



the sign of quality

Our employees are unique individuals,
but our quality is consistent.

**Code of Conduct
for Employees.**

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Foreword by the Board

Dear employees,

Today's world is marked by buzzwords like "sustainability" and "circular economy". We take pride in the fact that we have embraced and contributed to the circular economy for many years, transforming waste paper into high-quality products. Throughout this journey, we have committed ourselves to upholding high standards of environmental protection, occupational safety, social responsibility, and quality.

As we continue to achieve success and navigate the dynamic business landscape, we are always mindful of our corporate values. Through our collective efforts, we ensure that we reach our goals while staying true to our principles.

Our daily operations are increasingly influenced by new legal requirements. The ESG (Environmental, Social, Corporate Governance) criteria affect all market participants in the EU, including our organization. We tackle these challenges together as a team, adhering to our internal guidelines and the law.

This Code of Conduct offers valuable insights into the diverse regulations, helping us to understand them. These guidelines apply to every employee in our Group, regardless of their country or role,

and create a clear framework that strengthens our organization as a whole. By sharing and discussing these guidelines, we can foster the values that, alongside our business policies and mission statement, form another pillar of our corporate culture.

Hubert Marte
Chairman of the Board

Udo Nachbar
Board Member, Technology



Hubert Marte,
Chairman of the Board
Ganahl Group



Udo Nachbauer,
Board Member, Technology
Ganahl Group



Stephan Kaar,
Managing Director
Corrugated board plant
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Sigrid Rauscher,
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Paper mill Frastanz, AT



Otto Schweinzer,
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Corrugated board plant
St. Ruprecht, AT



Thomas Baumüller,
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Recycling plant
Zimmermann Hall, AT



Mihnea Baldea,
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Corrugated board plant
Rondocarton Romania, RO



Anca Popescu,
Managing Director
Corrugated board plant
Apahida – Cluj, RO



Florin Grad,
Managing Director
Corrugated board plant
Târgoviște, RO



Emanuel Loghin,
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Corrugated board plant
Sibiu, RO



Zsolt Miklós,
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Corrugated board plant
Budapest, HU



Joachim Wieland,
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Corrugated board plant
Langenenslingen, DE



Klaus Paier,
Head of Finance &
Controlling
Ganahl Group



Sencer Kurtulus,
Head of Business Unit
Faserwell Frastanz, AT



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Statement of Principles by the Management

Dear colleagues,

As the Ganahl Group's senior management, we bear responsibility towards our employees, the environment, society, and for the preservation of biodiversity.

In the area of human rights, our actions are guided by the UN Guiding Principles on Business and Human Rights, as well as the OECD Guidelines for Multinational Enterprises. We also adhere to the core labor standards set forth by the International Labour Organization (ILO), and the International Bill of Human Rights.

To ensure this, we must all play our part through our daily actions. If uncertainties arise or violations are observed, we must not look away.

Instead, we should speak to our supervisors, the works council, management, or seek advice from the Compliance department.

Furthermore, we and all stakeholders have unrestricted access to our reporting platform at all times. Any concerns can be expressed freely and anonymously there. We are committed to fostering and maintaining an open corporate culture. By maintaining transparency and actively discussing the contents of this Code of Conduct, we strengthen the company as a whole.

Integrity, fairness, and adherence to rules are the foundation of our actions and indispensable for the success of the Ganahl Group. We must all work together to ensure that these principles continue to underpin our daily professional lives.

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Our Responsibilities

As a modern, family-owned industrial company, the Ganahl Group is committed to a corporate management model that takes economic, ecological, and social aspects into account. We meet our responsibilities towards our customers, our employees, the environment, and wider society. We are also committed to upholding ethical principles in all our business activities. Our proactive mindset, combined with the highest quality standards and professional and social competence, enables us to produce eco-friendly products with maximum benefits for our customers. In doing so, we also make a vital contribution to protecting the environment. Our employees play a key role in this process. They are our most valuable asset, ensuring the continued success of our company.

This Code of Conduct provides all employees with a framework for their professional activities. It defines the foundations of our work and provides the link between our mission statement, our business policies, and the legal regulations that apply within the company.

This Code of Conduct covers the following four key areas:

- Social responsibility
- Responsibility towards business partners
- Responsibility towards employees
- Responsibility towards the Ganahl Group

High levels of motivation and an unwavering commitment to continuous development and improvement characterize our daily professional actions. At the same time, we rely on the power of unity, seeking and promoting collaboration at every opportunity. However, this is only possible if we treat each other with appreciation, respect, and fairness, while ensuring strict compliance with legal requirements and internal regulations. By demonstrating our personal dedication and clear commitment to responsible and ethical behavior, each of us can play our part in safeguarding the Ganahl Group's positive reputation, thereby promoting the company's economic success. For as we all know: Our employees are unique individuals, but our quality is consistent.

For the sake of readability, this document was formulated using gender-neutral language. All personal designations apply equally to people of all genders.

3.1

Social responsibility

a. Human rights

Background

Our obligations to respect and uphold human rights are defined in the European Convention on Human Rights and the United Nations Universal Declaration of Human Rights.

Corporate responsibility

We are committed to upholding human rights, including children's rights (hereinafter referred to collectively as "human rights"). The Ganahl Group rejects all forms of child labor, forced labor, and compulsory labor. This applies to our company, and our expectations extend to our business partners as well.

We recognize fundamental human rights, and in a commercial context, this primarily includes our employees' right to organize and assemble within the workplace.

My contribution

As an individual employee, I can make an important contribution by valuing and upholding human rights through my actions. I can also ensure that human rights are respected in my immediate environment.

If I witness a human rights violation at work, I will help to stop it – either by taking action myself or by informing my supervisor.

Example

You are responsible for procurement and discover through media reports that one of your suppliers may be employing children. You report this information to your supervisor or the Compliance department. The Ganahl Group will then investigate the matter and determine further steps. Based on discussions with the supplier, measures can then be implemented to improve the situation at the supplier's company. If the situation does not improve, it may result in the termination of the business relationship.

b. Equal treatment and equal opportunities

Background

As explained in our mission statement, we put people at the heart of everything we do, treating everyone with respect, fairness, and dignity. We support each other in achieving our goals and enjoy working as a team. Together, we form a strong community characterized by respect for the differences that make each individual unique.

Corporate responsibility

We ensure that everyone has equal opportunities and treat everyone equally. We do not accept any form of discrimination, harassment, or bullying. We believe that no one should suffer disadvantages due to their gender, background, skin color, nationality, religion, political opinion, union membership, sexual identity and orientation, physical or mental disabilities, or age. Accordingly, we adhere to the principle of equal treatment when evaluating employees and applicants.

My contribution

I adhere to our mission statement and treat my colleagues fairly and respectfully at all times.

If I become aware of unequal treatment or unequal opportunities, I will speak to the person responsible about their conduct. If this is not possible, I will report the matter to my supervisor, the HR department, or the compliance officer.

Example

If you believe that a colleague is being discriminated against because of their background, help us address this by speaking up so that appropriate action can be taken.

c. Product safety

Background

Our customers use our packaging solutions every day, primarily to protect their products and convey important information. The Ganahl Group is therefore responsible for avoiding risks, protecting human health and the environment, and ensuring product safety.

Corporate responsibility

We produce paper for the packaging industry, manufacture corrugated cardboard and moulded pulp packaging, and collect waste paper. In all three segments, customer benefits are our top priority, forming the basis for long-term business relationships. These benefits are built on the highest standards of service, quality, and product safety, which are reflected in the strategy we employ to ensure product and process safety. In this way, we guarantee the best possible service, absolute reliability, punctuality, and impeccable quality for our business partners – true to our motto: “the sign of quality”. Furthermore, we view quality as a dynamic process that requires the continuous improvement of all quality-related services.

My contribution

If I become aware of any quality issues, I implement corrective measures and work towards improvements within the scope of my abilities.

Example

You discover that incorrect printing has occurred on food packaging and the affected packages have already been dispatched. Inform your supervisor as quickly as possible, enabling them to take the necessary steps to prevent any defective food products from reaching consumers.

d. Environmental and climate protection

Background

Our environmental protection efforts are focused on safeguarding natural resources to preserve our way of life. Key areas include conserving forests, soil, and landscapes, maintaining air quality, protecting water bodies, and preserving both biodiversity and species diversity.

An essential aspect of environmental protection is climate protection. Our primary goal here is to reduce harmful emissions that contribute to global warming.

The products we manufacture are part of an ecological sustainability chain; we collect waste paper and use it as a raw material in our paper factory. In addition, the packaging produced by our corrugated board plants is almost 100% recyclable. In this way, we are able to close the recycling loop, ensuring both ecological and economic sustainability.

Corporate responsibility

Our commitment to the environment is evident in our careful use of natural resources and efficient utilization of materials, energy, and logistics. Our goal is to minimize pollutant emissions – to achieve this, we invest in new technologies that save energy and protect the environment. In addition, we continuously improve our working methods. Collectively, therefore, we take the necessary steps to achieve our environmental goals. In our daily operations, we endeavor to act in an environmentally friendly manner, utilize resources sparingly, and minimize the environmental impact of our operations. We expect the same commitment from our business partners.

My contribution

In the course of my professional activities, I actively promote environmental protection and ensure that I use resources thoughtfully and responsibly.

Example

Actively consider ways to save resources such as raw materials, energy, and water to help promote a sustainable future and combat climate change. Submit your suggestions for improvements to your supervisor in the form of an energy and environmental report.

3.2

Responsibility towards business partners

a. Conflicts of interest

Background

Our work is aligned with the business interests of the Ganahl Group. Therefore, all employees must avoid situations in which their personal, family, financial, or political interests conflict with those of the Ganahl Group. Such conflicts are more likely to occur if employees take on additional jobs or side projects.

Corporate responsibility

The Ganahl Group respects the private interests and personal lives of all its employees. However, any potential conflicts between employees' private and business interests must be avoided, including situations that may merely create the appearance of such a conflict. Business decisions must always be based solely on objective criteria and not personal interests.

My contribution

I take care to avoid even the appearance of a conflict of interest and disclose any potential conflicts to my supervisor and the HR department. Together, we seek a solution that does not compromise the interests of the Ganahl Group.

Example

Your supervisor asks you to review several bids. One of the most attractive bids comes from a close friend's company.

You disclose this fact to your supervisor so that you can withdraw from the decision-making process and avoid even the appearance of a conflict of interest.

b. Invitations and gifts

Background

In the business world, it is common to receive invitations, gifts, and offers of hospitality. As long as these gestures are within the cultural norms of the country where the Ganahl Group subsidiary operates, they are generally acceptable. However, if these gestures exceed acceptable limits and influence the behavior of a third party or your own conduct, accepting them may be illegal in the country concerned.

Corporate responsibility

Our internal guidelines specify how to handle invitations, gifts, and offers of hospitality, helping you to understand what will be deemed appropriate.

My contribution

I have read and adhere to the internal guidelines on gifts and invitations. If in doubt, I ask my supervisor or the Compliance department for advice.

Example

You receive a valuable gift from a customer, such as a luxury watch.

After checking the internal guidelines, you realize that accepting this gift is not in line with the cultural norms of the relevant country. You therefore decline the gift and report the incident to your supervisor or the Compliance department.

c. Prohibition of corruption and bribery

Background

According to the definition by Transparency International, corruption is “the misuse of entrusted power for personal gain or advantage”. Unfortunately, corruption is widespread and has led to numerous court cases and investigative committees. Corruption increases business costs, reduces trust, and undermines fair competition. It is also illegal and could therefore result in criminal proceedings against both the Ganahl Group and individual employees.

Corporate responsibility

The Ganahl Group’s reputation is shaped by our conduct towards our business partners. In the course of our daily business, we comply with the law and firmly believe in treating others as we would wish to be treated ourselves. We secure our contracts through fair business practices, high quality standards, and competitive pricing. We do not offer, promise, or grant any improper advantages to gain benefits or influence decision-makers.

My contribution

I do not engage in bribery or accept bribes. Before accepting gifts or invitations, I seek appropriate guidance (see also the section on invitations and gifts).

Example

You are in the process of submitting a bid. The decision-maker at the customer’s company suggests you will win the contract if you provide a “substantial gift”.

This is a clear case of corruption. You immediately report the incident to your supervisor and the Compliance department.

d. Prohibition of money laundering and terrorist financing

Background

Money laundering involves concealing the origin of funds obtained through illegal activities. If such funds are used to support terrorist activities or organizations, this constitutes terrorist financing. Unlike many other crimes, ignorance is never a defence in such cases. In other words, you may be held criminally liable even if you were unaware of the illegal origin of the money. By participating in the scheme, even unwittingly, you may commit a criminal offense.

Corporate responsibility

We carefully vet the business partners we work with. Our goal is to ensure that we only engage with reputable partners and always ensure that their funds come from legal sources.

My contribution

I always adhere to international money laundering regulations. If I notice suspicious behavior by customers, I immediately inform my supervisor or the Compliance department.

Example

A customer overpays the Ganahl Group by a significant amount and requests that the excess funds be transferred to an overseas account, instead of the registered business account.

In such cases, ask the customer to explain their request and then discuss the next steps with your supervisor.

e. Accounting and financial reporting

Background

The Ganahl Group keeps its accounts properly and publishes its business figures annually in its annual report. This transparency builds trust with our stakeholders – any irregularities in this area could cause serious problems within the Ganahl Group.

Corporate responsibility

We strictly adhere to the legal requirements in the areas of accounting and financial reporting. Transparency and accurate figures are of utmost importance to us. We ensure that our reports are timely and comply with statutory regulations.

My contribution

I accurately record all business transactions and book them in accordance with the legal requirements. I also make sure that the associated documents are correct, complete, and properly stored. In addition, I take appropriate steps to ensure that internal and external reporting deadlines are met.

Example

You are asked to exclude financial records for a particular customer from the books. Refuse this request and report the incident to your supervisor.

f. Fair competition

Background

The Ganahl Group is a committed supporter of open and independent competition. We adhere to market-economy principles and fair-competition rules. Fair and unrestricted competition is a cornerstone of our social and economic system, and is protected by competition and antitrust laws. It drives growth and job creation, motivating us to continuously improve our practices.

Agreements with competitors on price-fixing or sharing markets, territories, or customers – whether formal or informal – are prohibited. Sharing information with competitors about current or future prices, margins, costs, offers, market shares, our sales practices, or specific customers is also forbidden.

Corporate responsibility

Our business practices are founded on the principles of the free-market economy. We agree on fair terms of payment with our suppliers and do not exploit our market influence. We ensure that every employee is aware of and adheres to the relevant internal regulations and laws applicable to their area.

My contribution

I do not discuss prices with competitors or share any information that could impair free competition.

Example

At an event, an employee from a competitor asks you about prices or competitive data.

Inform them that you cannot provide such information and report the incident to the Compliance department.

g. Procurement

Background

The Ganahl Group maintains numerous contractual relationships with suppliers and service providers. Procurement is a cornerstone of our company's success – carefully sourced raw materials and supplies have a sustainable and positive impact on our bottom line.

Corporate responsibility

Our procurement department carefully selects suppliers based on objective criteria, including economic and ecological factors. We conduct risk assessments to minimize the risk of operational failures and supply chain bottlenecks.

My contribution

I choose suppliers or service providers based on objective criteria. I also involve the relevant procurement department and other departments in the ordering process, such as quality management, finance, sales, logistics, scheduling, engineering, and planning.

Example

You become aware that a colleague intends to place an order with a supplier without informing the relevant procurement department. Raise the matter with your colleague directly or inform your supervisor. Provided the order was based on objective and financially sound criteria, it will then be properly integrated into the Ganahl Group's procurement process.

3.3

Responsibility towards employees

a. Occupational health and safety

Background

The health and safety of all employees is a top priority for the Ganahl Group. We guarantee comprehensive protection for our staff within the framework of the applicable national regulations.

Corporate responsibility

Our employees and other stakeholders have the right to be protected from accidents and occupational diseases while at work. Accordingly, we design our workplaces to be as safe and healthy as possible in order to prevent accidents and work-related illnesses. By using modern tools and promoting health and safety awareness, we ensure a safe, healthy, and hygienic work environment. This is especially important for our vulnerable or at-risk employees, as well as temporary workers and external service providers.

We expect all employees to support our health and safety measures within their areas of influence to the best of their ability. Our shared goal is to prevent accidents. In support of this, our designated officers organize regular information sessions and provide appropriate training.

My contribution

I comply with all health and safety instructions in the course of my work. I take appropriate steps to protect myself and others. I immediately report any accidents, near-misses, or critical situations to prevent further harm and suffering.

Example

You notice that an employee from an external company is not wearing the required protective equipment for their work area (e.g. ear protection, safety shoes, high-visibility vest). You bring this to their attention and explain the necessary safety measures.

b. Fair treatment and freedom of assembly

Please see section 3.1 a of this Code of Conduct.

c. Regulated employment, working hours, and fair compensation

Background

Our employees are engaged in freely chosen employment. We do not permit any form of forced or involuntary labor. All work at our company is performed on the basis of a regulated employment contract in compliance with national labor laws.

Within the Ganahl Group, we highly value our employees' personal commitment, professionalism, and performance. Our high regard for our employees is also reflected in the extensive social and additional benefits we voluntarily provide. We offer fair compensation and further benefits (such as social benefits and paid vacation time) that meet or exceed statutory requirements and/or industry standards.

Corporate responsibility

We treat our employees fairly and compensate them at industry-standard levels. We do not discriminate based on gender, ancestry, skin color, nationality, religion, ideology, political or social activities, union membership, sexual identity and orientation, or physical and/or mental disabilities.

3.4

Responsibility towards the Ganahl Group

a. Data protection

Background

Various legal regulations are in place to protect personal data and uphold privacy.

Corporate responsibility

We make sure that modern information and communication technologies are used correctly in our company, with a focus on protecting the privacy and data of our customers, business partners, and employees. We ensure that all data-collection and data-processing tasks are conducted in compliance with applicable laws. We diligently meet our reporting obligations to national supervisory authorities and regulatory bodies.

My contribution

I handle the data I receive at work with due care. I safeguard the data entrusted to me and do not share it with unauthorized third parties.

Example

You receive a participant list while organizing an event. A colleague who is not involved in the organization asks for the list. As a first step, you check with your supervisor to ensure that the data is being used properly.

b. Protecting and securing information, knowledge, and intellectual property

Background

The Ganahl Group holds multiple patents and trademarks, and possesses extensive technical know-how. This knowledge and these intangible assets are the foundation of our success. Unauthorized disclosure of this information could therefore cause significant damage and have serious consequences for the Ganahl Group.

Corporate responsibility

Ganahl Group employees handle the company's physical and intellectual property, assets, and other resources carefully, efficiently, and economically, using them only for company-related activities. We are committed to ensuring that confidential information is managed responsibly. We abide by laws and internal regulations that protect confidential information, and we respect the trade secrets of our competitors, business partners, and customers.

My contribution

I treat the information entrusted to me in the course of my work with due care and only share it with authorized individuals. I am especially mindful when handling sensitive information concerning the Ganahl Group, its customers, or suppliers.

Example

As part of your work in the product development department you are granted access to a customer's patents. You keep this information confidential and do not share it with unauthorized third parties.

c. IT security

Background

Many of our daily tasks are carried out using computers or other equipment with IT interfaces. While these technologies are hugely beneficial, they also present a variety of risks. Criminal organizations are increasingly shifting their activities online, attempting to defraud companies and individuals alike.

Corporate responsibility

We are aware of these criminal activities and therefore provide training on the topic of information security.

My contribution

I always complete the training provided and familiarize myself with the internal guidelines for the use of devices.

I understand that online communication or careless use of USB sticks in the workplace could damage the IT infrastructure of the Ganahl Group.

Example

You receive an email with unusual content. You verify the sender, do not randomly open attachments, and do not click on links. If you receive suspicious emails or calls, contact your supervisor or the IT department.

d. Handling company assets

Background

The intangible and tangible assets of the Ganahl Group are crucial to our long-term success. We always use these assets strictly in accordance with company regulations. Exceptions are only permitted if the regulations explicitly allow personal use of company resources.

Corporate responsibility

We respect the assets of the Ganahl Group and use them carefully in our daily work.

My contribution

I adhere to internal guidelines and use company assets mindfully.

Example

Use your work tools (machines/laptop) properly and as instructed during your training. Doing so will reduce the likelihood of damage due to carelessness, thereby protecting company assets.

4

Recommendations for action

In conclusion, we wish to emphasize the importance of each individual for the success of our company. Ultimately, it is our “collective uniqueness” that underpins the exceptional quality standards we achieve together.

Our recommendations for action:

- **Integrity and fairness:** Always act with integrity and fairness, adhering to our Code of Conduct and the law.
- **Communication and collaboration:** Always treat each other with respect and promote open, constructive collaboration. Our individual contributions are valuable, helping to strengthen our corporate culture.
- **Safety awareness:** Prioritize safety by adhering to the health and safety guidelines in the workplace. Safety is our top priority.
- **Environmental responsibility:** Consider the environmental impact of your actions and help us achieve our sustainability goals.
- **Responsibilities towards business partners:** Treat our business partners fairly and respectfully, taking care to avoid conflicts of interest.
- **Handling company assets:** Always treat company assets with due care and prudence.

Through our personal commitment and willingness to continuously improve, each of us can make a significant contribution to our shared success. Our employees are unique individuals, but our quality is consistent.

www.rondo-ganahl.com