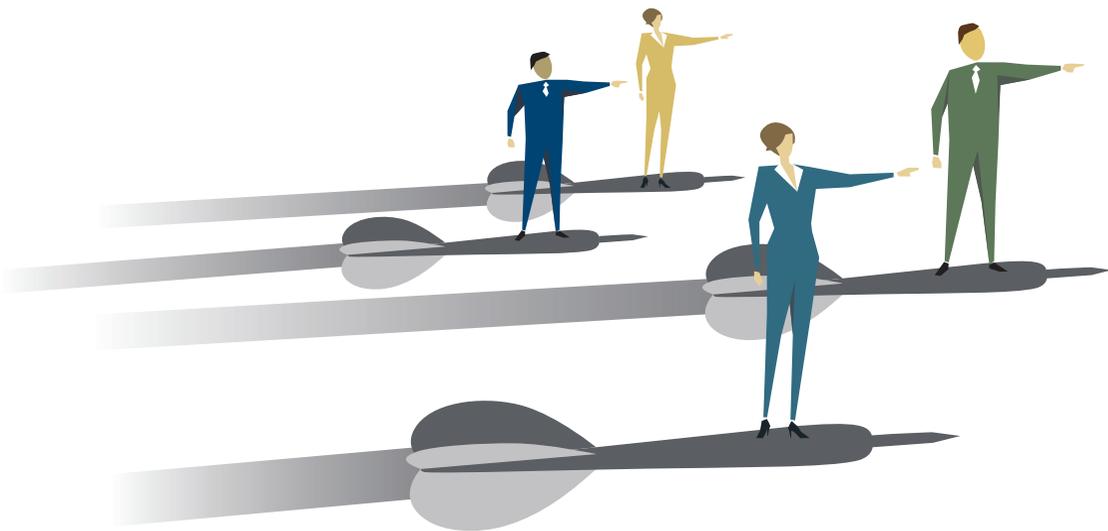




**ONE GROUP**

**ONE CODE OF CONDUCT**

**B** *e correct*



**BRÜCKNER  
MASCHINENBAU** 

Brückner Maschinenbau offers innovative technologies and services for manufacturing stretched plastic films for high-quality packaging materials and technical fields of application.

**BRÜCKNER  
SERVTEC** 

Brückner Servtec is your partner over the entire production facility lifecycle, offering service and upgrades and providing solutions for boosting productivity, enhancing film quality and producing new products.

**KIEFEL  
TECHNOLOGIES** 

Kiefel is the technology partner when it comes to designing and producing machines used to process plastic films in the automotive, refrigeration, medical technology and packaging industries.

**PACKSYS  
GLOBAL** 

PackSys Global has 40 years of experience and expertise in integrating innovative Swiss technology and mechanical precision into state-of-the-art packaging equipment.



To All Members of the Brückner Group:

Compliance with applicable laws, responsible conduct, and ethical behavior toward one another and our business partners are all integral parts of our value system. Each and every one of us, from the executive management to managers and employees, lives by these values and is guided by them in his or her actions. Legally compliant conduct is a top priority for us. That applies to our executive management, managers, and employees alike – everywhere and at all times.

We operate in various countries and in different lines of business. All of us want to achieve great things, and we believe the path we take to get there is just as important as the final outcome. Our shared Code of Conduct offers guidance along the way. It sets out our fundamental values in concrete form. Our Code of Conduct is the centerpiece of our corporate culture and our internal compass. It gives us guidelines that we use to make decisions and take action according to the same standards all over the world.

This Code of Conduct is an expression of our ethical and social responsibilities. It sets out minimum standards for our actions within society at large, regardless of the area in which we work. It is binding on each and every one of us.

The Code of Conduct forms the basis of our shared corporate culture. It shows what we stand for.

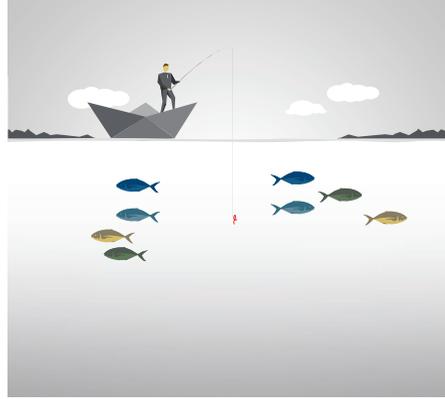
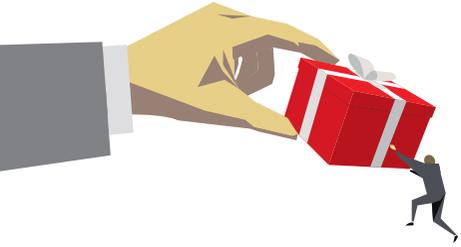
By observing the rules laid out in this Code of Conduct, we can help maintain the trust our customers and business partners place in the Brückner Group while also safeguarding the economic success and continuity of all the companies in the Brückner Group.

We ask you – our employees, managers, and members of executive management teams – to familiarize yourselves with the content of this Code of Conduct and observe it as binding guidance in your day-to-day actions.

  
Dr. Axel von Wiedersperg

  
Maximilian Schneider

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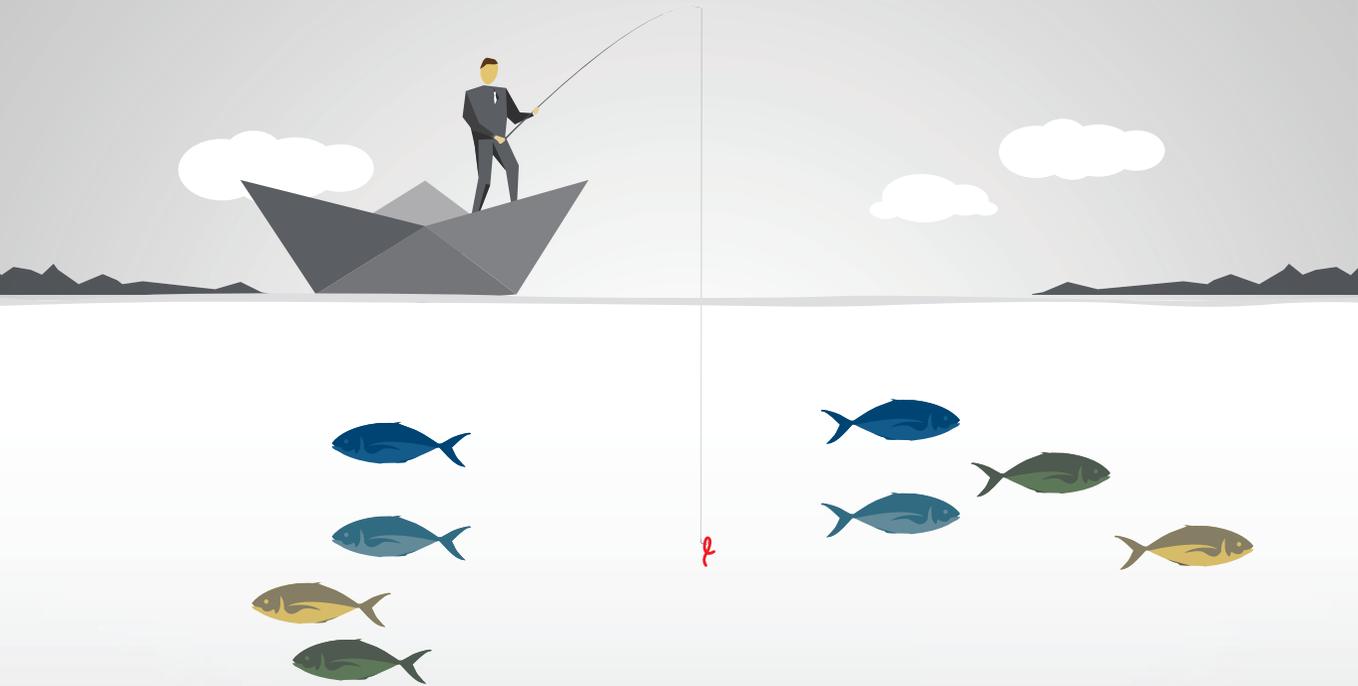
“The people who work together within the Brückner Group are the cornerstone of our success. We view all people as equal, and we respect them equally. To uphold these values, we respect and promote the rules on human rights and social and labor standards.”



## 1. Social responsibility

We believe it is crucial to safeguard human rights and protect minorities. We do not want to achieve business success unless it is in line with the human rights recognized by the international community. To us, it is the individual who counts, not his or her nationality, ethnic origin, gender, skin color, family or marital status, age, disability, religion, beliefs or sexual orientation. That is why when we work together with others, both within the Brückner Group and with our business partners, we uphold human rights as fundamental standards that apply to everyone. We always bear in mind how our actions may affect human rights and what we can do to help make sure these rights are safeguarded. We strive to ensure equality of opportunity in the labor market and cultivate an atmosphere of diversity and tolerance, since our diverse team forms the basis for our achievements. All of us want a safe, healthy work environment, which is why we implement all of the applicable accident prevention regulations as a matter of course, relying on local laws and regulations as minimum standards. We ensure fair pay and take care to make certain that working hours do not exceed the maximum permitted under the applicable laws and regulations.

- We do not discriminate against anyone based on ethnic origin, gender, religion or beliefs, disability status, age, sexual identity or other factors.
- We always treat all colleagues and business partners fairly, professionally and with respect.
- We are committed to diversity and equal opportunity.
- All of us work together in a spirit of mutual trust to achieve these aims.
- We adhere to all legal and technical requirements for safety in the workplace.



” *The quality of our products is the key to our success. Our relationships with business partners are founded on respect and integrity. We are committed to fighting corruption in any and all forms, including the provision or acceptance of direct or indirect benefits by third parties who support our sales and distribution activities.* ”

## 2. Prohibition of corruption

We are committed to free, fair competition in which those with the best products and services are the winners. Corruption causes decisions to be made for inappropriate reasons. It stands in the way of progress and innovation, and distorts competition. This is why bribing public officials and employees of businesses as well as taking bribes are punishable all over the world as criminal acts. Corruption also runs counter to our fundamental understanding of who we are. The Brückner Group stands out for the superior quality of its machines and services and for its employees' extraordinary expertise and dedication, and it competes fairly on the global markets.

Beyond that, we are also aware that working with third parties who support our sales and distribution activities carries the risk that these parties will unfairly influence our business partners and use the compensation paid to them for corrupt purposes. With this in mind, we are extremely conscientious and careful when working with consultants and intermediaries. We do not want potential legal violations committed by third-party intermediaries to tarnish our company's reputation – or, worse, expose us to liability. For further details on working with consultants and intermediaries, please see the guideline titled “Consultancy and Agency Agreements in Sales and Marketing.”

- We make business decisions exclusively based on objective criteria, such as price, quality, reliability and cost.
- We do not provide or accept any benefits of a tangible or intangible nature that could in turn create the impression of dishonest preferential treatment in our business dealings.
- We do not pay any bribes, including those in the guise of payments to “facilitate” or “expedite” official acts (when dealing with customs or entering another country, for example).
- We do not provide any benefits, tangible or intangible, to public officials.

### 3. Gifts and invitations

Gifts and invitations are common parts of business life. If these perquisites stay within reasonable limits, they are viewed as permissible ways of cultivating customer relationships, and there is no reason for concern. We are always aware that perquisites like these can be viewed as bribes if they overstep reasonable bounds and are intended to influence a business partner. We make certain that delegation visits and plant tours are always organized as business events and take place under appropriate conditions. We take special care to examine our behavior where there are multiple gifts or invitations or where the timing coincides with the finalization of a contract.

For further details regarding gifts and invitations, please see the guideline titled “Gifts and Invitations.”

- We ensure that the perquisites that we grant and accept stay within reasonable limits and merely represent gestures of appreciation.
- We examine all of our conduct closely with an eye to whether perquisites could give rise to a conflict of interest. In the process, we look at how often we grant perquisites, whether they are customary in the social setting, and whether the timing coincides directly with plans to finalize a contract in the immediate future.



“We do not grant or accept gifts and invitations except within moderate and reasonable limits, and we ensure that any such gifts and invitations are only made for permissible purposes of cultivating customer relationships and do not exert any undue influence over the recipient.”

*“We make our business decisions exclusively based on objective criteria. We do not allow ourselves to be guided by personal interests or relationships.”*



## 4. Transparency and openness in case of conflicts of interest

Ensuring that members of the executive management and employees alike do not face conflicts of interest or divided loyalties is important to us. We are aware that some situations may involve competing or conflicting interests. In cases like these, personal interests may conflict with those of the Brückner Group. These kinds of conflicts can arise from family relationships, partnerships, business interests, and investments. They can also be the product of side jobs and similar activities outside a person's employment with the Brückner Group. Conflicts of interest do not in themselves represent misconduct, and they are not unusual. What counts is how we deal with them. Our working relationships are founded on mutual trust and on efforts to meet our customers' requirements. Our work should always be geared toward securing the success of the Brückner Group. With that in mind, we always prioritize benefits to the Brückner Group over personal benefits, and we are open and transparent in our dealings with possible conflicts of interest.

- We are aware that conflicts of interest can arise.
- We do not allow our decisions to be influenced by personal interests or relationships.
- We avoid risks by disclosing possible conflicts of interest early on and avoiding them from the outset.
- We report any and all side jobs and similar activities and obtain permission for these when necessary.

## 5. Sponsoring and donations

Our economic success allows us to donate to non-profit organizations and to provide support, including financing, for research and development activities conducted by institutions and associations. We give back on our own initiative and without requesting or expecting anything in return.

We do expect something in return for our sponsoring activities, but always in proportion to the measures undertaken. The goal of our sponsoring activities is to raise our company's profile and enhance our public image.

- We donate voluntarily and without anything in return.
- All of our donations and sponsoring activities are subject to a transparent approval process.

*“We make sure our donation and sponsoring activities are transparent.”*



## 6. Prohibition of money laundering

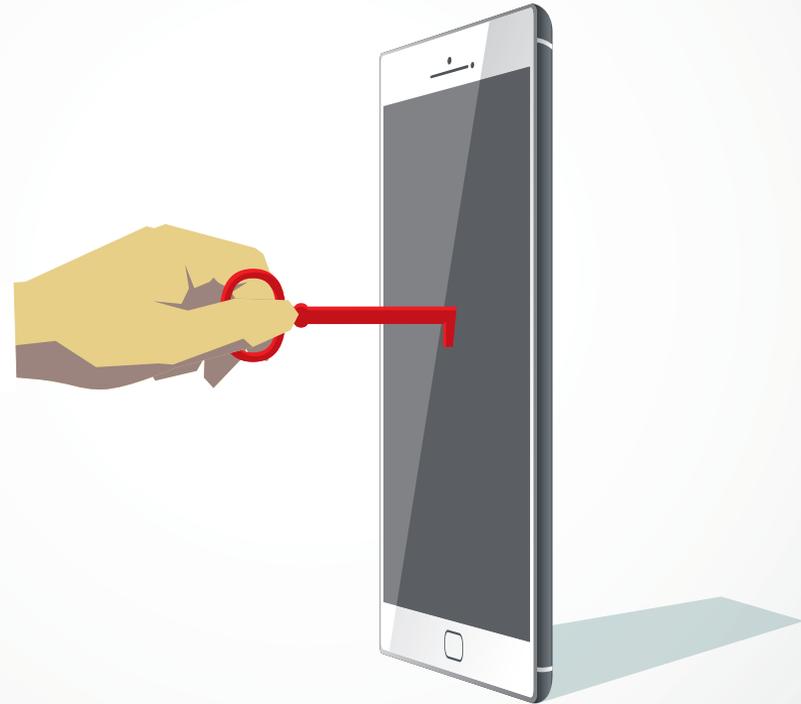
Our company policy is not to do any business with persons or organizations involved in criminal or illegal activities. Money laundering serves to legalize assets that have been obtained illegally, especially money. Funds obtained through criminal activity are put into circulation in the normal economy to make them seem legal. In many cases, companies like the Brückner Group are used as a screen to do this, making these companies unwitting accessories to money laundering. One especially critical aspect here is that the companies involved do not necessarily have to know that money is being laundered. Even careless involvement can have serious adverse consequences for all concerned.

- We perform careful identity checks on customers, service providers and other third parties before the Brückner Group enters into any business relationship with them.
- We strive to limit our business relationships to third parties whose financing is derived from legitimate sources.
- We make all payment flows transparent and handle them in accordance with the law.
- We do not accept cash payments.



*“We check our customers’ identities carefully and follow up on questionable transactions and customer requests.”*

” *When handling personal data, we protect the personal rights of all employees, business partners and other third parties. We adhere strictly to all laws regarding the protection and security of personal data.* ”



## 7. Protection and security of personal data

We respect each individual's personality and rights of self-determination, so we take special care to protect the personal data entrusted to us. In today's digital world, the scale of personal data collection and sharing has grown considerably. Data can be collected, forwarded, analyzed and put to use quickly. That's why we believe it is especially important to deal responsibly with personal data. This includes information on employees, applicants, customers and business partners. We protect these data by only using them for the intended and permissible purposes. We are transparent about our processing of data and comply with the required security precautions to protect information. Employees who work with personal data receive advice and support from the company's data protection officer and are encouraged to contact the officer with questions anytime.

- We are aware of where, how and for what purpose we process which personal data.
- We take care to keep the handling of personal data to a minimum and to ensure that personal data are only shared within the limits of the law, both outside and inside the Brückner Group.

“We appreciate how valuable company property, knowledge, patents, and business and trade secrets are to the Brückner Group and third parties, and we are careful in how we handle them.”



## 8. Protection of business and trade secrets, company property and IT security

Through our personal hard work and dedication, we create new tangible and intangible assets each and every day. We treat these assets with careful consideration and make sure they are not used for the wrong purposes, wasted or misused. Intangible assets, such as inventions and innovations, are key competitive factors, so they are also significant assets. They are what helps us keep our edge on the market as an innovative company. In our work, we deal with this kind of information on a daily basis, whether orally, in writing or in digital form. We adhere to all security precautions that have been put in place to protect this information at all times and are especially mindful when dealing with this kind of information in public places.

But we are not the only ones who trust in our reliability and ability to keep information confidential – our customers do, too. Their success is also our success. We treat our customers' proprietary information as strictly confidential. Our customers can count on us to do this, just as we trust in them to do the same.

- Our knowledge is the basis of our success. We are aware of this and protect that knowledge.
- We utilize the Brückner Group assets, both tangible and intangible, exclusively for business purposes.
- We are aware that electronic processing of data, especially e-mail, is vulnerable to security problems.
- We take special care to protect the software used in our machines.
- We respect and protect our business partners' business and trade secrets as if they were our own.
- We protect confidential information that we receive in the course of our work and prevent unauthorized sharing.

## 9. Fair competition

Special laws on competition and antitrust laws help keep competition fair. To us, fair competition means winning over customers with the quality of our products and with our ideas and innovative solutions.

Without competition, companies' innovative drive suffers. Prices become distorted, and in many cases, product quality suffers as well. With this in mind, we firmly reject any and all unlawful agreements, such as price fixing, and other anticompetitive agreements with other market participants. We are aware that even merely sharing non-public information that is relevant to the market and agreements between enterprises at different levels of the market can affect competition and may therefore be prohibited under antitrust law. Particular caution is needed at association meetings and other events where industry players come together. The opportunities for dialogue and discussion that these occasions offer must not be used to share confidential market and company information in order to influence the market.

We are the market leader in some countries and business segments. We are careful to ensure that we do not impede other market participants and customers by always dealing responsibly with our leading position on the market.

We are especially cautious when customers request exclusivity, as this can also impact competition.

- Competition spurs us on and challenges us to make our products among the best on the market.
- We do not make any anticompetitive agreements with competitors, suppliers or customers.
- We do not share or accept any information that can be used to deduce current or future market behavior.
- We are aware that there are areas where the Brückner Group occupies a dominant position. We are careful not to abuse our position in these cases.



“Our ability to compete is based on the quality of our products. We do not engage in prohibited agreements with others, nor do we share confidential information with competitors.”

”

*We make certain our products do not fall into the wrong hands by adhering to all export control regulations that are relevant to our worldwide business. All of our imports and exports are always in accordance with the applicable customs and import regulations.*”



## 10. International trade in goods and services

Our company operates internationally. International movements of goods are a part of our day-to-day business. This makes compliance with the rules and regulations in this sector especially important. We are aware that there are many different rules to observe, and that there can be restrictions concerning the nature of the product, the country of origin or destination country, and even the customer's identity. Special tax rules and regulations on the origin of goods can also apply.

- We are aware of what we supply to whom, in what country, and for what purpose.
- We support each other within the Brückner Group in order to observe the regulations that apply to proper exports and imports.
- We adhere to the applicable import regulations for goods, even in urgent cases.



## 11. Environmental protection

Protecting the environment is one of the major challenges of our time. Environmental protection regulations apply to various fields. There are laws on general environmental protection, handling of waste, chemicals, clean water, protecting the climate, and preventing and limiting emissions. We have always been concerned with the important issue of conserving valuable resources. We develop innovative technologies and creative solutions that reduce our own environmental impact and help our customers meet increasingly stringent environmental requirements.

- We deal responsibly with natural resources and use energy sparingly. We ensure that raw materials, products, and waste are stored, transported, and disposed of safely.
- As an innovation leader, we are aware of our responsibility to protect the environment. We are always hard at work, doing our part to ensure a sustainable future for the plastics and packaging industry.

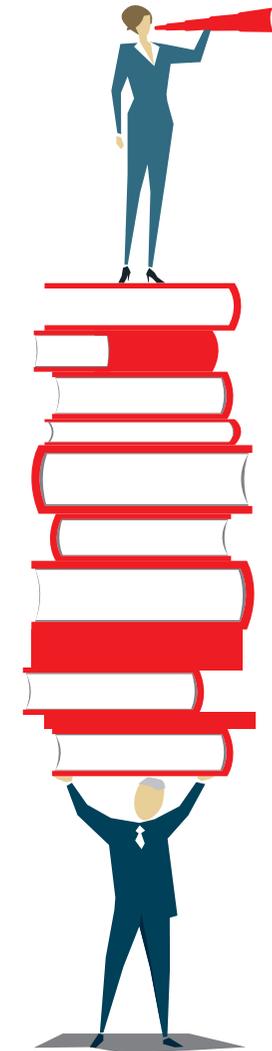
*” In our role as part of the plastics and packaging industry, we are aware of our responsibilities in terms of protecting the environment and our climate. We harness innovation to reduce our environmental impact and help make the products manufactured on our machines more environmentally friendly.”*

## 12. Truthful information

Customer satisfaction is our goal. We achieve it by providing high-quality products and services. Occasionally, though, a customer may ask us to include certain information in invoices or other documents, or to change certain information after the fact, like the invoice date, the value of the machine purchased, or the number of parts sold. The customer may have legitimate reasons to make these kinds of requests, or they may be prompted by dubious interests. For example, a customer might need the altered information in order to receive money, such as subsidies or grants, higher loan amounts, or insurance benefits without being entitled to these funds. If we provide false information in documents that the customer submits to third parties and the customer obtains an undue financial benefit as a result, we can bear criminal liability ourselves for our role in helping the customer. With this in mind, we take a critical view of any unusual or abnormal customer requests and ensure that all the information we provide is truthful.

- All of the information we provide in documents reflects the truth.
- We protect ourselves and do not risk any personal disadvantages just to do a customer a favor.
- We observe the legal requirements relating to keeping business documents for certain periods.

“The information we provide in invoices and other documents is always truthful.”



# Contact

Everyone at the company – our employees, managers, and members of the executive management – needs to understand the importance of the principles set down in this Code of Conduct. Legal violations can often be avoided simply by seeking advice early on.

If you are not sure whether your conduct is in keeping with the guidelines laid out in this Code of Conduct or have any questions about the Code of Conduct itself, please feel free to contact your supervisor and the members of the Brückner Group compliance organization. All of them will be happy to advise you.

A special e-mail address has been set up for questions about the Code of Conduct or the compliance guidelines: [compliance@brueckner.com](mailto:compliance@brueckner.com). You can also use this address to report violations of the law, this Code of Conduct, or the compliance guidelines.

You can also report the details of violations confidentially through our whistleblower system, which is accessible via the “Compliance” section of the Brückner Group website. The whistleblower system is maintained by an independent external provider. The identity of the person reporting violations to the Code of Conduct is kept anonymous.

For further information on our compliance system, please see the guideline titled “Compliance Code of the Brückner Group.”

# Imprint

PUBLISHER  
Brückner Group GmbH  
Königsberger Strasse 5–7  
83313 Siegsdorf, Germany  
[www.brueckner.com](http://www.brueckner.com)

DESIGN  
[www.fokus-design.com](http://www.fokus-design.com)

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