

# Code of Ethics

of Novopress GmbH Pressen  
und Presswerkzeuge & Co. KG

**novopress**  
because quality matters

## Imprint

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GmbH

Pressen und Presswerkzeuge  
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## Preamble

As a company that operates internationally, **Novopress GmbH Pressen und Presswerkzeuge & Co. KG** (hereinafter “**Novopress**”) is aware of its responsibility to society and the environment, and in particular to its customers, suppliers, and other business partners, as well as to its shareholders and employees\*.

**Novopress** therefore commits itself to clear principles that form the framework for its corporate and social activities and which are based on the fact that the actions of **Novopress** and its employees are determined by personal responsibility, sincerity, loyalty, and respect for each individual fellow human being, and equally for society and the environment.

With the following Code of Ethics **Novopress** pursues the goal of defining, by way of a voluntary commitment, fundamentally self-evident ethical and legal minimum standards, as well as basic compliance principles for **Novopress**’ entrepreneurial activities, and at the same time providing guidance for the employees.

\* For reasons of readability, only the masculine form is used in the text. However, this always refers to both the feminine and the masculine form.

## 1. Scope and principles

The Code of Ethics applies to the entire **Novopress** company. The members of the Board of Management and all other executives are expected to act as role models in observing the Code of Ethics in accordance with their position in the company.

Through its actions, **Novopress** also intends to work towards the widespread dissemination of the minimum standards and compliance principles laid down in this Code of Ethics. Companies and persons with whom **Novopress** has a business relationship should therefore be encouraged to adhere equally to these principles or to commit themselves to comparable sets of rules.

The minimum standards and compliance principles laid down in this Code of Ethics should also be taken into account in the future design of all company regulations and contractual arrangements.

## 2. Social responsibility towards society and the environment

**Novopress** is expressly committed to its social responsibility for society and the environment, both on a regional and national level, as well as internationally. Awareness of this social responsibility is also a key factor for sustainable corporate success.

Above all, **Novopress** considers itself to have a special responsibility to promote social developments, especially at the regional and local level, for example through social, ecological, and cultural initiatives or other appropriate measures.

Another high priority is the protection of the environment and the conservation of its resources, both for the present generation and for future generations. Accordingly, environmentally friendly design, technical safety, and health protection are fixed targets already during the development of their products.

**Novopress** is committed to the corresponding social standards within the company and also pays particular attention to the implementation of these standards in the business relationships with its customers and suppliers as well as other business partners.

### 3. Compliance with laws and regulations

**Novopress** is fully committed to acting in accordance with the law. Observance of law and legislation is a top priority for **Novopress**.

**Novopress** always observes the relevant laws and official regulations as well as the internal rules of the company. In addition, the framework conditions for **Novopress'** entrepreneurial activities are not only formed by international or national law, but also by a multitude of social, cultural, and societal rules. As far as legally permissible and possible, **Novopress** also includes these frequently unwritten

regulations in the decision-making and consideration processes and strives to act in accordance with them. To this end, **Novopress** will continuously inform all employees of the regulations that affect them, taking into account the participation rights of employee representatives, and will always support them in their observation.

**Novopress** also works towards compliance with the relevant laws, regulations, and framework conditions by its customers, suppliers, and other business partners.

## 4. Business activities - general principles

**Novopress** conducts all business in an exclusively fair, legal and honest manner and acts in accordance with applicable laws, reasonable business practices and ethical principles. In particular, **Novopress** is committed to unadulterated competition, i.e. competition that is not impaired by unlawful, restrictive, and/or unfair business practices.

To ensure transparency and regularity of operations and business activities, business transactions must be fully and truthfully documented.

The private interests of **Novopress** employees and the interests of the company must always be kept strictly separate. A conflict of interest occurs when private interests collide with **Novopress** interests.

## 5. External relations

### 5.1 Conduct towards customers

**Novopress** offers its customers a wide range of products and services. The aim is to meet the needs of customers through appropriate and efficient solutions. This includes the constant review of the service portfolio and its forward-looking adaptation to new market requirements. **Novopress** always tries to ensure that all customers are treated fairly.

### 5.2 Conduct towards suppliers

In its relationships with suppliers, **Novopress** ensures compliance with the rules of the Code of Ethics. **Novopress** therefore does not maintain any business relationships with suppliers who are known to violate fundamental principles that are considered essential in the **Novopress** Code of Ethics.

### 5.3 Conduct towards intermediaries, agents, and advisors

At **Novopress**, contracts with intermediaries, agents, and consultants are only concluded with appropriately qualified persons or companies. The amount of the remuneration must be commensurate with the services and qualifications of the intermediary, agent, or consultant.

### 5.4 Conduct towards shareholders

**Novopress** regards the capital of its shareholders as a prerequisite and basis for its business activities. The preservation of the capital and the achievement of a predetermined return on it, as well as transparency and responsibility towards the shareholders, are therefore essential goals for **Novopress**.

### 5.5 Conduct towards authorities and the public

**Novopress** cooperates with state authorities and the public in a trustworthy manner on the basis of applicable law. In particular, **Novopress** respects the professional independence of journalists and the media.

### 5.6 Information principles

Open and effective cooperation and collaboration with state authorities and the public includes correct and truthful reporting. All published notices, corporate information, records, reports, proposals, and accounts must be factual, accurate, understandable, truthful, and in compliance with legal requirements.

**Novopress** is also expressly committed to correct and truthful reporting to its shareholders, business partners, and employees.

### 5.7 Political conduct

**Novopress** is neutral in terms of party politics and does not make donations to political parties or to organizations or foundations that have close ties to political parties. **Novopress** also does not enter into consulting agreements or similar remunerated agreements with persons who hold public offices or public mandates on a full-time basis.

### 5.8 Conduct towards competitors

Competitors and other companies are not discredited. In particular, **Novopress** does not use unlawful practices in competition and does not provide any incentives to do so.

## 6. Internal relations

### 6.1 Working conditions, plant safety, health protection

**Novopress** makes sure that all requirements and specifications regarding working conditions, plant safety, and health protection are complied with in order to guarantee a safe and healthy working environment for employees in accordance with all applicable laws, regulations, and company rules.

**Novopress** is also working on the continuous improvement of occupational and plant safety and health protection, taking into account the participation rights of employee representatives, in order to ensure the best possible precautions against the risk of accidents. This applies to the technical planning of workplaces, facilities and processes as well as to safety management and personal conduct in everyday work.

Furthermore, **Novopress** guarantees that the fees comply with the legal regulations regarding minimum fees.

**Novopress** also undertakes, in compliance with the participation rights of employee representatives, to provide its employees with comprehensive and regular training on how to comply with the legal requirements and to always support them in the process.

### 6.2 Equal opportunities and respectful cooperation

**Novopress** respects the dignity and personality of each employee. Dealing with one another is characterized by mutual respect, fairness, team spirit, professionalism, and openness. In this respect, too, the members of the management board as well as the executives act as role models according to their position in the company.

**Novopress** promotes equal opportunities and diversity. In particular, any discrimination based on gender, age, religion, race, disability, ethnic origin, worldview, or sexual identity is prohibited, especially in hiring, compensation, access to training, promotion, termination of employment, or retirement.

### **6.3 Employee representation**

**Novopress** works together with the employee representatives in a spirit of trust, in accordance with and in compliance with the provisions of the Works Constitution Act and the applicable works agreements.

## 7. Sustainability of the Code of Ethics

**Novopress** is aware that trust in a company is measured in particular by how the company is perceived and experienced by third parties, in particular customers, suppliers, and business partners, as well as by the general public.

**Novopress** will therefore ensure that the lived corporate reality corresponds to the minimum standards and compliance principles laid down in this Code of Ethics. Each employee receives a copy of the Code of Ethics.

Basic values are formulated in the Code of Ethics, which of course do not regulate all situations conclusively. When in doubt, employees should consult their manager, or the organizational unit responsible for compliance management, or the responsible compliance officer.



GmbH  
Pressen und Presswerkzeuge  
& Co. KG

Neuss, 2022

A handwritten signature in purple ink, consisting of a large, sweeping loop followed by a smaller, more intricate flourish.

Gert Rieger  
Managing Director



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