

# CoC Code of Conduct

Corporate code of the MM Group

# Code of Conduct

## Corporate code

Mayr-Melnhof Karton AG and its subsidiaries (the MM Group, hereinafter referred to as "MM") are committed to responsible corporate governance guided by the principles of integrity, legality, honesty and transparency.

Mutual trust as a basic understanding provides the basis for constructive cooperation within the company and with business partners. In order to meet the high requirements as far as possible, MM places high standards on its employees as well as customers, suppliers, service providers and other contractual partners in terms of responsible conduct with integrity.

This Corporate Code of Conduct of the MM Group is derived from the fundamental values of the MM Group and is in line with the ILO core labor standards, the OECD Guidelines for Multinational Enterprises and the UN Global Compact Initiative, of which MM is a member.

The Code is both a framework and a guideline for sustainable responsible action in and with the MM Group. We understand sustainability in the sense of Agenda 2030 and the UN Sustainability Goals contained therein, to the achievement of which MM actively contributes. Sustainable development is a central component of the identity, strategy and risk management of the MM Group.

**The MM Group expects all its employees, customers, suppliers and other partners (hereinafter "we") to fully comply with the following principles.**

Where appropriate, the following principles are augmented by corresponding guidelines and training courses intended to support and concretize implementation.

## Quality

Our products are required to meet the relevant legal and industry standards as well as the high expectations of our customers with regard to continuous quality, product and food safety. In particular, it is important to safeguard the requirements of product and food safety while maintaining high hygiene standards.

## Compliance with the law

We comply with all applicable laws and regulations of the countries in which we do business and observe the respective standards, codes of conduct and, where applicable, voluntary commitments.

The obligation to comply with the law also includes, for example, compliance with all trade sanctions and embargoes applicable to the respective business relationships, including compliance with processes to ensure sanctions compliance by our business partners.

## Human Rights Policy Statement

We are committed to upholding and respecting human rights along the entire supply chain and reject any form of forced labor and discrimination within our own company and among our business partners.

Responsibility with regard to compliance with human rights lies with two departments. Internal topics (employees) are the responsibility of Group HR, whereas Group Sustainability is responsible for the compliance with human rights along the supply chain. Both departments implement activities and enterprise-wide measures for the observance of human rights.

The MM Group continuously analyzes its supply chain with regard to (potential) violations of human rights. In case of violations, fast and targeted measures can be taken in order to further minimize the risk of human rights violations in the future.

## Child labor

We reject child labor in our own company and at our business partners regardless of local laws. As a minimum standard, we are guided by international standards (in particular ILO Conventions C 138 and C 182) and ensure that our employees are of the minimum age required by law.

## Mutual respect, equal treatment, promotion of diversity

We commit ourselves to creating a working environment throughout our group of companies that is characterized by honesty and mutual respect. We see the diversity of our employees as an essential resource and an enrichment that enables us to perform our tasks even more creatively and better. We oppose any form of discrimination and harassment on grounds of gender, race, skin, religion, age, national or ethnic descent, disability, or sexual orientation.

Employees and applicants are assessed in accordance with the principle of equal treatment.

## Employee development

We systematically develop the potential of our employees for the future of our company. In doing so, we pay attention to the training of professional as well as social and personality-related competencies.

## Relationship with employees and employee representatives

We respect the rights of our employees to freedom of association. We strive for a long-term constructive dialog with employee representatives.

## Working hours and remuneration

We observe the applicable regulations on working hours in all companies of our Group. We recognize the right of our employees to appropriate remuneration and comply with the legal requirements of the respective countries.

## Health and safety

We foster the health and safety of our employees by providing a safe and healthy work environment. The applicable standards for health and safety in the workplace are complied with. Our goal is to continuously improve health and safety in the workplace with appropriate measures, such as ongoing evaluation and training

## Drugs, alcohol

We expect our employees to carry out their work and decisions correctly and without any alcohol or drug impairment.

This principle is aimed at the well-being, health and safety of employees, in particular the prevention of occupational accidents, as well as the productivity of the company.

## Conflicts of interests, combating corruption

We rigorously keep corporate interests separate from private ones. We aim to avoid even the mere appearance of a conflict of interests. We make decisions on the basis of reasonable economic considerations in accordance with laws and standards. In our business relations, we always act perfectly in line with the respective regulations against corruption, bribery, fraud, and money laundering. We do not accept benefits that could lead to a conflict of interest. No bribes or any other form of unlawful payment or financial benefit may be accepted, offered or paid.

Benefits that our employees accept, offer or grant – be it directly or indirectly – within the framework of their business activities must be appropriate; this includes customary hospitality and events, as well as gifts of low value.

## Competition, conduct in the market

We commit to unrestricted, fair competition with our competitors, business partners, and other market participants. We undertake to comply with the laws against cartels and other restrictions of competition of all countries in which we do business.

Agreements and concerted practices that have the purpose or effect of preventing, restricting or distorting competition are prohibited under the provisions of the above-mentioned laws.

Collaboration in associations and participation in their events are only take place for legitimate reasons. Any comparison with competitors or exchange of information is in accordance with the applicable laws.

## References/reports

For the reporting of breaches of provisions of this Corporate Code, other internal guidelines and regulations of the MM Group or legal requirements, a reporting channel in accordance with the applicable legal requirements (in particular Directive (EU) 2019/1937) has been established (<https://mmgroup.integrityline.com>). Reports and tip-offs about such violations are investigated carefully and in accordance with the applicable legal requirements. The protection of whistleblowers is guaranteed; reprisals against employees and other persons who point out violations will not be tolerated.

## Information technology and data protection

We place great importance on the legally and ethically sound use of information systems and attach particular importance to IT security and data protection. The legally compliant and ethically responsible use of new IT systems and technologies, such as artificial intelligence and other big data applications, is a high priority for us. All employees are required to regularly

use all available IT security measures to protect data and information and to act in accordance with our high legal and ethical standards.

The protection of personal data of employees, business and contractual partners and other data subjects is ensured by technical and organizational safeguards. Personal data are processed exclusively in compliance with the applicable data protection regulations.

## Ecological responsibility

We see it as our responsibility, as a globally active company, to keep the ecological impact of our own business activities as low as possible, above and beyond minimum legal standards. Our goal is to create positive added value for the environment and society through sustainable products. To achieve this, we minimize the negative impacts of our internal processes and along the entire supply chain.

## Business partners

We expect our business partners to always comply with all legal regulations and industry standards in their cooperation with us and encourage them to implement and apply similar principles of responsibility where possible.

The Management Board of Mayr-Melnhof Karton AG

### Legal notice

This Code of Conduct contains the fundamental mindset of the MM Group. However, it cannot be understood to be the basis for demanding a certain type of behavior from the MM Group or for establishing contractual claims against the company.

### MM Integrity Line

Should you identify misconduct or non-compliance with this Code of Conduct or unlawful behavior that concerns the MM Group or the welfare of MM Group employees, we request you to report this through the MM Integrity Line (completely anonymously, if you wish): <https://mmgroup.integrityline.com>

### Should you have any questions

If you have any questions about this Code of Conduct, please contact: [coc@mm.group](mailto:coc@mm.group)

December 2023