

Document No.:	COM-0025	Effective Date:	2021-05-01	Business Area:	Compliance
Documenttype:	Directives	Revision #:	00	Author:	Stephanie Maudrey
Application:	Global	Revision Date:		Approval:	Ulrich Michel

# Responsible Business Partner Policy

## 1. Introduction

All4Labels is committed to responsible business practices and conducting business with the highest ethical standards. All4Labels wants to maintain stable and honest business relationships with all its “Business Partners”, including but not limited to, suppliers, advisers, agents and customers.

This Responsible Business Partner Policy (“the Policy”) explains the global standards to be followed in your daily business activities on behalf of All4Labels. It is not a comprehensive statement of all standards you are expected to follow when working with All4Labels. Additional requirements may be necessary based on the country in which you operate.

This Policy is intended to support All4Labels as it strives to meet the increasing need for transparency with regard to how businesses manage their broad range of operational, social and environmental responsibilities.

All4Labels expects their Business Partners to adopt the principles set out below to ensure alignment with All4Labels own commitments to social responsibility.

## 2. Compliance with legal requirements

Business Partners will comply with all applicable laws and regulations in all locations where they conduct business including relevant international laws and regulations such as those on trade sanctions, export controls, reporting obligations, data protection, insider dealing and anti-competition laws.

## 3. Act with integrity in all business dealings

All4Labels acts with integrity at all times and we expect our Business Partners to behave in the same way.

Business Partners will not engage in personal activities or public comments that are intended to damage All4Labels business interests or reputation.

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Business Partners must record all business transactions accurately, prudently and transparently, in compliance with applicable accounting standards and recognized best practice.

Business Partners should insist and ensure their agents, suppliers and others working on their behalf act lawfully, and in accordance with the standards set out in this Policy.

#### **4. Anti-bribery and corruption**

Business Partners will comply with all applicable anti-bribery laws and all applicable local laws where All4Labels and its subsidiaries operate.

Business Partners will not offer, promise, give (including facilitation payments), demand or accept bribes or other improper advantage, including excessive gifts and entertainment, in order to obtain, retain or give business.

#### **5. Gifts and Hospitality**

Business entertaining and hospitality involving individuals representing All4Labels must be kept reasonable in nature and proportionate and be done entirely for the purpose of maintaining good business relations and not intended to influence in any way decisions about future business. The provision of gifts should be rare, always be legitimate and aligned with company policy.

#### **6. Competition Law**

All4Labels believes in competing fairly in the marketplace. Business Partners will comply with all applicable antitrust and competition laws, which prohibit agreements, business practices or conduct that are anti-competitive or unreasonably restrain trade. Competitor information will be obtained and maintained in accordance with applicable competition laws at all times.

#### **7. Human rights & Fair Treatment**

All4Labels requires its Business Partners to uphold all internationally recognized human rights wherever their operations are located. Business Partners should recruit, select and promote their employees solely based on qualifications and skills. All workers are treated with respect and dignity. No worker is subject to any physical,

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sexual, psychological verbal harassment, abuse or other form of intimidation. There is no discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement. Discrimination, based on, age, role, gender, gender identity, colour, ethnicity, religion, country of origin, nationality, sexual orientation, marital status, pregnancy, dependents, disability, social origin, union membership or political views is prevented. In particular, attention is paid to the rights of workers most vulnerable to discrimination.

Business Partners must adhere to regulations prohibiting human trafficking – in particular for the purpose of forced labour (modern slavery) – and comply with all applicable local laws in the countries in which they operate. Forced or involuntary labour is prohibited. This applies especially to any form of forced labour exacted from a person under the threat of penalty (e.g. by withholding identification papers).

## 8. Prohibition of Child Labor

We expect our Business Partners to prohibit the use of child labour and to ensure that no person is employed at an age younger than 15. Should national laws require a higher age, this shall apply instead. The Business Partner must ensure that proof-of-age documentation is in place for all employees and that the rights of young employees are protected in compliance with the applicable laws and regulations.

Business partners shall protect young workers of legal working age, up to the legal age of majority, from any type of employment or work which, by its nature or circumstances in which it is carried out, is likely to jeopardise their health, safety or morals, or interfere with their schooling needs.

## 9. Conflicts of interest

Business Partners must avoid any situation or relationship that may involve an inappropriate conflict or the appearance of a conflict with the interests of All4Labels. Business Partners must declare all and any conflict of interest in any business dealing to All4Labels to allow All4Labels to take appropriate action.

## 10. Health, safety and security

Business Partners will provide their employees with a safe and healthy workplace in compliance with all applicable land laws and regulations. Business Partners should

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protect their employees, physical assets, information and reputation from potential security threats including cyber security threats.

## 11. Confidential information

Business Partners will protect all intellectual property and other confidential information provided by All4Labels. All information provided by All4Labels, which is not in the public domain, is deemed confidential and should only be used for its intended and designated purpose.

All and any personal information about individuals, such as All4Labels' customers or workers are handled with full respect for the protection of their privacy and for all relevant privacy laws and regulations.

## 12. Environment

Business Partners will operate in a manner that protects the environment and must comply with all applicable environmental laws, regulations and standards. Operations, sourcing, manufacture, distribution of products and the supply of services should be conducted with the aim of protecting and preserving the environment.

## 13. Financial records and Money Laundering

All business and commercial dealings must be carried out in a transparent manner and recorded accurately in All4Labels books and records. All4Labels will not tolerate any actual or potential involvement in money laundering or market abuse.

## 14. Communication

Business Partners will make these principles known to employees dealing with All4Labels and promote and monitor compliance.

## 15. Maintaining records

Business Partners will maintain documentation necessary to demonstrate compliance with these principles.

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## 16. Application and compliance

All4Labels reserves the right to conduct enquiries and investigations of Business Partners' conduct to satisfy ourselves that these principles are being met. Note that failure to demonstrate compliance with these principles will require the implementation of corrective action by the Business Partner and may result in contract termination.

## 17. Compliance Violations

All4Labels encourages the Business Partner and its employees to report any violations. Such reports can be made as follows:

- Via e-mail ([compliance@all4labels.com](mailto:compliance@all4labels.com)) or
- Over the All4Labels incident reporting platform "[Here4You](#)"


## 18. Questions

Please contact your Compliance Officer with any questions regarding this Guideline.

## 19. Effective Date

This Guideline comes into force with effect as of 2021-05-01.

It supersedes and replaces any other guidelines or rules of the Company pertaining to the subject matter hereof.

  
\_\_\_\_\_  
Ulrich Michel  
CFO

  
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Stephanie Maudrey  
Team Compliance

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## 20. Revision History

Date	Description of Change	Approved by