



CHARTER OF THE CHS CONTAINER GROUP

Table of Content

Page

FOREWORD 1

1. INTRODUCTION 2

2. PRINCIPLES OF SOCIETAL AND SOCIAL RESPONSIBILITY 2

3. BEHAVIOUR WITH COMPETITORS, OFFICIALS AND BUSINESS PARTNERS 3

4. BEHAVIOUR OF OUR EMPLOYEES 4

5. DEALING WITH COMPANY PROPERTY, INSIDER TRADING AND DATA PROTECTION 5

6. IMPLEMENTATION OF THE CODE OF CONDUCT 6

7. COMPLIANCE OFFICER / CONTACT PERSON..... 6



Charter of the CHS Container Group

Foreword

Dear colleagues,

During recent years, CHS Container Group has steadily grown into an internationally active group of companies with more than 200 employees¹. In view of our multicultural personnel structure, our numerous national and international business relations to medium-sized companies as well as large corporations, and our wide range of projects, it is important for us to have a formally defined corporate culture.

A common Code of Conduct, compliance with legal and ethical rules and the pursuit of common values form a solid foundation for our daily work and provide reliable orientation for our employees. Transparency and proportionate action is always our focus.

For this reason, management has defined and adopted the following code of conduct, and it is binding for all employees. In particular, we would like to point out the role model function of supervisors, who make a significant contribution to the successful implementation of our values.

As employees of a medium-sized group of companies, an open and honest approach between the members of our staff as well as with all of our business partners is essential. Similarly, loyalty to the companies that belong to the CHS Container Group has been an integral part of our success up till now, and it will continue to be in the future.

We expect all employees to not only read and formally comply with this Code of Conduct, but also to internalise and live by it.

Bremen,

The managing directors of the CHS Container Group

Signatures are on the original document.

¹ For the sake of better readability, only the masculine form is used in the following. All personal statements naturally apply to both women and men.



1. Introduction

This Code of Conduct is binding for management and all employees of the core companies and affiliates of CHS Container Group. All business transactions and activities that are carried out under our company name 'CHS' or in conjunction with a company that belongs to the CHS Container Group are subject to the guidelines specified below.

This Code of Conduct, and thus acting with integrity, is the heart of our corporate culture and our philosophy. We should always examine our daily work from the viewpoints of relevant national and international laws, ethical principles and values, and applicable rules. The behaviour and conduct of each employee to colleagues, customers and business partners reflects the values of the entire group.

This guideline is intended as a roadmap for cooperation among colleagues and with business partners in a multicultural, fast-paced world. Naturally, this document cannot possibly cover all problems and challenges that may arise. Sound judgement and common sense should be exercised. If there is any doubt about correct behaviour, then you may always consult your supervisor. A solution can then be developed together that is based on our values and is worth standing up for.

Definition of compliance

The term 'compliance' will be used hereinafter. Compliance is defined as adherence to rules (legal regulations and corporate policies).

2. Principles of societal and social responsibility

Responsibility

As a medium-sized group, we are aware of our responsibility towards society, future generations and compliance with national and international laws. Our corporate activity is always in line with the interests of society and the environment. The following paragraphs concisely describe what we understand this responsibility to be and what we stand for:

Human rights and laws

We respect and promote the observance of internationally recognised human rights. This applies to our dealings with one another, with business partners and all people with whom we have contact during our daily work. In addition, each employee is also obligated to comply with the applicable laws and regulations of the countries in which we operate.

Equality and tolerance

We provide equal opportunities for our employees, regardless of gender, age, colour, ethnicity, disability, nationality or sexual orientation. We respect different religions and political beliefs, provided they are built on the principles of a free democratic order and tolerance towards people who have different opinions. We reject discrimination against our employees, colleagues and all people.



Safety, health and environment

Safety at work, the preservation and promotion of health in offices, logistics jobs or production, the efficiency and job satisfaction of our employees and minimising environmental impact are all key precepts of our corporate activity and of each individual employee. For this reason, we expect all employees to comply with safety regulations and to be aware of hazards during their daily work. As an industrial company, we view the protection of the environment and all measures necessary to achieve it as worthwhile goals.

Behaving with integrity

The personal integrity of each employee is a solid foundation of our corporate group. Only conscientious personal behaviour and activities that are based on convictions and values can reflect the corporate philosophy of the CHS Container Group, which is based on honesty, openness and integrity.

3. Behaviour with competitors, officials and business partners

Corruption

The CHS Container Group does not tolerate corruption. This includes any other unfair business practices of our staff or third parties contracted by us. These will not be tolerated either.

Accepting undue advantage and bribery

No advantages, incentives, privileges or benefits that could compromise the ability to make objective and fair decisions are accepted, offered or demanded by us, neither directly nor indirectly via third parties.

We strictly comply with all rules set forth in applicable competition legislation. We do not make deals or enter into partnerships that influence terms and conditions or prices. We do not prevent fair competition in any inadmissible way.

Any intangible or tangible benefits to public officials, employees or representatives of government institutions, political parties, their representatives, politicians, elected officials and candidates for political office or their relatives are strictly prohibited.

This does not apply to business dinners within the customary limits or promotional gifts of low value. In addition to this, it is the responsibility of each employee to stay informed about the individual regulations of the corresponding public institution.

Ambiguous or compromising situations where employees come under any obligation to third parties will not be tolerated.

CHS Container Group expects its employees to exercise sound judgement and demonstrate a high level of responsibility.

Business relations

We do not view ourselves simply as suppliers or service providers in relation to our customers but rather strive for long-term partnerships that are characterised by openness and honesty. Whatever demands our customers place on us, we see it as our duty to not only develop safe and effective solutions but to create solutions for our customers that have sustained added value. However, we will only enter into a business partnership where our fundamental values and



principles are reflected. We protect the data and the expertise entrusted to us by our partners and customers with the same care that we have for our own.

Naturally, this also applies to our suppliers. Here again, we strive for a business partnership that is based on honesty, trust and commitment. In addition, we expect our suppliers to work in accordance with the same values and implement the same measures that we have laid down in our Code of Conduct.

4. Behaviour of our employees

The CHS Container Group expects its employees to take responsibility, to show initiative and to learn from mistakes during the course of their work.

Confidentiality and handling of information

All internal, confidential and proprietary information about the business activities of the CHS Container Group are subject to secrecy. This also applies to all non-public information communicated to us by our business partners. It is protected by us in accordance with legal and contractual requirements. The same applies to information about our business partners.

Knowledge of this information may only be used by employees and institutions of the CHS Container Group for business purposes, not for personal benefit or given to third parties. Third parties in this context may include friends, acquaintances, family members or even employees and colleagues of the CHS Container Group who do not officially need to have knowledge of the corresponding information.

Information that is subject to a confidentiality agreement may not be passed on to third parties without permission. The information must be handled sensitively and stored securely. The details are laid down in the terms of the corresponding agreements.

All confidential information must be kept strictly secret both during and after the end of the period of employment. To this end, each employee signs a confidentiality agreement together with the employment contract.

Conflicts of interest and ancillary activity

We avoid situations where personal financial interests of employees and institutions conflict (directly or indirectly through related parties or companies) with the interests of the CHS Container Group or our business partners. The interests of the CHS Container Group may not be negatively affected in conflict situations. The compatibility of work and family life remains unaffected by this.

Investments in competitors or business partners as well as ancillary activities must not entail the risk of a conflict of interest. An employee must inform their supervisor of any actual or suspected conflict of interest. As a general rule, CHS Container Group is not against employees having ancillary activities. However, the employee's supervisor must still be informed of the ancillary activity and give their approval.

In addition, CHS Container Group encourages its employees to get involved in social issues in public functions, citizens' groups or associations. This commitment must not conflict with the legitimate interests of the CHS Container Group.



Invitations and gifts

In connection with their work for the CHS Container Group, our employees and institutions may accept and express invitations within the framework of internal arrangements. The invitations must be reasonable and must not be made in anticipation of an inadmissible consideration or preference.

The same applies to the granting and accepting of gifts and other benefits or advantages of any kind.

5. Dealing with company property, insider trading and data protection

Protection of corporate assets

Every employee of the CHS Container Group is obliged to protect company assets from loss, theft, misuse or unauthorised use. Equipment, inventories, vehicles, office supplies, documents, files, and data media of the company may not be used for private purposes, except as expressly permitted by a special agreement.

Insider trading

If employees of the CHS Container Group receive insider information about publicly listed companies in connection with their business activities (e.g. as part of project work with customers), then this information may not be used for personal gain. Anyone who possesses important inside information and passes this information to others is in violation of applicable securities laws and the policies of our corporate group.

Data protection

The data protection regulations in the German Federal Data Protection Act must be strictly observed. The success of the CHS Container Group also depends on the respectful and secure handling of personal data, and this requires a high level of data protection. This applies in particular to the personal data of employees, customers, business partners and third parties.

Cash payment transactions, unofficial cash and money laundering

Undocumented cash payment transactions promote the offence of money laundering. Payments using cash or cashier's checks are therefore only permitted with an accompanying receipt and only for small amounts.



6. Implementation of the Code of Conduct

Compliance Officer

The function of the Compliance Officer for the entire CHS Container Group is handled centrally in Bremen by Mr Reimond Menke from the auditing company ECOVIS MKM Menke & Kollegen GmbH Wirtschaftsprüfungsgesellschaft.

The Compliance Officer will regularly conduct audits within the group of companies and verify the implementation of the Code of Conduct. If there is any doubt, corresponding interviews will be conducted with relevant persons.

The Compliance Officer shall have the right to access all data in the course of specific inspections or suspected cases. Applicable regulations regarding personal data will naturally be taken into account.

Questions and reports

Questions regarding the Code of Conduct can be submitted to an employee's direct supervisor or the Compliance Officer.

Please address any report of suspected illegal behaviour either to management or to the Compliance Officer. All reports and information will be treated with strict confidentiality. Reports submitted to the Compliance Officer will be made anonymous.

Violations and penalties

Violations of the Code of Conduct may result in consequences ranging from disciplinary action to dismissal and legal proceedings. All supervisors at CHS Container Group are responsible for ensuring that all employees in their respective areas are familiar with the contents of this Code of Conduct and comply with the rules. To this extent, this Code of Conduct applies as an employment-related obligation as defined by labour legislation.

Management reserves the right to amend the contents of this Code of Conduct.

7. Compliance Officer / Contact person

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