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All employees and the management of Novapax Kunststofftechnik Steiner GmbH & Co. KG are bound by the provisions of this Code of Conduct. It sets out the values, principles and practices that govern the business practices of Novapax Kunststofftechnik Steiner GmbH & Co. KG. The company's mission is to adhere to ethical standards and create a work environment that promotes integrity, respect and fairness. A strictly lawful and principled business policy serves the long-term business interests. This Code of Conduct has been approved by the management of Novapax Kunststofftechnik Steiner GmbH & Co. KG.

Compliance with laws and regulations in Germany and abroad in all business decisions and actions

Novapax Kunststofftechnik Steiner GmbH & Co. KG endeavors to comply with the applicable laws and other relevant regulations in Germany and abroad. Integrity and sincerity promote fair competition, also in relation to our customers and suppliers.

Obligation of the management

Novapax Kunststofftechnik Steiner GmbH & Co. KG sees itself as obliged to act economically, socially and environmentally conscious. Novapax Kunststofftechnik Steiner GmbH & Co. KG therefore strives to conduct its business competently and ethically and to protect fair competition in all markets in which it operates, by complying with applicable antitrust laws, competition and restrictions of competition.

Prospective conflicts

Novapax Kunststofftechnik Steiner GmbH & Co. KG expects its employees to be loyal to the company. All employees must avoid situations in which their personal or financial interests conflict with those of Novapax Kunststofftechnik Steiner GmbH & Co. KG. Therefore, it is particularly prohibited to participate in competitors, suppliers or customers or to enter into business relationships with them in the private sphere, insofar as this can lead to a conflict of interest. Conflict situations must not affect the interests of Novapax Kunststofftechnik Steiner GmbH & Co. KG.

Such conflicts of interest may arise in many situations: no employee may accept any benefits whatsoever, which may reasonably be expected to result from business decisions or transactions of Novapax Kunststofftechnik Steiner GmbH & Co. KG could influence. Invitations must be within the bounds of customary hospitality. Due to their position in Novapax Kunststofftechnik Steiner GmbH & Co. KG employees should not gain personal advantages directly and / or indirectly through access to confidential information. All employees have the duty to promote as far as possible the legitimate interests of Novapax Kunststofftechnik Steiner GmbH & Co. KG. Any competition with the

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00	10.07.2018	Von Holt	Dr. Heine/Steiner	Dr. Heine/Steiner	In Kraft
01	09.11.2018	Von Holt	W. Steiner	W. Steiner	In Kraft

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company should be avoided. Any actual or potential conflict of interest must be reported and discussed with the relevant supervisor.

Prohibition of corruption

Novapax Kunststofftechnik Steiner GmbH & Co. KG is against corruption and bribery. Behaviors where business is done by unfair means will not be tolerated. Employees of Novapax Kunststofftechnik Steiner GmbH & Co. KG may not offer business partners any benefits or receive or accept from them those which could lead to an impairment of an objective and fair business decision or even give it the appearance of such appearance.

Fair working conditions

All employees of Novapax Kunststofftechnik Steiner GmbH & Co. KG have to ensure a safe and healthy environment. Therefore, safety regulations and practices must be strictly adhered to. As a socially responsible employer, Novapax Kunststofftechnik Steiner GmbH & Co. KG considers its employees a great value. It demands great dedication from its staff and in return shares the business success with them.

The personnel policy of Novapax Kunststofftechnik Steiner GmbH & Co. KG helps to offer employees the opportunity of professional and personal development. Open exchange of views, criticism and ideas are encouraged. Novapax Kunststofftechnik Steiner GmbH & Co. KG condemns unlawful discrimination or harassment of any kind.

Dealing with internal knowledge

All employees of Novapax Kunststofftechnik Steiner GmbH & Co. KG are obliged to ensure a fast and smooth exchange of information within the company. Information must be passed on correctly and completely to the affected areas, unless special interests exist in exceptional cases, in particular due to confidentiality obligations. Relevant knowledge must not be unlawfully withheld, falsified or selectively passed on. Dishonest reporting within the company or to outside organizations or persons is strictly prohibited. All financial statements, annual reports, business papers and books of Novapax Kunststofftechnik Steiner GmbH & Co. KG must accurately represent transactions. They must comply with the legal requirements and the accounting principles and internal accounting procedures of Novapax Kunststofftechnik Steiner GmbH & Co. KG.

Dealing with assets

All employees of Novapax Kunststofftechnik Steiner GmbH & Co. KG are responsible for the proper and careful handling of the property of the company. Every employee is obliged to protect the property of Novapax Kunststofftechnik Steiner GmbH & Co. KG against loss, damage, misuse, theft, embezzlement or destruction. Each employee has

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an obligation to inform his supervisor without delay of any use of assets contrary to the above.

Secrecy and privacy

Much of the business information of Novapax Kunststofftechnik Steiner GmbH & Co. KG is confidential or legally protected, so there is a duty of secrecy. This does not apply if publication of the information has been approved by Novapax Kunststofftechnik Steiner GmbH & Co. KG or is mandatory due to laws or regulations. The duty to maintain secrecy relates in particular to intellectual property. These include business secrets, patents, trademarks and copyrights, but also business and marketing plans, designs, business papers, salary data, and any other unpublished financial data and reports. All personal information about employees, customers, business partners and suppliers as well as other third parties are carefully used in Novapax Kunststofftechnik Steiner GmbH & Co. KG and treated confidentially in full compliance with data protection laws. The protection of this information must be met with the utmost care.

Implementation and monitoring

The rules contained in this Code of Conduct form a core of the corporate culture of Novapax Kunststofftechnik Steiner GmbH & Co. KG. Consistent adherence to these principles is indispensable. Every employee is responsible for this.

If an employee has concerns or complaints about the issues listed in this Code of Conduct or has knowledge of any breaches of the Code of Conduct contained herein, he should promptly submit this to his supervisor for clarification. This can also be done anonymously or in a confidential manner. If an employee is not satisfied with the clarification, he / she can submit the request or the complaint not only to his / her supervisor but also to the personnel department. Novapax Kunststofftechnik Steiner GmbH & Co. KG does not accept any reprisals for complaints made in good faith under this Code of Conduct.

Responsibility

All employees and the management of Novapax Kunststofftechnik Steiner GmbH & Co. KG are bound by the rules of this Code of Conduct.



Chief Executive Officer
Wolfgang Steiner

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