

Code of Conduct

for companies of the CPH Group

(Code of Conduct)

Our beliefs – Our conduct



Our beliefs – Our conduct



Dear colleagues

Integrity is the foundation of the CPH Group's success. Ethical conduct and acting in a responsible manner are essential to our business.

This Code of Conduct provides a set of ethical standards and guidelines for appropriate behavior in everyday business, considering applicable laws and regulations based on our corporate values. These rules are binding for all employees of the CPH Group companies.

Each of us is responsible for complying with this Code of Conduct and thus for upholding and protecting the values and reputation of our companies now and in the future. It is therefore our responsibility to carefully familiarize ourselves with its content, understand their spirit, and act accordingly. Concerns can be reported (anonymously if desired) so that we can identify risks at an early stage and take targeted measures.

If you have any questions or uncertainties, please contact your supervisor, the human resources manager responsible, the respective site management, the divisional management, or the group management.

Thank you for your commitment and contribution to the integrity and success of the CPH Group.

A handwritten signature in blue ink, which appears to read 'Alois Waldburg-Zeil'.

Alois Waldburg-Zeil

CEO CPH Group

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Gender-neutral language: For ease of reading and linguistic simplicity, this Code of Conduct sometimes uses the masculine form to refer to individuals or groups of individuals. However, all terms in this document are to be understood as gender-neutral and always refer to individuals of any gender.

1 Introduction

Through our work and behavior, we as representatives of our company contribute to upholding the ethical principles of the CPH Group and support its economic success. With its Code of Conduct, the CPH Group ensures legal compliance and ethical conduct across all companies and at all locations. Every employee (including all managers, regardless of their management level) must comply with the guidelines of this Code of Conduct. We also expect our business partners to act in accordance with our Code of Conduct.

All CPH Group employees are responsible for their actions. They are obliged to comply with applicable laws, guidelines, and standards of conduct at all times. Even though laws and customs vary from location to location, the fundamental ethical obligations outlined in this document apply globally. They form the basis for our decisions and actions. Violations may result in disciplinary measures and claims for damages, regardless of any official proceedings.

Our managers serve as role models and ensure that their employees understand the importance of this Code of Conduct and behave accordingly. In addition, managers at all levels are responsible for creating an environment in which employees feel comfortable asking questions, raising concerns, and reporting misconduct. If you have any questions about this Code of Conduct, you can contact your supervisor, the human resources manager responsible, the respective site management, the divisional management, or the group management.

This Code of Conduct serves as a guide for our employees. It is not a complete set of rules, and additional rules and obligations may also be addressed in other documents and guidelines. Accordingly, this Code of Conduct does not replace such other, more specific provisions.

A code of conduct cannot cover every situation that employees may encounter. The code of conduct therefore does not replace the obligation of each individual employee to use their common sense and sound judgment.

2 Our responsibility in the workplace

2.1 Occupational safety and health

Definition/background:

Occupational safety and health protection encompass all measures that serve to protect the physical and mental health of employees.

Corporate policy:

The safety and health of CPH Group employees is our top priority. Our objective is to maintain an accident-free and healthy workplace where risks are actively minimized. By complying with national regulations and conducting internal training, CPH Group creates a safe and healthy working environment. As employees, we contribute to this and are obliged to participate in the designated safety training courses, strictly follow safety instructions, and take precautions to protect ourselves, our colleagues, and third parties. Accidents, violations, risks, and unsafe conditions must be reported immediately to the occupational safety officer or supervisor responsible. We pay attention to accident hazards as well as the physical and mental well-being of our employees and offer timely support if there are signs of work stress or illness.

The CPH Group does not tolerate employees working under the influence of alcohol, drugs, or other intoxicants or substances that impair their ability to work.

What does this mean for me?

"I always comply with safety regulations and wear my protective equipment. If I discover a defective machine or a risk such as loose cables, I report this to my supervisor immediately. I actively participate in safety training and ensure that my colleagues also follow work instructions. If I have any questions or safety concerns, I contact the responsible occupational safety officer or my supervisor."

2.2 Diversity, equal opportunities, fairness, and respect

Definition/background:

Diversity, equal opportunities, fairness, and respect stand for appreciative and fair cooperation within the company. They mean that all employees are treated equally and respectfully and recognized as individuals. This applies regardless of personal characteristics such as ethnic or social origin, culture, religion, ideology, age, gender, skin color, disability, sexual identity, or other legally protected attributes, which may vary by region – thus free from discrimination.

Corporate policy:

The CPH Group encourages a corporate culture that respects diversity and equal opportunities. Our employees, applicants, and business partners can expect fairness and respect from us. In particular, we respect the rights of others as well as country-specific and cultural differences in the business environment. Assessments are based on qualifications, skills, and performance, not on personal attributes. Discrimination, disadvantages, and bullying, as well as harassment, whether physical or verbal, are not tolerated in any form. This includes, among other things, offensive remarks or derogatory gestures. All employees are obliged to respect the personal space and privacy of other employees.

Offensive or legally prohibited information may not be obtained or disseminated in our company. We create a working environment in which everyone feels safe, respected, and integrated. Employees and supervisors are obliged to be alert to violations and to intervene actively.

What does this mean for me?

"In my environment, I adhere to the principles of diversity, equal opportunity, tolerance, and fairness. I treat all colleagues with respect, regardless of their origin, gender, age, or other personal attributes. If I observe someone being discriminated against, harassed, or treated unfairly, I address the situation or report the incident to my supervisor or the human resources manager."

2.3 Our company's assets

Definition/background:

Assets include all tangible and intangible resources of a company, such as equipment, devices, vehicles, IT systems, financial resources, working time, data, and trade secrets.

Corporate policy:

Our assets are the foundation of our business success. As employees, we are obliged to protect these assets against theft, loss, misuse, or unauthorized use. They are to be used exclusively for business purposes, unless internal guidelines allow for exceptions. We use resources with care and avoid waste.

What does this mean for me?

"I take good care of company property – whether it's my laptop, a tool, financial resources, data, or trade secrets. I use these assets exclusively for business purposes and report any loss or damage to my supervisor immediately. If I am unsure whether private use is permitted, I ask my supervisor in advance. I do not grant others access to CPH Group resources."

2.4 Confidential information and intellectual property

Definition/background:

Confidential information is any non-public data and knowledge that must be protected from unauthorized access, disclosure, or use. This includes, for example, trade secrets, technical developments, or customer data. Intellectual property includes patents, trademarks, copyrights, and technical know-how, among other things.

Corporate policy:

The protection of confidential information and intellectual property is crucial to our long-term success and competitiveness. We protect this information through clear access regulations and technical measures such as encrypted IT systems and regular training. Employees may only use confidential information within the scope of their duties and may only share it with authorized people. All employees are obliged not to disclose any confidential information during their employment and after leaving the company. Any violation of these rules can lead to financial losses, damage to our company's reputation, and legal consequences.

What does this mean for me?

"I handle confidential information entrusted to me in the course of my work responsibly. I ensure that no unauthorized persons have access to it. When I am on the road, I take special care to ensure that no one can view sensitive documents. If anything is unclear, I can ask my supervisors or the IT department how best to protect information. If I realize that I have accidentally gained access to confidential information belonging to the CPH Group, customers, suppliers, or other third parties, I will clarify this misunderstanding and do not use the data. In case of doubts, I reach out to my supervisor."

2.5 IT security

Definition/background:

IT security encompasses all measures taken to protect information systems, data, and digital communication tools from unauthorized access, misuse, loss, or manipulation. This includes, for example, the responsible use of email, the internet, software, AI applications, and mobile devices.

Corporate policy:

The goal is to ensure the integrity, confidentiality, and availability of our company data and to minimize risks such as data loss, cyberattacks, or misuse of information. We only use hardware and software approved by the IT department and secure communication channels for the exchange of information. Unless internal guidelines allow for exceptions, the company's IT resources may only be used for business purposes. Access data and passwords must be treated confidentially and changed regularly. Suspicious emails, attachments, or links must not be opened, but must be reported to the IT department immediately. In addition, the IT usage guidelines must be observed.

What does this mean for me?

"I protect my login details and never share passwords. Before opening email attachments or clicking on links, I carefully check the sender and the context of the email. If I notice a suspicious message or fear that my device is no longer secure, I immediately inform the IT department. When in doubt, I ask how I can best protect data and systems. I am aware that my work devices may only be used for business purposes and that I am not allowed to store private data on them, for example, unless internal policies allow exceptions."

2.6 Personal data

Definition/background:

Personal data is any information relating to an identified or identifiable person, such as name, date of birth, contact details, health information, photos with identifiable people, or confidential data such as salary details or performance reviews. In this context, data protection means protecting the personal data of employees, customers, business partners, and other affected people, as well as respecting their privacy.

Corporate policy:

To protect personal data, we collect, process, use, and store personal data only within the scope of legal permissibility and in accordance with contractual agreements. The data of third parties is protected with the same care as our own information.

What does this mean for me?

"I handle personal data (including photos) entrusted to me in the course of my work with care. If I have access to the personal data of other employees or customers, I do not pass it on unless I have the appropriate consent. If I accidentally pass on data, I report this immediately to my supervisor or data protection officer in order to prevent any potential damage. I can also contact them if I am unsure whether the use of data is permitted."

3 Our responsibility to society

3.1 Human rights, forced and child labor

Definition/background:

Human rights are fundamental rights and freedoms to which every human being is entitled, regardless of their origin, gender, religion, or social status. The requirements and expectations of international communities regarding human rights are set out in the United Nations Universal Declaration of Human Rights, among other documents.

Corporate policy:

We are committed to respecting human rights in our actions and expect the same from our business partners. All human rights are important. Specifically, we strictly reject any form of child labor and forced labor. We respect the right to equal opportunities and do not tolerate discrimination. Working conditions comply with legal and international standards. This includes aspects such as remuneration and working hours. We respect the right to freedom of association and the right to form and join employee associations. Employees who have joined an employee association are neither favored nor disadvantaged.

If we suspect human rights violations – such as signs of child labor at suppliers – we investigate them thoroughly and take appropriate action.

What does this mean for me?

"I respect human rights as a fundamental guideline in my actions. I contribute to the protection of human rights by being vigilant about human rights violations that occur in my environment. If I learn of or suspect human rights violations in our company or at a business partner, I address this openly and inform my superior or human resources manager."

3.2 Social engagement, sponsorship and donations

Definition/background:

Social engagement includes sponsorship (performance-related support), donations (voluntary contributions without compensation), and charitable initiatives.

Corporate policy:

We understand sponsorship and donations to mean the financial support of events, projects, and organizations that serve charitable purposes in areas such as education, science, culture, social welfare, or the environment. They are carried out exclusively to strengthen our social responsibility and our corporate reputation – never to gain unfair advantages or circumvent regulations. All donations and sponsorship activities must comply with applicable laws. In accordance with internal regulations, all donations, sponsorship activities, and charitable initiatives must be approved in advance by a member of group management.

What does this mean for me?

"I critically evaluate sponsorship or donation requests: Does the request align with our corporate values? Does it serve a legitimate charitable purpose? Any initiatives I wish to support must be approved by a member of the group management."

3.3 Information policy and media releases

Definition/background:

Information policy and media releases cover all internal and external communication measures of a company. This concerns the handling of information to employees, business partners, investors, or other stakeholders, as well as the handling of the press, analysts, or other external parties. The information policy covers the responsible handling of sensitive and confidential information, as well as clear rules on who is authorized to represent the company publicly and provide information. This also includes behavior on social media.

Corporate policy:

Through clear, timely, and truthful communication about material events within the company, we foster trust between our company and our stakeholders. All media releases and public statements are made through the CPH Group's head of corporate communication. All official inquiries from the media, analysts, or other external parties are immediately forwarded to the CPH Group's head of corporate communication. External marketing communications in the form of trade publications, brochures, and customer information are the responsibility of the individual business division Zeochem and Perlen Packaging.

The use of social media in a business context is subject to clear guidelines. Internal information or trade secrets must not be published. When communicating on social networks, we take care to protect our company's reputation. When expressing private opinions in public, it must be made clear that these are personal views.

What does this mean for me?

"I do not make any public statements or give interviews on behalf of the CPH Group companies and always forward inquiries from the media or other external parties to my supervisor and the CPH Group's head of corporate communication. If I come across statements on the internet about CPH Group companies that I believe to be incorrect, I do not respond to them, but report them to my supervisor or the CPH Group's head of corporate communication. When I express my personal opinion, I do not do so on behalf of the CPH Group."

3.4 Environment

Definition/background:

Environmental protection means conserving natural resources such as air, water, soil, and energy, avoiding pollution, and minimizing the impact of our actions on the climate and nature.

Corporate policy:

Sustainability is a central part of the CPH Group's corporate history and, at the same time, a prerequisite for the long-term value creation. We are committed to complying with legal requirements and promoting sustainability and resource efficiency. Environmental considerations are taken into account from the outset when developing new products and processes. When operating production facilities, we ensure that their impact on the environment and climate is kept to a minimum. We also expect our suppliers and business partners to comply with these environmental standards.

What does this mean for me?

"In my daily work, I make sure to use energy and materials sparingly, avoid or separate waste, and use environmentally friendly alternatives. If I see opportunities to make processes more sustainable, I can submit them as a CIP suggestion or propose them directly to my supervisor. I report violations of environmental regulations to my supervisor immediately. In this way, I contribute to protecting the environment and the climate."

4 Our responsibility in the business environment

4.1 Compliance, legal regulations, and policies

Definition/background:

Compliance means adhering to all laws, internal policies, ethical standards, and voluntary commitments that are relevant to business activities. This also includes local, national, and international regulations in every country where the CPH Group operates.

Corporate policy:

The CPH Group operates globally with subsidiaries in various legal systems. We comply with applicable local, national, and international laws as well as internal policies. Compliance further includes following our internal ethical principles set out in this Code of Conduct. Doing so safeguards our company, us as employees, and our partners from legal and reputational consequences and forms the foundation for responsible conduct.

What does this mean for me?

"In my daily work, I make sure that all legal requirements and internal policies are complied with. If I am unsure whether an action complies with the rules, I do not hesitate to ask my supervisor for advice. In this way, I ensure that my behavior always meets legal requirements and our company standards. This allows me to avoid risks for both the company and myself."

4.2 Conflicts of interest

Definition/background:

A conflict of interest arises when an employee's personal or private interests conflict with, or appear to influence, the interests of the company or when there is the appearance of influence on business decisions. Conflicts of interest can arise from financial investments, personal or family relationships, and secondary employment, among other things. Secondary employment in particular leads to conflicts of interest if it relates to the company's business activities or if there are business relationships with suppliers, customers, or competitors.

Corporate policy:

Our aim is to always make business decisions in the best interests of our company and to avoid conflicts arising from personal interests. Holding public office is generally permitted, as long as the scope and time commitment do not interfere with work duties. Before an election, the employee must inform their direct supervisor and the respective human resources manager. If holding office could impair the employee's work performance, the approval of the divisional management must be obtained. Secondary employment or similar activities must be disclosed and require the prior written approval of the employer.

What does this mean for me?

"I carefully consider whether there could be a conflict of interest in my situation – for example, if I am planning to take on a secondary occupation, a family member is employed by a supplier, or if I have private contact with business partners. If I am unsure or recognize a potential conflict, I inform my supervisor."

4.3 Fair competition

Definition/background:

Fair competition means that a company complies with all applicable competition and antitrust laws and competes with other market participants solely on the basis of performance, quality, innovation, and service. Unfair practices such as price fixing, market sharing, passing on sensitive information to competitors, or abusing a dominant market position are prohibited.

Corporate policy:

We are committed to fair and free competition that provides equal opportunities for all market participants and offers customers the best products and services. In competition, we focus on performance, customer orientation, and the quality of our products. In particular, agreements with competitors that restrict competition (e.g., on prices, quantities, markets), abuse of a dominant market position, and the unauthorized exchange of information are prohibited. Violations can have legal consequences and damage the reputation of our company.

What does this mean for me?

"I do not share competitively sensitive information such as pricing, contract terms, or strategic business plans of my company with external parties. If I inadvertently receive competitively sensitive information from a competitor, I immediately inform my supervisor and take no further action before consulting with him. If I have any doubts or questions about competition law, I will also contact my supervisor to ensure that my conduct complies with legal and internal company requirements at all times."

4.4 Corruption, gifts, and benefits

Definition/background:

Corruption includes all actions in which employees, business partners, or third parties attempt to unlawfully influence business decisions or actions for their own benefit or for the benefit of third parties. Corruption includes practices such as bribery, fraud, or extortion. Bribery includes offering, promising, granting, requesting, or accepting benefits such as bribes, kickbacks, inappropriate gifts, or benefits. Even minor favors or seemingly harmless gifts can be considered undue influence if they compromise independence or objectivity. Corruption violates national and international laws as well as internal policies, jeopardizes the integrity of markets, and damages the company.

Corporate policy:

We do not tolerate any form of corruption – neither in dealings with business partners nor with government entities or other third parties. Alone the performance and the quality of our products is convincing enough in all our business dealings. We take great care not to grant or accept any improper advantages and to prevent bribery. We are obliged to reject offers of bribes or other undue benefits – whether business-related or personal – and to report such incidents immediately to our supervisor. Indirect forms of bribery and corruption, such as the use of intermediaries or consultants to circumvent restrictions, are likewise prohibited.

We must inform our supervisor about any gifts, benefits, or invitations we receive. We only accept gifts, benefits, or invitations that are of minor value, are within the scope of normal business practices, and without any potential to influence business activities. Valuable gifts, cash, or inappropriate invitations are politely declined and reported to our supervisor.

What does this mean for me?

"I will never offer money, gifts, or other benefits to public officials or business partners in order to influence a decision in my favor. If such a benefit is offered to me, I will politely decline it and inform my supervisor. If I am unsure whether a particular behavior could be considered as corruption, I will seek guidance from my supervisor on the correct course of action. I always make my decisions independently and in the best interests of our company. I can also prevent corruption within the company by ensuring that every payment is in return for a business-related service or product, is appropriate and in line with market conditions, and is fully documented. The aim is to prevent business payments from being used to conceal inappropriate benefits. In this way, I actively contribute to ensuring that our company acts with integrity and in full compliance with the law."

4.5 Money laundering and terrorist financing

Definition/background:

Money laundering refers to the concealment of the origin of funds or assets that originate from criminal activities (e.g., corruption, fraud, or tax evasion) or whose illegal origin is to be concealed by introducing them into the legal economic cycle.

Terrorism financing occurs when funds or other resources are provided to support terrorist activities or organizations.

Even unintentional involvement in money laundering or terrorist financing can lead to legal consequences.

Corporate policy:

We have zero tolerance for any form of money laundering or terrorist financing and are committed to strict compliance with the relevant laws. We verify the identity and economic background of customers and business partners to ensure that we only work with reputable partners. We only accept payments that are clearly linked to legitimate goods or services and originate from traceable, legitimate sources.

What does this mean for me?

"By being vigilant, I can actively contribute to ensuring that my company complies with the laws and principles for combating money laundering and terrorist financing. When entering into new business relationships, I carefully check who I am dealing with and ensure that I can clearly trace the origin of the funds. If I notice a payment coming from an unusual source, I immediately inform my supervisor."

4.6 Integrity of financial reporting

Definition/background:

Integrity in financial reporting means that all financial transactions, business activities, and assets of the company are recorded, documented, and reported accurately, completely, and transparently.

Corporate policy:

As an international, publicly traded company, the integrity of our financial reporting contributes significantly to the success of our company and to maintaining the trust of shareholders, customers, business partners, and other stakeholders. We ensure that all business transactions are recorded in the relevant systems in a timely, truthful, and traceable manner and that internal controls are complied with. Accounting and financial reporting are always carried out in accordance with applicable legal and internal company requirements. Manipulation or misrepresentation is strictly prohibited. Financial records are retained in accordance with legal requirements.

What does this mean for me?

"I record all financial transactions and business transactions correctly and promptly in accordance with the designated processes. If I am unsure how to document a business transaction, I consult my supervisor or the relevant finance department. I do not falsify documents to embellish figures or cover up mistakes, and I report any irregularities or suspicious circumstances immediately. In this way, I help to ensure that our financial reports are transparent and reliable at all times."

4.7 Regulatory inquiries

Definition/background:

Regulatory inquiries and investigations include formal inquiries, audits, or investigations by government entities or their representatives requesting information or documents from the company. The purpose may be to verify compliance with legal requirements and investigate possible legal violations. Responsible handling of such inquiries is essential to minimize legal risks and protect the integrity of the company.

Company policy:

When I receive a non-routine request for information from a government entity or its representatives, it is essential that I forward it to my supervisor immediately before responding. This is to ensure that the response is legally compliant and appropriate for the CPH Group. When in doubt, any request should be forwarded to my supervisor.

What does this mean for me?

"If I am unsure whether a request for information from an authority is routine or not, I will immediately notify my supervisor and will not disclose any information on my own. In this way, I help the company avoid risks associated with potentially incorrect or excessive disclosures of information and ensure that all legal obligations are met."

4.8 Insider information

Definition/background:

Insider information is information that is not publicly known and that could significantly influence the price of securities if it became public knowledge. This includes, for example, non-public financial results, planned material corporate changes such as acquisitions or a change in group management, the development or launch of material new products or technologies, and the conclusion or loss of significant contracts or customer relationships. Insider trading refers to the purchase or sale of securities based on such insider information or the disclosure of this information to third parties.

Corporate policy:

If we as employees have access to insider information, we are obliged to treat it as strictly confidential and not to use it for private or unrelated purposes. Insider information may not be used for trading in securities and may not be disclosed to other parties within or outside our company. Furthermore, no transactions may be recommended on the basis of insider information. Violations of insider trading laws and company rules may result in consequences under labor law and criminal prosecution.

What does this mean for me?

"I treat insider information that is not publicly known as strictly confidential. I do not use it for my personal securities transactions and refrain from buying or selling shares or other securities of our company or the company concerned when insider information is available. If I am in possession of insider information, I do not pass it on to third parties and do not make recommendations to my friends, family, or other third parties. If in doubt, I consult my supervisor."

4.9 Product compliance

Definition/background:

Product compliance refers to the fulfillment of all applicable legal and regulatory requirements, norms, and standards by our products. This is to ensure that products comply with the specified specifications throughout their entire life cycle and are therefore offered on the market in a safe and compliant manner.

Corporate policy:

We are committed to ensuring our products are safe for customers, users, and third parties, that risks are minimized, and that the agreed product quality standards are consistently met. We therefore commit to testing our products for compliance with all relevant laws and standards, preparing the necessary documentation, and obtaining certifications and approvals where necessary. To this end, we have established processes for product testing, quality control, and customer feedback. This also helps us to continuously improve the quality of our products.

What does this mean for me?

"If I notice, suspect, or learn from a customer that a product does not comply with all regulations or our quality standards, I report this to my supervisor or the responsible department (e.g., quality management)."

4.10 Global trade

Definition/background:

Compliance with import and export control laws includes compliance with all laws and regulations relating to the import and export of goods, technologies, software, and services. This also includes embargoes, sanctions, licensing requirements, and special requirements for handling sensitive or controlled goods (e.g., dual-use goods).

Corporate policy:

As an internationally active company, we operate worldwide. Our commitment is to ensure that no unauthorized trade with sanctioned countries, organizations, or individuals takes place and that all required approvals are obtained. Therefore, all cross-border transfers of goods or technologies must comply with the respective export and import control laws.

What does this mean for me?

"Before confirming an order, I check whether special export licenses are required or whether import restrictions apply. I also check whether the customer or the country of destination is on an embargo or sanctions list. If necessary, I obtain an end-user statement (end-user certificate) in which the customer makes a commitment regarding the final use and whereabouts of the goods sold. If I have any questions or uncertainties, I contact the export responsible or my supervisor."

5 Reporting and dealing with violations

5.1 Reporting violations

As employees, we are obliged to report violations and concerns regarding possible violations of this Code of Conduct, especially if there is a risk to the company – ideally before these risks materialize. The first point of contact is the direct supervisor. The second point of contact is the human resources manager. Reports can also be made to site management, divisional management, or group management. If necessary, violations can also be reported confidentially and anonymously via an external reporting system (<https://cphgroup.integrityline.io/>).

5.2 Protection from negative consequences

Managers are obliged to create an open environment in which employees can raise concerns without fear of retaliation. At the request of the reporting person, their identity will be kept confidential, as far as this is legally possible. The CPH Group ensures that violations can be reported confidentially. The CPH Group does not tolerate any form of disadvantage for employees who report possible violations or ask questions.

5.3 Dealing with violations and strengthening prevention

The CPH Group's objective is to prevent misconduct and damage and to strengthen prevention by identifying potential violations at an early stage. Dealing with violations involves investigating them, initiating appropriate measures, and consistently implementing sanctions. Violations of this Code of Conduct, internal policies, or laws will be investigated impartially, promptly, and thoroughly and may result in disciplinary, labor law, civil law, or criminal law consequences.

In the case of violations of this Code of Conduct, the CPH Group may also assert claims for damages against the employee within the framework of the applicable legal provisions. The clarification of the facts, the results of the investigation, and possible remedial measures will be documented in a comprehensible form, as far as necessary.

6 Decision-making guidance

6.1 Self-Assessment

Each of us may be confronted with situations in our daily work where legal or ethical concerns arise. In such cases, the following questions, among others, can help guide our decisions:

- Does the action comply with the principles of this Code of Conduct?
- Have I considered and carefully weighed all relevant aspects and facts?
- Am I convinced that my action does not violate any legal or internal regulations?
- Am I prepared to take responsibility for my actions before my supervisor or senior management?
- Would I approve of similar decisions in comparable cases within the company?
- Could it affect our reputation if my action were reported in the media?
- Could I accept my actions if I were affected by them myself?
- What would my personal network say about my actions?

6.2 Considerations when working with business partners

If we, as employees, recognize one or more of the following or similar warning signals in interactions with business partners, we contact our supervisor to discuss how to proceed.

For example, if a business partner:

- proposes a business deal that suggests bribery;
- may not respect the values set out in this Code of Conduct;
- does not appear to be a fair business partner in other situations;
- shows no interest in quality, training, warranties, etc.;
- has a relationship (such as family ties or former employment) that could improperly influence the business partner's behavior;
- requests an unusual payment method that deviates from the usual or expected standard and is associated with increased risks in terms of consideration, transparency, traceability, or legal compliance; typical improper payments include, among others, the transfer of commissions via a bank in a third country or in a currency other than that of the country in which the service is provided, cash payments, payments that are split into small, fragmented amounts or made to multiple recipients in order to keep the amounts below the reporting or competence thresholds, or unusual payment methods outside regulated banking infrastructures, such as cryptocurrencies;
- proposes payment terms that deviate from the norm, such as payment against delivery of goods without the usual safeguards;
- claims that he or she can help secure a contract with a customer or another contractual partner in exchange for a benefit, due to a special arrangement with the contractual partner that could violate ethical principles;
- Requests a commission that is unusually high in relation to the service provided.

7 Validity

The Code of Conduct applies to all employees of the CPH Group companies. Supplementary internal policies, legal requirements, and local regulations must also be observed. If these deviate from the CPH Group Code of Conduct, the stricter requirements apply. If you have any questions, please contact your supervisor, local human resources manager, or the respective site management, divisional management, or group management.

The Code of Conduct shall come into force after it has been communicated to employees, in accordance with local regulations, and may be amended by the CPH Group at any time.

8 Definition of terms

Term	Definition
CPH Group	All companies within the CPH Group AG, as listed in the appendix
Human resources managers	Human resources managers are employees from local human resources management and central human resources departments.
Division management	Executive management of the respective division Zeochem: Global Management Team, GMT Perlen Packaging: Perlen Packaging Executive Management, GL
Site management	Executive Management of the respective local subsidiary
Group management	Group-level management consisting of the CEO and CFO of the CPH Group AG and the respective CEOs of the two divisions Zeochem and Perlen Packaging.

APPENDIX: Companies of the CPH Group

cph group

Chemistry & Packaging

- CPH Group AG, Perlen, Switzerland

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- Zeochem AG, Rüti ZH, Switzerland
- Zeochem d.o.o. Zvornik, Bosnia-Herzegovina
- Zeochem LLC, Louisville, USA
- Zeochem Pte Ltd, Singapore, Singapore
- Jiangsu Zeochem Technology Co. Ltd, Lianyungang City, China
- Sorbchem India Pvt. Ltd., Vadodara, India
- Zeochem Silica Materials Inc., Quebec, Canada
- SiliCycle SAS, Paris, France
- SiliCycle Associate Hong Kong Ltd., Hong Kong, China
- SiliCycle (Shanghai) Science and Technology Development Co. Ltd., Shanghai, China



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- Perlen Packaging GmbH, Müllheim, Germany
- Perlen Packaging LLC, Whippany, USA
- Perlen Packaging (Suzhou) Co. Ltd., Suzhou City, China
- Perlen Packaging Anápolis Indústria e Comércio Ltda., Anápolis, Brazil
- LOG Plastic Products Company Ltd., Ashdot Ya'acov Ichud, Israel
- LOG Plasticon Zrt., Tököl, Hungary