

CODE OF CONDUCT



ILLIG Group
Compliance Policy
for Ethical Conduct

CONTENT

Foreword 3
Scope of application 4
Rights and laws must be observed 5
Dealings with business partners and third parties 6
Avoiding conflicts of interest. 7
Handling insider information. 8
Security and quality have top priority. 9
Safeguarding property10
Information and training11
Reporting incidents12



Dear ILLIG Staff,

the ILLIG Group is a leading global provider of thermoforming and packaging systems and tool systems for plastic materials and cardboard. Our service portfolio encompasses the development, construction, manufacture, installation and commissioning of complex production lines and individual components. With our 360° packaging development solution Pactivity® and high-performance packaging systems, ILLIG offers our customers resource-efficient and sustainable solutions, and supports packaging manufacturers in designing for recycling. With branch offices and representation in over 80 countries, ILLIG is present in all markets across the globe. For over 75 years now, the family-owned company has supported its customers worldwide as a reliable partner through the economic production of demanding, high-precision molded parts – with innovative technology of the highest quality and comprehensive global service.

As the ILLIG Group, we are committed to upholding our social responsibility. Our actions comply with compliance regulations. We hold ourselves, totally and uncompromisingly, to ethical principles, applicable law, our company values and all internal rules. The following behavioral principles listed in this Code of Conduct are binding for all employees, shareholders, suppliers and partners of the ILLIG Group.

Please make sure to familiarize yourself with these guidelines for your daily work and to act accordingly.

Executive Management

Scope of application for the CODE OF CONDUCT

The Code of Conduct is binding for all employees of the ILLIG Group at all hierarchical levels without exception as a guideline for ethical conduct. Other companies of the ILLIG Group may observe additional compliance-related policies and ethical principles insofar as these do not contradict the behavioral principals of the ILLIG Group.

Rights and laws must be observed

On principal, all employees must observe and adhere to the applicable laws and regulations of the countries in which the ILLIG Group maintains business relations. This includes all company agreements, standards and rules of the ILLIG Group. Respecting human rights and fundamental labor laws, as well as occupational health and safety, are extremely important to the ILLIG Group. We strive to foster sustainable environmental protection and to act against corruption. All employees and executives are to act lawfully on principle. They are personally responsible for compliance with applicable law and the internal guidelines of the ILLIG Group in their respective areas of responsibility.

No child labor or forced labor

The ILLIG Group rejects all forms of child labor, forced labor and slavery, and respects the minimum legal age of employment in accordance with the respective applicable laws.

Human rights

The ILLIG Group respects and supports internationally recognized human rights. Our dealings with each other and with our business partners are based on mutual trust, respect, tolerance and fairness. We respect the dignity, privacy and personal rights of every individual.

Non-discrimination

We uphold the German General Act on Equal Treatment (“Allgemeines Gleichbehandlungsgesetz”) and do not tolerate discrimination of any kind. We do not discriminate on the basis of gender, sexual orientation, age, skin color, social or ethnic origins, physical or mental limitations, political or religious views, union membership or nationality. These principles apply to all staff in existing employment relations as well as for career development and training. They also apply to all new hires. In the ILLIG Group, performance, personality, capability and suitability are the only decisive criteria.

Cooperation with the works council

For Illig, a trusting and close cooperation with the works council is a decisive component and proven cornerstone of the company’s policy. The basis of mutual trust and cooperative interaction is an open and constructive dialogue characterised by mutual respect.

Occupational health and safety and environmental protection

The ILLIG Group observes legal regulations and standards for occupational safety and takes the appropriate measures to ensure the occupational safety of all employees. All employees are responsible for refraining from any endangerment of human beings or the environment, keeping the environmental impact to a minimum and using resources sparingly. All staff members undertake to ensure that the corresponding processes, business materials and business premises comply with applicable law and internal regulations related to occupational health and safety and environmental protection.

Dealings with business partners and third parties

Prohibition against corruption

The ILLIG Group does not tolerate any form of corruption, bribery, acceptance or granting of preferential treatment or any other corruptive behavior that would create an impression of undue influence. Employees are prohibited from using the company's connections in their own or in third-party interest or to the detriment of the company. In particular, employees of the ILLIG Group are prohibited from granting or accepting any benefits in business transactions (such as money, valuables, services or any other benefits, including invitations from or to suppliers or customers) aimed at influencing proper decisions or the observance of rules and laws. The ILLIG Group prohibits benefits in dealings with civil servants or other public officials under any circumstances. We also expect our business partners to comply with applicable law and with our policies for ethical behavior.

Antitrust and competition law

All employees of the ILLIG Group observe the rules of fair competition and antitrust regulations within the framework of applicable legal regulations. The market position of the ILLIG Group may not be used unlawfully to assert unfair advantage for prices, products or supply. In the context of competitive situations, any collusion regarding territorial or customer distribution, prices or price components, supply relationships or their conditions, capacities, offering/bidding behavior or market and investment strategies is strictly forbidden. This prohibition encompasses all written, oral or tacit agreements.

Customer and supplier relations

All agreements with customers or suppliers are to be concluded in full and unambiguously. All subsequent modifications or amendments require the written form. Employees of the ILLIG Group responsible for purchasing are to choose suppliers purely on a competitive basis under comparison of the price, quality, performance and suitability of the offered products or services. In particular, they comply with antitrust and competition law as well as international trade regulations. Adherence to the valid underlying signature regulations of materials management is mandatory.

Handling donations and sponsoring

The ILLIG Group may make financial or material donations to education and the sciences, culture and athletics as well as for social causes and issues. Donations and sponsorships are only possible within the framework of applicable legal regulations. Benefits are only to be granted to institutions that are officially recognized as charitable organizations or are authorized to accept donations by special regulation. All allocations must be documented in written form stating the purpose, the recipient of the donation and the recipient's confirmation of receipt.



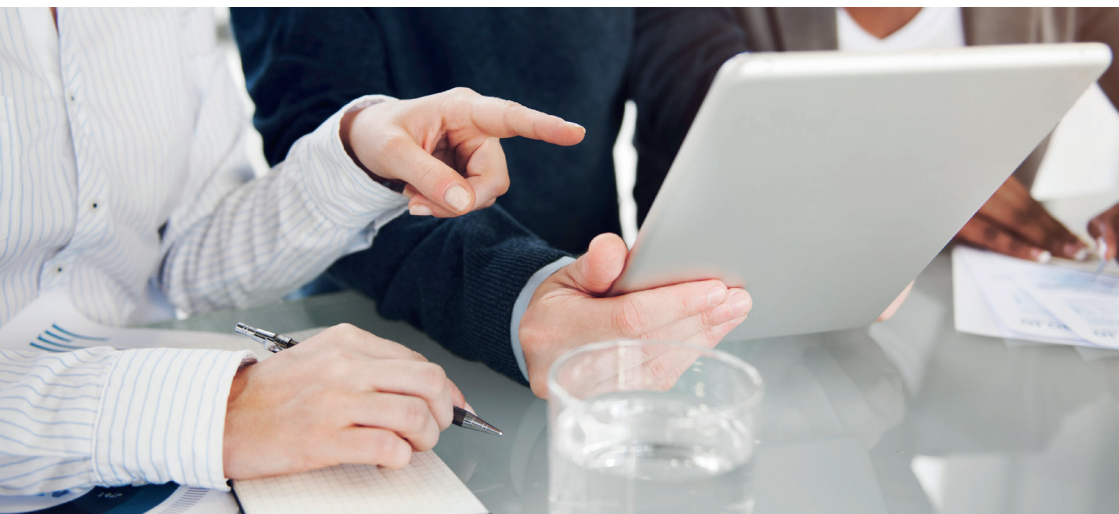
Avoiding conflicts of interest

Conflicts of interest

Business decisions within the ILLIG Group are solely made in the best interest of the company. Any conflicts of interest arising from personal activities, including those of relatives or third parties, are to be avoided. Any conflicts of interest that become apparent are to be solved under transparent disclosure in strict adherence to data protection laws and regulations with the involvement of all relevant participants.

Secondary employment and shareholdings

The ILLIG Group welcomes volunteer commitments in organizations or other institutions insofar as these do not conflict with the duties laid out in the employment contract of the respective employee. In general, employees must notify the company regarding any secondary employment. Furthermore, any secondary employment or shareholdings with companies that are in competition with ILLIG Group companies are only permitted in individual cases after prior approval in written form. The same also applies to secondary employment or shareholdings with customers, suppliers or trade partners of the ILLIG Group.



Handling insider information

Non-disclosure

The technological innovative power of ILLIG is a key success factor in international competition. Therefore, the protection of intellectual property takes top priority. All ILLIG employees are obligated to non-disclosure concerning any business or trade secrets that are entrusted to them within the scope of their business activities or are otherwise made known to them. All work and affairs, in particular concerning future-oriented plans and developments, that are of significance to the ILLIG Group or its business partners and have not been publicly disclosed (insider information) are to be treated as strictly confidential and may not be disclosed to third parties under any circumstances.

Data protection and data security

The ILLIG Group protects confidential, secret and personal data. Personal data is only collected, processed and used as far as required for defined, unambiguous and legitimate purposes. The ILLIG Group strives to ensure that the use of data is transparent for data subjects and that their rights to information and rectification, as well as to objection, restriction of processing, and erasure are upheld.



Security and quality have top priority

The ILLIG Group places the highest priority on the quality of its products and systems and on the safety of its customers. The ILLIG Group complies with all relevant quality control guidelines.

Handling company property

The property of the ILLIG Group may only be used for official business unless exceptional provisions allow for private use. Employees are to treat the property of the ILLIG Group with all due care and protect it from damage or loss.

Information and training

Management staff are to inform the employees assigned to their areas of responsibility about this Compliance Policy. They are responsible for ensuring that no violations of legal regulations or of this Policy occur that could have been prevented or inhibited by proper supervision. Management staff must make it clear that violations of the law will not be tolerated and will result in disciplinary consequences independent of legal sanctions and without regard to the employee's position in all cases. As part of their function as role models, they are to exhibit ethical behavior at all times. The ILLIG Group regularly holds documented employee training sessions on specific topics and risk areas.

Reporting incidents

For the protection of employees, business partners, society and the environment, it is an urgent necessity that any deviations from the behavioral principals listed in this Policy are reported immediately. To do so, the following reporting channels are available to all staff:

1. **HR department**
2. **Executive management**

The works council will promptly be notified once reports have been received.

All incoming incident reports concerning compliance matters will be handled without delay. The ILLIG Group will not tolerate any form of discrimination against employees who submit these reports with good intentions. All employees will receive a response to every incident report submitted. In every case reported, appropriate measures will be taken as quickly as possible to remedy the issue after careful review.





ILLIG systems for thermoforming and packaging technology

- | Sheet-processing machines
- | Automatic roll-fed thermoformers for forming/punching tools
- | Automatic roll-fed machines with separate forming and punching
- | Skin and blister packaging machines



ILLIG packaging solutions GmbH

Robert-Bosch-Strasse 10 | 74081 Heilbronn | Germany
Phone: +49 7131 505-0 | info@illig.com | www.illig.com