

# **CORPORATE GOVERNANCE**

COMPO's corporate governance encompasses the company-wide values and standards. It governs how decisions are made, how actions are taken and applies equally to management, executives and employees. It also forms the basis for relationships with superiors, colleagues and partners. COMPO's corporate governance is characterised by a pleasant working atmosphere, teamwork and a flat hierarchy - an excerpt:

## RESPONSIBLE CONDUCT

## **Compliance-Management**

At COMPO, mandatory compliance with internal company and legal provisions is an integral part, both of the internal value system and the company's core values. The binding framework for legal and ethical conduct and for compliance with legal requirements is clearly defined in the compliance system. It forms the basis for the implementation of internal and external regulations. In order to familiarise all employees with conduct in accordance with the law and guidelines, the topic of compliance is an integral part of mandatory training courses.

#### **Code of Conduct**

The Code of Conduct provides the legal and ethical framework for the conduct of employees. It defines the basic rules of conduct within the company as well as in relation to the company's business partners and the general public. The Code also reflects COMPO's core values, in particular integrity, fairness and respect, compliance with regulations and laws, employment, occupational health and safety, production safety and quality, and environmental protection. It regulates that the business transactions and business relationships conducted at COMPO are conducted in accordance with the sustainability goals, all laws and regulations and the high ethical standards of the Group. This is because only such business conduct simultaneously serves social interests and ensures the long-term continued existence and success of the company. The rules that apply in the company are followed by all employees at all times and everywhere. The management system is also constantly being improved.

#### Goals

In order to achieve continuous improvement within the company, COMPO formulates annual targets in the areas of quality, environment, energy and occupational health and safety, to define measures to achieve the targets and to discuss the results regularly. COMPO is committed to ensuring the availability of the resources and information required to achieve the targets.

## Involvement of employees in the company

COMPO really wants all employees to participate fully. The group has committees that are devoted to the concerns of employees on site and to maintaining exchanges with the management based on trust. Agreements are used to regulate aspects of the relationship between employer and employees that are not covered by the law. In addition, site-specific tools are used to encourage employees to contribute their own ideas and suggestions for im-provement, in an uncomplicated and open manner, on how COMPO can work more efficiently, sustainably and in a more environmentally friendly manner.



## RESPONSIBLE ATTITUDE

#### Human rights, labor and social standards

It goes without saying that COMPO respects human rights without exception in all its business activities. The internationally recognized human rights, in particular the principles of the International Bill of Human Rights, the OECD Guidelines for Multinational Enterprises and the labour and social standards of the International Labour Organization (ILO) are respected and supported. The Code of Conduct stipulates that forced labour, child labour and discrimination are not tolerated in any formneither at COMPO nor at the company's business partners. COMPO also requires its business partners to comply with all relevant laws on the remu-neration of labour and the statutory provisions on working hours.

### **Equal opportunities and treatment**

COMPO offers equal employment opportunities for all employees and follows the principle of "equal pay for work of equal value". Unlawful discrimination against employees is not tolerated. The Code of Conduct stipulates that no employee may discriminate against another employee or business partner on the grounds of ethnic background, culture, religion, age, disability, gender, sexual orientation or ideology.

#### Health and safety at work

The health and safety of employees is of particular importance. Accordingly, a safe and healthy working environment is provided and continuously improved. In the same way, it is ensured that the company does not create any risks to the health and safety of its neighbours.

Occupational health and safety is ensured within the framework of the applicable national regulations and on the basis of the company's health and safety policy.

To prevent work-related injuries and illnesses, COMPO is committed to providing safe and healthy working conditions. To this end, risks are identified and continuously minimized by means of a catalogue of measures. The company's safety issues are regularly communicated and where relevant the appropriate training is given. Where appropriate the information is written down to form work instructions, best practices and process descriptions.

## **Environmental protection and energy management**

COMPO respects the environment in the pursuit of all business activities and expects the same from its employees. COMPO is committed to protecting the environment and conserving natural resources. Therefore, business is conducted in full compliance with all environmental laws and regulations. Regular training for management, executives and employees ensures that everyone is familiar with the relevant environmental laws and regulations and can incorporate them into their own behaviour and take them into account when making decisions. It is the responsibility of each and every one of us to acquire this knowledge. Through our own behaviour, we contribute to the goals of environmental protection and the conservation of natural resources.

A particular requirement at the production and bottling sites is the obligation to reduce emissions as much as possible, to reduce energy consumption and to minimise waste while ensuring that any that does occur is disposed of properly, always in compliance with legal requirements and binding obligations. The reduction of energy consumption through the continuous optimisation of processes and the use of renewable energies is given a high priority. COMPO is committed to continuously optimising its environmental management system in order to improve its environmental performance.



## FAIR COMPETITION AND INTEGRITY

#### Fair competition

COMPO is committed to fair and free competition and prohibits any form of anti-competitive practices. COMPO complies with laws and regulations and observes the applicable legal requirements, prohibitions and obligations at all times. This includes all laws and regulations relating to trade sanctions and other sanctions, customs duties and import and export controls.

#### Money laundering prevention

It is of crucial importance that COMPO protects its reputation and avoids any contact with money laundering and terrorist financing. All employees are required to report unusual financial transactions that could give lead to suspicion of money laundering to the Legal & Compliance department in case of doubt.

#### Anti-corruption and acceptance of gifts

COMPO rejects any form of corrupt and corruptible behaviour. It is only permitted to accept invitations from business partners or customers if the occasion and the scope of the invita-tion are appropriate. If an employee is promised or offered an advantage that goes beyond a customary benefit, he or she must report this immediately to his or her line manager or the Legal & Compliance department.

# QUALITY AND PRODUCT SAFETY

## Product conformity and safety

COMPO's quality promise applies both to the international product range and to company-wide solutions and services. They must function reliably and be uncomplicated and safe to use. The high standards of sustainability, from raw materials to logistics, are always in line with the COMPO quality promise. Care is taken to ensure that all legal requirements for product safety are taken into account in the development and marketing of products and that any relevant norms and standards are complied with. New products are only marketed if it is en-sured that they do not endanger the safety and health of people or have any avoidable negative effects on the environment when used as intended or in a foreseeable manner. The continuous improvement of all processes and systems is an integral part of our daily work.

The satisfaction of all stakeholders is one of the most important principles. COMPO undergoes regular quality controls in order to be able to demonstrate compliance with the high standards and associated requirements of all customers for the international product range and for company-wide solutions, services and processes through official certifications. For us, quality management means a holistic view of all aspects of our activities in accordance with standards, laws and customer requirements.

## DATA SECURITY

## Data security and the protection of personal data

The protection of personal data – especially of employees, customers and suppliers – is of particular importance to us at COMPO. We protect all company information as well as information from and about our business partners and treat it confidentially. We do not collect, store, process or use any personal data without a legal basis and the consent of the data subject.



# OPEN AND RESPONSIBLE COMMUNICATION

#### **Communication**

COMPO's responsible actions also include the timely and comprehensive provision of infor-mation. COMPO has therefore made it its mission to communicate transparently, both internally and externally. The principles of ecological, social and societal management and corresponding corporate activities are presented in a comprehensive and transparent manner.

Stephan Engster CEO

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