



STOELZLE GLASS GROUP



# CODE OF CONDUCT

Our commitment to responsibility, respect and sustainability



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OUR VALUES AND  
STANDARDS ARE  
OF FUNDAMENTAL  
SIGNIFICANCE FOR  
OUR SUCCESS.

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# PREAMBLE

## Foreword by management

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The trust placed in us by employees, business partners, and the local communities is pivotal for our success. Negligent, unethical or unlawful behaviour could easily destroy this trust. That is why there is nothing more important to Stoelzle than how we act and how we transact our business. We are therefore strongly committed to abiding by this Code of Conduct and living by our values. The Stoelzle Glass Group can only ensure its long-term sustainability as a reliable business partner for Pharma, Spirits, Perfumery & Cosmetics, and Specialities customers when each and every employee acts in line with the regulations and international standards in force.

We create the highest levels of credibility through uncompromising integrity with regard to our ethic

principles. We at Stoelzle Glass Group therefore place immense value on vigorously encouraging observance of this Code of Conduct. This Code of Conduct does not claim to describe or elucidate all the statutory regulations that apply to our commercial activity and conduct. Rather, it specifies the areas that are essential to our lasting success. It is designed to help us make the right decisions at the right time, to ensure that all our stakeholders continue to place their trust in us over the long haul.

Dr. August Grupp, MBA  
CEO Stoelzle Glass Group



# 1. CODE OF CONDUCT

## Standards for exemplary conduct

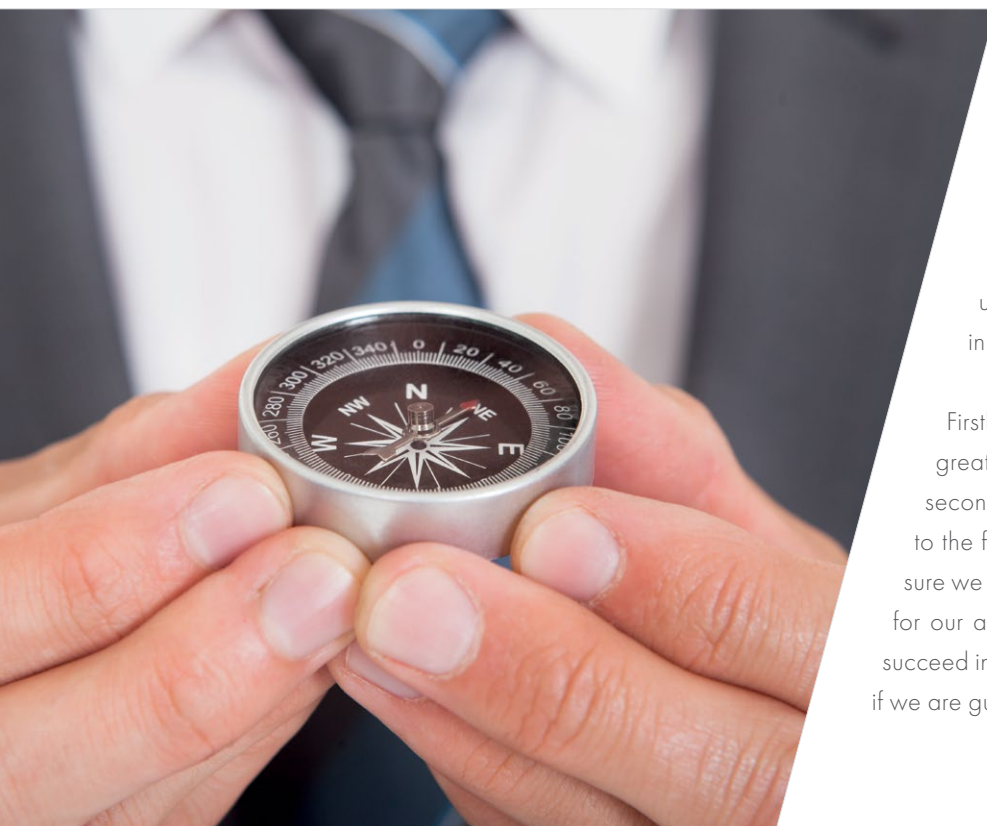
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We as the Stoelzle Glass Group take our social responsibilities very seriously and are committed to sustainable growth with our high-quality packaging glass. Over the past few years, the Stoelzle Glass Group has grown considerably, and we strive to ensure that employees continue to feel proud of our company. This Code of Conduct is intended to set the standards for exemplary conduct at the Stoelzle Glass Group.

In daily business life, one can expect situations to occur in which it is important to make decisions and act with integrity. This Code of Conduct is a binding set of rules, which guides our daily actions and behaviour and reflects our corporate culture across the entire Stoelzle Glass Group.

### KEY QUESTIONS FOR OUR DOING AND ACTIONS

1. If I act in this way, will I be having a positive impact on my company, staff and colleagues?
2. Is the action or situation transparent, traceable and comprehensible?
3. Would I be proud to tell my family or friends about it?
4. Would I like it if my actions were reported publicly?



It is designed to be a practicable document that regulates our responsibilities towards clients, business partners and employees in a transparent fashion. Some chapters contain a model question and answer to help us develop a better understanding of how these rules apply in daily working life.

Firstly, our written Code of Conduct provides greater clarity on what is expected of us; secondly, and no less importantly, we can refer to the following key questions to help us make sure we do the right thing and take responsibility for our actions. We have no doubt that we will succeed in achieving sustainable entrepreneurship if we are guided by these questions.



# 3. WE SAY: "SAFETY FIRST"

## Consistent safety culture at the workplace

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### AS THE STOELZLE GLASS GROUP, WE ENSURE A SAFE AND HEALTHY WORKING ENVIRONMENT

In terms of safety, we always keep our eyes open and remain vigilant, not just our own safety but that of our colleagues too. We work consistently on our safety culture and on the development of safe and secure working processes by means of continual training sessions at the workplace. This includes how to handle hazardous substances safely.

We report danger zones and near-accidents as quickly as possible in order to prevent future incidents. Disregard or violation of our safety regulations is not tolerated – this applies to all levels of the company hierarchy without exception. We regularly check our accident prevention regulations to make sure they remain effective. Any infringements must be reported at once and steps will be introduced to improve matters.

#### PERSONAL SECURITY

We do not tolerate any consumption of alcohol or drugs at the workplace, to safeguard the personal safety of all employees.



#### GOOD TO KNOW



**Question:** You are working at the IS machine and notice that a colleague has pushed their safety goggles onto their forehead in order to wipe sweat from their eyes. Suddenly, an error at the station needs to be remedied and your colleague goes to the IS Maschine, forgetting that their safety goggles are still on their forehead and not covering the eyes as is proper. What do you do?



**Answer:** Our company's safety regulations are based on risk assessments and oblige individuals – depending on the workplace – to bear responsibility for their own personal protective equipment. In this case, eyes should be protected from potential injury by glass splinters and splashes of oil. I therefore go up to my colleague and notify them that they are not wearing their safety goggles correctly.



# 4. PROPERTY & DATA PROTECTION

## Company property and confidential information

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### WE TREAT COMPANY PROPERTY WITH CARE

#### BUSINESS EQUIPMENT

Property belonging to the Stoelzle Glass Group – for example, machines, tools and communication equipment must be used exclusively for operational business purposes. All employees are obliged to protect company property from misuse, loss or theft. This includes both material and intellectual goods and software licences.

#### ORDER AND CLEANLINESS

We pay special attention to order and cleanliness. Please note that vandalism in all areas (particularly in changing rooms and communal rooms), deliberately damaging property and deliberate soiling are considered serious offences.

#### INTERNAL REGULATIONS

All internal regulations concerning the use of company cars, company mobile phones, phones, computers, the internet and all information technologies must be adhered to without exception. These are regulated in separate guidelines.

#### TRADE SECRETS

All Stoelzle employees must treat corporate know-how as strictly confidential, and use such knowledge exclusively

to perform their tasks and duties. Intellectual property must be protected against acquisition by third parties and against unauthorised access by third parties. Intellectual property includes, for example, glass formulas, inventions and product prototypes, as well as trade secrets such as information about clients, suppliers and software.





#### GENERAL DATA PROTECTION REGULATION FOR PERSONAL DATA

- This is any information relating to an identified or identifiable natural person
- Examples: name, address, date of birth, staff number, client number, bank details, etc.

## WE PROTECT IMPORTANT DATA

### PERSONAL DATA

As part of our business activity, we collect and manage personal data pertaining to our employees, contractual partners and clients; we also collect customer data. We collect and process personal data in accordance with the data protection regulations governing each respective country in which we operate. The right to privacy is a human right, which is why the Stoelzle Glass Group treats all data in the strictest confidence. We establish all the measures required to protect said data from unauthorised access. Data is permitted to be forwarded to third parties only where statutory regulations allow.

Passwords or codes are not forwarded to managers or employees working in the IT department (exception: holiday cover staff, who are informed of all access rights in compliance with internal guidelines).

### TRADE SECRETS

We are bound by law to observe confidentiality in all matters and information pertaining to our clients and business partners. This includes company and trade secrets. Employees must maintain this confidentiality even after their employment ends. Data Protection Guidelines are available from the company.

# 5. ETHICS AND COMPLIANCE

## Compliance with legal regulations and provisions

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### FAIR AND COMPETITIVE PERFORMANCE

#### COMPLIANCE WITH ALL STANDARDS AND REGULATIONS

We conduct our business in compliance with all statutory norms and regulations in the markets in which we operate. By observing the local customs that exist in each respective country, we guarantee the highest degree of integrity.

Fair and competitive conduct is of central importance to us. In particular, this relates to the ban on competitors exchanging information and/or making arrangements on the subject of price, zoning, production amounts or any other competitively relevant parameters, as well as on price-fixing by sales partners.

#### FORBIDDEN ARRANGEMENTS AND ANTI-COMPETITIVE MEASURES

Illegal arrangements also include informal conversations in which anti-competitive measures are agreed. We strictly reject even the appearance of coordinated or collusive behaviour; any lobbying activities are conducted entirely transparently.

#### MONEY LAUNDERING

One of Stoelzle's stated aims is to not be misused for money laundering or any other illegal purpose, and not to contribute in any way to such purposes. Money laundering is when illegally obtained money is funnelled into legitimate financial and economic systems in order to disguise its true origin, and thus appear lawful.

#### GOOD TO KNOW



**Question:** At a trade fair, representatives from competitor firms go for lunch together. During the meal, there is a discussion of planned price policies at the various companies. How should you behave in this circumstance?



**Answer:** Even if you are not participating actively in the conversation, it could be construed that you and therefore Stoelzle are involved in a cartel. Remove yourself from this situation and others like it!

#### KEY DETAILS AT A GLANCE

1. Compliance with legal regulations and provisions in the markets
2. Fair and competitive performance
3. No anticompetitive measures and forbidden agreements
4. No money laundering for illegal purposes

# WE AVOID CONFLICTS OF INTEREST AND WE DISTANCE OURSELVES FROM CORRUPTION

It is forbidden to use business relationships for our own private gain, and to give preference to business partners out of private interest.

We expect our suppliers, service providers and contractual partners to inform us of any conflicts of interest that may have a bearing on contracts and business relationships.

Corruption encompasses demanding, offering or accepting a dishonest advantage. In some circumstances, it is unclear whether something may constitute unlawfulness. All employees must take care to distance themselves from corruption, bribery and "grey areas".

Our business relationships with clients, suppliers and authorities are transparent and comply with international anti-corruption standards. Any incidents or moments that arouse grounds for suspicion must be reported immediately to [compliance@stoelzle.com](mailto:compliance@stoelzle.com). By following these rules, we safeguard the company's reputation. All employees must clearly declare to management any personal relationships with clients, suppliers or possible applicants.

Bearing all this in mind, we do not tolerate the offer or acceptance of monetary gifts. We view small gifts as an expression of mutual appreciation that serves to build and maintain long-term business relationships. However, the value of the gift must be appropriate; small gifts are permitted, provided that these are not given with the intent to influence business decisions, or indeed that they do not arouse suspicion of this. If in doubt, please contact the relevant manager or email [compliance@stoelzle.com](mailto:compliance@stoelzle.com).



CONTACT IN CASES OF DOUBT AND AMBIGUITY  
✉ [compliance@stoelzle.com](mailto:compliance@stoelzle.com)

### GOOD TO KNOW

**?** **Question:** A large investment into the company is in the pipeline. An employee working in Purchasing is invited to attend a business dinner by a potential supplier of this major contract. Should the invitation be accepted?

**!** **Answer:** This invitation can be accepted on condition that participants talk business during the meal. Take care to ensure transparency, practice restraint and remain vigilant of public perception and outward appearance.



## WE PURSUE A TRANSPARENT APPROACH TO DONATIONS AND SPONSORSHIP



Donations are voluntary services supplied by the Stoelzle Glass Group, without the expectation of anything in return. Transparent documentation of the donation must be provided. The donation recipient and the intended purpose of the donation must be disclosed and must be legally defensible.

We do not permit donations to be made to organizations whose aims do not accord with the principles and values of the Stoelzle Glass Group, or to organizations that may tarnish the reputation of the Stoelzle Glass Group. The focus of donations is established in agreement with plant management and executive management. Stoelzle donation amount limits are defined in conjunction with the department in charge of donations and sponsorship, and agreed with management.

In the case of sponsorships, we act with political and social responsibility in mind. In particular, we take care not to encourage "old-boy networks" or insider relationships. In any case, any close personal relationships between

the recipient organization and Stoelzle employees must be declared openly and reported to the officer in charge of sponsorships.

### GOOD TO KNOW



**Question:** Some members of the local voluntary fire brigade ask Stoelzle for a donation to hold a party. Should a donation be made in this case?



**Answer:** Yes, a donation is possible in this case, as the request is for a non-profit organisation. The person in charge of sponsorships must be made aware of any personal relationships between Stoelzle employees and the voluntary fire brigade service.

# 6. BUSINESS RELATIONSHIPS

Clients, business partners, authorities and auditors

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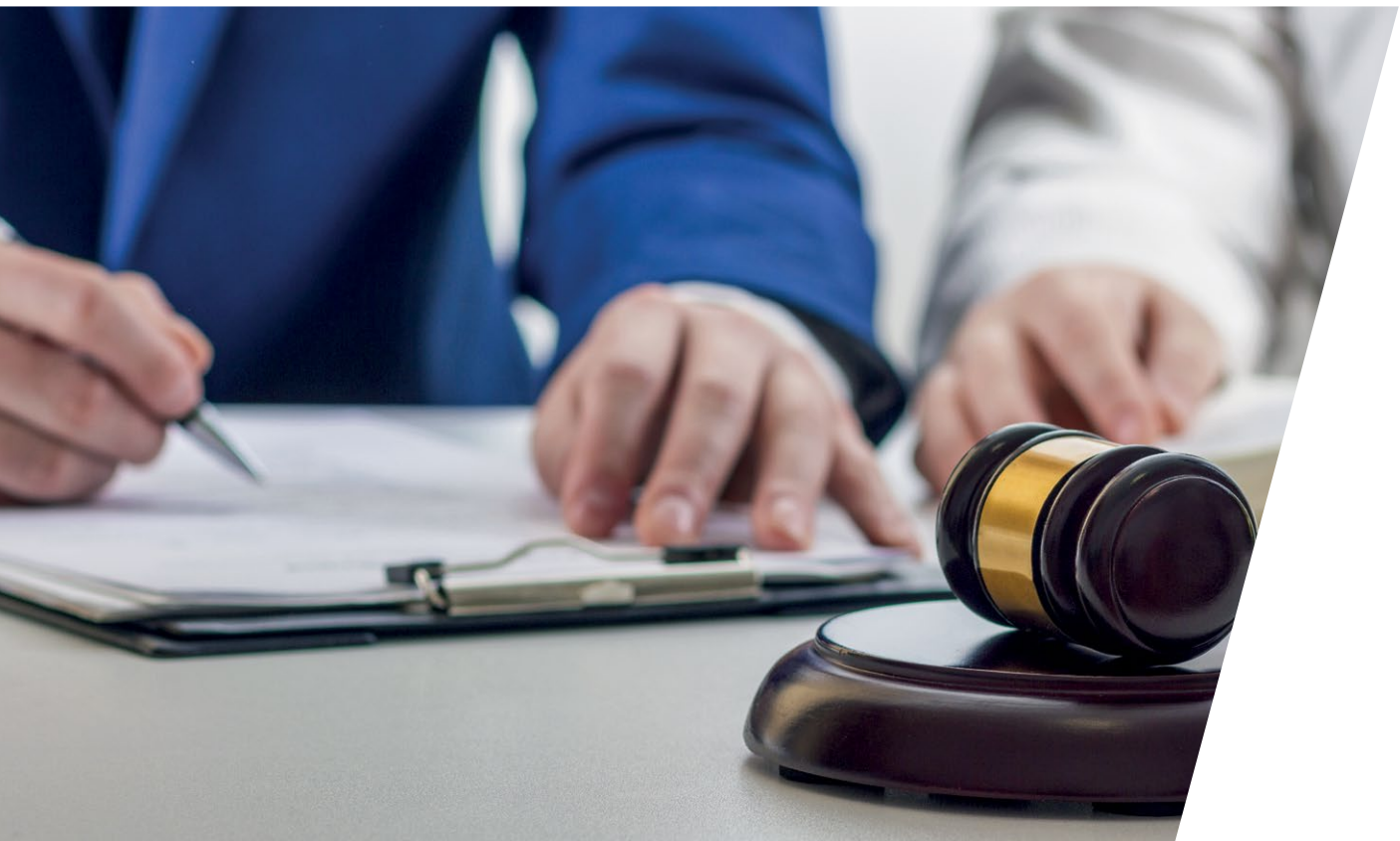
## WE STRIVE FOR LONG-TERM, SUSTAINABLE BUSINESS RELATIONSHIPS

Our aim is to create the best solutions for our clients and to supply the finest quality packaging glass we can. We therefore treat our clients and business partners with sincerity and fairness, we are trustworthy, and we respect their differing interests.

We are a competent and reliable partner for our clients and business partners, and we communicate with them on an equal footing. We strive to foster long-term and sustainable business relationships. We are aware that we

are measured on a daily basis by our ethical, social and environmental performance.

Communication with officials and authorities is built on the principles of transparent, proper communication, and honesty. We also ensure that the auditors investigating our sites and processes are entirely independent, thus helping to minimise risks and contribute to the continual improvement of our company.



# 7. SUPPLIERS

Quality-related, ecological and social responsibilities

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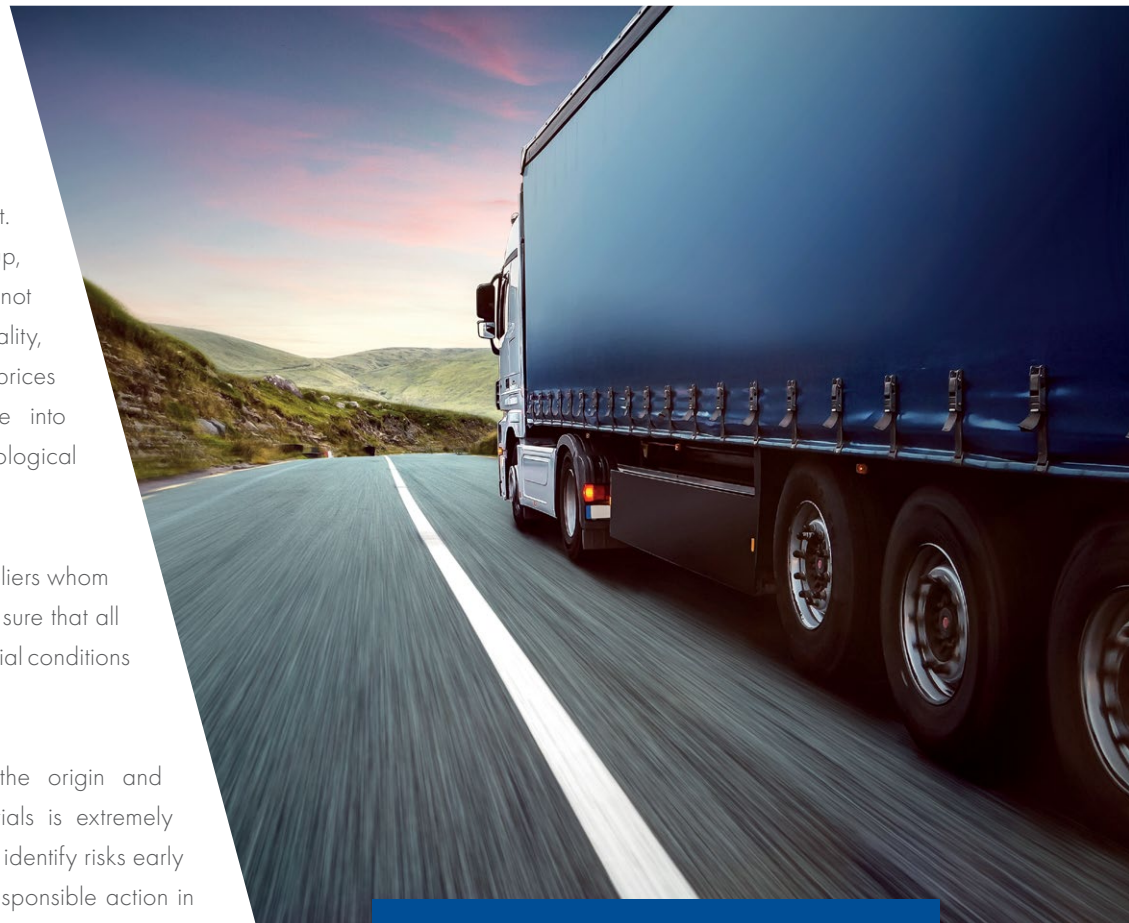
## WE STRIVE TO BE RELIABLE PARTNERS WORKING ON AN EQUAL FOOTING

We share ethical and social principles with our suppliers, representatives and consultants, as well as a commitment to protecting the environment. At the Stoelzle Glass Group, purchasing decisions are not made solely based on quality, time frame, service and prices offered, but always take into account social and ecological factors too.

Every year, we select suppliers whom we audit in order to make sure that all quality, ecological and social conditions meet our standards.

Transparency regarding the origin and source of our raw materials is extremely important to us, in order to identify risks early on. We have enshrined responsible action in our procurement processes.

We continually monitor financial and non-financial risks, both current and future, assessing their significance for our business activity. Management actively pursues the company's risk management programme and puts particular emphasis on building a sustainable risk culture across the whole company and along the value creation chain.



### MODERN SLAVERY ACT

The Modern Slavery Act of 2015 was passed by the Parliament of the United Kingdom, created to fight modern slavery. The Stoelzle Glass Group aims to prevent slavery and human trafficking from its supply chain as well as from its own activities.

# 8. FAIR INTERACTION

Respectful conduct with and among employees

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## WE UPHOLD HUMAN RIGHTS AND TREAT ONE ANOTHER FAIRLY

We as the Stoelzle Glass Group believe that human dignity is fundamental, and that we must uphold human rights. We are committed to the United Nations Global Compact. We therefore vehemently reject all forms of discrimination, violence or violations of human dignity based on race, ethnic origin, skin colour, religion, gender, worldview, disability or any other characteristics.

As an internationally operating business, we value diversity, which is expressed in our employees' backgrounds, culture, language and ideas. We respect and appreciate diversity among our workers and believe that this enriches our company.

Our daily dealings with one another, across all levels of the company hierarchy, is characterised by mutual respect, openness, honesty, trust and cooperation. We welcome different experiences, perspectives and competencies, which contribute considerably to the success of the Stoelzle Glass Group. Our managers bear an important responsibility in this respect.

The Stoelzle Glass Group offers all employees the same employment opportunities – a transparent recruitment process underscores this point. In our view, the most important criteria for possible promotion are skills and qualification. When recruiting and promoting employees, we make sure to treat all candidates the same, no matter their gender, race, background, religion or age.

Employees across all locations have the right to join together to form a union and discuss working conditions, without fearing reprisals. We stand for fair working conditions, appropriate salaries, and believe that the same rules should be applied to everybody. Worker protection measures, employment law, worker representative rights and collective contract regulations are all strictly observed.

All employees, whatever their position or function, be this in production, decoration, administration, or sales, are considered equally valuable in the success of the Stoelzle Glass Group.

### SEXUAL HARASSMENT

The Stoelzle Glass Group prohibits all forms of sexual harassment. This includes obvious sexual advances, offensive or suggestive comments or gestures, jokes and obscene expressions. Even if such actions are not meant to be compromising, this behaviour can still be perceived as harassment and should therefore be reported immediately.





## FUNDAMENTAL VALUES AT STOELZLE GLASS GROUP

Human rights are considered fundamental at all Stoelzle Glass Group locations; we reject outright any instance of forced labour and child labour.

### GOOD TO KNOW



**Question:** Someone from the company notices that a manager is behaving inappropriately towards an employee, or is sexually harassing them (e.g. very loud, offensive or inappropriate behaviour). How should the observer act in this situation?



**Answer:** Inappropriate conduct of any kind must be reported immediately to a supervisor or via email to the compliance officer! Respectful behaviour, regardless of hierarchy, is very important to us at Stoelzle – both in communication and in human interaction.

✉ [compliance@stoelzle.com](mailto:compliance@stoelzle.com)

# 9. ENVIRONMENT AND RESOURCES

Circular economy, forethought and careful use of raw materials

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## WE PROTECT THE ENVIRONMENT AND USE RESOURCES RESPONSIBLY

As the Stoezle Glass Group, we recycle over 100,000 tonnes of glass per year, thus saving on raw materials and energy. We continue to be aware of our environmental responsibilities and are committed to the careful use of our raw materials, as well as to the efficient use of energy and water. When designing and specifying our facilities, we make every effort to procure energy-efficient systems and technologies.

Glass is 100 percent recyclable. Even so, we give deep thought as to how we can save resources and materials in all company processes, and how we can keep our environmental impact low. The Stoezle Glass Group ensures compliance at all sites with all

statutory provisions and standards in environmental protection.

Our research department is constantly working on innovative and environmentally solutions as well as the use of energy-efficient technologies to manufacture glass packaging. All Stoezle employees perform their tasks and duties bearing in mind our ecological responsibility.

Proactive communication with local neighbourhood residents on environmental topics is important to us. We pursue all complaints submitted to us very carefully and make every effort to deliver pleasing solutions to all those involved.

### PRINCIPLES OF THE CIRCULAR ECONOMY AND THE PRECAUTIONARY PRINCIPLE

1. How to keep reducing our ecological footprint
2. How to contribute to achieving climate goals through the efficient use of energy, raw materials, materials, water and packaging
3. How to avoid polluting the environment and avoid emissions in production and throughout our entire business activity





# 10. PRODUCT SAFETY

Take responsibility for our quality, hygiene and product protection

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## WE DELIVER THE BEST QUALITY TO OUR CLIENTS

The Stoezle Glass Group stands for outstanding quality and the finest packaging glass supplied to clients. Defective products may cause damage not only to the company, but, more importantly, to the user as well. In order to guarantee a high level of quality, we work continually on improving our quality standards and improving our internal structures and processes. In all areas, we strive to deliver the highest performance

in order to make sure that clients trust us and have confidence in us.

As a glass-producing company, we carry a great deal of responsibility in creating products that comply with quality, hygiene and safety standards. Our responsibility extends to the end client, who expects us to deliver a safe product.



# 11. BINDING NATURE

## Compliance with our Code of Conduct

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Our Code of Conduct ensures that we observe all statutory and generally applicable ethical standards. It also serves to ensure that we avoid damage of any kind to the Stoelzle Glass Group. This Code of Conduct, and the values and regulations it contains, are therefore binding for the entire Stoelzle Glass Group: that is to say, all employees, regardless of company hierarchy.

We do not tolerate any violations of the Code and will respond to any infringement without exception. If managers or supervisors issue instructions that run contrary to this Code of Conduct, employees have no justification for acting against the Code.

Those who do not act in accordance with the company's guidelines and agreements must expect consequences within the framework of company and statutory regulations. If a Stoelzle employee suspects or ascertains any instance of misconduct, he or she is required to report this immediately. "Looking the other way" in this case is deemed a form of unethical conduct. If a violation of the Code or incident of misconduct is ascertained, information must be sent by email to [compliance@stoelzle.com](mailto:compliance@stoelzle.com).

All information is dealt with quickly and authoritatively, and treated in the strictest confidence. Every person accused has the opportunity to provide an explanation. Those who submit the information will not suffer any negative consequences from doing so.



**VIOLATION OR INCIDENT  
OF MISCONDUCT**

✉ [compliance@stoelzle.com](mailto:compliance@stoelzle.com)

# IMPRINT

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Stoelzle Oberglas GmbH  
Fabrikstraße 11, A-8580 Köflach  
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**CEO:** Dr. August Grupp, MBA

**Responsible for content:**

DI(FH) Birgit Schalk  
Sustainability Manager, Stoelzle Glass Group  
Integrated Management Systems

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## STOELZLE GLASS GROUP

Stoelzle Oberglas GmbH  
Fabrikstraße 11, A-8580 Köflach  
Tel.: +43 (0) 3144 / 706  
E-Mail: [compliance@stoelzle.com](mailto:compliance@stoelzle.com)  
[www.stoelzle.com](http://www.stoelzle.com)