

W E E N E R
PLASTIC PACKAGING GROUP



IDEA
DESIGN
PRODUCT

Code of Conduct

2013

Weener

The Weener
Group-our Code
of Conduct

Code of Conduct

of Weener Plastic Packaging Group (Weener Group)

- Code of Conduct -

In light of the ongoing globalisation, it is expected from an international commercial enterprise that the same standards be applied to all business activities.

We, the members of WEENER Group, a leading international manufacturer of plastic packaging, consider this Code of Conduct a joint guideline for our activities and our decision-making processes within WEENER Group. It shall apply to all executives and employees of WEENER Group worldwide.

As a globally active company, we feel obligated to take on obligations vis-à-vis the society at large. At the same time, it is understood that we display moral behaviour towards our employees, business partners, customers, government authorities and other persons involved in our business activities.

Together with our customers and suppliers, we strive to always develop intelligent and innovative solutions that increase the economic efficiency of Weener Group. It is just as important that our products be produced as environmentally sustainably and resource-conserving as possible for the common good.

Our Capital

Our company is characterised by long-term partnerships with our customers and suppliers. Cooperation is built on mutual trust, respect and fairness. In our activities, we strive to consider the various cultural and social framework conditions of the respective countries. In this, we respect and promote cultural diversity within our corporate group.

Our international production network, which allows us to produce our products in an economical, environmentally friendly and sustainable manner, is not the only factor that contributes to our position on the highly competitive market. The other factor that helps us secure competitive advantages is our social, intercultural competency.

Our Standard

Being globally active also means fulfilling our self-set standards all over the world. This is the only way to satisfy our customers and to justify the confidence placed in our corporate group. Only the cooperation of all employees makes it possible to maintain these high standards and thus to enable sustainable economic activity and to secure competitiveness at an international level.

The customers of our company are as important as the employees. Business success is made possible only through long-term customer relationships. We therefore endeavour to offer our customers flawless quality and premium products at all times.

Corporate Responsibility

Compliance with Prevailing Law

Due to the excellent reputation that Weener Group has established since its foundation, we were able to continuously improve our position on the world market.

For an internationally active corporate group such as ours, there is no question that we adhere to all applicable laws and regulations at national and international levels. This is the only way to maintain economic success in the long term.

We therefore demand that all executives know and adhere to the basic laws and regulations of the individual countries as well as the respective corporate rules. If some locations set stricter standards than the ones contained in this Code of Conduct, such stricter standards shall prevail on principle. In case of uncertainty about rules or laws, the legal department of the company must be consulted.

We strive to act in an honest and transparent manner when dealing with governments and authorities. This applies to all necessary and coincidental contacts with governments and authorities of any kind.

All employees are obliged to refer inquiries from authorities to management or their respective legal departments. If an employee responds to an inquiry from an authority according to prevailing law and if s/he answers the questions properly and correctly, s/he must not fear any consequences.

The reputation of the entire company can be seriously damaged even through supposedly minor violations of the law.

If an employee notices violations of the law of any kind, or if s/he is uncertain about the legal situation, s/he shall contact her/his superior, the human resources department, management or the legal department.

- Management (ph: +49 4951 306-220)
- Human Resources Department (ph: +49 4951 306-835)
- Legal Department (ph: +49 4951 306-219)
- Employee Council (ph: +49 4951 306-400)

Intercultural Cooperation

We protect and preserve the human rights and obligate ourselves to maintain moral principles for intercultural interaction at all locations of WEENER Group.

The foundation of our Code of Conduct is the "International Bill of Human Rights", a document recognised nearly everywhere in the world, which governs the standards of human interaction.

We consider the diversity and the various cultural backgrounds that our employees contribute to our company all over the world important assets, because they promote innovative power, creativity, tolerance and community within WEENER Group, and - last but not least - an understanding of the requirements and concerns of our international customers.

We therefore do not tolerate any kind of discrimination in our company. We expect that all 1,500 employees in all locations of WEENER Group interact in a respectful fashion. A good work environment improves productivity and therefore enhance our joint corporate success.

Of course, there is a strict prohibition of child labour in all production plants of WEENER Group.

Environmental Protection

We make sure that natural resources, such as energy, water, and materials, are used in a responsible and economical manner in the production of our products. We expect each individual employee of WEENER Group to act accordingly. This will ensure that the company can be managed in an economically efficient and future-oriented way.

Health and Occupational Safety

As a matter of course, we provide a risk-free and healthy work environment for our employees through adherence to the laws and regulations on occupational health and safety. Our high standards are subject to continuous analysis and further development. Supervisors are in charge of ensuring employees' health and safety and must take the necessary measures to restore safety standards or to improve them, if possible.

It is important that all company employees adhere to these standards. It is our objective to provide our customers with flawless and undamaged products at all times. Only this way can we avoid health risks to third parties, possibly significant economic loss and the loss of customer confidence. It is therefore essential that all employees strictly adhere to the laws and regulations on environmental protection and plant and occupational safety. Should problems or concerns arise, employees are requested to contact their superiors to allow for speedy remediation.

Global Thinking

Naturally, our Code of Conduct applies to all production plants and all companies of the WEENER Group worldwide. As a globally acting producer, we feel the responsibility to design all processes in our production plants and at our business partners' facilities in a socially acceptable manner. This also includes the adherence to social standards and the safeguarding of healthy framework conditions for all our employees.

Trusting Cooperation

Trust and Respect in the Company

One of our goals is the promotion of a pleasant and tolerant work environment for every employee. The work environment of all employees should be characterised by honesty, dignity and courtesy.

We therefore will not tolerate any discrimination against or bullying of colleagues, customers or suppliers. Any personnel-related decisions, such as hiring or promotions, must be free of discrimination. It is strictly forbidden to violate a person's dignity, be it verbally or physically.

We emphasise that the misconduct of an individual should not destroy the good working atmosphere of a whole department. We therefore would like to encourage all employees to utter even critical thoughts. By doing so, employees can contribute to avoiding misconduct, or recognising it at an earlier stage and stopping it.

Threatening employees who would like to report on misconduct in good faith with consequences or browbeating them is strictly forbidden and will not be tolerated.

Executives are held to listen to the concerns and issues of their employees at all times. They are required to investigate the concerns brought forward without prejudice and in a fair manner. If the employees have misgivings about contacting their superiors, they may also communicate their concerns to the employee council or the human resources department.

As everywhere else, it is possible that conflicts of interest arise in day-to-day business. Such conflicts can relate to professional, private or financial matters. This can result in wrong decisions being made with regards to WEENER Group. If employees find themselves in conflict of interest, they are obligated to report the situation to their superior or management without undue delay.

Data Privacy Protection

We guarantee the highest level of diligence and absolute confidentiality when handling our employees' personal data. Of course we adhere to all statutory regulations in the compilation, filing and transmission of personal data. All human resources staff are held to observe data privacy protection standards with diligence and accuracy.

Trusting Contact with Customers

It is our priority to improve our customers' success. We therefore endeavour every day to deliver to our customers the best-possible products and services in order to meet their high requirements. Each and every of our employees makes his or her personal contribution towards this goal.

Communication with our customers is characterised by honesty and transparency. We are always seeking trusting and fair dialogue.

We equally accept and respect our customers' independence and do not interfere with their procurement processes.

Trusting Contact with Suppliers

Business decisions are made on the basis of objective framework conditions, such as prices, corresponding quality and service standards, as well as integrity and reliability of the business partners.

We treat all of our business partners in a fair and respectful manner, and expect to be treated like this by our partners in return.

All employees are held to make business decisions for the benefit of the company. Individual personal, professional or financial interests that may affect business activity or disadvantage the company must be prevented. All decision-making processes must be based on factual considerations.

Dealing in our Competitive Environment

Our corporate policy is aimed at the promotion of fair competition. We strictly adhere to laws and regulations relating to competition and anti-trust legislation. Our competitive advantage lies in the quality and the benefits of our products and services, and we market these products and services in an honest and appropriate manner. We commit ourselves to honest, free and unbiased competition that values the laws and regulations of equity.

We do not enter into discussions with competitors where conditions, prices, price changes, discounts, sales volumes or margins, customers or markets are discussed. All of our business activities must adhere to prevailing competition and anti-trust laws in all aspects and all over the world.

In terms of fair competition, employees are forbidden to participate in such discussions or negotiations with co-competitors. If a competitor's employee should try to involve a WEENER Group employee in such a discussion, the WEENER Group employee shall inform her/his superior or management.

In light of the complexity of the competition and anti-trust laws, it is recommended that the legal department be informed in case of doubt.

Integrity – a Basic Value

Gifts meant to be bribes are neither accepted nor offered by us. This also applies to entertainment and amusements that exceed the limits of usual business activity.

All employees are forbidden to offer, present or receive gifts or other benefits for reasons of offering or receiving advantages. If an employee is made such an offer by a business partner, s/he is obligated to inform her/his superior immediately.

Exceptions are permitted only within the parameters of regular business contact. Business entertainment or gifts of small value are excluded, provided that any manipulation of business decisions is ruled out from the outset.

We strictly disapprove of and forbid the receipt or payment of money for the purpose of bribing. Non-compliance may lead to legal consequences.

Strictly forbidden is also the introduction of funds or other assets stemming directly or indirectly from criminal activities in the sense of

money laundering, e.g. by exchange or transfer, into the legal economic cycle. Non-compliance may lead to legal consequences for the employee.

Since we are not a political organisation, we also do not make contributions to parties or their political representatives. No holder of public office must be offered or granted any personal benefit of any kind.

Company Assets

Our company's tangible and intangible operating resources and assets serve our employees in the completion of their tasks and thus aid in the achievement of our corporate objectives.

Each employee is obligated to treat such operating resources and assets with care and diligence. Damaged, wasted or wrongfully used assets severely damage the company.

Operating resources, assets or facilities of WEENER Group must not be used for private purposes or removed from the company's premises without express permission of the competent department.

Protection of our Know How

The know-how and the internal information of WEENER Group must be protected. Our knowledge is our competitive advantage.

Although we generally promote information exchange and open communication, we respect the confidentiality and value of information. If an employee provides information to third parties, either knowingly or by accident, s/he may severely harm the company.

Employees in the possession of particularly confidential information or who those have access to such information must ensure the confidentiality of the information, also vis-à-vis their colleagues.

Confidential information includes, among other things, company secrets, copyrights and patents, marketing strategies and concepts, supplier data, customer data, price lists, information on production processes, technologies, developments and product innovations, prototypes, as well as the personal data of employees.

Data provided to us by our business partners as confidential information must be treated by employees like the confidential information of WEENER Group.

Each employee must ensure that electronic files and documents are protected from third-party access, for example, when leaving the workplace. Employees shall change their passwords on a regular basis and select them in accordance with the safety provisions. Confidential discussions and telephone calls must be carried out in a manner so as to prevent unauthorized persons from overhearing the content.

It is recommended that all employees forward media or third-party inquiries to management and not make any statements.

We Protect Resources

Our daily activities and the core of our strategies for the future of our business are characterised by maximal environmental sustainability across the entire lifecycle of our products and the responsible use of resources.

Economic issues rank behind the protection of human health and the environment in our company.

Our employees' are instructed to preserve our natural resources by using them efficiently and thoughtfully. If possible, the use of water and energy should be reduced. In addition, employees are responsible for seeing that emissions, noise and odours are prevented and the smallest-possible amount of waste is produced.

Our process engineers and engineers are encouraged to develop new technologies and processes to minimise the use of natural resources and raw materials and to consider the use of renewable energies.

As a company acting on the world market and employing 1,500 people worldwide, we feel a significant social responsibility.

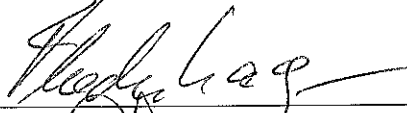
We want to live up to this responsibility and therefore we pledge:
Our words shall be consistent with our actions – any time and any place.

Weener, November 2013

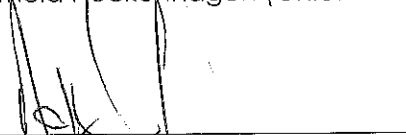
Board of Directors of WEENER Plastik GmbH



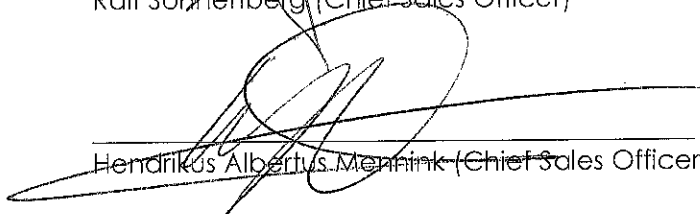
Roelof Wiebe Zeevat (Chief Executive Officer)



Gerhold Fockenhagen (Chief Technical Officer)



Ralf Sonnenberg (Chief Sales Officer)



Hendrikus Albertus Menpink (Chief Sales Officer)