

Supplier Code of Conduct

January 2023

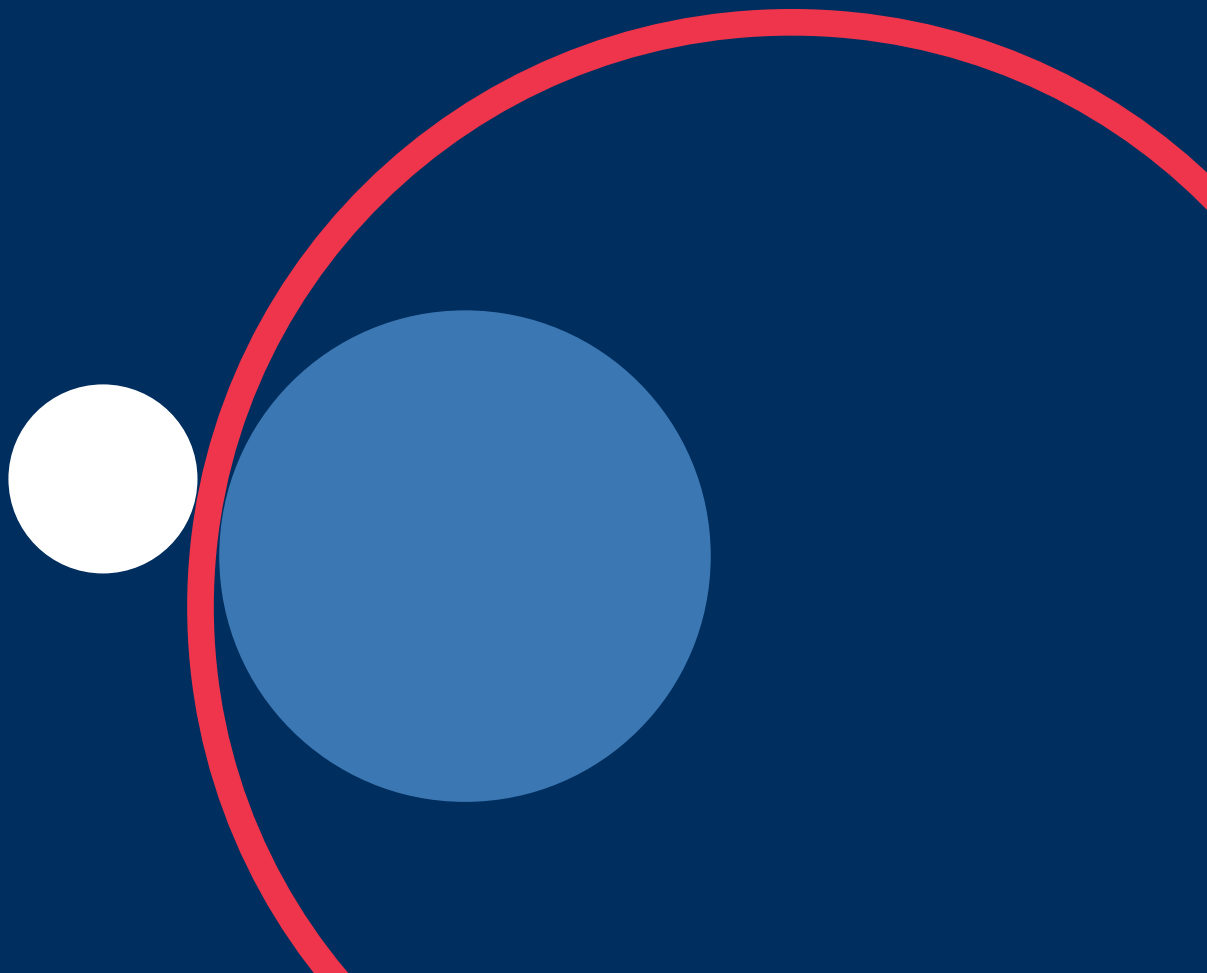
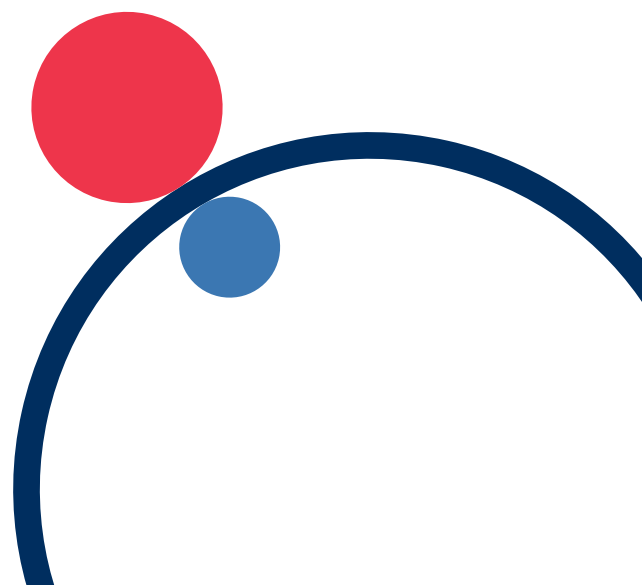


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Introduction

All4Labels wants to achieve its responsibility in society and towards its employees, customers and business partners as well as its shareholder. Therefore, All4Labels commits to clear principles as a framework for its entrepreneurial and business actions.

Economic success and moral commitment are not contradictory for All4Labels, but are an indispensable prerequisite for positive, sustainable economic activity.

This Supplier Code of Conduct reflects the company's culture, principles, and values and describes fundamental environmental, social and ethical principles to which business partners should align themselves. The cornerstones of this Supplier Code of Conduct are relevant national and international laws and legal regulations as well as international conventions.

It is the declared aim of All4Labels to outline the primary principles that drive the relationship between All4Labels and its suppliers. All4Labels expects that our business partners will act in accordance with the same or similar principles as All4Labels does and will support us in doing so. In addition, All4Labels encourages suppliers to apply these principles to their entire supply chains.

Vision

Transforming the packaging industry – becoming a global leader for Sustainable & Digital Packaging Solutions.

Ambition

Connecting brands & consumers with innovative and sustainable packaging solutions, and best-in-class service and quality, using the latest technology. Setting benchmarks in safety and service, while ensuring outstanding results.

Our Values

Curiosity • One team • Responsibility • Empowerment

1. Environmental responsibility

All4Labels expects suppliers to work in an environmentally conscious and efficient manner to minimize negative environmental impacts. To do this, suppliers must conserve natural resources, avoid hazardous substances, and contribute to the issues of sustainability, reuse, and recycling.

1.1 Address climate change & reduce greenhouse gas (GHG) emissions

Suppliers should quantify their greenhouse gas emissions and adopt ambitious emission reduction targets to ensure energy-efficient and environmentally compatible use of resources. It is expected that suppliers take steps to address their own operations towards Carbon neutrality and ultimately net zero emissions, while challenging their own supply chains to follow.

1.2 Prevent environmental hazards and pollution

Environmental hazards, including pollution from air emissions, wastewater discharge, waste disposal, and the use of hazardous substances, are risks suppliers must identify, manage, communicate, and reduce.

1.3 Develop resource conservation and circularity

The suppliers should conserve and use the natural resources responsibly, including raw materials, minerals, fossil fuels, etc. by reviewing practices such as development, transport, disposal production processes and technologies, increasing recycled content in products and raw materials, exploring the use of alternate materials, and implementing circular business models. Thereby, they avoid or reduce all negative impacts on biodiversity, climate, and water quality as best as possible.

1.4 Environmental legislation

Suppliers must identify and adhere to all applicable environmental requirements, such as obtaining any required permits, licenses, or registrations in a valid and current format, meeting the prescribed performance thresholds, monitoring discharges, and making timely submissions of any required reports and filings.

1.5 Use of chemicals

Suppliers shall not supply All4Labels with products containing conflict materials and chemicals as defined in Article 3, Paragraph 1(a) and Annex A of the Stockholm Convention on Persistent Organic Pollutants of May 23, 2001.

Additionally, suppliers which supply to European Union, should comply with REACH regulation and provide compliance declaration on every REACH update.

1.6 Sustainable sources

Suppliers should obtain their resources from sustainable sources whenever possible. All4Labels values and encourages suppliers who can show evidence of sustainable sourcing practices.

2. Social responsibility

As defined by the International Labor Organization (ILO) and the United Nations Global Compact (UNGC), suppliers are committed to upholding the rights of all workers, treating them with dignity and respect, and ensuring decent working conditions.

2.1 Forced labor

Any sort of activity demanded compulsorily, under threat of punishment, is considered forced labor. Therefore, All4Labels does not allow any support to the practice of any form of forced labor. Hereby All4Labels force its suppliers to also not allow forced labor and to expect them to undertake everything possible to act against forced labor.

2.2 Child labor & young worker

Suppliers shall reject any form of child labor and comply with the applicable minimum age for the employment of children, but in no case children younger than 15 shall be engaged. In order to prevent young workers from being exposed to hazardous working conditions, appropriate safeguards should be implemented when they are employed.

2.3 Prejudice, discrimination, and harassment

All4Labels repudiates all sorts of prejudice, discrimination, and harassment. Therefore, suppliers undertake to prohibit any form of discrimination and to take resolute action against it. In particular, the company pledges to investigate and confront situations of humiliation, pillory, intimidation, hostility, and constraint related to color, gender, age, nationality, political or religious conviction, ideology, national or ethnic origin, social origin, health status, disability or sexual orientation.

2.4 Salaries

Compensation and benefits shall be according to the country's applicable laws and respective collective bargaining agreements for the professional category, assuring proper living standards. Suppliers are expected to offer their employees fair and competitive salaries and benefits.

2.5 Free association and collective bargaining

In accordance with national and international law, suppliers shall respect the right of all workers to join and form trade unions of their own choosing, to engage in collective bargaining, to engage in peaceful assembly, as well as the right to strike and of workers to refrain from such activities.

2.6 Security forces

Suppliers do not engage private or public security forces to protect the company if their use violates applicable human rights, civil liberties or labor laws.

2.7 Occupational health and safety

Suppliers ensure that the national and international regulations for occupational safety, health protection and hygiene at the workplace applicable at the place of employment are complied with. To this end, they apply appropriate practices like frequently performed risk assessments, reasonable protective measures, training of the entire workforce as well as suitable personal protective equipment to avoid potential health and occupational risks for their employees. They also constantly strive to improve and further develop working conditions. For this purpose, suppliers shall be open to a mutual exchange with All4Labels and provide KPI's such as lost-time-incident rates upon request.

2.8 Working hours

Supplier shall ensure that working hours, including overtime, does not exceed applicable legal requirements.

2.9 Forced eviction

Suppliers oppose all forms of unlawful eviction and expropriation for the acquisition, development, or other use of land, forests, and waters.

2.10 Other human rights

Suppliers respect and support the observance of all other national human rights applicable at the place of employment as well as any internationally applicable human rights.

3. Governance and ethical business conduct

All4Labels expects its suppliers to operate their business in an ethical manner, to operate only within the framework of all applicable laws, to act with integrity and to treat any business partner with respect.

3.1 Business integrity

Suppliers maintain a trusting, fair, correct, and reliable relationship with their customers, suppliers and other business partners. They fulfill their agreements and contracts and comply with country-specific laws and regulations.

3.2 Gifts and offers

Suppliers or supplier's representatives shall not offer any commission, valuable item, favor, reward or entertainment to any employee of All4Labels. They shall also refrain from having any relationship with these employees aiming at obtaining an advantage that may give rise to a conflict of interest. In addition, our suppliers generally do not accept or give inappropriate gifts or other benefits to their business partners.

3.3 Kinship and affective relationship

All4Labels respects the kinship and affective connections that binds its employees and suppliers together. However, All4Labels understands that some limits should be established to avoid conflicts of interest. All4Labels employees may nominate suppliers with whom they have some degree of kinship, as long as they do not act or influence on the supplier's hiring or management.

3.4 Privacy and intellectual property

Compensation and benefits shall be according to the country's applicable laws and respective collective bargaining agreements for the professional category, assuring proper living standards. Suppliers are expected to offer their employees fair and competitive salaries and benefits.

3.5 Protection of identity and non-retaliation

Suppliers should implement a process that allows the employees to raise a concern without fear of retaliation. The process should ensure the confidentiality, anonymity and protection of the employees/whistleblowers are maintained.

3.6 Anti-bribery and corruption

Suppliers reject any form of bribery, venality or any other illegal incentives and do not pay acceleration payments and do not accept them under any circumstances. Our business partners, as well as All4Labels, do not practice or tolerate any kind of corruption, extortion, or fraud. All4Labels does not tolerate unlawful practices by its suppliers in their business conduct or support coercive business practices aiming at obtaining advantages.

3.7 Money laundering

Suppliers comply with all laws and regulations against money laundering or against supporting and financing terrorist activities.

3.8 Competition and antitrust law

Suppliers do not enter into agreements that violate competition and antitrust laws.

3.9 Export controls and customs

Suppliers ensure that all national and international export control and customs regulations are complied with all regulations governing the import and export of goods, services and information. Regardless of a delivery process, transactions with countries, companies or persons on sanctions lists are generally prohibited.

4. Operational management

All4Labels expects suppliers to join us in supplying excellent products and services. A proper production chain management and the application of control mechanisms assure a much more satisfactory result for the company and its partners.

4.1 All4Labels quality policy

All4Labels commitment is to assure customer satisfaction in a competitive and profitable manner by supplying quality graphic products and services, innovative and creative management, employees training and development and compliance with legal and customers' requirements, seeking products and processes ongoing and sustainable improvement.

4.2 Management system

All4Labels suppliers must keep a management system assuring a high-quality level of products and deliveries. All products and services supplied shall comply with the applicable legislation and with the specifications or requirements agreed upon between suppliers and All4Labels.

4.3 Observance of policies, rules, and procedures

Suppliers shall observe all policies, rules, and legislations related to their activities All4Labels may, at any time, request evidence of the proper compliance with such requirements.

4.4 Operating and/or commercial changes

Suppliers shall pledge to report any operating, structural, or commercial change as well as technical changes in the products that may affect their relationship with All4Labels.

4.5 Law abiding behavior

Suppliers strictly comply with laws and other national and international regulations. They take into account that legal and social norms can change over time. They therefore continuously review their conduct and adapt it in line with requirements.

5. Conduct management

Conduct management aims to ensure understanding of the guidelines and the proper treatment of conflicts and deviations from the Supplier Code of Conduct, as well as to give suppliers the opportunity to clarify any doubts related to the Supplier Code of Conduct.

5.1 Implementation of Supplier Code of Conduct

Suppliers are undertaking to inform the compliance department of All4Labels immediately in the event of a violation or suspected violation of the Supplier Code of Conduct in their business area or at their suppliers. Furthermore, suppliers commit to implement, promote and comply with the All4Labels Supplier Code of Conduct in their company and with their suppliers.

All4Labels can control the compliance with all regulations established in this Supplier Code of Conduct with the help of prevention and control measures at all locations of the business partner. Therefore, All4Labels can conduct on-site or digital audits as well as questionnaire-based reviews of the supplier's CSR practices. All4Labels will direct suppliers to take the necessary corrective measures as soon as possible if the results of such an exercise indicate that suppliers are not complying with this Supplier Code of Conduct. In the event of violations of the values and principles set forth in this Supplier Code of Conduct or failure to comply with the requirements, All4Labels reserves the right to take appropriate measures, up to and including suspension or termination of the business relationship.

5.2 Risk management

Suppliers shall identify all risks in their supply chains that are related to the Supplier Code of Conduct, such as human rights or environmental risks, and take prompt and appropriate actions where necessary.

5.3 Notes on reporting violations

Information on weaknesses or other circumstances that lead to legal violations can be submitted directly to the human rights officer or the compliance department at All4Labels, but also anonymously, in particular via the electronic whistleblowing system (<https://www.bkms-system.net/all4labels>). Information will be treated confidentially. If the identity of the whistleblower is known, it will be kept secret upon request. All4Labels assures whistleblowers that it will not take any steps to identify the whistleblower in the event of an anonymous report. This does not apply to improper use. Denunciations of any kind will not be tolerated.

6. Closing words and further information

For All4Labels, economic success and moral commitment are not contradictory, but rather an indispensable prerequisite for sustainable positive economic activity. This includes offering products and services of the highest quality. But it also means that the business conduct of our employees is honest. All4Labels expects the same from our business partners. Violations of this Supplier Code of Conduct will not be tolerated by All4Labels.

7. Your contact for compliance issues

E-mail: compliance@all4labels.com

8. Consent

By signing this Supplier Code of Conduct, our supplier commits to responsibly comply with the listed standards and regulations. Our business partner also commits to clearly communicate the content of this Supplier Code of Conduct to internal and external employees, suppliers, subcontractors and other contracted companies and assures All4Labels that all necessary measures to comply with the Supplier Code of Conduct will be properly implemented and promoted.

Place, date: _____

Name: _____

Signature & stamp: _____