M.01.2 Allgemeiner Verhaltenskodex / Code of Conduct

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Preamble

HOSTI GmbH regards sustainable and responsible conduct as an integral part of its corporate strategy and day-to-day business practices. Economic success, environmental responsibility, ethical business conduct and social responsibility form the basis of our corporate activities.

This Code of Conduct is based on national and international standards and takes particular account of the requirements of the German Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz - LkSG), the core labour standards of the International Labour Organization (ILO), the OECD Guidelines for Multinational Enterprises and the principles of the UN Global Compact.

This Code of Conduct applies to all employees, managers and business partners of HOSTI GmbH.

A. Requirements

1. Compliance with Laws

We consistently comply with all applicable laws, regulatory requirements and internal policies. Compliance with legal requirements is the foundation of our business conduct. Business decisions are made transparently, traceably and responsibly.

1.1 Leadership

Integrity and responsible corporate governance are essential elements of our corporate culture. Managers bear particular responsibility for implementing this Code of Conduct and foster a culture of openness, sustainability and compliance. Managers act as role models, take reports and concerns seriously, and encourage employees to speak up openly.

2. Environmental Responsibility

Protecting the environment and the climate is an essential part of our corporate responsibility. We are committed to reducing emissions, waste and energy consumption and to using natural resources responsibly. We also support measures to improve energy efficiency and promote sustainable production and procurement processes.
HOSTI GmbH pursues a process of continuous improvement to enhance its environmental performance. This includes, among other things, monitoring relevant environmental indicators, raising employee awareness and implementing appropriate environmental and climate protection measures

3. Protection of Natural Resources and Ecosystems

We are committed to avoiding harmful environmental changes that could adversely affect people, biodiversity or natural resources. In particular, we reject illegal deforestation, soil and water pollution and disproportionate air emissions.

4. Social Responsibility

HOSTI GmbH respects and protects internationally recognised human rights and is committed to fair working conditions throughout the value chain.

4.1 Respect for Human Rights

We respect internationally recognised human rights and are committed to complying with the ILO core labour standards and the requirements of the German Supply Chain Due Diligence Act (LkSG).

4.2 Freedom of Association and Protection of Privacy

We respect the dignity, privacy and personal rights of every individual. We also respect the right to freedom of association and freedom of expression within the framework of applicable law.

4.3 Prohibition of Child Labour

Child labour is not tolerated in any form. We do not employ persons below the legally prescribed minimum age and comply in particular with the requirements of Section 2(2) Nos. 1 and 2 of the German Supply Chain Due Diligence Act (LkSG) and the relevant ILO Conventions.

4.4 Prohibition of Forced Labour

Any form of forced labour, modern slavery or human trafficking is prohibited. Employment relationships are based exclusively on free choice. We comply in particular with the requirements of Section 2(2) Nos. 3 to 5 of the German Supply Chain Due Diligence Act (LkSG).

4.5 Occupational Health and Safety

The health and safety of our employees is a top priority. We provide safe and healthy working conditions through preventive measures, regular training, risk assessments and appropriate occupational safety measures. Employees receive regular awareness training on occupational health and safety.

4.6 Prohibition of Discrimination

We do not tolerate discrimination or harassment based on gender, age, origin, religion, sexual orientation, disability or other personal characteristics. We regard diversity and equal opportunities as an important foundation for sustainable business success. Bullying, intimidation, discriminatory or sexual harassment and other degrading behaviour are not tolerated.

4.7 Fair Remuneration and Working Hours

Remuneration is provided at least in accordance with statutory minimum requirements and applicable employment law. Working hours, rest periods and holiday entitlements comply with the applicable legal provisions. HOSTI aims to remunerate all employees in accordance with the applicable ver.di collective agreement for employees in the paper, board and plastics processing industry (PPKV).

5. Ethical Business Conduct

HOSTI GmbH is committed to conducting business with integrity and responsibility. Corruption, bribery and anti-competitive practices are not tolerated.

5.1 Fair Competition

We are committed to fair competition and consistently comply with antitrust and competition law requirements.

5.2 Corruption

Any form of corruption, bribery or improper influence is prohibited. Business decisions must be objectively justifiable and free from personal interests. Actual or potential conflicts of interest must be disclosed at an early stage. Employees must not participate in decisions where personal, family or financial interests could impair their objectivity.

5.3 Gifts and Other Benefits

Gifts, invitations or other benefits may only be offered or accepted within an appropriate, transparent and legally permissible framework. They must neither influence business decisions nor create the appearance of improper influence. The HOSTI GmbH Anti-Corruption Code governs the handling of gifts, invitations, value thresholds and reporting obligations and must be observed by all employees.

5.4 Money Laundering

We work exclusively with reputable business partners and comply with all applicable anti-money laundering requirements.

5.5 Data Protection and Confidentiality

HOSTI GmbH is committed to handling personal data and confidential information responsibly. Confidential company information must be protected and must not be disclosed without authorisation. Company information, trade secrets, IT systems and other assets must be protected against loss, misuse and unauthorised access. Data protection or information security incidents must be reported internally without delay.

6. Sustainable Procurement and Supply Chain

We expect our suppliers and business partners to comply with social, environmental and ethical standards. Suppliers are assessed on a risk-based basis and integrated into our sustainability requirements. HOSTI GmbH reserves the right to verify compliance with these requirements through appropriate measures.

7. Our Targets

To support the effective implementation of this Code of Conduct, HOSTI has defined the following measurable targets. Progress against these targets is reviewed and documented at least annually. Identified deviations are assessed and addressed through appropriate measures.

Social Targets	Indicator	Target Date
Provide regular training for all employees on the Code of Conduct, human rights, equal treatment, corruption prevention and reporting channels	Percentage of employees trained	100% by the end of 2027; thereafter at least 90% annually
Provide timely Code of Conduct training to new employees and document acknowledgement	Percentage of new employees trained on time	100% within three months of joining
Handle reports of potential violations confidentially, traceably and promptly	Percentage of reports documented and initially assessed within the required timeframe	100% initial assessment within ten working days
Require relevant suppliers and business partners to comply with fundamental conduct, labour and human rights standards	Share of relevant procurement volume covered by an accepted CoC or equivalent requirements	at least 80% by the end of 2028
Provide regular occupational health and safety training to relevant employees	Percentage of relevant employees trained on time	100% annually
Avoid serious occupational accidents	Number of serious occupational accidents	0 on an ongoing basis

B. Implementation of the Code of Conduct

The implementation of this Code of Conduct is supported by appropriate processes, defined responsibilities, training measures and continuous improvement activities. Suspected violations may be reported confidentially through the HOSTI GmbH whistleblowing system. Whistleblowers who report concerns in good faith are protected against disadvantage and retaliation.
Violations may result in appropriate employment-related measures or, in the case of business partners, contractual measures.

HOSTI GmbH regularly reviews this Code of Conduct with regard to its currency, effectiveness and regulatory requirements.

HOSTI GmbH
Pfedelbach,

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– Management –