

Compliance Management Guideline

Preamble

As a worldwide operating enterprise, acting in the business areas of packaging and processing, Romaco is exposed to competition. Fair competition is the basis of integrity and progress; it provides us with options and development opportunities in the market.

This Compliance Management Guideline is our statement of commitment to the highest standards of integrity and ethical behavior.

We all shall exercise the degree of care, diligence and skill that a reasonably prudent business would exercise in comparable circumstances. We act ethically, with honesty and integrity, in the best interests of Romaco at all times.

We are proud of our brands and proud of what we do. We believe in ourselves, we believe in each other. Therefore we promote the interests of Romaco and we avoid any conflicts of interest with Romaco.

Our corporate principles should provide orientation and create momentum for new prospects.

Sincerely,

Joerg Pieper
CEO Romaco Group

Carsten Strenger
CFO/COO Romaco Group

1 **Goal**

The key goals of our Compliance Management Guideline are to establish, implement and enforce effective

- compliance with applicable laws and regulations and Romaco's policies,
- clear and uniform written standards of conduct, policies and procedures,
- education and training programs for our employees regarding their responsibilities for maintaining a high level of compliance and ethical and legal behavior,
- procedures for auditing compliance,
- procedures for receiving employee concerns and questions and encouraging employees to report allegations of non-compliance and
- fair processes for taking disciplinary actions for non-compliance.

Illegal actions are not in the interest of the Romaco Group. They are unethical, can result in considerable loss of reputation and lead to criminal prosecution, civil damages and loss of business.

2 **Compliance**

This Compliance Management Guideline expresses the commitment of our worldwide operating group to conduct business in accordance with all applicable laws, rules and regulations and the highest ethical standards in every country in which Romaco does business.

- We treat customers, colleagues or other persons with respect, courtesy, honesty and fairness, and have proper regard for their interests, rights, safety and welfare. We do not accept any forms of harassment or discrimination.
- We have the duty to ensure that our job responsibilities and personal interests remain separate and we do not use our employment at Romaco to obtain private benefits.
- We seek to outperform our competition fairly and honestly, especially because highest quality and innovative technology with the goal of long-term customer satisfaction define our thinking and actions.
- We make our business decisions, in particular within the scope of acquisitions, on the basis of thorough analysis of opportunities and risks. Therefore our internal and external reports and decisions are correct, complete and comprehensible.

Our policy is determined in the Romaco Business Code of Conduct. That guideline defines the general principles of good conduct (e.g. Export Laws, Entertainment, Antitrust, Anti-Corruption, etc.).

In addition to laws, legal and ethical regulations and principles, there are also internal guidelines that cover particular areas. These guidelines must be followed as part of the universal Compliance Management Guideline. Examples are the IT Security Guideline, Accounting Principles, and Travel Policy (inter alia).

3 **Reporting and Handling Breaches**

Whenever necessary, we should immediately report any potential violations firstly to our manager concerning any legal or business conduct issue (anonymously, if desired). If we are uncomfortable talking to our manager or it is not appropriate in the circumstances, we also receive advice and guidance from our local senior management team or the compliance officer. The aforementioned apply also in cases of doubt.

It is obvious that in any cases of breaches a serious Compliance Management Guideline needs effective and consequent sanctions. We achieve this through a "Zero Tolerance Policy".

It is our personal responsibility to understand and comply with the Romaco Compliance Management Guideline, the Romaco Business Code of Conduct and his following guidelines, in particular by conscientiously avoiding any conflict of interest and seeking prior permission from the Management Board in any case of exception.

Our managers bear a special responsibility, therefore each manager is called upon to set example by acting in accordance to the Compliance Management Guideline. They are also the first point of contact for questions of their subordinates. It is also their main task to ensure compliance with this Guideline in their scope of responsibility.

We, managers and employees, independent contractors and agents are required to read, understand and abide by the standards of this Guideline. A failure to follow the Compliance Management Guideline results in disciplinary measures up to, and including, dismissal. Any indication will be investigated. Therefore please make fair dealing a basis for all business activities and apply valid laws, rules and regulations.

Romaco Group
Karlsruhe, April 2018
