

# Communications Policy

## Schur Flexibles Group

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This policy went into force on 03/03/2021. Its first revision was approved by our management board on 01/07/2021. This document has been created digitally and is valid without a signature.

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## 1. Purpose

Being a growing market player with entities (Group Sites) across Europe, we at Schur Flexibles Group (Group) make a strong effort towards a consolidated and united corporate appearance to the public. Our Corporate Communications Policy will guide us along this way.

The Group has adopted this policy to establish guidelines with respect to the confidentiality as well as disclosure of information regarding the business, operations, and affairs of Schur Flexibles Group to the general public, the media, and other stakeholders.

More specifically, the purpose of this Policy is:

- to establish guidelines to protect and preserve the confidentiality of sensitive information
- to ensure that consistent standards and procedures apply to all corporate communications and
- to provide orientation on joint standards of internal communications.

## 2. Scope

Compliance to this Communications Policy is mandatory for all employees and contractors in the Group. It is part of the Group's Corporate Policies and applies along the Code of Conduct and outlines guidelines governing internal and external communications.

## 3. Internal Communications

### 3.1 Group Level

"Hey!" is the central internal communication platform for Schur Flexibles Group. All relevant groupwide announcements, news and guidelines will be published on the Hey! intranet page on a regular, if necessary even an ad hoc, basis. These news are internal news and – if not published to the public as well – not intended to be disseminated to third parties / public audiences.

All Group Departments as well as Group Sites are going to have their own sections to provide relevant internal service and news information to all employees, as well as to use restricted areas for collaboration only. Group aims to integrate additional workflows into the Hey! platform to grow it into a personalised digital working place for all employees.

The content on department and site pages is managed by the respective named editors for these sub-pages. The main Hey! page is under the responsibility of Group Communications.

Design templates and support in establishing the site pages will be provided by Group IT in collaboration with Group Communications.

### 3.2 Site Level

Local internal communication is the responsibility of the respective local management. Group Communications aims to support local communication by establishing standardised tools.

The Group Sites are required to translate the relevant content which is provided by Group Communications into the local language and disseminate the respective information to local employees.

Local management is called upon to use the right channels for the respective local information flow .e.g. to spread news via local Hey!, on site screens or blackboards as well.

Works councils should be involved in the information flow proactively and in advance.

## **4. External Group Communications**

### **4.1 Group Media Communications**

All media relations' activities on Group-level are coordinated by Group Communications, all product related activities aligned with the strategic direction of the Group by Group Marketing. Strategic changes have to be pre-aligned with Group Communications and CEO following the Group story. All Group-level communication to the public has to be approved in advance by Group Communications or the CEO, product-related activities by Group Marketing or the CSO.

### **4.2 Authorised Spokespersons**

No persons other than the Authorised Spokespersons are authorised to communicate with the media on behalf of Schur Flexibles Group on Group-level, unless specifically authorised by the CEO or Group Communications.

Unless otherwise authorised by the CEO or Group Communications, the only Group Personnel permitted to communicate with the media on behalf of the Company (the "Authorised Spokespersons") are:

- CEO
- Head of Group Communications
- with respect to matters relating to products / customers, the CSO
- with respect to matters relating to operations, the COO
- with respect to matters relating to sustainability, the Head of Sustainability
- with respect to matters relating to R&D, the Head of Research & Development

All Group-level related media enquiries must be referred to Group Communications as soon as possible for follow-up by an Authorised Spokesperson.

### **4.3 Local Communications in entities**

Local issues are within the responsibility of local management, except they have implications at Group level.

Local-level publications have to follow the group-wide standards of how information to the media is being published in respect to Corporate Wording and Corporate Design. Such documents are subject to regular updates, please ensure that you work with the latest versions.

All local publications are brought to the attention of Group Communications by a copy or link of the publication, but need no approval in advance.

### **4.4 Public Announcements in Print, Mail, Web or SFG's own Social Media Channels**

All official Group announcements and statements have to be approved by Corporate Communications in advance of publication.

These have to follow the group-wide standards of how information to the media is being published in respect to the wording and Corporate Design. Such documents are subject to regular updates, please ensure that you work with the latest versions.

### **4.5 Media Relations / Press Releases**

The Group will issue press releases from time to time to disclose information that is important or of use to the public. All media releases on Group-level have to be approved in advance by Group Communications.

#### 4.6 Other Publications

All Group publications need approval in advance by Corporate Communications, product related publications need approval in advance by Group Marketing.

These publications are f.e.:

- Videos
- Reports
- Brochures
- E-Mail Newsletters

#### 4.7 Media Co-operations / Advertisements

Media plans have to be shared in advance with Corporate Communications.

Local advertisements have to follow the group-wide standards of how information to the media is being published in respect to the wording and Corporate Design. Such documents are subject to regular updates, please ensure that you work with the latest versions.

#### 4.8 Speaking Engagements, Conferences and Interest Groups

Speaking engagements and presentations by Group Personnel on any matter which pertains to the Group or which may affect the Group's corporate identity or its relations with the public, industry or government must be approved in advance by the CEO or Group Communications. Participants without speaking engagements shall provide a very short report to their managers from such events.

#### 4.9 Routine Information Requests

Enquiries from the public for general and routine information can be answered by the appropriate personnel, but only to the extent the request relates to information that is publicly available.

In order to avoid providing inaccurate or incomplete information to outside sources, all other outside inquiries regarding the Group or its employees must be referred to an Authorised Spokesperson. Only an Authorised Spokesperson is authorised to make or approve public statements pertaining to the Company or its employees, directors or officers or operations.

#### 4.10 Restrictions on communications "Aroma Protection"

Based on strict legal restrictions by authorities for advertising and communications on tobacco related topics, the Group never mentions "tobacco" in all its communications to internal and external stakeholders and any public audiences, but refers to this sector as "Aroma Protection".

#### 4.11 Rumours

The Group will not normally comment, affirmatively or otherwise, on rumours or speculation (whether in the media, on the internet or otherwise). No insider may comment on rumours.

An Authorised Spokesperson is permitted to state that the Company has a policy against commenting on rumours. In certain circumstances Group Communications may determine that it is appropriate to issue a response. In such cases, any response to rumours or speculation will be under the direction of Group Communications and in compliance with this Policy.

## 5. Website

The official website of Schur Flexibles Group is [www.schurflexibles.com](http://www.schurflexibles.com). All subsidiaries and brands of the Group are presented on this website if required. Any publications that may be required under national law - including password-protected pages upon request - can be made available on this page.

In addition to this website, no other independent websites of companies or brands of Schur Flexibles Group are permitted. Exceptions are only possible with the respective approval of the Management Board of Schur Flexibles Group. In this case, compliance with all data protection laws is a prerequisite. The content must be approved by Schur Flexibles Group Communications.

## 6. Social Media

### 6.1 Group Channels

The Group is going to host channels on most important B2B social media platforms, such as LinkedIn, Twitter, Youtube, Vimeo, Xing as well as Group profiles on B2C platforms, such as Instagram, facebook.

All content on Group Channels has to be approved in advance either by Group Communications (Corporate topics) or Group Marketing (product-related topics).

Posting on official Group social media forums is restricted to authorised Group Communications and Group Marketing employees. Only selected editors may post on behalf of and on topics of the Group after appropriate training.

### 6.2 Employees' Activities on Social Media

Group employees have the permission to use social media during working hours at the company, for sharing company posts or reactions to company posts and relevant job-related content.

Group employees are allowed to share, react to and comment on the company's posts – to an appropriate extent – according to the company's guidelines.

When making Group-related statements, employees always publish these posts under their own name, stating the company and function, and providing a means of contact or feedback. It is allowed to use the Group's own e-mail address in B2B networks. It is important to state that the post contains exclusively personal opinions of NAME: Always speak for yourself and write in the 1st person: "I".

All employees strictly adhere to the policy of not publishing any Confidential Information. Already published and business related content may be shared or commented on in B2B channels.

SFG employees publish thoughtfully, protect their own privacy and respect the privacy of others. Communication on Social Media is always based on respect.

The Group as well as partners, customers and suppliers of the company will not be publicly criticised. Problems are being discussed and clarified internally, not in public. If any alert needs to be raised, please refer to the Code of Conduct and the alert tool available for this purpose. Group employees accept the freedom of expression on social media and do not publish any insulting or discriminatory content.

In all activities, the Employees comply with applicable laws, labour laws and with these Social Media Guidelines as well as corporate guidelines such as the Code of Conduct. Employees take particular account of personal rights and copyright and trademark rights in all publications.

Employees take into account in advance any general and industry-specific advertising restrictions and bans applicable to all publications and comply with applicable labelling regulations for all publications.

Employees admit errors and mistakes without hesitation and correct them promptly. Public criticism is also responded to immediately. Incorrect or critical posts are not deleted without comment but corrected.

In the case of multiple, public critical statements about the company, its products or services, employees immediately resort to internal crisis plans and templates for crisis communication. At the same time, employees immediately consult with the responsible persons and inform the company management.

If someone is not sure about how to use Social Media in a business context and would like to improve their respective skills, training on various levels can be organised via Group Communications.

## **7. Entry into force**

This Policy enters into force on 01/07/2021 and shall be valid until formally updated, replaced or cancelled. Entity Annexes are valid from their respective publishing date.

