

# Code of Conduct for Suppliers and Business Partners



# Foreword

Ladies and Gentlemen,

Greiner AG has stood for sustainable, long-term business activities for 150 years now. We recognize that, as a globally operating company, we have a great responsibility toward our employees, the environment, society, and our shareholders. For this reason, we have committed ourselves to upholding ethical and sustainable practices in everything we do as a company. This applies to our relationship with our suppliers and business partners in particular.

Greiner AG considers sustainability within the supply chain to be an important component of our corporate responsibility. We believe that sustainability extends across the entire process of procuring materials, products, and services. To ensure that we are pursuing an integrated approach, sustainability criteria such as environmental protection, occupational safety, and respect for human rights are also taken into account in the selection, assessment, and development of our suppliers.

Against this background, we at Greiner AG have developed this Code of Conduct, which establishes nonnegotiable minimum standards and serves as the foundation for our relationships with our suppliers and business partners. By establishing this Code of Conduct, we want to shoulder our responsibility for people and the environment and ensure that our actions and the activities of our suppliers and business partners are ethical, environmentally sustainable, and socially acceptable.



Axel Kühner  
CEO Greiner AG



Hannes Moser  
CFO Greiner AG



Manfred Stanek  
COO Greiner AG

# The Three Pillars of the Greiner Code of Conduct

The Greiner Code of Conduct for Suppliers and Business Partners is based on social, environmental and ethical policies and principles.

## Social Policies and Principles

### Human Rights

Suppliers are obligated to respect and comply with applicable local labor law, the UK Modern Slavery Act, and ILO standards (ILO Library Resources – International Labour Standards – ILO Research Guides at International Labour Organization), internationally recognized labor standards, and human rights for all their employees and contracted labor, ensuring they are being treated fairly with dignity and respect. Among other requirements, this means that our suppliers and business partners are committed to not use forced, bonded or child labor. At a minimum, our suppliers and business partners shall observe Convention 138 (Minimum Age), Convention 182 (Worst Forms of Child Labor), and Convention 105 (Abolition of Forced Labor) of the International Labor Organization (ILO).

Business partners must ensure no form of bonded labor is used and that employment is on the basis of free will.

### Equal Opportunities and Nondiscrimination

We expect our suppliers and business partners to promote equal opportunities and equal treatment and prevent discrimination in the recruitment of personnel, promotions, and the provision of training and further education. No employee may face any disadvantage due to their gender, age, skin color, culture, ethnic origin, sexual orientation, political views, disability, religious affiliation, or ideology. Our suppliers and business partners must observe Convention 111 of the International Labour Organization (ILO) pertaining to Discrimination (Employment and Occupation).

### Freedom of Association

We expect our suppliers and business partners to respect the right of their employees to freedom of association and collective bargaining. Employee representatives must not be subjected to discrimination or termination of contract in retaliation for exercising employee rights, submitting grievances, participating in union activities, or reporting suspected legal violations. Our suppliers and business partners must observe Convention 87 (Freedom of Association) and Convention 98 (Right to Organize and Collective Bargaining) of the International Labour Organization (ILO).

### Health and Safety in the Workplace

We expect our suppliers and business partners to comply with the respective applicable legal requirements regarding health and safety in the workplace in order to protect the safety and health of their employees. Suppliers and business partners should follow internationally recognized standards, actively work to identify and resolve safety deficiencies, and continually improve conditions in the workplace so that health and safety are guaranteed and protected. This includes:

- identifying, assessing, and addressing health and safety issues, risks, and impacts in their current and future operations and
- defining ambitious health and safety goals or adopting standards emphasizing that no task is important enough to put anyone's health or safety at risk.

## Minimum Wage and Working Hours

We expect our suppliers and business partners to pursue a fair remuneration policy that takes into account all local laws governing labor and pay. If legal or collective bargaining regulations do not exist, wages and benefits shall be based on industry-specific, contractually negotiated remuneration and benefits that are typical for the respective location and ensure an appropriate standard of living for the employees and their families. Our suppliers and business partners must comply with Convention 100 (Equal Remuneration) of the International Labour Organization (ILO).

# Environmental Policies and Principles

## Environmental Protection

We expect our suppliers and business partners to adopt measures to ensure that the environment is treated in a responsible manner. They should strive to develop and disseminate environmentally friendly technologies. We require that the respective applicable national laws, regulations, and standards pertaining to the environment are upheld. In the development and manufacturing of products, in their utilization phase, and in other activities, provision must be made for the minimization of greenhouse gas emissions, the use of renewable resources, and the minimization of harm to health and the environment (such as the pollution of air, water and soil, negative impacts on biodiversity and deforestation). Additionally, suppliers agree to manage transport efficiently to reduce risk, cost, and environmental impact.

## Energy and Resource Efficiency

We expect our suppliers and business partners to use natural resources sparingly and to reduce environmental impacts in the air, on land, and in the water. Our suppliers and business partners shall contribute to reducing energy consumption and greenhouse gas emissions.

## Waste and Recycling

We expect our suppliers and business partners to consider the prevention of waste as well as the reuse, recycling, and safe, environmentally friendly disposal of remaining waste in the development and manufacturing of products, in their utilization phase, and in other activities.

## Conflict Materials

Our suppliers and business partners have to ensure that their products use no raw materials that are cultivated or mined in conflict or high-risk zones or that finance armed groups that violate human rights. In addition, we ask our suppliers to follow Commission Recommendation (EU) 2018/1149 for the identification of conflict-affected and high-risk areas and other supply chain risks and due diligence obligations under Regulation (EU) 2017/821 of the European Parliament and of the Council, the OECD due diligence guidance for responsible supply chains of minerals from conflict-affected and high-risk areas and Section 1502 of the Dodd-Frank Act on requiring responsible minerals sourcing where applicable.

We commit ourselves to responsible sourcing by preferencing EcoVadis-certified suppliers and recycled products where practically possible and economically feasible.

## Chemicals

We expect our suppliers and business partners to register chemical substances in a central database maintained by the REACH (Registration, Evaluation, Authorisation and Chemicals) authority if they produce or import these substances in or into the EU in quantities greater than one metric ton per year.

## Product Safety

We expect our suppliers and business partners to observe all respective applicable legal requirements and provisions pertaining to product safety, in particular the legal requirements regarding the safety, labeling, and packaging of products as well as the use of hazardous substances and mate-

rials. Our suppliers and business partners shall share their knowledge and expertise with customers, their own suppliers, and third parties and take a transparent and proactive approach to providing Greiner with information regarding the environmental and safety aspects of their products.

## Ethical Policies and Principles

### Legal Requirements

We expect our suppliers and business partners to conduct themselves in an ethical and fair manner when operating their businesses, to observe all international, national, and local laws and regulations applicable to their business activities, and to obtain all necessary permits. These requirements cover different aspects like environmental issues (e.g. compliance with applicable land, forest and water rights and waste regulations or the avoidance of forced eviction) but also social (e.g. human rights, social standards, health & safety) and ethical (e.g. corruption, bribery, fair competition) aspects as outlined in this policy.

### Corruption

We expect our suppliers and business partners to respect, support, and observe national and international efforts (such as the conventions of the United Nations (UN), the Organisation for Economic Co-operation and Development (OECD), and the UK Bribery Act 2010). In particular, they shall ensure that their employees, subcontractors, and representatives do not pay, offer, or accept any bribes, kick-backs, improper donations, or other improper payments or advantages to or from customers, public officials, or other third parties.

### Bribery

We expect our suppliers and business partners not to misuse invitations or gifts to influence others. The same applies to Greiner employees. Invitations and gifts are only to be given when the occasion and scale are appropriate; i.e., they are of insignificant monetary value and are considered a business practice that is generally acceptable in the respective location. Likewise, suppliers and business partners shall not request or accept inappropriate advantages of this kind.

### Money Laundering

We expect our suppliers and business partners to observe the relevant legal obligations regarding the prevention of money laundering and not to participate in money laundering activities. Our suppliers and business partners shall only conduct business relationships with business partners of whose integrity they are convinced.

### Import and Export Controls

We expect our suppliers and business partners to comply with all the respective applicable laws pertaining to the import and export of goods, services, and information. Our suppliers and business partners shall respect any applicable trade restrictions, embargoes, and other restrictions.

### Competition

We expect our suppliers and business partners to conduct themselves fairly in the competitive environment and to observe the applicable antitrust laws. Our suppliers and business partners shall not enter into agreements with competitors in violation of antitrust laws, nor shall they take improper advantage of any potential market-dominating position.

### Conflicts of Interest

We expect our suppliers and business partners to make their decisions solely on the basis of objective criteria and not to allow themselves to be influenced by personal interests or relationships.

## Data, Commercial Secrets, and Company Assets

We expect our suppliers and business partners to observe all respective applicable laws intended to protect the personal data of employees, customers, suppliers, and other affected parties. Furthermore, expertise, patents, company and commercial secrets belonging to Greiner or third parties must be respected. Suppliers and business partners shall not pass such information on to third parties without Greiner's express written consent. We expect our suppliers and business partners to publish their business data and reports regarding their business activities truthfully and in accordance with the respective applicable laws.

Suppliers commit to data protection and privacy and shall ensure proper technical and organizational measures to protect data and privacy.

## Transparency & Traceability

We expect our suppliers to establish adequate processes to follow and document its their own supply chains if practically possible, economically feasible and especially when it is requested by Greiner. In addition, the supplier shall ensure that any subcontractor/supplier subcontractors being part of the supply chain relevant to the contractual relationship also obeys the values and standards highlighted in this policy. Our goal is to work with our suppliers to create the greatest possible transparency and traceability, and to actively address and mitigate supply chain risks.

# Scope of Application

We, Greiner AG, expect our suppliers and business partners as well as their employees to act responsibly, observe this Code of Conduct, and perform their work in accordance with the guidelines and principles contained herein. If the suppliers or business partners hire third parties (such as subcontractors or representatives) within the scope of their business relationships, Greiner expects these third parties to also perform their work in accordance with the fundamental principles specified in this Code of Conduct. Greiner reserves the right to carry out on-site inspections to ensure that the defined requirements are being observed by the supplier or business partner on a case-by-case basis. Such inspections will be carried out by Greiner itself or by external partners, following prior notification and in the presence of representatives of the supplier or business partner.

# Consequences of Violations

In the event of violations of this Code of Conduct, the supplier or business partner is obliged to report these to Greiner. If a supplier or business partner does not observe the fundamental principles defined in this Code of Conduct, Greiner is entitled to terminate the business relationship with the respective supplier or business partner for exceptional reasons.

# Reporting Violations

We at Greiner AG strive to live by our values and conduct ourselves in keeping with the highest legal and ethical standards. We expect the same from our suppliers and business partners. If you are aware or learn of any violations of this Code of Conduct, you can report these anonymously via our TellGreiner platform: <https://tell-greiner.com/Home/Start>

## Confirmation on the Part of the Supplier or Business Partner

We hereby confirm that we have received and understood the Greiner Code of Conduct for Suppliers and Business Partners. We further guarantee that all of our activities are carried out in accordance with the contents of the current version of the Greiner Code of Conduct for Suppliers and Business Partners available on (<https://sustainability.greiner.com/en/suppliers/>).

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Company name

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Name and role

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DUNS number

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Company register number, if a company register exists

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Date and location

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Signature



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