

Preamble

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 conduct.

The principles of this Code of Conduct identify potential areas of risk and conflict and specify how we handle them. As such, it serves as a rulebook for our day-to-day work. It is supplemented by internal guidelines and policies, as well as by contractual agreements. In addition, we comply 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. In doing so, Sanner remains true to the principles of its founder and protects its reputation in the market.

Thank you very much!



Hans-Willem van Vliet

Managing Director/CEO of the Sanner Group

Responsibility to people

We are 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. This includes the following principles:

Human rights & non-discrimination

- Treating employees with respect and creating a workplace free from harassment, abuse and discrimination of any kind;
- Recognising employees' rights to organise and bargain collectively within the limits permitted by law;
- Complying with minimum wages and working hours in accordance with local laws and/or the minimum standards of the respective national economic sectors while observing the relevant ILO standards;
- Prohibiting the use of child and forced labour, any form of modern slavery and human trafficking, as well as the use, procurement or offering of illicit activities;
- Respecting the right to freedom of expression;
- Ensuring due diligence to promote responsible supply chains for minerals from conflict and high-risk areas in accordance with the OECD Guiding Principles.

Health & safety

- Reducing the incidence of occupational accidents and illnesses by establishing and maintaining appropriate safety standards;
- Conducting regular training of employees to safeguard occupational safety and improve risk awareness.

Environmental responsibility

We are committed to taking reasonable precautions for the environment as part of our business activities. This includes the following principles:

- The efficient use of resources and the use of secondary raw materials wherever possible, as well as the use of energy-efficient, climate-neutral and environmentally friendly technologies;
- Conservation and promotion of biodiversity;
- Ending or restricting the production, use or release of persistent organic pollutants;

- The classification and labelling of the hazard characteristics of substances and mixtures to enable the safe use of chemicals;
- The appropriate disposal, control and treatment of
 - waste, including compliance with prohibitions on the export of hazardous waste,
 - waste water,
 - emissions,
 - chemicals, or
 - other materials with potentially adverse effects on human health or the environment

prior to their release. This also includes the reduction of waste and emissions, as well as compliance with restrictions on the handling of products containing mercury.

Responsibility as a business partner

We are committed to fair competitive practices and a fair business relationship with Sanner. To this end, we agree to adhere to the following principles:

- The prohibition of any kind of corruption, extortion, embezzlement, misappropriation, money laundering and financing of terrorism;
- Respect for the applicable regulations under competition law;
- Compliance with the applicable customs and export regulations and sanctions;
- Confidentiality and protection of personal data, as well as of Sanner's confidential information and trade secrets;
- The obligation to inform Sanner of any situation that may give rise to a conflict of interest in the context of the business relationship;
- The obligation to supply products that comply with the applicable laws and regulations, as well as with Sanner's quality standards.

Responsibility for compliance

We are committed to ensuring that these principles, as well as applicable regulations and laws, are adhered to in a responsible manner. This includes having an effective whistleblowing system in place, either in-house or externally, so that violations of these principles and the associated risks can be brought to our attention.

Within the framework of our responsibility to maintain a supply chain based on integrity and trust, the companies involved in the supply chain, their employees and other third parties may also turn

to Sanner's whistleblowing system at any time in the event of possible compliance violations. (Whistleblowing system)

Sanner will review this Code of Conduct regularly and make changes, as necessary. Important amendments will be communicated to the suppliers. Since cooperation based on integrity and trust is of great importance to Sanner, we will support our suppliers in fulfilling the due diligence obligations contained in this Code of Conduct, if required.

In addition, in order to ensure compliance with its own due diligence obligations, Sanner may use appropriate means to verify the supplier's compliance with this Code of Conduct. As part of such an audit, the supplier shall provide Sanner with access to all necessary data and information relating to the implementation of this Code of Conduct.

In we become aware of a suspected breach of this Code of Conduct, we undertake to investigate the matter accordingly. In the event of suspected violations, Sanner may also conduct its own investigations with the support of the supplier. In the case of a breach of this Code of Conduct and the principles it contains, Sanner also reserves the right to take appropriate legal action.

We undertake to communicate the contents of this Code of Conduct to our employees, agents and subcontractors in an appropriate manner.

If you suspect any violations of the Sanner Code of Conduct, please contact us at the following email address: