



*Verhaltenskodex*  
*Code of Conduct*

# Our Corporate Responsibility

Run by its owners, Faubel is a company with high values and a tradition of more than 165 years. We are based in Northern Hesse and operate worldwide in the printing, paper, and film processing industry. With our innovative products for the pharmaceutical, chemical, and technical industries, we make a valuable contribution to health and technological progress.

However, our corporate responsibility goes far beyond this. We are aware of our corporate responsibility in a time of increasing global interconnectedness and growing social and ecological challenges. We want to fulfill this role actively, comprehensively, and sustainably and be measured against our own standards. In our entrepreneurial activities, we feel responsible toward society, our staff, our customers, the environment, and our suppliers.

This Code of Conduct (CoC) sets out the standards which underpin our ethical behavior. In this way, we wish to ensure mutual respect, honesty, and fairness in our dealings with our stakeholders. Compliance with legal requirements is a matter of course for us. However, we also want to set standards and continuously improve. To this end, we engage in regular dialog with our stakeholders.

This Code considers the diverse cultures and values of our employees and is a commitment to the social responsibility of our globally-oriented business.

To maintain the high reputation that our company enjoys with customers, business partners, and the general public, we expect each of our employees to act impeccably and responsibly. This compilation of principles governing our corporate responsibility will contribute to this.

Melsungen, March 2022

Management and Works Council  
Faubel & Co. Nachfolger GmbH

# Scope of Application and Integrity

The Code of Conduct of Faubel & Co. Nachfolger GmbH applies to all corporate activities, both in internal cooperation and towards business partners. It is binding for all our staff.

Integrity is part of the self-image of our company. We expect all our staff to be familiar with the principles of our Code of Conduct and observe them at all times. Our values make our actions predictable, transparent, and reliable for our business partners.

This Code of Conduct summarizes Faubel's most critical corporate values and standards with which all our staff must be familiar. It guides them on their main ethical and legal obligations and gives them confidence in their own proper conduct when on the job. Besides compliance with legal requirements, other rules, and standards, ethical behavior is a high priority at Faubel.

Corporate responsibility and the correct understanding of leadership are the foundations for this as they govern our conduct - internally in our dealings with each other and externally in interaction with business partners or the public.

A good reputation is essential to the sustainability of our success as a company!

For this reason, ethically and legally appropriate behavior and absolute integrity are indispensable within our entire corporate

Failure to comply with this Code may lead to considerable damage, not only to our company but also to our staff, business partners, and shareholders. The Code of Conduct is binding for us all, whether we act as employees or managers in the company.

We will not tolerate any violations of its contents. Anyone who violates this Code shall have to face the consequences, which - depending on the severity of the breach - may range from measures under labor law to claims for damages under civil law or sanctions under criminal law.

The company expects its suppliers to comply with the guiding principles of this Code of Conduct. It will support them in this to the best of its ability and encourage them to do the same in their respective supply chains.

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# Article 1: Compliance with the Law

The Faubel Group, with all its staff, is bound by the applicable national and international laws and guidelines. These include, e.g., the payment of taxes, the necessary obtaining of official orders, the protection of third parties' tangible and intangible legal assets (e.g., intellectual property), and the observance of all criminal law barriers, particularly against money laundering and fraud. Similarly, all employees must comply with internal company regulations (e.g., company agreements) and guidelines.

## **Corporate policy:**

For us, compliance with laws and regulations is the fundamental principle of our business and responsible actions. We comply with applicable laws, legal prohibitions, and obligations at all times, even if this involves short-term business disadvantages or difficulties. All law violations must always be treated under the „zero-tolerance rule.“

## **My contribution:**

I know and comply with the laws and policies relevant to my job. I ensure that I carry out my activities based on current legislation and keep myself informed about possible changes in the law.

Negative example: A Faubel employee has tampered with financial data to „reduce“ tax payments unlawfully.

Positive example: A Faubel employee has spotted discrepancies while reviewing financial records and reports them to their supervisor.

## Article 2: Avoiding Conflicts of Interest

A conflict of interest exists every time an employee's private interests collide with those of the Faubel Group or if there is a possibility that it may occur. Such a conflict of interest may arise from an employee's personal interests or sideline activities.

### **Corporate Policy:**

We respect the personal interests and lives of all our staff. However, business-relevant decisions are made exclusively in the best interests of the Faubel Group. Collision with personal interests is to be avoided from the start if it arises in connection with a business decision. If it does occur, it must be resolved in compliance with the applicable laws and regulations of the group of companies. Open communication and utter transparency are crucial in this respect.

### **My Contribution:**

I make sure to avoid potential conflicts of interest. If a conflict of interest does arise, I report it to my supervisor or the HR department. Together we try to find a solution that is in line with the interests of the Faubel Group.

Negative example: While working for Faubel, an employee decides to take on another part-time job with another label manufacturer without notifying us in advance.

Positive example: A department manager asks an employee who reports to him to check offers from several suppliers. The employee notices that the most favorable offer by far comes from a company run by a close friend of the department manager. The supervisor must be informed about this as a conflict of interest may exist.

## Article 3: Fair Competition and Antitrust Laws

Irrespective of the individual case, it is expressly prohibited to align offers, prices, terms and conditions, production plans, prices, or market shares with those of competitors. It also includes informal meetings and coordination. The exchange or disclosure of commercially sensitive information relating to competitors, customers, or suppliers may also violate competition laws. If the risk of unfair competition were to arise, it would have to be avoided.

### **Corporate Policy:**

We believe in fair competition. All employees must comply with the rules of fair competition within the scope of the legislation. We comply with applicable competition and antitrust laws, prohibiting agreements or practices that unduly restrain trade or competition.

### **My Contribution:**

In my area of responsibility, I actively contribute to applying these rules. When discussing or otherwise interacting with competitors, I avoid topics that are relevant to competition with each other. These include, among other things, prices, pricing, business planning, development progress, or delivery deadlines.

Negative example: A Faubel employee and a competitor's staff member share sensitive information about pricing strategies for specific booklet labels.

Positive example: During a trade show, a Faubel employee is verbally offered to agree on prices for some clinical trial labels for the upcoming calendar year with a competitor's employee who sells comparable labels. The Faubel employee immediately rejects the offer and reports the matter to their supervisor.

## Article 4: Gifts and Hospitality (i.a., Prohibition of Corruption)

Gifts and entertainment are often exchanged with customers, suppliers, and other partners to establish good business relationships and show appreciation. However, such gifts and entertainment must reflect standard business conduct and may not influence - or appear to influence - business decisions. The principles of proportionality and common sense should guide us in such situations.

### **Corporate Policy:**

Our internal policies (company agreements) govern how we deal with gifts, business meals and events, donations and sponsorships, and what should be observed when such contributions are made. Any active or passive bribery, as well as any attempt to do so, is prohibited at Faubel. In the event of non-compliance, the person involved will be subject to consequences under labor or criminal law. If an employee gets into such a situation or becomes aware of it, they must inform the management and the works council accordingly.

### **My Contribution:**

I familiarize myself with our General Company Agreement governing the way we deal with gifts, business meals, and events and strictly comply with it. I regularly review my behavior against this background to determine whether conflicts of interest exist or may arise.

Negative example: A Faubel employee invites a potential customer on a short vacation.

Positive example: A customer's employee gives you a valuable birthday gift that you may not be allowed to accept as stipulated by our internal policy. You report it to your supervisor and management, asking them to tell you how you should behave. If you cannot obtain short-term feedback, you politely decline the gift, referring to our internal policy.



# Article 5: Information Security, Data Protection and Confidentiality

Protecting data, assets, employees, visitors, information systems, premises, and networks from hostile acts and, if necessary, competitors is paramount to our success. Sustainable business success for the Faubel Group depends on the proper use of confidential information and the protection of its secrecy. Confidential information (e.g., business secrets, designs, sketches, technical drawings, and so forth) may not be disclosed to unauthorized persons, either internally or externally. This obligation also extends beyond the end of any existing employment relationship. Non-disclosure agreements need to be concluded with business partners to protect this information. In addition, the processing of personal data is subject to strict statutory provisions (e.g., the EU General Data Protection Regulation). The Faubel Group strictly adheres to the applicable data protection laws.

## **Corporate Policy:**

We care for IT and EDP security and comply with the applicable rules and regulations. In addition, we use the company's property and resources appropriately and carefully and protect them from loss or theft.

We take the necessary steps to adequately protect confidential information and business documents from access and insight by non-involved colleagues and other third parties. Protecting personal data from employees, customers, suppliers, and other stakeholders is a priority.

## **My Contribution:**

I treat all information and data from business partners marked as confidential to me with care, maintain confidentiality, and do not disclose it without authorization. I do not share personal passwords and access codes with third parties. I ensure that the processing of information worthy of protection in my area of activity is adequately secured to prevent unauthorized internal or external use.

If I am notified of possible data protection violations, these must be reported immediately to the data protection officer in charge at Faubel ([datenschutz@faubel.de](mailto:datenschutz@faubel.de)). I inform myself about the applicable IT security regulations and comply with the stipulations made therein.

Negative example: A Faubel employee forwards data protected by a confidentiality agreement to unauthorized third parties.

Positive example: When leaving their workplace, a Faubel employee does not rely on their screen being locked automatically after a few minutes but will lock the screen themselves using the keyboard before leaving.

# Article 6: Product Quality and Safety

The utmost quality and continuous quality improvement are essential for our company's growth and success. Faubel has been certified under DIN EN ISO 9001 by DQS, the German Association for the Certification of Management Systems, since 1994. The requirements of „Good Manufacturing Practice“ (GMP) guidelines for packaging materials issued by the Gütegemeinschaft Pharma-Verpackung (Quality Association for Pharmaceutical Packaging) have been implemented in ISO standardized documentation and processes. Customer satisfaction, process-oriented management, error prevention, continuous improvement, and comprehensive quality management are indispensable. Customer requirements must be met, especially concerning quality, reliability, and delivery time.

Concerning product safety, all employees are responsible for eliminating, as far as possible, risks and hazards that may arise from using our products. The applicable technical and legal standards and regulations must be identified and observed.

## **Corporate Policy:**

It is therefore not only our duty but also our claim to comply with the legal and official regulations and internal standards that apply to our products. Our products are constantly developed in compliance with legal requirements and internal rules. We aim to ensure this continuously and systematically through procedures, structures, and control before, during, and after manufacturing. And we achieve this without making any compromises. We make sure that appropriate measures can be initiated in good time whenever deviations occur. Our employees are called upon to improve the quality of our products and services continuously.

## **My Contribution:**

If I notice or have concerns that our products may pose hazards or that regulations are not being complied with, I take action to remedy the situation. I report the case to my supervisor or the QM department.

Negative example: A Faubel employee does not apply all the applicable QM inspection procedures when inspecting the product during manufacturing.

Positive example: During an inspection, a Faubel employee notices a slight inaccuracy that they cannot precisely assess as „incorrect“ or „correct.“ They then consult their supervisor or a person from the quality department about this.

## Article 7: Dealing with Corporate Assets

Tangible (and intangible) assets (e.g., products, office, business equipment, software, logos, know-how, etc.) from the company are always earmarked for a specific purpose. They are designed to support the respective employees in achieving and promoting their business goals. Assets from the Faubel Group are exclusively used for business purposes, not private ones.

### **Corporate Policy:**

We handle company property appropriately and carefully and protect it from loss, theft, or misuse. We use tangible (as well as intangible) corporate assets solely for corporate purposes and not for personal use unless explicitly permitted.

### **My Contribution:**

I comply with company policies and guidelines and handle company assets with care and consideration. In addition, I only use them for specific purposes, i.e., for activities within the scope of my job.

Negative example: A Faubel employee uses the laptop provided to him/her for work to extensively surf the Internet for personal use during his/her work time.

Positive example: To perform renovation jobs at home, a Faubel employee needs a special tool that could also be found in the company's tool inventory. However, he/she is aware of the internal guidelines and of the fact that he/she is not allowed to borrow that tool.

## Article 8: Social Responsibility and Business

Commitment to ethics and social responsibility is a cornerstone of the Faubel Group's corporate philosophy. We respect and protect the personal dignity of each employee and foster a corporate culture of fairness and mutual respect. The United Nations' Universal Declaration of Human Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms set out the requirements and expectations of the international community concerning the respect for and observance of human rights.

### **Corporate Policy:**

Faubel respects human rights and promotes their observance. The company encourages its staff to consider human rights universal in accordance with universally recognized laws and procedures.

### **My Contribution:**

I observe human rights as a binding guideline. In my business environment, I am alert to possible human rights violations. If I receive information about human rights violations, I do everything I can to prevent or remedy these violations.

Negative example: During a supplier audit, suspicions of human rights abuse are not being investigated.

Positive example: While goods are being purchased, a Faubel employee receives notification that a supplier is employing persons in production under degrading conditions. They immediately report the matter to their superior.

# Article 9: Equal Treatment and Non-Discrimination

Equal opportunities and equal treatment are essential cornerstones for fair and open conduct. The Faubel Group promotes respectful and cooperative interaction, diversity, and tolerance. It is the only way we can achieve the degree of productivity, competitiveness, innovation, creativity, and efficiency we seek. In addition, our goal is to maintain a respectful and positive working atmosphere in all areas.

## **Corporate Policy:**

A culture of mutual trust, equal opportunities, and mutual respect are paramount to us. We promote equal opportunities and prevent discrimination when hiring, promoting or granting initial and further training to our staff. As a matter of principle, we select, hire and promote our teams based on their qualifications and skills. We treat all staff equally, regardless of gender, age, skin color, culture, ethnicity, sexual identity, disability, religion, or belief.

Any form of (verbal or non-verbal) harassment or discrimination against our employees, e.g., because of their nationality, origin, religion, gender, age, sexual orientation, or similar, is prohibited. No employee may be discriminated against because they are exercising their rights. It includes the prohibition of child labor, forced labor, discrimination, bullying, and physical disciplinary measures.

## **My Contribution:**

I observe the principles of equal treatment and non-discrimination and draw my colleagues' attention in my work environment to such behavior. Suppose I notice that those rules are or have been broken in my daily work. In that case, I point out the misconduct to the person concerned and, if necessary, report the incident to the HR department or the works council.

Negative example: A Faubel supervisor discriminates against some of their employees because of their origins.

Positive example: I immediately report any discrimination to my supervisor, the HR department, or the management, whether it affects another person or me.

# Article 10: Cooperation with Employees' Representatives

We recognize the right of all employees to form trade unions and employee representation bodies on a democratic basis as set out in national regulations.

## **Corporate Policy:**

We are committed to cooperating with employee representatives in an open and trusting manner, engaging in constructive and cooperative communication with each other, and striving for a fair balance of interests. Professional interaction with employee representatives, which permits neither favoritism nor discrimination, is an integral part of our corporate culture.

## **My Contribution:**

Whether I am the managing director, an executive, or an employee representative, my interests shall play no role in negotiations and discussions. First and foremost, it is the well-being of all individuals in the company and business prosperity that matter. To this end, we listen to each other and address mutual arguments.

Negative example: An employee representative wants to secure a personal advantage for himself/herself by becoming a member of the works council.

Positive example: A new works agreement is negotiated and implemented fairly and openly by the works council and the employer.

# Article 11: Occupational Health and Safety

The health and safety of employees in the workplace is a key concern at Faubel. Therefore, all international and site-specific health and safety regulations and the respective national working time laws must comply with the relevant legislation. In addition, Faubel is committed to continuously improving the ergonomic and safety aspects of the work environment it provides while offering preventive and downstream support in keeping all its employees healthy.

## **Corporate Policy:**

Occupational health and safety are an integral part of all our operations. Each of our employees is expected to promote occupational health and safety in their work environment and to comply with the applicable OHS regulations. Each manager must instruct and support their colleagues in fulfilling this duty.

## **My Contribution:**

I observe safety regulations at my workplace and in other work areas. I avoid risky behavior, identify dangerous situations and take action in good time. I set an example in my daily work. In addition, I take part in all health protection and prevention measures and campaigns offered.

Negative example: A Faubel department manager instructs their employees to work longer hours than the local work time regulations would allow.

Positive example: In a production hall, a Faubel employee is working at a machine without wearing safety shoes. Another person notices this and points out that safety shoes must be worn in that area. If the person concerned does not comply, the supervisor is notified.

# Article 12: Sustainability, Climate and Environmental Protection

A fundamental principle at Faubel is to protect the environment and the climate for future generations sustainably and comply with all applicable environmental protection laws and guidelines. To this end, Faubel expects and encourages environmentally conscious behavior on the part of its staff and business partners.

## **Corporate Policy:**

All employees are required to use our resources carefully and play an active role in protecting the environment. Priority goals are: conserving and protecting natural resources, responsibly using raw materials, avoiding, reducing, recycling, and disposing of waste appropriately, supplementing power supply through renewable energies, and avoiding environmentally hazardous incidents as much as possible. In addition, we acknowledge our responsibility for sustainability and environmental protection toward suppliers, business partners, and contractors.

## **My Contribution:**

Within the scope of my duties (and beyond), I have responsibility for treating natural resources with care and behaving in a way that contributes to protecting the environment and climate. In doing so, I ensure that my activities have an as little negative impact on the environment as possible and that the requirements of environmental protection laws are met.

Negative example: A department manager instructs an employee to dispose of old paint in one of the containers designated for waste paper.

Positive example: When airing the offices, radiators are turned down.



# Article 13: Export Control & Customs

As an enterprise operating globally, we must comply with regulations that restrict the free movement of goods in our worldwide business operations. Several international and national laws, regulations and embargoes restrict or prohibit the trade, export or import of technologies, goods or services, as well as capital flows and payment transactions. Such restrictions and prohibitions may arise from the nature of the goods, the country of origin or end use, or the identity of the business partners concerned. The respective laws and regulations of the countries in which we operate, e.g., Germany, U.S.A, China, are supplemented by internal company restrictions regarding the intended purpose.

## **Corporate Policy:**

We are aware of our social responsibility in fulfilling tax and customs requirements and are expressly committed to complying with national and international legislation. We also observe the regulations governing the import and export of goods, services and information.

## **My Contribution:**

In my area of responsibility, I design internal structures and processes in such a way that the tax and customs duties to be paid by the respective companies of the Faubel Group are calculated in a complete, correct and timely manner, recorded in corresponding financial reports and remitted to the responsible tax authorities. When making decisions on the import or export of products and services, I specifically check whether this decision may be subject to export control.

Negative example: A FPS employee in the USA deliberately bypasses a customs directive so that a shipment from Germany reaches you on time.

Positive example: A Faubel employee in Project Management Internal Sales receives an inquiry from a potential customer who wants Faubel to ship his order to a country that may be under embargo. Uncertain about what to do, the employee seeks advice from the departments concerned within the company

# Article 14: Appearance and Communication in Public

The Faubel Group values truthful reporting and clear and open communication with employees, business partners, shareholders, the press, and the public based on honesty and respect for the law. To ensure a uniform and consistent corporate image, everyone in the company must follow internal procedures when communicating. In doing so, each of our employees respects the performance of their counterparts as well as their professional and personal reputations.

## **Corporate Policy:**

Trust between business partners, investors, and other stakeholders is the cornerstone of a successful long-term relationship. To maintain and preserve trust, we ensure consistent and clear communication. We, therefore, coordinate the implementation of planned communication and marketing activities in various business areas with the Marketing department in charge. We respect the right to freedom of expression, personal rights, and privacy protection. However, every employee should be aware that they may also be perceived as part of Faubel and a company representative outside of work. They are therefore required to safeguard the company's image and reputation by having appropriate behavior and appearance in public.

## **My Contribution:**

I do not publicly make any statements on behalf of Faubel and systematically refer all inquiries to the Marketing department. When expressing personal opinions in the media, I do not associate my role or job at Faubel with the statements I make.

Negative example: I make derogatory comments about my supervisor on social media.

Positive example: A Faubel employee notices a post on social media criticizing manufacturing methods in a particular department. It becomes immediately apparent that the statement has no substance whatsoever. Even though it is urgent to correct this misrepresentation without delay, they then contact the Marketing department, which can react appropriately to this post.

# Article 15: Reconciliation of Work and Family Life (Work-Life Balance)

The Faubel Group values compatibility between free time, family, and career. In addition, we respect the right to adequate remuneration and do not discriminate between genders.

## **Corporate Policy:**

We support the rationale behind the concept of work-life balance. In the pursuit of balance, individual attitudes and objectives are essential, as are operating and social conditions, which the Faubel Group seeks to offer in the best possible way while taking into account operational considerations. It involves, for example, examining and, if necessary, approving staff requests for parental leave, fixed term part-time work (Brückenteilzeit), nursing leave, or sabbaticals. In addition, we want to work closely with employee representatives to facilitate the reconciliation of work and family life through modern workplace design and flexible work time models.

## **My Contribution:**

I am aware of the current working time and workplace models. In addition, I gather initial information when my life circumstances change, and the desire for a change in my work model arises. I then contact the HR department to discuss my situation. In addition, I notify my direct supervisor of my desire for a change at an early stage. Furthermore, I comply with all regulations, such as company agreements, where these topics are covered within the Faubel Group.

Example: A Faubel employee wants to return to work part-time after taking parental leave.

# Article 16: Communication, Implementation and Contacts

This policy applies to all employees and companies of the Faubel Group. It is brought to our employees' attention appropriately and at specified intervals, ensuring compliance. In addition, each employee receives a copy upon joining the company.

We expect all Faubel managers to act according to and communicate the principle of commitment to integrity conveyed by this Code of Conduct and take responsibility for ensuring compliance with it.

Our managers have a particular role model function and allow their actions to be measured against the Code of Conduct to a specific extent. They are the first point of contact for questions about these regulations' meaning. In addition, they ensure that all employees know and understand the present Code of Conduct. As part of their managerial duties, they prevent unacceptable behavior or take appropriate action to prevent breaches of the rules in their area of responsibility. Trusting and good cooperation between staff and managers is reflected by honest and open information alongside mutual support.

The HR Department of the Faubel Group is at the disposal of all employees and third parties (customers, suppliers, etc.) to answer any further questions regarding the Code of Conduct.

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