

Dear employees,

In 1894, our founder Friedrich Sanner laid the foundation for the company by establishing a production facility for wine corks, followed later by corks for pharmaceutical glass bottles. At that time, the company also began to enshrine its guiding principles, with an emphasis on sustainable processes, be it with regard to products, resources, customers or employees. Today's shareholders and management take this responsibility very seriously, and sustainability is now practised comprehensively throughout the group in the context of ESG (environment, social responsibility and governance).

One aspect of this commitment is quality assurance, as reflected in our ISO 50001 certification. It also includes the introduction of new sustainable products, such as Sanner BioBase, as well as the way we interact with each other, which is anchored in the Sanner culture and based on the principles of respect, tolerance and care.

Our Code of Conduct (CoC) outlines our approach to sustainability in dealing with our business partners. It is a set of rules that we have laid down for the entire organisation, which also governs our relationships with suppliers and customers. The Sanner CoC complies with all statutory requirements, but also reflects our commitment to honest, sustainable and ethical behaviour.

At a time of political, economic and social uncertainty, it is important to us as an international company to define and adhere to uniform principles of conduct, which shape our actions in our day-to-day work as well as in critical situations. Adherence to our Code of Conduct helps us to make the right decisions, comply with applicable laws and strengthen the trust of our business partners in our company. In doing so, Sanner remains true to the principles of its founder and protects its reputation in the market.

We thank you for your support in this regard.



Hans-Willem van Vliet

Managing Director/CEO of the Sanner Group

Code of Conduct Sanner Group

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Preamble

The Sanner Group Code of Conduct defines how we, that is, the management, executives and each individual employee, aim to conduct ourselves within the company as well as externally in our daily work, at all times and in all places. We hereby assume responsibility for our company.

The principles of this Code of Conduct identify potential areas of risk and conflict and outline how we handle them. As such, it serves as rulebook for our day-to-day work. It is supplemented by internal guidelines and regulations, as well as by contractual agreements. In addition, we act in compliance with all national and international laws and regulations. Violations of the Code of Conduct will not be tolerated.

It is therefore the responsibility of each individual to familiarise themselves with the content of the Sanner Group Code of Conduct in order to meet our shared responsibility with regard to sustainability, social interactions, respect for human rights, fair business practices and legal requirements.



Our responsibility in our interactions with each other

Lawful conduct

At SANNER, one of the fundamental principles is compliance with the applicable laws and regulations. All employees must comply with these laws and regulations, the Code of Conduct and the currently valid corporate rules and policies of Sanner. Violations should be avoided at all costs and will be consistently investigated and sanctioned by Sanner.

Respect, honesty & integrity

At Sanner, our conduct is based on universal values and principles, in particular those of respect, honesty and integrity.

Sanner is committed to sound and recognised business practices. In doing so, we base our decisions concerning employees and business partners exclusively on appropriate and objective considerations.

Recognition & Consideration

All employees have a responsibility to comply with the principles enshrined in our Code of Conduct.

Managers always act as role models and trustworthy interlocutors for their employees. In addition, as part of their management responsibilities, they ensure that the applicable laws and regulations, the Code of Conduct and Sanner's rules and policies are disseminated, monitored and adhered to by their employees



Our responsibility to people

Sanner is committed to protecting human rights in accordance with the United Nations Universal Declaration of Human Rights. In this context, we undertake to uphold internationally recognised labour and social standards. Our aim is to value all employees equally and to support them in achieving their personal potential.

Employee Rights

We recognise and respect the right of our employees to freedom of association, assembly and collective bargaining – insofar as this is legally permissible and possible in the respective country. We neither favour nor discriminate against members of workers' organisations or trade unions.

Freedom of opinion

We will protect and uphold the freedom of expression and opinion of all employees.

Remuneration & working hours

Sanner acts in compliance with the applicable laws and regulations on compensation and ensures that employees are adequately remunerated. We comply with the applicable rules for the protection of workers and the regulations on working hours worldwide.

Employee development & non-discrimination

At Sanner, we value and welcome differences among people, cultures, opinions and perspectives. That is why we require and encourage the creation of interdisciplinary and intercultural success teams, bringing colleagues from different hierarchical levels and genders together. We cooperate in building a global culture of diversity in which our employees feel integrated.

This is also why any form of discrimination, harassment or insult will not be tolerated at Sanner under any circumstances.

All employees have the right to be treated fairly, courteously and respectfully by their managers and colleagues. We thus expect all our employees to respect the privacy as well as the personal rights of other individuals. Sexual harassment and bullying, discrimination or insults will not be tolerated and will result in disciplinary action.

Prohibition of child & forced labour

It is not permissible to force anyone or employee any person against their will.

Sanner complies with the prohibition of child labour in accordance with the standards of the International Labour Organization (ILO) and rejects all forms of child labour, forced labour, slavery and practices similar to slavery, human trafficking, as well as the use, procurement or offering of illicit activities.

Health & Safety

In our business activities and in our relationships with our suppliers, we maintain high standards of health and safety, which also helps us to maintain the trust of our employees, business partners and other stakeholders. In this regard, we take a wide range of measures to continuously improve the health, performance and occupational safety of our employees.

At Sanner, we work continuously to prevent accidents and injuries. Furthermore, we take protective measures to avoid exposure to chemical, physical or biological substances.

In doing so, we not only ensure compliance with the applicable laws and regulations, but also create a culture in which every individual bears the responsibility to minimise risks and promote safe work practices. This also includes regular employee training to ensure occupational safety, improve risk awareness and promote a culture of safety.

Promoting Responsible Supply Chains

In accordance with the Guiding Principles of the Organisation for Economic Co-operation and Development (OECD), Sanner takes care to ensure that no minerals are sourced from conflict and high-risk areas whose extraction would contribute to the financing of armed conflicts or be carried out in violation of the human rights of mine workers.



Our responsibility to the environment

For Sanner, the protection of the environment and the conservation and efficient use of resources, as well as the use of secondary raw materials where possible, are corporate goals of high priority.

This is a matter of social responsibility. At a time when resources are being rapidly depleted and the environment is in serious danger, we strive to find ways to use resources responsibly. Where possible, this includes, in particular, the use of energy-efficient, climate-neutral and environmentally friendly technologies and the reduction of waste and our emissions to air, water, soil and through noise.



Our responsibility as a business partner

In accordance with our value system, which determines and guides the entrepreneurial work and actions of Sanner, we always act as an integral business partner, drive innovation and thus create value for our customers.

Fair competition

All employees are obliged to comply with the rules of fair competition. Entering into any anti-competitive agreements with competitors, in particular to fix prices, agree on offers, set production limits or quotas, or divide up customers or markets, is not permitted.

As a rule, the exchange of market-sensitive, non-public information with competitors is also prohibited.

Prevention of corruption

Sanner rejects any form of corruption. This applies in relation to individuals, companies as well as authorities and other institutions.

Invitations, gifts and other benefits exceeding a symbolic value and the limits of what is appropriate are to be politely but firmly declined.

Orders or consultancy contracts may not be abused to give unjustified advantages to public officials, employees of business partners or their relatives or business associates. Individuals acting on behalf of Sanner will be remunerated appropriately, in proportion to the service provided and only in return for legitimate services.

Conflicts of interest

Employees may not pursue business activities or personal interests that conflict with the legitimate interests of Sanner.

Conflicts of interest may arise in particular if employees have private (business) relationships with business partners of Sanner or their employees or are themselves involved in a company with which Sanner has a business relationship.

Sanner employees may not work for or manage a company that competes with Sanner or engage in activities that would put them in competition with Sanner.

Anti-money laundering & terrorist financing

Sanner only conducts business activities with reputable business partners who have been vetted in advance, comply with anti-money laundering and counter-terrorist financing regulations and laws, and obtain their resources from legitimate sources.

Export control & customs

Sanner complies with export control and customs regulations in the countries where we do business. All employees involved in the import and export of goods, services, software or technology must comply with these regulations.

Product compliance

Sanner manufactures innovative, high-quality products. It therefore goes without saying that our products comply with the applicable laws and regulations as well as the quality requirements of our customers.

From the product development stage onwards, we focus on environmentally friendly design, technical safety and health protection.

Through their expertise and candour, all employees help to ensure that Sanner lives up to this responsibility.



Our responsibility for information

In a digital society, it is an essential part of our business to handle information of any kind in a responsible manner.

Data protection

Sanner only collects, processes or uses personal data insofar as this is necessary for specific, unambiguous and lawful purposes. Furthermore, we store personal data in accordance with the state of the art and only transmit them using secure means of communication in compliance with the law.

We use data in a way that is transparent for the data subjects while respecting their rights to information and, if applicable, their rights to object to the use of their data, block their data and delete their data.

Information security

Protecting Sanner's internal information and trade secrets – including those of our business partners – is critical to Sanner's success and continued existence.

To ensure that information is handled in a security-conscious manner, we have implemented organisational, technical and legal safeguards that all employees must adhere to in their areas of responsibility in order to guarantee an appropriate level of information security at Sanner.

Cyber Security

In an environment of ever-changing cyber threats, it is of great importance to safeguard the confidentiality, availability and integrity of computer systems and networks and the information they contain, as well as to protect production facilities. The measures implemented at Sanner for this purpose are based on the requirements of ISO 27001. To ensure that they are effective, all employees must actively support cybersecurity with their own security-conscious behaviour.

Our responsibility for compliance

If there is any doubt as to whether your actions or the actions of third parties comply with applicable regulations and laws, the Code of Conduct or other Sanner company regulations, Sanner executives, management, works council and site managers are available as contact persons.

Possible compliance violations can also be reported confidentially via the Sanner Whistleblower System. You can also report these directly to Sanner via the following email address: Compliance@sanner-group.com



The responsibilities of our business partners

With this Code of Conduct, Sanner has set itself important goals – and we expect the same from our business partners. In particular, we want to engage with our suppliers to achieve these goals and are working with them to improve sustainability performance.

Scope & implementation

This Code of Conduct applies to all Sanner employees worldwide. Rules and policies within the Group can substantiate this, provided that they do not contradict the basic principles it contains.

As a responsible company, Sanner actively promotes the observance of and compliance with the aforementioned principles.

This Code of Conduct is regularly reviewed for accuracy and relevance. Changes must be approved by Sanner's management.