

Code of Conduct

Preamble

Logopak Sistemas S.L. is a company of the Possehl Group, whose activities are based on clear basic values and standards of conduct in order to meet the high demands of its shareholder, the Possehl Foundation. This includes ethically irreproachable behaviour of the management and employees, the preservation of the good reputation of the Possehl Group as a whole as well as of each individual company, the safeguarding of the company's success and further growth while at the same time limiting risks.

The Code of Conduct pursues the goal of ensuring a high level of social and ethical competence through the best possible transparency. To this end, all employees are to be provided with behavioural guidelines for concrete action in important business situations.

1. Compliance with laws

Logopak Sistemas S.L. as well as all Logopak Group companies is required to comply with the respective legal and cultural frameworks in the countries in which they operate.

All employees are expected to know and comply with the respective laws and guidelines. Special priority is also given to the protection of internationally recognised human rights and their observance.

Violation of laws and other binding regulations can have far-reaching consequences for the employee under labour law and criminal law.

2. Occupational health and safety

Logopak Sistemas S.L. offers its employees a safe working environment and fair working conditions. No employee should be exposed to unnecessary risks.

Every employee is relevant and co-responsible for effective health and safety in the workplace. Compliance with safety regulations is essential.

3. Responsibility for the environment

Logopak Sistemas S.L. is committed to complying with applicable legal environmental regulations and corporate standards.

Furthermore, we actively contribute to the protection of the environment by recognising our responsibility for the conservation of natural resources and by promoting the development and diffusion of environmentally friendly technologies, while maintaining high quality and safety standards.

4. Social responsibility

The observance of human rights as well as respect and appreciation for fellow human beings are prerequisites for responsible interaction with one another.

Each and every employee shares the responsibility for ensuring that fundamental social standards are observed and that these rights are not violated. They are indispensable for good human coexistence and interaction and therefore apply equally to dealings within the company and with business partners.

5. Dealings with each other – prohibition of discrimination

Logopak Sistemas S.L. disapproves of forced labour, child labour or any other form of exploitation and contempt for human beings.

No employee may be discriminated against, i.e., disadvantaged without objective reason, because of ethnic or territorial origin or affiliation, gender, age, skin colour, political opinion, sexual identity and orientation, religious conviction, social origin, physical constitution, disability or other personal characteristics.

Neither personal insults nor forms of sexual harassment in the workplace are tolerated.

6. Avoidance of conflicts of interest

6.1 Personal or private interests

Business decisions must not be influenced by offering or granting personal or financial benefits to individuals. Official duties and private interests must be strictly separated from each other.

Logopak Sistemas S.L. supports its employees through targeted regular instructions to recognise possible conflicts of interest and to act independently of personal relationships in the common entrepreneurial interest.

6.2 Accepting and giving gifts and invitations

Logopak Sistemas S.L. employees are prohibited from giving or accepting monetary gifts, such as cash, monetary equivalents or securities, on official business. In general, no gifts or gratuities may be accepted or distributed that influence or interfere with independent decision-making. The only exceptions to this rule are occasional and promotional gifts as well as invitations to business meals that are related to a specific business purpose.

7. Fair competition

The applicable competition and antitrust laws regulate dealings with competitors, suppliers and customers. Agreements with competitors and other activities that hinder free and open competition in an unlawful manner, unduly influence prices and conditions or allocate business areas or customers are not permitted.

Legally protected and competition-relevant information may not be passed on and suppliers or other business partners may not be inadmissibly excluded from competition.

8. Bribery, corruption and tax evasion

Corruption and the crimes that often accompany it, such as tax evasion, fraud and forgery of documents, are not tolerated in our companies.

Granting advantages that are otherwise contrary to the legitimate interests of the company is prohibited. Any suspicion of bribery or corruption must be avoided. Direct or indirect payments or financial benefits of this kind may neither be accepted nor offered.

The use of any irregular means of payment or other forms of concealment of payment flows is also prohibited. Unusual monetary transactions are subject to mandatory reporting (see European Money Laundering Directive).

9. Protection of company property and trade secrets

9.1. Company property

Company property shall be protected from loss, theft or misuse. Tangible assets such as materials, goods, office supplies, customer and promotional gifts and equipment shall be handled with care and used only for company purposes. Only with the express consent of the supervisor may facilities or objects of Logopak Sistemas S.L. be used for private purposes or removed from the company. The currently applicable regulations on private telephone, email and internet use must be observed.

9.2 Protection of all data

Data that Logopak Sistemas S.L. receives from employees, business partners and customers is protected. Local laws (e.g., the General Data Protection Regulation “GDPR” of the European Union), regulations and standards governing the handling of confidential data must be strictly observed.

9.3 Confidentiality

Both during the duration of an employment relationship and after its termination, company and business secrets must be protected from disclosure to unauthorised persons. This includes internal company interests as well as any information concerning customers of the Logopak Group and their business secrets. Internal and external information is subject to absolute confidentiality. The only exception to this rule is information that is already in the public domain, accessible to third parties or requested by public authorities.

9.4 Communication with the media

Communication with the media requires the approval of the management.

10. Procedure for implementation

Logopak Sistemas S.L. employees may report violations of the Code of Conduct or legal requirements to the Compliance Officer of the Identification Solutions division. The current Compliance Officer is Alfredo Sansone (Head of Supply Chain and Operations & Compliance (PID), Novexx Solution GmbH, Ohmstraße 3, 85386 Eching, Tel.: +49 8165 925 218, email: alfredo.sansone@novexx.com).