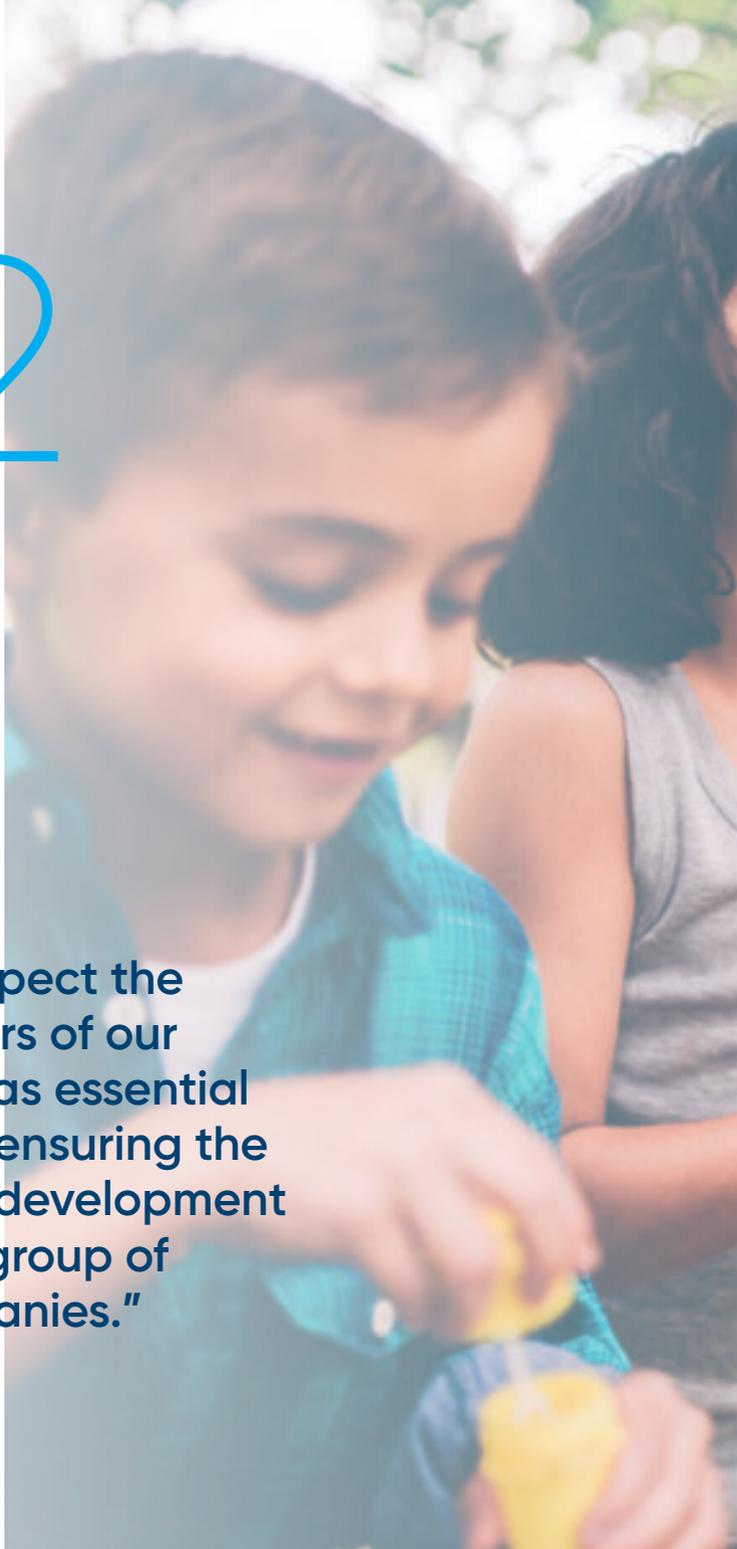
Every country and society has its own social, religious, and cultural norms and values. The Greiner workforce carefully considers these norms and values when conducting business in these countries.

The Greiner workforce acts in a socially responsible manner. When performing their duties, the members of the Greiner workforce take account of the consequences and effects of their actions on society.



2

“We respect the members of our workforce as essential partners in ensuring the commercial development of our group of companies.”





Standards of conduct with regard to the workforce

a.) Respect for human rights

Respecting human rights is a fundamental element of any modern society. In conducting its business, Greiner ensures that human rights are protected and does not tolerate any violations of human rights. Greiner respects the human rights of every member of the Greiner workforce.

b.) Compliance with labor regulations

Greiner undertakes to comply with all existing labor regulations. Moreover, we champion fair pay, regulated working hours, and a healthy work-life balance.

In addition, Greiner is committed to complying with the International Labour Organization's Minimum Age Convention. We do not accept child labor.

Guideline 2

We comply with national and international laws. We do not tolerate illegal or forced labor.

We firmly reject all forms of bullying, violence, and harassment and ensure an appropriate level of awareness of these issues among the members of our workforce through thorough information campaigns. We work together with workforce representatives to take preventive measures against these behaviors.

We welcome diversity and promote an organizational culture built on family spirit, dialogue, and open communication.

c.) Nondiscrimination

We are strongly opposed to discrimination in the workplace (including with regard to hiring, promotions, pay, work duties, working hours, training opportunities, and dismissals), whether based on gender, age, nationality, race, skin color, ethnicity, religion, belief, social status, origin, marital status, sexual orientation, physical or mental disabilities, or any other characteristic protected by the applicable laws and regulations.

d.) Health and safety in the workplace

We have a great responsibility toward the members of our workforce and the society we live in. In order to protect the health and safety of every member of the Greiner workforce, Greiner complies with the legal requirements applicable to each workplace. We adhere to internationally recognized standards, actively work to identify and correct safety deficiencies, and continuously improve workplace conditions to ensure and protect health and safety. We strive to create a safe work environment with a lived culture of respect and equal opportunities for all, including in our recruitment, training, and career development processes.





3

**"We promote
fair and free
competition."**

Commitment to fair competition

Greiner's fundamental understanding is that all business activities are to be carried out in a fair, ethical, and transparent manner in order to maintain and strengthen the trust of the public, our customers, our business partners, and every member of our workforce.

Guideline 3

a.) Compliance with competition and antitrust laws

Greiner is committed to the principles of a free market and to promoting fair competition. We comply with all the applicable rules on competition.

Greiner acknowledges that national competition laws may differ from country to country and that all applicable laws and regulations must be obeyed without exception.

For Greiner and our workforce, it goes without saying that we do not participate – whether directly or indirectly – in anticompetitive, monopolistic, or unfair business practices.

Such anticompetitive business practices include price fixing, bid rigging (collusive bidding), setting limitations or quotas on production, sharing or segmenting the market through the assignment of customers, suppliers, territories, or business segments, rejecting business (boycotts), illegal price maintenance, illegal price discrimination, or other agreements that may suppress or restrict competition.

We do not participate in international business cartels.

If members of our workforce enter into contact with competitors, whether intentionally or unintentionally, they must take care not to accept or provide any information that could indicate the present or future market behavior of Greiner or another organization operating in the market.

b.) Standards of conduct in the absence of applicable laws

The Greiner companies also strive to conduct business in a fair and ethical manner in countries that do not have any laws governing competition and, at all times, endeavor to refrain from anticompetitive practices as described above.

4

**“We are opposed
to any form
of corruption.”**





Prohibition of bribery and corruption

a.) General information

Greiner and its entire workforce are committed to conducting business with third parties exclusively in a fair and ethical manner, to refraining from bribery, and to avoiding any prohibited behavior toward or action in relation to public office holders.

Guideline 4

b.) Prohibition of bribery

Nobody is to be offered, promised, or given bribes or other unjustified benefits, either directly or indirectly, with the aim of obtaining or maintaining business orders or other advantages.

The Greiner workforce will not demand or accept bribes or other undue benefits, either directly or indirectly.

Subcontracts, purchase orders, and consultancy agreements must not be used as a means to facilitate payments to employees of business partners or other third parties.

Occasional gifts in line with general business practices, customary hospitality, or other benefits of low value, where any influence on a business decision or decision by a public authority is excluded from the outset, are only permissible subject to the relevant national legal stipulations.

Under no circumstances is it permissible to offer, grant, demand, or accept sums of money.

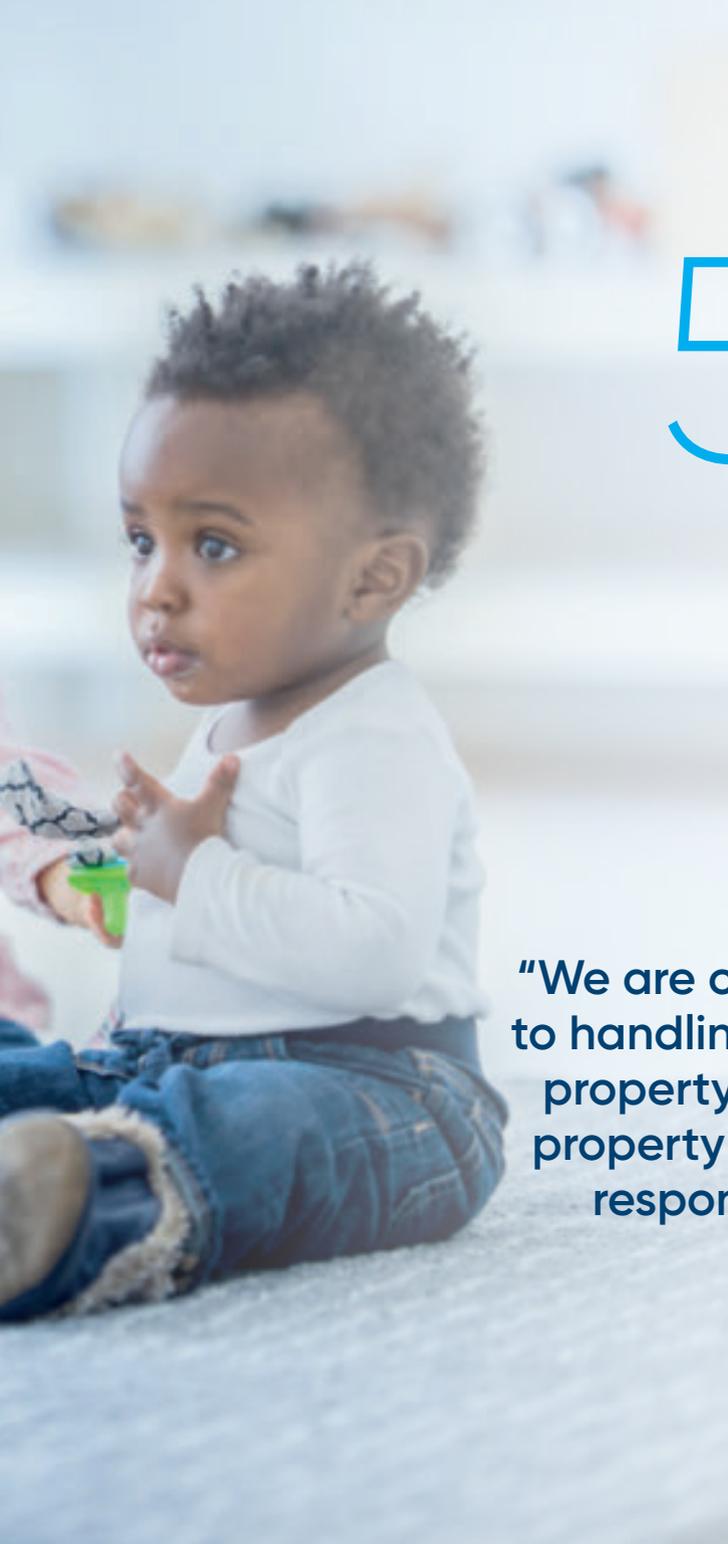
c.) Prohibition of (other) illegal inducements

Greiner and its workforce do not make any illegal donations to candidates for public office, political parties, or other political organizations. Any payment or benefit must fully comply with the disclosure requirements in the relevant jurisdiction.

d.) Money laundering and fraud

We expect the Greiner workforce to comply with the relevant statutory requirements regarding the prevention of money laundering and fraud – and to refrain from engaging in any money laundering or fraudulent activities .





5

“We are committed to handling our own property and the property of others responsibly.”

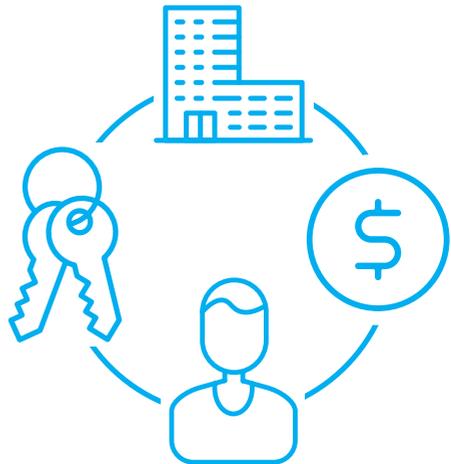
Handling
Greiner's
property
and that of
our business
partners

Guideline 5

The way we handle Greiner's property and that of our business partners is essential to maintaining our trustworthiness as a company.

Greiner's property and that of our business partners includes both tangible and intangible assets, such as business-related information, trade secrets, inside knowledge, and industrial property rights. This also includes our inventions and patents, which are crucial to Greiner's long-term success.

Every member of our workforce will handle such property with the utmost care and responsibility and act in such a manner as can be reasonably expected by both an employer and a business partner.



6

“We separate professional and private interests.”





Business conduct and separation of interests

Guideline 6

In the course of our business activities, we treat all our suppliers, customers, and business partners with fairness and respect. The private interests of members of our workforce and the interests of our group of companies must be kept strictly separate in this context. Conflicts of interest must be avoided or, if unavoidable, must be made transparent.

Greiner refuses to let its business activities be influenced by personal relationships or interests.

Instead, decisions are exclusively based on sound and objective reasoning. Any secondary occupations must not have any influence on how Greiner conducts business.





A young child with blonde hair, wearing a blue hoodie, is shown from the side, looking out towards a blurred green landscape. The child's hand is visible at the bottom left. The background is a soft-focus outdoor scene with trees and foliage.

7

“We want to keep the negative social and environmental impacts of our business activities to an absolute minimum.”

Sustainability

Greiner AG has stood for a sustainable, long-term approach to business for more than 150 years. We recognize that, as a global company, we have a great responsibility toward our workforce, the environment, society, and our shareholders.

Guideline 7

For this reason, we have committed ourselves to upholding sustainable practices in everything we do as a company.

At Greiner, we feel a strong duty to protect the environment and reduce our ecological footprint.

We use natural resources responsibly and are working to develop resource-efficient business models centered on or aimed at delivering a circular economy.

We expect our workforce to act in such a way as to ensure the environment is treated with care, including developing and increasing the adoption of environmentally friendly technologies.

We demand compliance with the relevant national laws, regulations, and standards relating to the environment.

When developing and manufacturing products or engaging in other activities, we take steps to minimize greenhouse gas emissions, reduce our consumption of resources such as energy, water, and materials, handle waste correctly, make use of renewable resources, and minimize adverse impacts on health and the environment.



8

“We handle personal data, confidential business information, and trade secrets responsibly.”

PR



PRIVACY

Data protection and safeguarding of confidential business information and trade secrets

Guideline 8

Our entire workforce (including former and future members of the Greiner workforce), our business partners, suppliers, other contractual partners, and other stakeholders can rely on us to safeguard their privacy rights, confidential business information, and trade secrets.

We are committed to complying with all relevant national and international data protection regulations and to implementing appropriate and reasonable data security measures. We therefore always adhere to the legal requirements when collecting, compiling, processing, using, and storing personal data.

In particular, when any personal data from data processing operations has been entrusted or made available to us solely on the basis of our professional activities, we keep this personal data confidential – even after the termination of an employment relationship or contractual relationship. We only ever share personal data to the extent permitted by law and when this has been expressly approved by an internal order.

We protect our confidential business information and trade secrets and those of our business partners at all times, including from unauthorized access by third parties.



General information

The guidelines set out in this Code of Conduct are based on the Greiner philosophy. As a result, it is pivotal to us as a group of companies that all the members of our workforce understand, live by, and follow these rules.

Violations of this Code of Conduct will not be tolerated and will have consequences.

We offer all members of our workforce the necessary training and ensure that every one of them has the opportunity to seek advice in confidence from Greiner's compliance officers if questions or problems arise in the course of their day-to-day work.

Greiner's Compliance organization is responsible for ensuring that the guidelines set out are implemented and upheld.

Any unanswered questions?

Please don't hesitate to get in touch with the following members of staff directly:

- The local compliance officer (LCO) for your branch
- The division compliance officer (DCO) for your division
- Greiner's group compliance officer (GCO)

You can also contact us at any time by e-mailing office.compliance@greiner.com.

Contact information

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Contact information

Maximilian Wellner

Head of Group Compliance & Legal

Greiner AG
Greinerstrasse 70
4550 Kremsmünster
Austria

Landline: +43 50541 60277
Cell: +43 664 82 54 086

maximilian.wellner@greiner.com
tell-greiner.com
office.compliance@greiner.com



For further information about
sustainability at Greiner, please
visit our sustainability website:
sustainability.greiner.com



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