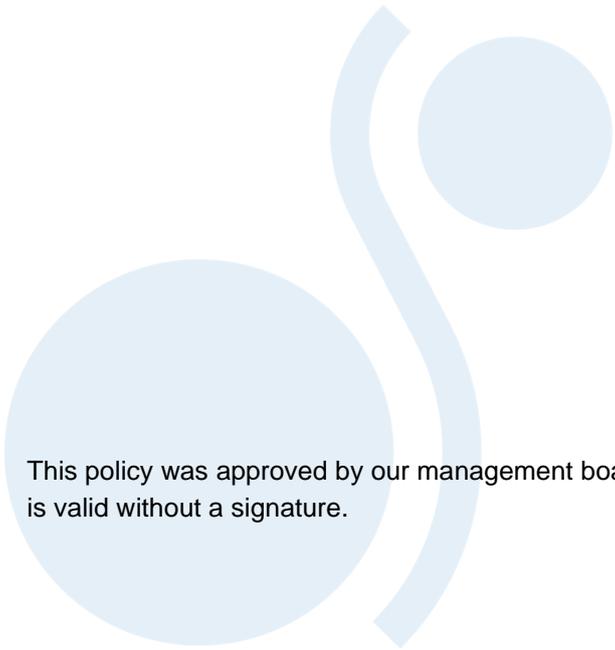


# Group Governance and Compliance Policy Schur Flexibles Group

Date: 07/07/2021

Status: effective by 07/07/2021



This policy was approved by our management board on 07/07/2021. This document has been created digitally and is valid without a signature.

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## 1. Group Governance

Schur Flexibles Group (Schur Flexibles Holding GesmbH and any subsidiaries under its control, in short “Group” and “Group Entities”) is a private equity owned business, ultimately controlled by the US investment firm Lindsay Goldberg.

It is managed by a Management Board consisting of:

- Chief Executive Officer: Michael Schernthaner  
CEO and Chairperson of the Management Board and responsible for Strategy / M&A, Legal and Human Resources, IT, Communication, Finance and Tax.
- Chief Sales Officer: Friedrich Humer  
CSO and responsible for Sales, Marketing, Key Account Management and R&D.
- Chief Operations Officer: Juan Lu s Mart nez Arteaga  
COO and responsible for Operations and Procurement.

The Management Board is supported by an Advisory Board (Beirat) with consulting function. The Advisory Board also oversees the implementation of the Rules of Procedure (Gesch ftsordnung) for the Governance of the Group.

The Rules of Procedures are cascaded downwards within the Group and oblige Managers from Group Entities to inform or seek approval from the Managing Board in accordance with the applicable Rules of Procedure.

The Group Governance process does not relieve Managers of Group Entities from any of their legal obligations in their capacity as managing directors, site managers or managers of personnel (“Managers”), especially in regards to mandatory laws and regulations for i.a. health, safety and environment, labour and employment, adherence to quality standards, food safety, financial standards, compliance to anti-corruption, trade laws, export sanctions and data protection.

## 2. Compliance

To ensure compliance with mandatory law, applicable regulations and best practises, the Group has implemented a comprehensive Code of Conduct mandatory for any Group Managers and Employees. The Code of Conduct has been published via the Group’s Intranet and an online training module mandatory for all Group employees is under development and planned for implementation in 2021.

The main chapters of the Code of Conduct are

- Fundamental ethical principles
- Safety and health at work
- Protection of the environment
- Anti-bribery and corruption
- Gifts and invitations
- Donations and sponsoring
- Compliance with antitrust and competition laws
- Conflicts of interest
- Compliance with trade control regulations
- Privacy and information security

- Software licenses and information protected by copyright
- Protection of company assets
- Compliance with provisions regarding money laundering
- Product regulations and advertising
- Communication with the media

The compliance to the Code of Conduct is assessed by surveys conducted by external independent experts. The last survey has been performed in 2020. Its results and recommendations have been reported to the Management Board and the recommended actions have been implemented.

Audits through external audit partners are performed according to a yearly audit plan. The findings and recommendations are reported to the Management Board, which also oversees the implementation of any actions. Due to the COVID Crisis, no audits have been performed in 2020.

A digital alert system (“whistleblowing”) hosted by an external party has been implemented in the Group in 2020 and communicated to all employees together with an update of the Code of Conduct. The alert system is available in several languages and provides full anonymity to any person wishing to raise an alert. The investigation of alerts has been delegated to Legal and HR, which shall investigate independently (with the support of independent external experts, if deemed necessary) and report conclusions and recommendations to the Management Board.

In 2020 one alert alleging an unfair dismissal of an employee has been raised. The alert has been investigated and the substantiated conclusions have been presented to the Management Board, which consequently approved the closing of the alert.

