

### **Code of Conduct for Business Partners**

#### 1. Foreword

At Mayer-Kuvert-network GmbH and with it all its affiliated companies ("Mayer Group"), we have set ourselves the goal of developing innovative products and marketing them successfully. In doing so, we also want to continuously improve existing products for the benefit of our customers.

We work hard to be one of the most respected and successful companies in paper processing. We can only achieve this goal if we have the trust and support of our employees, shareholders, business partners and society in general.

Our Code of Conduct reflects our commitment to meeting the expectations of our stakeholders as a socially responsible company. It includes the basic principles and rules for ethical business conduct. We believe that the way we achieve our business results is just as important as the outcome itself.

Our business partners, their experience and their quality are an essential part of our company's success. In its cooperation with business partners, the Mayer Group is concerned with sharing its own values and setting high standards for the behaviour of those it represents or with whom it does business. We therefore expect our business partners to comply with the applicable laws and regulations as well as the basic principles described in this Code.

To this end, the standards set out in this Code of Conduct for Business Partners must be recognized by them and also implemented in relation to their Business Partners.

### 2. Environmental protection and sustainability

a) The business partner will carry out its business activities in a sustainable and ecologically responsible manner and implement appropriate measures to protect the environment.

Preference should be given to products and services that are characterised by durability, ease of repair, upgradability or recyclability and which, compared to other products, have less packaging (or reusable or environmentally friendly packaging), lead to less or less polluting waste and have been made from residual materials or waste. These product properties are not only environmentally friendly, but can also mean cost savings in the long term.

The business partner undertakes

- comply with all applicable legislation on sustainability and environmental protection,
- take appropriate measures to avoid or minimise any potential adverse
  effects on the environment that may result from its business activities.

### b) Chemical Management

All business partners are obliged to comply with the permissible chemical limits in accordance with the EU REACH Regulation. A robust chemical management system must be implemented and due diligence checks must be carried out to ensure compliance.

The production does not use chlorine and the current guidelines on mineral oil components and other harmful chemicals, which reduces the environmental impact of production. Separate storage rooms with the appropriate safety equipment (drip trays, explosion protection and CO2 extinguishing system) are available for the storage and mixing of the glues, printing inks and operating materials.

## c) Wood, Paper

The Mayer Group is committed to complying with the EU Regulation for Deforestation-Free Products (EUDR) from 01.01.2026. This includes compliance with the information gathering required by the EUDR, risk assessment, risk minimization if necessary, and the submission of the due diligence declaration. In order to be able to work in this area in a legally compliant manner, we expect our business partners to take the same care in providing all information in the supply chain.

The Mayer Group is committed to ensuring that the extraction of the raw materials for our products does not contribute to the damage of forests with a high nature conservation value or forests with a high carbon stock. We expect the same from our business partners. An

important component here is the use of as much recycled material as possible as well as the certifications according to FSC or PEFC:

### 3. Human rights

The Mayer Group expects its business partners to conduct their business with integrity and in compliance with high ethical standards. This includes, in particular, the protection of internationally recognised human rights.

#### 4. Prohibition of forced and compulsory labour

The Mayer Group does not accept the use of forced or compulsory labour. Accordingly, our business partners must not:

- Involuntary work, including work performed under threat of punishment or sanctions
- Forced or compulsory labour in all its forms
- Demand deposits or financial guarantees from employees
- Retention of identity documents (such as passports, identity cards, etc.)
- Using debt bondage of any kind, or allowing or encouraging employees to get into debt through hiring fees, fines, or other means
- Failure to comply with the right of employees to terminate their employment relationship with a reasonable notice period
- Failure to respect the right of employees to leave the workplace after their shift

#### 5. Prohibition of child labour

In no phase of business activity may children be employed or otherwise involved by the business partner or its suppliers. Within the framework of its business activities and those of its business partners, the business partner will ensure that the minimum standards of the ILO core labour standards on the minimum age for admission to employment and the prohibition of child labour are complied with by implementing appropriate measures.

Business partners are required to comply with documented due diligence obligations to ensure that no forced or compulsory labour, including human trafficking, or child labour takes place in their own operations or in their supply chains.

## 6. Ensuring freedom of association and the right to collective bargaining

The Mayer Group respects freedom of association and the right to collective bargaining, and we expect our business partners to do the same. In concrete terms, this means that the business partners

- not interfere with the right of their employees to form and join trade unions or other associations of their choice
- do not discourage trade union

- recognise elected workers' representatives and ensure that they are not discriminated against
- the rights to conduct collective action in accordance with the respective national laws and regulations. Employees must not be discriminated against because of the exercise of these rights.

### 7. Appropriate wages

The business partner will implement legal or collective bargaining requirements on minimum wages, overtime regulations and social benefits. Working time requirements must at least comply with the applicable laws of the country of production, industry standards or the relevant ILO core labour standards, whichever is stricter.

#### 8. Occupational safety and health

The business partner will design its work areas and keep them in such a condition that they can be used free of health hazards. Conditions at the workplace and in company facilities and working conditions that violate basic human rights are prohibited. In particular, adolescents (adolescents) should not be exposed to dangerous, unsafe or unhealthy circumstances that endanger their health and development. Staff should be regularly trained/instructed on health and safety at work.

### 9. Non-discriminatory work environment, diversity and inclusion

The business partner is obliged to treat his employees and all persons who come into contact with him fairly and equally. Discrimination on the basis of gender or sexual identity, age, religion or belief, race, ethnic origin, national or social origin or disability of employees is prohibited.

The business partner implements the principles of equal treatment, in particular the obligation to pay equal pay for equal work and to ensure equal opportunities for development and promotion, within the scope of its business activities.

#### 10. Management

The business partner is obliged to comply with all applicable laws, regulations and official requirements in the course of its business activities.

#### 11. Protection of data

The business partner is obliged to comply with the applicable data protection regulations, in particular requirements on cross-border data transfer and cybersecurity.

#### 12. Protection of confidentiality and trade

The business partner will oblige its employees and its business partners to comply with the confidentiality and protection of the Mayer Group's trade secrets and to comprehensively protect them from disclosure to third parties.

### 13. Combating bribery and corruption

The Mayer Group pursues a zero-tolerance policy towards business partners who commit fraud, corruption or other serious violations of laws and regulations to combat bribery, corruption and competition law.

The business partner undertakes to conduct business fairly and responsibly and ensures that its employees and/or agents do not engage in bribery and/or corruption that could give the appearance of undue influence.

### 14. Anti-money laundering, combating the financing of terrorism

The Business Partner has complied with all applicable laws and regulations to combat money laundering and terrorist financing.

### 15. Compliance with trade and economic sanctions:

The Business Associate undertakes to comply with all applicable trade and economic sanctions throughout its business activities. These include, in particular:

- International and national sanctions issued by the United Nations, the European
  Union, the United States of America, as well as other relevant states or institutions.
- Ensuring that no materials, products, or services are obtained, used, or provided in a manner that violates these sanctions.

### 16. Antitrust law and fair competition

The business partner will comply with all national and international antitrust laws and regulations, in particular Art. 101 et seq. of the Treaty on the Functioning of the European Union (TFEU) and will not enter into any illegal or restrictive agreements with other competitors.

The Business Partner will comply with all national and international competition laws and regulations and will not engage in any unfair business practices.

#### 17. Conflicts

The business partner will take the necessary precautions to avoid conflicts of interest between it and the Mayer Group or with regard to the employees involved in the business relationship.

The Business Partner shall, upon becoming aware, disclose to the Mayer Group any conflicts of interest or situations that create the appearance of a conflict of interest or give rise to an actual conflict of interest in its relationship with the Mayer Group or in the performance of the Agreement.

#### 18. Supply chains

The business partner is obliged to monitor risks in its supply chains and take appropriate measures to reduce risk.

### 19. Obligation of the business partner

The Code of Conduct for Business Partners is an integral part of the contractual basis existing between the Mayer Group and its business partner.

Against this background, the business partner undertakes to implement and comply with all standards defined in this Code of Conduct for Business Partners in addition to the contractual provisions existing between it and the Mayer Group. The business partner will ensure that the standards described in this Code of Conduct for Business Partners are recognized and implemented by employees as well as their business partners.

#### 20. Transparency and evidence

The Business Partner undertakes to provide the Mayer Group upon request with all necessary documents or evidence proving compliance with the Code of Conduct for Business Partners as well as the Trade and Economic Sanctions.

#### 21. Liability

Should the business partner breach the obligations of this letter, the Mayer Group reserves the right to take legal action, including terminating existing contracts and asserting claims for damages.

# 22. Subsidiarity

Insofar as the obligations under this Code of Conduct for Business Partners are in conflict with the contracts existing between the Business Partner and the Mayer Group, the contractual obligations shall take precedence over the obligations under this Code of Conduct for Business Partners. This regulation also applies in particular in cases of doubt.

This letter is considered a binding agreement.