



CODE OF CONDUCT

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Number: WP_COC

Date: 1. March 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 long-standing experience form the foundation of our success. This Code outlines our values and rules of conduct, which guide our daily actions. Every employee is required to act with responsibility, integrity, and in accordance with the law.

2. Implementation and Training

The Code of Conduct is introduced to each new employee by HR or the responsible manager. After the introduction, the employee confirms in writing that they have read, understood, and will comply with the Code. This confirmation is filed in their personnel record.

Within the first three months of employment, participation in a mandatory compliance and ethics training workshop is required. Refresher trainings are conducted regularly, and employees are expected to actively participate. Managers are responsible for ensuring that their teams complete the required trainings and comply with all provisions of the Code.



3. Code of Conduct Principles

3.1 Legal and Regulatory Compliance

All activities must comply with applicable laws and principles of good corporate governance. Each employee must know and follow relevant laws and regulations.

Examples:

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

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, and child labor are prohibited.

Examples:

- Equal treatment regardless of origin, gender, religion, etc.
- Zero tolerance for harassment or bullying.





3.3 Health & Safety

We commit to a safe working environment. Safety instructions, equipment, and risk reporting are mandatory. Every employee shares responsibility for safety.

Examples:

- Wearing protective clothing
- Participating in safety briefings

3.4 Environmental Protection & Sustainability

WINTIPAK strives to continuously reduce the environmental impact of its operations. We focus on recycling, energy-efficient processes, and promoting environmental awareness. We support the UN's Sustainable Development Goals and combat environmental hazards like climate change.

Examples:

- Waste separation and recycling
- Avoiding unnecessary business trips via digital meetings
- Use of energy-efficient technologies

3.5 Data Protection & Information Security

The protection of confidential information and personal data is of utmost importance. All employees must comply with applicable data protection laws and internal security policies.

Examples:

- No sharing of internal data with unauthorized parties
- Using secure passwords and safeguarding confidential documents
- Participating in data protection training

Our Goal: At least 90% of employees trained annually in data protection

Responsibility: Data Protection Coordinator & External Data Protection Officer

3.6 Quality & Product Safety

Quality is a core part of our processes and products. We pursue continuous improvement, feedback culture, and structured quality planning. Every employee helps uphold high standards.

Examples:

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

3.7 Anti-Corruption & Conflicts of Interest

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

Examples:

- No acceptance of gifts over CHF/EUR 50
- No undue influence on authorities or business partners

Anti-Corruption:

Our Goal: 0 documented cases of bribery or acceptance of undue advantages throughout the entire company per year.

Verantwortung: Compliance Department and Executive Management

Conflict of Interest Goals:

Our Goal: 1: 0 unresolved conflicts annually

Our Goal2: 100% of reported conflicts documented and resolved (e.g. via disclosure, reassignment, or rejection of side activities)

Responsibility: HR & Compliance

3.8 Reporting Violations & Sanctions

Violations of the Code can be reported anonymously or confidentially. Whistleblowers are protected. Proven violations lead to employment and possibly legal consequences.

Examples:

- Use of internal reporting channels or external ombuds offices
- No retaliation against whistleblowers

3.9 Anti-Money Laundering

Das Money laundering is the process of introducing illegally acquired assets into the legal financial system. WINTIPAK is committed to complying with all anti-money laundering laws. We follow the “Know Your Customer” (KYC) principle to verify business partners.

Indications of potential money laundering include in particular:

- Payments in a currency other than the one stated on the invoice
- Payments made by third parties who are not involved in the business relationship
- Transfers from unusual or unknown accounts
- Cash payments exceeding EUR 2,000
- Unclear ownership or participation structures of the business partner

Code of Conduct Rules:

- Cash payments over EUR 2,000 are not permitted.
- If the payer differs from the invoice recipient, their identity must be verified and written confirmation must be obtained from the customer stating that the payment is related to the business transaction.
- Before entering into business with new customers, their identity and — where possible — the beneficial owner must be verified (e.g., via commercial register extract or transparency register).

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

Our Goal: Zero cases of money laundering in the course of business operations per year.





3.10 Anti-Fraud

WINTIPAK has zero tolerance for fraud. This includes embezzlement, theft, billing fraud, document manipulation, and any deception for personal gain or harm to WINTIPAK.

Examples of Fraud:

- False travel expense claims
- Manipulation of time or performance records
- Theft of company property
- Misrepresentation of qualifications or results

Consequences: Betrug führt zur sofortigen Beendigung des Arbeitsverhältnisses und kann strafrechtlich verfolgt werden.

Responsibility: Die Abteilung Compliance & Recht sowie die Geschäftsleitung

Our Goals:

- 0 reported fraud cases per year
- 100% employee training on anti-fraud & business ethics every two years



4. Implementation with Business Partners

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

5. Monitoring & Further Development

This Code of Conduct is reviewed annually by management and adjusted as needed. Changes are actively communicated and reflected in updated training.

Winterthur, Switzerland, January 31, 2025

Markku Vaukhonen, CEO

A handwritten signature in black ink, appearing to read 'Markku Vaukhonen'.

Julia Schüller, CPO

A handwritten signature in black ink, appearing to be a stylized 'JS'.