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Our Conviction – Our Conduct

规范即信念

Introduction

介绍

The mission statement of Chemie + Papier Holding AG (CPH), passed in the year 2006, describes our values, objectives and business strategy. All sites in Europe, the US, Asia and Brazil of all different business divisions, inclusively Perlen Packaging, and all their employees live these shared values. The mission statement was revised twice, in 2009 and 2014. Within the internal review system and in addition to the present mission statement and management principles, the Code of Conduct responds in more detail to legal and moral requirements regarding behaviour of leadership and employees, and also business partners in the course of their duties.

2006年通过的化学纸业控股公司(CPH)的宗旨,明确了我们的价值观、目标以及营业策略。欧洲、美国、亚洲以及巴西,含贝润包装在内的所有业务部及其所有员工都需践行此价值观。本宗旨于2009年和2014年经过两次修改。在内部审查系统内,除宗旨与管理原则,《行为规范》则更涉及对管理人员及员工关系、业务过程中的合作伙伴的法律和道德要求的细节。

The Code of Conduct stands for self-commitment of leadership and employees, to pursue a defined behaviour pattern or equally, to refrain from an undesired one. It represents a supporting pillar for our commitment to act with a high degree of integrity. This requires that everyone is clearly aware of their responsibility and acts accordingly. Especially to ensure a successful business activity, absolute trust in all Perlen Packaging employees is of great significance to our business partners, customers, public and authorities.

《行为规范》意味着管理人员和员工承诺追求规定的行为模式,即避免错误的行为,代表着我们以此为基础承诺自身行为的正直。这要求每个人都清楚自身的职责并遵守行为规范。特别是为了确保业务活动的达成,对所有贝润员工的充分信任,对于生意伙伴、客户、公众以及官方都有极其重大的意义。

Herein, leadership acts as role model. They are expected to demonstrate a high level of social and ethical competence. The Code of Conduct is applicable to all Perlen Packaging plants. Leadership bears a great responsibility for implementing the Code of Conduct. They shall ensure that the employees are aware of the rules and they ought to put them into practice within their individual sphere of influence. Leadership representatives take their time to explain their own decisions, incase questions are raised in terms of the Code's Principles. They live the ingrained principles of the Code in an exemplary manner. Leadership is accountable for the implementation of the Code and provides regular feedback regarding measures taken and their results. The management is accountable to incorporate the Code of Conduct as vital part of employee training sessions.

管理人员必须是榜样。管理人员应该表现出高水准的社交水平与道德修养。《行为规范》适用于贝润的所有工厂,管理人员则肩负着落实行为规范的巨大责任。管理人员要确保所有员工明确公司的规定,并在自己的职责范围内遵守这些规定。如有基于行为准则所提出的疑问,管理人员要对其决议决定作解释沟通。管理人员处于行为规范榜样模范性的角色,践行行为准则并对措施及结果负有定期反馈以及培训的职责。



Wolfgang Grimm, Chief Executive Officer Perlen Packaging AG

November 24, 2021

1. Ethical Principles

道德原则

Following ethical principles are an integral part of Perlen Packaging's management and employee's system of values:

遵守以下道德原则，使之成为贝润包装管理以及员工价值体系的组成部分。

- **Correct behaviour, signifies to strictly comply with current laws of the individual country, consideration of legal and cultural parameters**
正确的行为，意味着严格遵循所在国家的现行法律并兼顾其法律文化标准
- **Loyalty towards Perlen Packaging and integrity towards all stakeholders**
对贝润包装忠诚并对所有股东诚信
- **Fair, courteous and respectful interaction with all employees**
与员工沟通交往时公正、礼貌，且尊重
- **Responsible and transparent conduct when dealing with risks**
面对风险或挑战时尽责并保证操作的透明
- **Professionalism, fairness and reliability within all external business relationships**
所有对外关系交往中做到专业、公正、可靠
- **Child labour is categorically prohibited in Perlen Packaging**
绝对禁止使用童工

2. Dealing with Conflicts of Interest

利益冲突的处理

In everyday working life, all Perlen Packaging employees prioritise the company's interests over personal interests. Therefore, Perlen Packaging expects all employees to act objectively and to avoid conflict situations which might arise when personal interests clash with Perlen Packaging interests. Personal interrelations (relatives, friends, or finances) shall be revealed at the time of application or employment, equally secondary employments, political functions or seats in any board of directors.

在日常工作中，所有贝润包装的员工必须将公司利益置于个人利益之上。因此，贝润希望所有员工客观行事并避免个人与公司发生利益矛盾时可能发生的冲突。应聘申请时，应当说明个人关系（亲戚、朋友、未婚夫/妻），同样要说明的还有其第二职业、政治职能或是任何理事会的职位。

3. Communication Policy

沟通政策

We encourage mutual trust by open communication related to significant activities; also when dealing with the public. It is our aim to communicate correctly and sensibly. In addition, we want to be renowned for an open and reliable communication policy. Sources of information are business reports, press releases, letters to stakeholders, communications on internal billboards, website and Intranet, company newspaper and communications through the Line Manager.

我们鼓励在与公众接触以及处理重大活动时通过公开交流的方式实现互信，旨在正确且清晰的交流。此外，我们希望以开放可靠的沟通政策而著称。信息的来源有业务报告、新闻稿、致股东的信、内部公告牌、网站、内联网、公司新闻报，以及直属管理人员的沟通交流。

Shareholders/Investors as well as general public/press are being informed about substantial events and activities related to the CPH Group. However, the relevant shareholders/investors and general public/press communication is exclusively performed by CPH Group Experts.

股东/投资人以及公众/媒体可得知 CPH集团的重大事件及活动，然而，CPH 集团的相关专家团队负责与之进行相关沟通。

External communication of non-stock market related information, such as technical publications, brochures and customer communication may be carried out by Perlen Packaging.

非股票相关信息的外部交流，如技术出版物、手册和客户沟通等应由贝润包装执行。

Confidential information must not be disclosed to third parties, a careful handling is essential. Operational and company secrets must not be passed on, neither internally nor externally. Even in the event of termination of employment this regulation will remain valid.

机密信息不可透露给第三方，必须谨慎处理。公司运作机密不可流传，无论内部还是外部。即便终止雇佣关系此规定依然有效。

When dealing with computers and electronic data, applying password security practices and regularly changing passwords do prevent unauthorised access.

在处理计算机和电子数据时，密码安全的运用以及定期密码变更可以防止未经授权的侵入。

You must not disclose insider trading information which is not readily available in the market-place. All employees are committed to comply with the regulations of the insider trading legislation. Confidential information must not be used as basis for trading company or any other company's commercial papers. Corresponding information must not be shared with people, neither inside nor outside the company.

不得透露市场上不可获得的内部交易信息。所有员工必须承诺遵守内部交易的规定。机密信息不得作为贸易公司或其他公司商务文件的基础。相关的信息不应与他人分享，无论内部还是外部。

4. Financial Assets and Financial Integrity

财务资产与财务诚信

The employees present a faithful and accurate picture of the company. All employees are expected not to misuse or waste the company's financial assets. Financial assets are for example: working time, company property, internal information and the company's prospects/opportunities.

员工应当对公司忠诚。所有员工应当避免误用或浪费财务资产。财务资产如：工作时间、公司财产、内部信息以及公司的前景/机遇。

5. Bribery and Corruption

贿赂与腐败

Perlen Packaging convinces by performance, quality and reliability of marketed products and services. No personal favours or benefits may be demanded, accepted, offered or granted to secure a favourable treatment at any time of contract initiation, processing or settlement. Offering or accepting gifts shall not exceed current cultural standards, customs and decency. It is prohibited to accept or offer monetary gifts, regardless of the amount in question. Non-monetary gifts or invitations may not exceed a reasonable limit. The moment you have got the feeling a gift might render you biased, the acceptance shall be politely but firmly refused. For gifts and invitations between employees and business partners, the following rules are applicable:

贝润包装以其产品的性能、质量、可靠性及服务获得认可。在合同订立、修改和确定过程中，不得要求、接受、提供或授予个人恩惠以获得优惠待遇。赠送或接受礼物不应超过文化、风俗的标准，且应合乎礼仪。禁止接受给予钱财馈赠，无论金额多少。非货币性的礼物或邀请也不宜过度。一旦你认为礼物可能过于贵重，应当礼貌但坚定地拒绝。该规定也适用于员工和业务伙伴之间的礼物和邀请。

- Gifts shall be handed over openly and if possible publically.

礼物赠送应当公开，在可能的情况下要以公众名义赠送。

- Gifts and invitations must not conflict with/exceed the individual business partner's rules.

礼物和邀请不应当与业务伙伴的规定相冲突。

- Gifts should not create the impression that a favour is expected in return. They should not be associated to any business transaction, neither in terms of time nor content.

送礼物不应当含有索取回报的意味。礼物应当与业务无关，在送礼时间和礼物内容上都是如此。

6. Discrimination

歧视

Leadership, employees and colleagues maintain a mindful, fair, esteeming and respectful interaction. Nobody should be assaulted, discriminated or treated disadvantageously, due to his or her racial or ethnic origin, nationality, gender, religious believe or ideology, political views, age or physical constitution, sexual orientation or appearance. It is every employee's duty to respect every other employee's privacy. Sexual assault is absolutely unacceptable.

管理人员、员工、同事交往中需互相关心、尊重、平等。禁止以人种、民族、国籍、性别、宗教信仰、意识形态、政治观点、年龄、身体情况、性取向或外表等因素攻击、歧视或威胁任何员工。尊重其他员工的隐私是每位员工的责任。性侵犯绝对禁止。

7. Donations and Sponsoring

捐赠与赞助

By sponsoring we understand financial support for events, projects and organisations which are advantageous for our company's image building. The same purpose applies to donations, even though rather to a limited extend. We apply following rules of conduct:

通过赞助我们获得财政支持以实施项目、计划和组织活动，这些对于公司形象的建立都有益处。捐赠也是一样，尽管程度有所区别。我们遵循下列规定：

- We preferably support local, events, organisations and projects which are related to our community.

我们倾向于支持当地的项目、组织活动和项目。

- The supported events, organisations and projects shall be of common interest and offer social and/or cultural added value.

我们所支持的项目、组织活动和项目应当是造福大众的，并且能够增加社会与/或文化方面的价值。

- We only support recognized organisations and projects.

我们只支持受认可的组织活动和项目。

8. Relationship with Society and Government

与社会和政府的关系

- Within the mission statement Perlen Packaging affirms to act responsibly towards society and government. Hence, whenever possible, Perlen Packaging allows employees to be publicly active in a corresponding position, if they wish to do so.

在本宗旨中，贝润包装明确对社会和政府负责。因此，任何可能的时候，贝润包装都允许员工基于其个人意愿从事公共活动。

- As global company Perlen Packaging is also working in countries with different political systems. Company and employees, commit to accept the local situation and conditions, and behave accordingly. However, if they should stand in contrast to our ethical and moral conviction, we avoid operating in these countries.

贝润包装作为全球化公司，在政治体系不同的国家开展业务。公司和员工承诺接受当地条件并以此作为行为准则。然而，如果当地条件有悖于我们的伦理道德信念，我们会避免在这些国家经营。

- Basically it is allowed to hold a public office (legislative, executive, judge, member of commissions etc.). Prior to a relevant election or assignment though, the employee shall inform the line manager.

通常情况下允许设立公共办公室（立法、行政、司法、委员会成员等）。但在相关选举和任命前，员工应当告知直属管理人员。

- The company is interested in collaborating with professional, economic and industry associations as well as with chambers of commerce, promotion of economic development and similar organisations.

公司乐于与行业、经济和行业协会以及商会、经济发展促进会等类似机构进行合作。

- Secondary professional activities, which pursue a pecuniary reward or absorb the employee extensively, require prior approval by Management.

旨在金钱回报或广泛招纳雇员的二级专业活动，需要管理层的批准。

- Perlen Packaging focuses on fair partnership. In the interest of company and employees, social partnerships lead to the following:

贝润包装注重公平的合作关系。为了公司和员工的利益，社会合作关系意味着以下各项内容：

- Definition of modern working conditions

现代工作条件的定义

- Encouragement to good employer-employee relationship

鼓励良好雇主-雇员关系

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- Ensuring a positive working climate
营造积极的工作氛围
 - Creating employee involvement options
创建提供员工参与选择的机会
 - Employees and social partners likewise, are considered as partners for employment contracts with Perlen Packaging.
员工与社会伙伴同样被视作与贝润包装有雇佣合作关系的伙伴

9. Environment Policy

环境政策

Guidelines for safety and environment protection

安全与环境保护指导方针

- One of Perlen Packaging's primary concerns is operational safety and environment protection.
贝润包装首要关心的问题之一就是生产安全和环境保护。
- Accidents and environmental impact are avoidable, provided that every activity is being thoroughly planned, safely prepared and thoughtfully implemented.
事故和环境影响是可以避免的，只要每项工作都仔细计划，安全准备、认真落实。
- We act in compliance with legal requirements and are geared with the requirements of our customers and the society.
我们按照法律要求行事，并适应我们的客户与社会的要求。
- We control our processes and procedures to ensure the Environmental Impact is kept at the lowest level possible, safety is guaranteed and incidences are being prevented.
我们控制生产过程与步骤以确保将环境影响控制在最小程度，确保安全并预防意外。
- We particularly focus on a considerate and economic use of resources as well as prevention of waste during the manufacturing process.
我们尤其重视资源的充分使用，同时也重视在制造过程中防止浪费。
- The responsibility for safety of people, material assets and environment lies with each and every one, our employees and leadership of all levels.
确保人员、物资、环境的安全是每一个人的责任，包括所有员工以及管理人员。

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- We are committed to a continuous process improvement. We set ourselves measurable goals, determine measures and control their effectiveness on a regular basis.

我们致力于持续改善加工过程。我们设立可衡量的目标，制定措施并定期控制效率。

- Employer and employees take all the safety precautions which are

雇主和雇员要做到安全预防措施，要符合以下几点

- recommended by our experience

根据经验做出的判断

- applicable according to the current state of the art

与目前发展状况相匹配

- appropriate to the given circumstances.

适用于客观情况

Development of our organisation

组织的发展

- Appropriate operational and labour organisation ensures safety and health of our employees.

适当的生产和劳工组织可以确保所有员工的安全与健康。

- It is within the leadership's responsibility to promote environmental and safety awareness as well as commitment to objectives. Our employee's sense of responsibility is being encouraged through constant and functional communication and education.

管理层在恪守规定的同时有责任提升员工对环境及安全的意识，员工的责任意识会通过不断的沟通和教育而得到提升。

- Leadership shall constantly review, which level of knowledge and skills they may expect from their employees. They initialize the required technical, organisational and HR measures to ensure safety in their division. In case specific knowledge is required, experts are available which take over responsibility for their instructions.

管理人员需经常审查了解员工的知识与技能情况，通过不断调整所需的技术、编制和人力资源措施来确保其部门的安全。在需要特定知识时，由相应专家负责提供指导。

- An operation or process shall only be performed/executed, if safety is ensured.

只有在确保安全的情况下，操作或运行才可以执行。

- We appreciate an open communication and information with both, public and personnel. We publish environment and safety reports on a regular basis and make the same accessible to all interested parties.

我们提倡与公众和个人的开放式沟通与信息交流，定期发表环境与安全报告并使得各个利益相关方都可以获得该报告。

10. Dealing with Violations

违规处理

Perlen Packaging cannot tolerate any violations of the Code of Conduct. Neither personal benefits nor gaining seemingly short-term advantages for our company can justify illegal and immoral business practices.

贝润包装不能容忍对行为规范的任何违反。无论是个人利益还是所谓的为公司获取短期利益都不能够成为违法以及不道德工作行为的借口。

Any violation must be reported immediately and directly to the Head HRM of Perlen Packaging or the HR department of each plant. The consequences are disciplinary measures and legal consequences (e.g. compensation claims). Each employee receives a copy of the Code of Conduct. Additionally, a current version is available on the intranet at any time.

任何违规行为必须立即并直接汇报至贝润包装人力资源总部或相应的贝润包装厂区人力资源管理部门。违规会导致违纪后果和法律后果（如赔偿责任）。每位员工都会收到一份《行为规范》手册。此外，其最新版本可在企业内部网站随时获取。

This Code of Conduct is being verified on a regular basis to ensure completeness and applicability. In case you have any comments and/or question to this Code of Conduct or you would like to report any violation, please contact the Head of Human Resources of Perlen Packaging.

本行为规范定期修订以确保其完整性和可操作性。如对本行为规范有任何意见及问题或者想要报告违规行为，请与贝润包装人力资源部门联系。