

# LINDAL Group

# Code of Conduct

Version 1.1 – June 2020

## The basis of our Code of Conduct

LINDAL Group was founded in 1959 and today is one of the world's market leaders in aerosol packaging technology. We offer a broad range of standard and custom aerosol packaging solutions and have become a partner of choice for many of the world's most prestigious, innovative and trusted brands.

As a family business, we have a strong set of values, which we shall act in accordance with:

- **Innovation** – we believe in adding value to our customer's products through continuous innovation and we encourage creativity and experimentation among our employees;
- **Hunger to Learn** – we are open and curious to learn from anyone, anywhere. We ask for and provide honest feedback without regard to position. We admit our mistakes and learn from them;
- **Sustainability** – as a family business we assume our responsibility towards future generations and act accordingly. We do not only believe in sustainable growth, but also in the sustainable use of global resources;
- **Trust and Reliability** – we build our relationships with business partners on mutual trust and reliability and we demonstrate our steadfast long-term commitment with open and honest communication.

These values reflect the spirit in which we conduct our day-to-day activities. Hence, they form the basis of our Code of Conduct; the purpose of which is to set out the globally applicable standards of conduct.

## Scope

Our Code of Conduct applies equally to all employees and directors within LINDAL Group.

## Our commitment

We shall adhere to high standards of ethics and business morals in all our operations and relations. Furthermore, we shall conduct our business in an environmentally and socially responsible manner and behave appropriately towards all of our stakeholders – our customers, suppliers, employees, shareholders, governments and non-governmental organizations (NGOs), the communities in which we operate and other parties that interact with LINDAL Group.

In particular, we embrace, support and act – within the sphere of our influence – the core values in the areas of human rights, labor standards, the environment and anti-corruption as expressed in the Ten Principles of the United Nations Global Compact, the Guiding Principles on Business and Human Rights as well as the Children’s Rights and Business Principles, Appendices 1–3, available on the website of the United Nations.

We review our Code of Conduct yearly and are committed to making changes in its content and implementation when circumstances so demand.

## Legal compliance

With production sites and presence around the globe, LINDAL Group is subject to a wide range of legal requirements. We shall comply with all applicable laws and regulations that relate to our activities in the countries in which we operate. It is the responsibility of each employee and director to make sure that they are aware of and abide by the laws and regulations that apply to them in their respective positions as representatives of LINDAL Group.

Naturally, legal systems are often highly complex and change over time. Therefore, each manager has to do his or her utmost to keep track of laws and regulations that relate to their areas of responsibility. In case of uncertainty, it is the responsibility of each employee to seek appropriate advice from their manager or the Compliance Officer on relevant legal requirements and other legal issues.

## Human rights

We support and respect the protection of internationally proclaimed human rights, such as the Universal Declaration of Human Rights, within the sphere of our influence.

All employees must be treated equally, have equal opportunities and not be subjected to discrimination based on, for example, ethnic or national origin, creed, skin color, gender, marital status, sexual orientation, religion, political opinion, nationality, social origin, disability or union membership.

We do not use child labor. Employees must be at least 16 years of age or have reached national school-leaving age upon completion of compulsory schooling, whichever is higher. The minimum age for hazardous work is 18 years of age.

We do not accept any form of forced labor or any other forms of involuntary labor. Neither do we tolerate working conditions or treatment that are in conflict with international laws and practices.

We protect, respect and remedy children's rights and human rights and seek to be transparent about human risks.

## **Accounting and reporting**

All business transactions and payments within each subsidiary of LINDAL Group must be recorded in a timely and accurate manner. We follow strict accounting principles and standards and have appropriate internal controls and processes to ensure that accounting and financial reporting comply with LINDAL Group's respective reporting manuals together with all applicable laws and regulations.

## **Business ethics**

LINDAL Group shall compete vigorously but honestly for business and uphold the highest standards in business ethics. We respect antitrust and fair competition laws that prohibit certain actions that unfairly and dishonestly harm competitors. Across the board we act in accordance with fair business, marketing and advertising practices.

## **Conflicts of interest and bribes**

Business decisions must be based on the best interest of LINDAL Group. All employees must avoid engaging in activities that could lead to any conflicts of interest.

A conflict of interest occurs, for example, when an employee's personal interests interfere with their ability to use their judgment objectively and in the best interests of LINDAL Group. A conflict of interest could, for example, arise where the employee or a member of their family gains personal enrichment through access to confidential information belonging to LINDAL Group.

If an employee believes that he or she may have any direct or indirect conflicts of interest, he or she must disclose such potential conflicts to their manager and seek a solution which avoids the conflict of interest.

## **Corruption and bribes**

Employees within LINDAL Group must not give, offer, accept or demand any kind of bribe, kickback or any other unlawful or unethical benefit.

Any such conduct must be reported immediately to management.

## **Confidentiality**

All information obtained at work should be considered and treated as confidential unless it is freely and publicly available. Confidential information should only be used for its intended purpose and never be disclosed to anyone other than employees or other authorized representatives of LINDAL Group who have a direct and legitimate need-to-know. The obligation to keep information confidential continues even after an employee leaves LINDAL Group.

## **Data privacy**

LINDAL Group is committed to protecting and respecting our employees' right to privacy and integrity, and we will always aim to protect our employees' personal data in an appropriate manner with adherence to applicable Data Protection Privacy Laws.

## **Workplace practices**

All our activities must be conducted with respect for employee health, safety and privacy. All employees shall be provided with a safe and healthy working environment. We take appropriate action to prevent workplace accidents or illnesses.

All employees shall be free to join associations of their own choice and shall have the right to collective bargaining. In countries where these practices are legally restricted, we strive to have parallel means in place to allow concerns to be brought to management attention.

All employees should know the basic terms and conditions of their employment and have readily and easy access to information such as governing policies, instructions and other information affecting their employment. Salaries, including overtime and benefits, shall equal or exceed local legal and industry minimum standards.

All employees should be treated with respect and dignity and not be subjected to any discrimination, abuse or harassment.

## **Environment**

Sustainability is our way of ensuring that the positive impacts we generate far outweigh our negative ones. To achieve this, we must reduce the environmental footprint of our products and operations as well as promote products, services and practices that help others along our value chain reduce theirs.

We support life-cycle thinking and a precautionary principle to environmental challenges. We will fulfil or exceed environmental legal requirements, regulations and international conventions applicable in the countries in which we operate.

All our subsidiaries are required to identify and analyze the environmental impacts and consequences of their operations and products and have appropriate environmental management systems in place to manage them.

## **Community involvement**

All our activities must be conducted with respect for the wellbeing of the local communities in which we operate. LINDAL Group maintains a neutral position with respect to political parties. Our employees are however encouraged to play an active role in society, including through activities in political parties. We also encourage our employees to actively participate in the communities in which they live and work and to propose community involvement projects to management.

## **Suppliers**

We will do our utmost to contract only with subcontractors and suppliers who themselves adhere to international human rights and environmental laws and practices, monitor their performance and take immediate and thorough steps in cases where this ethical performance comes into question.

## **Compliance**

All employees shall be instructed to read our policies. We shall take appropriate actions to inform our employees in a clear transparent manner and all employees shall be able to exercise their fundamental rights in accordance with applicable laws.

Our policy is to support open and fair discussion of issues and concerns. Employees are encouraged and expected to report all incidents of non-compliance or suspected non-

compliance with this Code of Conduct. Failure to comply may result in civil and criminal liability and /or disciplinary action, including termination of employment.

Employees can use our confidential “whistle blowing” reporting channels. These can be used to bring concerns and issues to the attention of the LINDAL Group management who will in turn make every effort to maintain the anonymity and confidentiality of those reporting.

Reporting channels for these purposes are shown below and are also available on our website, [www.lindalgroup.com](http://www.lindalgroup.com)

Dedicated email address for “whistle blowing”: [codeofconduct@lindalgroup.com](mailto:codeofconduct@lindalgroup.com)

None of the management within LINDAL Group will be held accountable for any loss of business resulting from compliance with this Code of Conduct. There shall be no retaliation or other negative consequences for persons reporting in good faith.

Advice or guidance on the interpretation of this Code of Conduct is available from the Compliance Officer of LINDAL Group.

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A handwritten signature in blue ink, appearing to read 'FX Gilbert'.

Francois-Xavier Gilbert  
**Chief Executive Officer**

A handwritten signature in blue ink, appearing to read 'Manfred Schnor'.

Manfred Schnor  
**Chief Financial Officer**