



CODE OF CONDUCT

TABLE OF CONTENTS

1. Introduction
2. Implementation and Training
3. Principles of Conduct
 - 3.1 Compliance with Laws and Regulations
 - 3.2 Human Rights & Fair Working Conditions
 - 3.3 Health & Safety
 - 3.4 Environmental Protection & Sustainability
 - 3.5 Data Protection & Information Security
 - 3.6 Quality & Product Safety
 - 3.7 Anti-Corruption
 - 3.8 Violations & Sanctions
 - 3.8.1 Reporting (Whistleblower System)
 - 3.9 Money Laundering Prevention
 - 3.10 Fraud Prevention (Anti-Fraud)
4. Implementation with Business Partners
5. Monitoring & Continuous Improvement
6. Confirmation of the Code of Conduct.

CODE OF CONDUCT

Number: WP_COC

Date: March 1, 2025

1. Introduction

WINTIPAK provides aseptic packaging solutions for the liquid food industry. Safety, quality, technological leadership, and customer proximity are our key success factors. We strive to be the preferred partner for our customers, employees, and business partners.

Our expertise and many years of experience form the foundation of our success. This Code describes our values and rules of conduct that guide our daily actions. Every employee is obligated to act with responsibility, integrity, and in compliance with the law.

2. Implementation and Training

The Code is provided to every new employee on their first working day. During onboarding, it is explained by HR or the responsible manager. After the presentation, the employee confirms in writing that they have taken note of it, and this confirmation is stored in the personnel file. Within the first three months, a mandatory compliance training workshop takes place.





3. Principles of Conduct

3.1 Compliance with Laws and Regulations

All activities are carried out in accordance with applicable laws and the principles of good corporate governance. Every employee is required to know and comply with relevant laws and regulations.

Examples:

- No participation in anti-competitive price agreements
- Reporting violations of the law to supervisors or HR
- No insider trading

Question:

An employee receives confidential information from a competitor about planned price changes and uses this information in a quotation calculation. Is this permissible?

Answer:

No. The use of confidential information from competitors violates competition law and internal company policies. Such information must neither be accepted nor used. The incident must be reported immediately to the Compliance Department.

3.2 Human Rights & Fair Working Conditions

We support and respect human rights in accordance with the UN Charter and ILO conventions. Discrimination, forced labor, or child labor are not permitted.

Examples:

- Equal treatment regardless of origin, gender, religion, etc.
- No tolerance for harassment or bullying.

Question:

A team leader prefers employees of a certain nationality for promotions and justifies this with "better cultural fit." Is this permissible?

Answer:

No. Discrimination based on origin or other personal characteristics is not permitted. Personnel decisions must be based exclusively on qualifications, performance, and objective criteria.

3.3 Health & Safety

We are committed to a safe working environment. Safety briefings, equipment, and reporting of risks are mandatory. Every employee bears responsibility for themselves and others.

Examples:

- Wearing protective clothing
- Participation in safety training

Question:

An employee skips wearing required protective clothing in production to save time. Is this permissible?

Answer:

No. Safety regulations must be strictly followed. Not wearing protective clothing endangers both personal safety and the safety of others. Violations must be reported and may result in employment-related consequences.

3.4 Environmental Protection & Sustainability

WINTIPAK strives to continuously reduce the environmental impact of its business activities. We rely on recycling, energy-efficient processes, and promote environmental awareness among all employees. We support the United Nations Sustainable Development Goals and combat environmental risks such as climate change.

Examples:

- Waste separation and recycling according to internal guidelines
- Avoid unnecessary business travel through digital meetings
- Use energy-efficient technologies

Question:

An employee disposes of production waste outside the designated recycling processes to save time. Is this permissible?

Answer:

No. Waste must be handled according to internal environmental and disposal guidelines. Ignoring environmental regulations can lead to legal consequences and harm the company's sustainability strategy.



3.5 Data Protection & Information Security

The protection of confidential information and personal data is of the highest priority. Every employee is required to comply with applicable data protection laws and internal security policies.

Question:

An employee sends an Excel file containing customer data (names, email addresses, contract details) unencrypted via email to an external agency. The file is not password protected. Is this compliant with data protection regulations?

Answer:

No. This clearly violates GDPR. Personal data may only be transmitted via secure channels and with appropriate protective measures, especially to external third parties. Unencrypted emails and unsecured files compromise data confidentiality and integrity.

Our goal: 100% of all employees will be trained annually in data protection by 2027.

Responsibility: Data protection coordination & external data protection officer.

Question:

An employee shares login credentials for internal systems with an external service provider to resolve an issue quickly. Is this permissible?

Answer:

No. Login credentials must never be shared. External access must be granted only through officially approved and secure procedures. The incident must be reported immediately to IT and data protection coordination.

Question:

An employee stores customer data on a private laptop to work from home. The device is not secured. Is this permissible?

Answer:

No. Personal data may only be processed using approved and secure company systems. The use of private, unsecured devices violates data protection policies and must be reported immediately.

3.6 Quality & Product Safety

Quality is a central component of our processes and products. We rely on continuous improvement, a feedback culture, and structured quality planning. All employees contribute to maintaining high standards.

Examples:

- Compliance with quality requirements in all areas
- Reporting and handling quality deviations

Question:

An employee notices a minor deviation from specifications in a production batch and considers not reporting it to avoid delivery delays. Is this permissible?

Answer:

No. Quality deviations must be reported immediately and reviewed according to internal processes. Withholding information can lead to product safety risks, customer complaints, and significant reputational damage. Quality and product safety always take priority over deadlines.





3.7 Anti-Corruption & Conflicts of Interest

WINTIPAK does not tolerate any form of bribery or undue advantage. Employees must clearly separate personal interests from professional ones and must not accept gifts or invitations that could lead to conflicts of interest.

Examples:

- No acceptance of gifts exceeding CHF/EUR 50
- No influence on authorities or business partners through favors

Anti-corruption:

Our Goal: 0 documented cases of bribery or undue advantage by 2027 across the company.

Responsibility: Compliance Department & Management

Question:

A supplier offers an employee a luxury weekend trip worth CHF 800 after a successful contract. May this be accepted?

Answer:

No. This represents an inappropriate advantage and may be considered attempted influence. Such invitations must be declined and reported.

Question:

An employee promises preferential treatment to a business partner in exchange for personal benefits. Is this permissible?

Answer:

No. Any form of granting or accepting advantages to influence business decisions is prohibited and may result in criminal consequences.

Conflicts of Interest:

Our Goal: 0 unresolved conflicts of interest by 2027

Our Goal 2: 100% of all reported conflicts of interest will be documented and resolved by 2027 (e.g. through disclosure, reassignment of responsibilities, or rejection of secondary employment).

Responsibility: HR & Compliance

Question:

An employee in procurement realizes that a company applying for a supply contract is owned by a close family member. She is involved in the selection decision. What should be done?

Answer:

This constitutes a potential conflict of interest. The employee must disclose this immediately to her supervisor or the Compliance Department. She must not be involved in the decision-making process. Transparency and documentation are mandatory.

Question:

An employee takes on secondary employment with a company that is in direct competition with WINTIPAK. Must this be disclosed?

Answer:

Yes. Secondary employment that is in competition with the company or affects business interests constitutes a potential conflict of interest. Such activities must be disclosed in advance and reviewed and approved by HR or Compliance.





3.8 Violations & Sanctions

If an employee becomes aware of or suspects misconduct or violations of policies or procedures, they must report the violations or suspected violations to their supervisor or the Chief People Officer. Violations of laws, regulations, and internal rules can have serious consequences for WINTIPAK AG and may significantly damage the company's reputation. Depending on the nature of the violation and taking into account the legal requirements, appropriate measures will be taken. These may include targeted training measures for future prevention as well as disciplinary sanctions, which can range from a warning to termination of the employment relationship. The implementation and monitoring of this process are carried out by the Chief People Officer in close coordination with the HR department and the management. The persons concerned will be informed of the outcome in a timely manner.

Question:

An employee repeatedly observes that internal policies are being disregarded but is unsure whether to report this because they fear negative consequences. What should be done?

Answer:

Employees are required to report violations or suspected violations. WINTIPAK ensures a confidential and protected reporting process. Whistleblowers must not suffer any disadvantages. Violations are examined objectively and appropriate measures are taken.

3.9 Reporting

Reports can be submitted to WINTIPAK AG via the website under "Contact" using the whistleblower platform: [<https://hinweisgeber.consense365.net/contact?ws=61814C1A-68E8-4144-B624-A4D97ABB41C1>] erfolgen.

We promote an open reporting culture through secure, anonymous communication channels and guarantee that we will not take any measures to uncover the identity of whistleblowers. Any form of discrimination or retaliation against whistleblowers, as well as against individuals who actively contribute to clarifying issues, is strictly prohibited and will be consistently sanctioned. All reports are processed with the highest level of confidentiality and in accordance with the presumption of innocence, within a fair and protected process, in order to safeguard the integrity of all parties involved. If errors occur during our procedures or unjustified disadvantages arise, we are committed to initiating appropriate corrective measures.



Question:

An employee anonymously reports a possible compliance violation. A manager tries to find out who submitted the report. Is this permissible?

Answer:

No. The identity of whistleblowers must be strictly protected. Any attempt to undermine anonymity or to take retaliatory measures constitutes a violation of this Code and may result in disciplinary consequences.

3.10 Money Laundering Prevention

The introduction of illegally obtained assets into the legal economic cycle is referred to as money laundering. WINTIPAK is committed to complying with all national and international regulations on the prevention of money laundering. The basis of our measures is the “Know Your Customer” (KYC) principle, which requires thorough verification of our business partners.

Indicators of potential money laundering include in particular:

- Payments in a currency different from that stated on the invoice
- Payments made by third parties not involved in the business relationship
- Transfers from unusual or unknown accounts
- Cash payments exceeding EUR 2,000
- Unclear ownership or shareholding structures of the business partner

Rules of conduct:

- Cash payments exceeding EUR 2,000 are not permitted
- If the payer differs from the contractual partner, their identity must be verified and a written confirmation must be obtained from the customer stating that the payment is related to the business relationship
- Before concluding business with new customers, the identity and - where possible - the beneficial owner must be verified (e.g. via commercial register extract or transparency register extract)

Responsibility: The Compliance & Legal Department is responsible for training, monitoring, and implementation.

Our Goal: 100% of all employees in sensitive areas will be trained in anti-money laundering by 2027.

Question:

A new customer wants to pay for a large order in cash amounting to EUR 15,000 and requests that the invoice be issued to another affiliated company. The ownership structure is unclear. What should be done?

Answer:

This behavior represents an increased risk of money laundering. Cash payments exceeding EUR 2,000 are not permitted. In addition, the identity and beneficial owner must be clearly established (KYC principle). The business transaction may only proceed after a full review and approval by Compliance.

Question:

A customer requests that several partial invoices be issued in order to split larger amounts below the internal cash payment limit. How should this be handled?

Answer:

Artificially splitting payments may be an indication of money laundering. Such requests must be rejected and reported to the Compliance Department for review. A business transaction may only proceed after approval has been granted.





3.11 Fraud Prevention (Anti-Fraud)

WINTIPAK follows a zero-tolerance policy towards fraudulent behavior. Fraud includes, among other things, embezzlement, theft, expense fraud, manipulation of documents, as well as any form of deception intended for personal gain or to mislead third parties to the detriment of WINTIPAK.

Examples of fraudulent behavior include::

- False statements in expense reports
- Manipulation of time records or performance documentation
- Theft of company property
- Misrepresentation of qualifications or business results

Consequences: Fraud will result in immediate termination of the employment relationship and may lead to criminal prosecution.

Responsibility: The Compliance & Legal Department and the Management.

Our Goal: 100% of all employees will complete mandatory training on “Anti-Fraud & Business Ethics” by 2027.

Question:

An employee repeatedly submits expense reports in which hotel invoices have been manipulated to obtain higher reimbursements. A colleague notices inconsistencies. What should be done?

Answer:

Manipulation of expense reports constitutes fraud. The suspicion must be reported via the designated reporting channels (supervisor, HR, or whistleblower platform). Proven fraud will result in employment-related consequences up to and including immediate dismissal, as well as possible criminal measures.

Question:

An employee manipulates internal performance indicators in order to meet targets and receive bonus payments. Is this permissible?

Answer:

No. The manipulation of performance or business data constitutes fraud. The suspicion must be reported via the designated reporting channels. Proven violations will result in employment-related and, if applicable, criminal consequences.

4. Implementation with Business Partners

Our suppliers, distributors, and other partners are an integral part of our value chain. They are required to adhere to the same ethical standards as WINTIPAK. Compliance with this Code is regularly reviewed.





Question:

A supplier is proven to violate labor or environmental standards. How does WINTIPAK respond?

Answer:

WINTIPAK requires the supplier to implement immediate corrective measures and jointly defines concrete improvement actions. In the case of serious or repeated violations, the business relationship may be terminated.

5. Monitoring & Continuous Improvement

This Code of Conduct is reviewed annually by the Compliance Department, the Chief People Officer, and the Management, and adjusted if necessary. Changes are actively communicated and training is updated accordingly. Compliance with and implementation of the Code of Conduct are also ensured by the Chief People Officer.

Winterthur, Switzerland, January 31, 2025

Markku Vauhonen, CEO

Julia Schüller, CPO



Acknowledgement of this Code of Conduct is mandatory for all employees of WINTIPAK AG. This confirmation does not create any obligations beyond the existing employment contract.

Confirmation of the Code of Conduct of WINTIPAK AG

This Code of Conduct is reviewed annually by the Compliance Department, the Chief People Officer, and the Management, and adjusted if necessary. Changes are actively communicated and training is updated accordingly. Compliance with and implementation of the Code of Conduct are also ensured by the Chief People Officer.

On _____, I have received and read the Code of Conduct of WINTIPAK AG. I am aware that it is my responsibility to read and comply with the principles, guidelines, and instructions contained therein.

Employee Name

Employee Signature

Date