



**Managing Directors Statement concerning the  
meaning of our Code of Conduct**

Laufenberg GmbH is a medium sized manager owned company. We deliver premium release liners to various industries worldwide. Responsible and lawful behaviour is of paramount importance to us and is significant for our reputation and success

Our partners, customers, the authorities and the public's trust are very important and we accept social, ethical and ecological responsibility in all aspects of our daily business. The fundamental question that remains is how can we ensure a positive influence on our environment and surroundings with our resources and competencies.

This Code of Conduct shows the demands placed on our relationships both internally and externally.

Jörg und Stephanie Soding

The image shows two handwritten signatures in blue ink. The signature on the left is 'J. Soding' and the signature on the right is 'St. Soding'. Both are written in a cursive, flowing style.

## Table of Contents

<b>Target group and scope of application</b>	<b>2</b>
<b>Basic principles</b>	<b>2</b>
Adherence to laws and norms	2
Ambassador to the company	3
Protection of company property and business information	3
Protection of intellectual property rights	3
Data protection	3
<b>Dealing with business partners and third parties</b>	<b>4</b>
Fair trade	4
Ban on corruption and granting of undue advantages	4
<b>Avoiding conflicts of interest – private activities</b>	<b>4</b>
<b>Responsibility and sustainability</b>	<b>5</b>
Social responsibility	5
Discrimination ban	5
Safety and environmental responsibility	5
Economic use of company resources	6
<b>Scope and implementation of the Code of Conduct</b>	<b>6</b>

## Target group / scope of application

The Code of Conduct applies to all Laufenberg GmbH employees and we expect our business partners to comply with the Code of Conduct. It is important to us to demonstrate that Laufenberg stands for trust, responsibility and fair play.

## Basic principles

Responsibility and fairness towards both people and our environment are guiding principles of our actions.

### Adherence to laws and norms

All Laufenberg employees commit themselves to comply with valid laws and statutory regulations. The company incorporates conventions of the International Labour Organisation, and their processes, to ensure that global standards concerning work, human rights and social justice are met. This includes the elimination of forced labour and human trafficking, the abolition of child labour and a ban on discrimination in the workplace and compliance with working time laws. In all company activities we aim to improve environmental, health and energy levels - employees, suppliers and all other contacts are actively included in the process to help achieve these requirements. Laufenberg's organisation works together with their partners based on principles of freedom of association and collective bargaining.

### Compliance with laws and guidelines

Laufenberg employees undertake to comply with all applicable laws and regulations. The company takes into account the conventions of the International Labour Organisation (ILO) to ensure global labour and human rights standards with the aim of social justice worldwide. This includes the elimination of forced labour, the abolition of child labour, the prohibition of discrimination in employment and occupation, and compliance with working time laws. In all our activities, we strive to improve our environmental, health and energy performance. Employees, suppliers and external companies are actively involved in improving quality and performance and ensuring compliance. Laufenberg upholds the right to freedom of association and collective bargaining within its organisation and with its partners.



### Ambassador to the company



Every employee's behaviour, irrespective of their position, determines how we as a company are perceived. Any mistake made by an individual can seriously affect our reputation - therefore personal integrity and a professional manner of all employees are of outmost importance. The Code of Conduct creates and shapes the foundation of this. An improved perception of the company can support our economic success

## Protection of company property and business information

Laufenberg property should be used with care and respect and used only for business purposes. All employees must ensure that property is taken care of and is neither lost, damaged, misused, stolen, embezzled nor destroyed. Each employee is obliged to inform his line manager without delay should he notice any misuse. Business information and any other sensitive information should be treated as strictly confidential and should not be passed onto any unauthorized person or third party.



## Protection of intellectual property rights

All Laufenberg employees are responsible for the protection of individual property rights and should do everything in their power to ensure that information on existing patents and know-how remains within the company. Intellectual property rights of others should be respected.



## Data protection

All personal information concerning employees, customers, business partners and suppliers, as well as any other third parties, are used carefully and handled strictly confidentially according to data protection laws. The security standards and work processes at Laufenberg are set up to ensure that any personal data is protected against unlawful use and access.



## Dealing with business partners and third parties

### Fair trade

Laufenberg and their employees support fair and unbiased competition and comply with all competition and cartel laws. In almost every country pre-arranged agreements and relationships are illegal. This means, for example, that no prior agreements are made with competitors concerning prices, offers or any other business issues that could affect the business market. The exclusion of any inappropriate favouritism to a contractual partner is forbidden. Laufenberg GmbH expects their business partners



to adhere to the principles and laws of a free market economy and to free trade.

## Ban on corruption and granting of undue advantages

Laufenberg is opposed to corruption and bribery. Any business dealings using unfair means will not be tolerated. Employees of Laufenberg GmbH are neither allowed to offer business partners any reductions nor accept any offers that could compromise an objective and fair business decision. Exceptions are made with occasional business advertising gifts that represent and are conform to custom and courtesy manners in various countries and do not exceed a value of € 35 / any benefits in excess of this must be clarified with the line manager and documented in our accounts department. The same applies to invitations. Cases of doubt must be clarified with the line manager. The same applies to any invitations. In case of doubt an employee should ask his line manager.



## Avoiding conflicts of interest – private activities



All Laufenberg employees are obliged to inform the personnel department should they plan to take an additional part time job or intend to set up their own business. This applies particularly if the job or investment is in a company that is either a competitor or could become a competitor of Laufenberg. Conflicts of interest between the duties and responsibilities of an employee and his personal interests must be avoided. Any behaviour, also in private surroundings, which could compromise Laufenberg's interests, should be avoided. When expressing any personal opinions in public employees should not refer to their function within the company.

## Responsibility and sustainability

### Social Responsibility

The adherence to human rights and fundamental social standards is the basic principle of a humane life together. Working conditions that violate these rights and standards contradict this basic principle. This applies within our company as well as in any co-operation with business partners. Each employee should ensure that human rights and fundamental social standards are not breached within their area of responsibility.



### Discrimination ban

All employees have a right to fair, polite and respectful treatment by line managers and colleagues. Nobody should be discriminated against due to race, colour, nationality, descent, sex, religion, personal convictions, political views, age, personal constitution, sexual orientation, personal appearance or any other characteristics - that means no discrimination without an objective reason. Everybody is obliged to respect the personal dignity and space of all employees. Harassment and any form of undesired personal body contact is forbidden.



### Safety and Environmental Responsibility

The avoidance and control of danger for humans and nature is an essential part of responsible behaviour. This applies to all areas within our company. Security regulations remain indispensable no matter whether they are written in law, or implemented by public authorities, or even if they are part of company guidelines. Security regulations must be standard practice for one's own safety, the safety of others and the safety of the company overall. Everyone is jointly responsible for security within his or her own working environment and receives in-depth training. Environmental responsibility is an ethical and corporate duty for Laufenberg. The compliance to all valid environmental regulations is a basic requirement and environmental aspects are always considered in every corporate decision. Laufenberg endeavours to ensure that any detrimental effect on the environment is avoided or reduced to a minimum. In so doing a contribution is made towards the preservation of natural resources and our climate is protected for future generations. All employees are requested to act with the preservation of the environment in mind - regular training courses and briefings are used to support this.





## Economic use of company resources

The economic use of company resources is self-evident. When using resources everyone should ensure that they are used in the interests of Laufenberg. Should there be more than one possible solution the most economic solution should be chosen.

## Scope and implementation of the Code of Conduct

Any violation of the Code of Conduct can lead to employment law consequences. The company management ensures that all principles and ethical values of this code are communicated to all employees in a suitable fashion and at regular intervals. All line managers with disciplinary responsibility are not only role models, but are also responsible to incorporate the code within the company and to monitor compliance. Each line manager must ensure, within his management responsibilities, that all employees understand and adhere to the regulations within the Code of Conduct. It is one of his/her responsibilities to ensure that the quintessence of the Code of Conduct is explained to all employees at regular intervals and that the code is understood and taken in by employees. Any violations should be communicated and reported. Each employee is allowed and requested to report any violation to this Code of Conduct and to Laufenberg guidelines. The company pledges not to treat any employee adversely if they violate the code or even if they inform the company concerning a possible violation. Any breach of rules can be passed onto the works council or to a line manager at any time – personal privacy will always be respected. Any violations are passed onto a panel, made up of the company management and the works council, they examine the situation according to a pre-defined procedure and define an appropriate solution. Nobody will be held responsible for any business disadvantages that occur after working in line with the Code of Conduct.





## Contact

### **Laufenberg GmbH**

Krüserstraße 2 | 47839 Krefeld | Germany

Tel.: +49 (0)2151 / 74 99-0

[mail@laufenberg.info](mailto:mail@laufenberg.info)

[www.laufenberg.info](http://www.laufenberg.info)