



monta Klebebandwerk GmbH

# Code of Conduct

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## 1. Principles

Our Compliance Guidelines and Anti-Corruption Guidelines are based on this Code of Conduct.

Its aim is to provide additional orientation for applying the guidelines, the laws of the individual countries and the internal regulations that are in place within the monta Group. Each employee is responsible for their own adherence to the requirements set out therein and must consult with their line managers in cases of doubt. The competent Compliance Officer on site may also be contacted for advice. Moreover, training on relevant topics and mandatory requirements will be provided at intervals.

The competent line manager and/or the Compliance Officer on site must be notified if any definite or imminent infringements of ethical, legal or internal monta rules and principles become known.

The Compliance Officer must keep strictly confidential all information that is provided in regard to infringements and must ensure objective investigation of the incidents.

No employee may be placed at a disadvantage due to their compliance with laws or monta regulations.

### 1.1 Respect of human rights and basic rights

The monta Group respects the internationally recognised human rights and makes efforts to ensure that they are upheld. The same applies to adherence to protective rights according to the laws of the respective country.

### 1.2 Principle of non-discrimination

The diversity of our staff represents a significant potential. With this in mind, the monta Group consciously recruits employees with different backgrounds and life experience. All employees are called upon to behave towards each other in the spirit of respect and to confront discrimination based on reasons of race, ethnicity, gender, ideology, faith, disability, age or sexual orientation.

### 1.3 Ban on child and forced labour

Child labour and any form of exploitation perpetrated on children, adolescents and other employees will not be tolerated. The minimum age for gainful employment at the monta Group must not be lower than the age at which compulsory schooling ends and shall on no accounts be below 15.

The monta Group rejects all forms of forced labour. No employee may ever be directly or indirectly coerced into work through the use of violence and/or intimidation.

## 2. Cooperation and dealings with business partners and third parties

### 2.1 Fighting corruption and preventing conflicts of interest

All employees must avoid situations in which their personal or financial interests may conflict with those of the monta Group. It is prohibited in particular to hold an interest in competitors, suppliers or customers or to enter into a business relationship with them if doing so might lead to a conflict of interest. The existence of a conflict of interest should be assumed if the person might be influenced in the fulfilment of their tasks on behalf of the

monta Group due to the nature or extent of their interest.

Business relationships with friends and family members may also lead to a conflict of interest. Employees must first consult with their line manager or respectively the Compliance Officer, in order to avoid the emergence of a conflict of interest.

Employees are prohibited from offering or accepting personal gifts or gratuities in connection with business relationships of the monta Group if it would be reasonable to assume that such gifts or gratuities might influence decisions or transactions.

The acceptance/disbursement of money is always prohibited. This extends to government officials and to employees of private enterprises. Invitations to business meals must be within the limits of customary hospitality.

No employee shall offer or procure – or attempt to offer or procure – undue advantages to the benefit of employees of business partners, their employees or other third parties. This shall be assumed in particular if the nature or the extent of the advantage would be suitable to influence the actions and decisions of the recipient in an inadmissible way. Particular caution must be applied when dealing with government officials and civil servants. The advice of the Compliance Officer must be obtained in these cases if there is any doubt. Third parties (consultants, brokers, sponsors etc.) must not be used in order to circumvent these rules. Employees who violate these provisions must expect considerable sanctions under labour, criminal or administrative law or significant compensation claims from the monta Group or third parties.

The Anti-Corruption Guidelines must be consulted and the advice of the Compliance Officer obtained if there is any doubt.

## 2.2 Fair competition and compliance with antitrust and competition laws

The monta Group is committed to upholding the principles of fair and transparent competition. Our companies, their directors and employees are prohibited from engaging in practices that are unlawful or even criminal. This applies in particular to illicit arrangements that may exclude, limit or distort competition. In this regard, employees must adhere to the relevant national laws and the internal regulations within the monta Group, especially the Compliance Guidelines and the Anti-Corruption Guidelines.

## 2.3 Donations and sponsoring

The monta Group refrains from making direct or indirect donations to political organisations, parties or individual politicians. Every exception must be coordinated in advance with the Management Board and the Compliance Officer

Sponsoring and charitable donations to other, apolitical recipients, must not be used to circumvent the provisions set out in these guidelines.

The Anti-Corruption Guidelines must be consulted for further information on charitable donations and on obtaining authorisation for charitable donations.

## 2.4 Compliance by partners

We are a reliable partner to our customers and suppliers at all times; our cooperation is based on trust and fairness. In this regard, we seek to build long-term relationships in the spirit of partnership. We therefore attach considerable importance to adherence by our customers and suppliers to the principles set out herein.

### **3. Occupational health and safety**

All montA employees must take care to ensure a working environment that is healthy and safe. Strict compliance with the safety regulations and the regulations of the employer's accident insurance association are indispensable in particular. All employees are obliged to report infringements of safety regulations to the line manager and/or the Safety Officer without undue delay. Any deficiencies must be rectified without delay.

### **4. Sustainability and environmental protection**

The montA Group is aware of the environmental impact of its business operations and undertakes to protect the soil, water and biological diversity. All employees must, to ensure sustainable economic activities, take preventative and mitigating actions in the fulfilment of their tasks to avoid harmful environmental repercussions and must ensure furthermore the efficient use of natural resources. All relevant laws and official requirements must be strictly observed. Any incidents of environmental damage must be reported without undue delay to the line manager and/or the Management Board.

### **5. Communication, PR and training**

We inform employees, business partners, shareholders and the general public as openly and transparently as possible about developments at our company. This is organised within the framework of a standardised and coordinated communications policy. It applies also when the company is confronted with the accusation of having violated the principles described in this document in a significant way. Practical

training is provided at intervals to create, i.e. reinforce, a profound understanding and awareness of these rules. This applies especially to key areas of the Compliance Guidelines, as well as to anti-corruption policies and compliance with the principles of fair competition and antitrust laws in particular.

### **6. Protection of company property, information management and data protection**

All montA employees must handle company property with care. In particular, this includes company know-how, trade and business secrets, inventions and assets that are protected by industrial property rights, as well as the handling of office equipment, resources and company vehicles.

Every montA employee must treat with strict confidentiality all important company information of which they become aware in the completion or their tasks on behalf of the company or in another way. They must consult with their line managers or the Compliance Officer in cases of doubt.

Irrespective of whether and to which extent personal data is protected according to the laws of the respective country, it is prohibited to use personal data for purposes other than those for which it was received by the montA Group. This extends also to data and information concerning partner companies, as well as to data and information that is subject to a special nondisclosure obligation.

## 7. Consequences of infringements

Adherence to these guidelines is mandatory for all employees; disciplinary sanctions will be imposed – regardless of the applicable laws in the respective country – in all cases of noncompliance, which may also include compensation claims and criminal prosecution.

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### CONTACT DETAILS FOR THE COMPLIANCE OFFICERS

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