

# Code of Ethics

Version: January 1, 2015

In accordance with the first point of our corporate values — **"Ethics, integrity and respect"** — we present this Code of Ethics as a compilation of the rules that must guide the behavior of all members of ARANOW Packaging Machinery around the world.

This Code<sup>1</sup> constitutes an essential support tool for the economic, sustainable, and orderly growth of the Company. Our concept of responsible growth gives us the conviction that this is only possible if it is built on solid, lasting foundations that are recognized by the social environment in which it operates.

These practices, therefore, complement and expand upon the current legal framework and are based on our company's commitment to upholding the ideals of **equal opportunity, dignity, and responsibility toward society**.

## 1. Scope of Application and Member Responsibility

This Code of Ethics is binding for all employees of ARANOW Packaging Machinery worldwide, as well as for all members of its management bodies, board of directors, and shareholders; all of whom will hereinafter be referred to as "members".

## 2. Ethical Conduct and Compliance with Applicable Laws

All members are required to follow this compilation of best practices and guidelines, as well as all applicable national and international laws. In every activity and business relationship, members must act loyally and with a respectful and trustworthy attitude, upholding and promoting ARANOW's reputation.

All members must respect human rights. All forms of discrimination are prohibited, whether based on race, ethnicity, culture, religion or ideology, sex, sexual identity, marital status, or any physical or mental disability.

Any activity promoting child labor, forced labor, or violations of labor conditions under international laws is strictly forbidden.

## 3. Environmental Protection

Protecting the environment is a top priority for ARANOW. For this reason, we use natural resources in a fully responsible manner.

*1 Official versions are available in English, French, German, Catalan and Spanish.*

## 4. Protection of Company Assets

All members must safeguard company assets from misuse and loss. As a general rule, assets may only be used for business purposes unless private use is specifically authorized.

Members must also protect ARANOW's intellectual property—such as patents, trademarks, or accumulated technical knowledge—from external threats and potential losses. Respect for third-party intellectual property must be scrupulous.

## 5. Information Handling

Trade secrets and other sensitive information must be treated confidentially and protected from unauthorized disclosure. The same applies to inventions and any other form of technical knowledge (*know-how*). Members with access to such information must not disclose it to third parties without express authorization, nor use it for purposes unrelated to their job.

Business documentation and data storage media must be protected against unauthorized third-party access. The collection, use, and storage of personal data must comply with current data protection regulations.

## 6. Conduct Regarding Competition

Antitrust legislation aims to ensure and preserve free and undistorted competition in the interest of all market participants.

Therefore, all members are obliged to comply with existing antitrust laws.

## 7. Anti-corruption

We reject corruption in any business action, whether on national territory or anywhere in the world. We renounce any business and the pursuit of internal objectives when the only way to achieve them is to contravene the law.

In particular, the following are prohibited:

- Offer, promise or grant to national or foreign officials any personal, financial or other benefit in exchange for taking or refraining from taking any official action.
- Offer, promise or grant to employees or representatives of domestic or foreign companies any personal, financial or other benefits.
- Supporting unlawful actions of others.
- Soliciting or accepting personal, financial or other benefits from business partners or employees of the same.

Excluded from the above prohibitions are gifts and entertainment which, in the context of business relationships with business partners, are within the scope of hospitality, custom and courtesy customary in business practice, provided that no national and/or international law is violated thereby.

Acceptance of gifts and entertainment is not always inappropriate; it is the circumstances that will determine their appropriateness. As a general rule, offers that could create an obligation to the supplier should be declined, and it should be noted that any gift estimated to be worth more than EUR 100 should be reported to the person responsible within the Company.

## 8. Conflicts of Interest

Members must avoid activities that could lead to conflicts of interest. As a general principle, contracts should not be awarded to close contacts such as spouses, partners, or relatives, or to companies where such individuals hold decision-making roles, have significant ownership, or act as our representatives in the contracting process.

## 9. Combating money laundering

ARANOW only cooperates with reputable business partners who operate within the regulations laid down by law and do not use illegal financial resources.

All members are obliged to comply with anti-money laundering laws and to promptly report any indications of suspicion of money laundering.

## 10. Values

This **Code of Ethics** is based on the ten Corporate Values that form the foundation of our way of being and acting.

## 11. Implementation

ARANOW is aware of its responsibility and is and will be actively working to ensure that the Code of Ethics is observed. Actions that are incompatible with this Code must be corrected without delay.

## Self-evaluation:

Monitoring and compliance with this Code of Ethics must be ensured. If at any time an ethical conflict arises, you can **self-assess** by answering the following questions:

1. Is it legal?
2. Is it in line with ARANOW's Corporate Values?
3. Will it have a negative effect on me or ARANOW?
4. Who else might be affected?
5. Would I feel reprimanded if others found out how I decided to act?
6. Is there an alternative solution that does not pose an ethical conflict?

And above all, act with transparency, confidently discuss your concerns with your line manager, explain your reasoning and share experiences that have led to conflict.

From the business world, we have an obligation to leave a fairer and more egalitarian society to future generations; without a doubt, leading by example is the best legacy.