

CODE OF CONDUCT

what we stand for and how we act

REYNDERS label printing



CONTENT

03 Explanation by the management

04 Introduction

05 Our company values

06 Business Integrity

- Compliance with the laws
- Communication & information
- Fair entrepreneurship and competition
- Fraud, deception and manipulation
- Presence in risk countries
- Child labour
- Forced labour
- The environment

09 Responsibilities of the organization

- Open communication
- Equal treatment
- Healthy working environment
- Right to get organized
- Collective bargaining
- Protection of personal data
- Development of cooperators

11 Responsibilities of the cooperators

- Confidentiality
- Use of company property
- Internet and email policy
- Media relations and announcements
- Prevention and well-being

EXPLANATION

REYNDERS label printing is an internationally operating group of six printing companies of self-adhesive labels and related products. As a family company it wants to be an autonomous, economically fit and financially healthy enterprise.

As a transparent organization with an open communication we want to be a reliable partner that treats its customers, its employees and its suppliers in a correct manner.

Quality, security and ethical trading with respect for health and environment are essential elements of our corporate policy.

That is why we have developed this Code of Conduct. It describes our strong dedication to ethics, a commitment that arises from our heritage as a family company and that is present in all our actions.

These standards and values must be recognizable within our organization in the way we shape our business, internally to our cooperators, as well as externally to our suppliers, our partners and our customers. This Code of Conduct is our guide.

By living up to our values we ensure that this Code of Conduct is not just words, but an attitude shown by all our cooperators, regardless of their background or location.

We must integrate this Code of Conduct in the structure of our company and it is your first responsibility to read it and to acknowledge its contents.

In short: there are four important steps that will help us to achieve and maintain these high ethical values throughout our organization.

- Become familiar with this Code of Conduct
- Apply the code in everyday situations
- Always try to do what is right
- Ask for advice when in doubt about what to do

There is no right way to do wrong... Acting in an ethical way is an important contribution to our good reputation and to enduring success.

We all want to work for a company we can be proud of.



Marc Reynders, CEO

Friday 5th of February 2021

INTRODUCTION

As a cooperator of REYNDERS label printing, we expect you to respect the intrinsic values of the company and to abide by the company's policy as well as the legislation and the rules. Our values show who we are and how we want to be perceived by our stakeholders. These values are put down in this code of conduct to serve as guidelines for the standard behaviour of all our cooperators.

This code of conduct is important for all of us. It explains what we stand for and how we act. When confronted with difficult ethical or juridical matters we are expected to behave according to our code of conduct.

In this document, you will find the following sections:

- Our corporate values
- Business integrity
- Responsibilities of the organization
- Responsibilities of the cooperators

We expect all our cooperators to speak up freely if they see or hear any kind of violation of the company's policy or the law. To this end we have written procedures to assist you in expressing your concerns. We have committed ourselves to fully protect any of our cooperators who reports any infringement or alleged violation.

The management will not hold responsible its cooperators for any commercial loss that occurs for living up to the code. However, we do want to make clear that the organization can and will consider disciplinary measures, up to ending a contract, when this code of conduct and the company values are willingly and knowingly violated.

OUR COMPANY VALUES

Company values

The company's statement is clear: REYNDERS label printing wants to be the first choice of its customers, its suppliers and its cooperators and a respected member of society. To this end the company values are of paramount importance for the proceedings of all our offices and for the behaviour of all employees when acting on behalf of the company.

The company values allow the management and the site managers to introduce additional local rules for businesslike behaviour, as far as these rules are compatible with our core values and do not harm the good reputation of REYNDERS label printing.

The Board of Directors and the site managers will see to it that the company values of REYNDERS label printing are comprehensibly communicated to all cooperators. Furthermore, the company values play an important role in the decision process of starting or carrying on relationships with suppliers and contractors, or joint-ventures.

Our mission and values

REYNDERS label printing want to be the leading solution provider in the label industry, driven by best-in-class employees and the strongest innovation power resulting in superior quality output, both in product and in service.

- Respect for people
- One team
- Partnership
- Passion to win
- Keep it simple
- Solution minded innovation
- Quality

Responsibilities

In the long term, REYNDERS label printing wants to create added value for its customer, its cooperators and the society it operates in. We do that because we are convinced that sustainable profitability is essential for the continuity of our company. We do our best to guarantee the success and the existence of our customers and we take our responsibility to supply products and services of high quality, at the best price and strictly conform to all safety, health and environmental requirements.

We want to create an attractive work climate for all our cooperators. We will recruit new cooperators based on their ability to fulfil the requirements of the job and we will create the required climate for further individual and professional development, as well as for a safe and healthy workplace.

We believe it to be our responsibility to forbid any form of intimidation, of discrimination and of exploitation by forced labour. We conduct our business in a socially acceptable manner, which means that we will abide by the laws of the countries we operate in and that we support fundamental human rights, as is the legitimate role of trade and industry. Within the framework of sustainable development we will pay attention to all issues concerning health, safety and environment.

BUSINESS INTEGRITY

Compliance with the laws

REYNDERS label printing will abide by all laws and regulations that apply to its activities. During their tasks cooperators might be confronted with various (legal) matters, as described further on. When unsure about what to do, everyone who finds himself/herself in such a situation should contact the management.

Communication and information

Given the scope of our activities, the impact on all concerned and the social roll of the organization, REYNDERS label printing recognizes the importance of good communication. The organization is devoted to straightforward, open and factual communication, unless this is not possible for reasons of confidentiality.

Free entrepreneurship and competition

REYNDERS label printing supports the principles of free entrepreneurship and honest competition. The organization tries to act faster, better and clearer to its customers' and prospects' needs. Under all circumstances it will compete passionately but honestly and within a legal frame of reference.

REYNDERS label printing requires integrity and honesty throughout all activities of the organization. Bribery and all other expressions of unethical business is strictly forbidden.

Cooperators of REYNDERS label printing are strongly advised to avoid all situations in which their private or financial interests can come into conflict with the interest of the organization.

All business transactions will be carried out and recorded according to the accounting rules of the organization and the local legislation. Audits will take place.

Policy on competition

REYNDERS label printing will step into competition with other entrepreneurs and inspires its cooperators to act ethically and according the law. The organization follows a strict policy to make sure its activities, in all countries, are in accordance with the applicable policies on competition.

Relationship with suppliers

REYNDERS label printing is eager to do business with partners that subscribe the same ethical, social and environmental values and will communicate their importance in starting and maintaining long-time relationships.

Payments

Bribery

Bribery is strictly forbidden, as is any other form of unethical business conduct. On no account shall a cooperator, an agent or a representative of REYNDERS label printing accept, propose, promise or authorize a payment or a gift:

- to gain commercial profit
- to influence the policy of any authority
- that could be interpreted as improper

Every employee should be aware that such a proposition, even without action, is a violation of the law and the policies of REYNDERS label printing.

Gifts

Personal gifts or favours of material or commercial value – i.e. a such value that it could influence the process of decision making or lead to dependence - shall not be given, nor accepted. If in doubt, one should inform and consult the management. At every level of the organization there should be absolute clarity between executives and cooperators as to business gifts.

Fraud, deception and manipulation

Every employee who finds or suspects a case of fraud, deception or manipulation shall immediately inform his/her management.

Broad definition: intentional concealment, omission, or perversion of truth, to gain unlawful or unfair advantage, induce another to part with some valuable item or surrender a legal right, or inflict injury in some manner.

Presence in risk countries

REYNDERS label printing is convinced that its activities can offer opportunities to improve conditions of live and prosperity in the regions where we are present. One of our corporate values is to support human rights, in line with the legitimate roll of business and trade.

- Only the Board of Directors can decide on the creation of a new company (= a new judicial entity), including companies in a country where REYNDERS label printing isn't yet present.
- All REYNDERS label printing sites must honour UN imposed economical sanctions. How and when is to be decided by the Board of Directors.

Child labour

Child labour is the kind of work, or the intensity thereof, that hinders children to enter education, that harms them physically and/or psychologically, that hampers the normal development in their family and that deprives them of their self-respect and their childhood. Therefore REYNDERS label printing will:

- respect the legal minimum age of employment in all countries where it is present
- never employ young people below the age of 18, according to the International Labor Organization's (ILO) Convention 138 "Minimum Age", en Convention 182 "Ban of Worst Forms of Child Labor".
- hold its site managers responsible for adoption of this standard by suppliers and contractors.

Forced labour

Under no circumstances will REYNDERS label printing make use of forced labour; the organization will only employ people who willingly accepted to do so. No cooperator will be asked to pay a deposit; nor with his/her identity documents be taken. The site managers are responsible for adoption of this standard by suppliers and contractors

The environment

REYNDERS label printing protects its direct surroundings and - by extension - the environment by making sure its activities and the supplied products do as little harm as possible. To that end we always look for the best production processes, optimal distribution and good waste management.

REYNDERS label printing incites its employees to help protect the environment. If a cooperator notices a violation of the environmental laws or any action to cover up such a violation, he should step forward and inform his/her supervisor or report it through the managements complaint platform.

RESPONSIBILITIES OF THE ORGANIZATION

Open communication

Sincerity, integrity and reliability all make for an open dialogue between all employees, executives and the management. All cooperators are encouraged to discuss any problems outward with their supervisors or – when appropriate – with HR or the prevention advisor.

Equal treatment

REYNDERS label printing wants to create an attractive work climate for all our cooperators. We will recruit new cooperators based on their ability to fulfil the requirements of the job and we will create the required climate for further individual and professional development, as well as for a safe and healthy workplace

We have the responsibility to suppress any kind of intimidation or discrimination. Our employees are recruited and offered career prospects, based on objective and non-discriminatory criteria. Race, skin colour, gender or conviction do not play a role.

We expect executives to have and to show the flexibility it takes to cope with differences in individual capabilities, personal ambition, local culture in view of the organization's interest. They should in fact be challenged to deal with these distinctions.

Healthy working environment

REYNDERS label printing provides a safe and healthy working environment for its own employees and for all other stakeholders. All sites have their own health and safety programme with specific rules and regulations that cover the working conditions. Every employee is trained to get acquainted with these rules and made aware of the necessity to follow them strictly.

REYNDERS label printing will take all necessary precautions to prevent accidents and injuries, both for its own cooperators as well as for contractors.

Right to get organized

REYNDERS label printing recognizes and respects its employees' right to get organized or to join an organization of their choice. This includes the right to be represented by a trade union within the framework of applicable laws, regulations, practices and labour relations. REYNDERS label printing will conduct the negotiations and consultations itself or through an employer's federation, if appropriate.

Protection of personal data

REYNDERS label printing recognizes the importance of the protection of personal data and will – according to GDPR – only collect and use these data for internal needs. Personal data are: name, address, phone numbers, mail address, ID records, reports, etc... Under no circumstances, these data will be shared with or sold to a third party, except to those contractors who take care of payroll accounting, employment agencies and the like.

Development of cooperators

At REYNDERS label printing we are always looking for motivated and well-trained professionals who are able to provide high-quality services to our customers. We conduct evaluation assessments in which we highly value an open dialogue on every employee's personal development. This is to be understood in the broadest possible manner: internal and external training, on-the-job educations, godparenthood for new employees, etc...

RESPONSIBILITIES OF THE COOPERATORS

It is every employee's responsibility to respect the values laid down in this Code of Conduct. This code isn't just words; it is an attitude we expect to see in every cooperator in his daily functioning in the organization. Therefore, non-compliance with the values in our Code of Conduct may result in specific sanctions, as described in the Labour Code.

Confidentiality

Except when and where it is absolutely required, the employee will not use nor reveal any confidential information he might have acquired during the practice of his job; this clause is valid during the period covered by the employment contract as well as after the termination of it.

The employee should acknowledge as "confidential", including but not limited: drawings, formulas, specifications, digitized information, books and manuals, reports, financial information, diaries and records, commercial secrets, and all written and spoken instructions with regard to activities, methods, treatments, techniques and equipment of the organization.

Use of company property

The organization provides each and every employee the required tools, machines and materials he/she needs to execute his/her job. At the same time the employee will be informed and instructed on how to use, to maintain, to replace and to return every item. Everyone is responsible for the care of the machines, tools, installations, protection gear, working clothes, and all other commodities and consumables to his/her disposal.

Customer supplied materials

All materials – material and virtual – that are supplied by a customer will remain his exclusive property. All employees should handle these materials with the utmost care; during storage, transport and use.

When converting these materials, everyone shall take care to keep the scrap to an absolute minimum. It is absolutely forbidden to use these customer supplied materials – whether semi-finished, finished or scrapped – for other purposes than those defined in the order. Under no circumstances should one provide samples of these materials to a third party, nor should it be used as a model, without explicit consent of the customer.

Internet and email policy

Every employee is responsible for the use of the data system at his/her disposal. The use of the IT during the office hours is solely for professional purposes. Outside this time frame – e.g. lunchpauses – the use for private means is tolerated on the condition that it is occasionally, ethically correct and not offensive to fellow workers; that it does not disturb the normal proceedings or the productivity of the company; and that it doesn't infringe on the law or the labour contract.

For security reasons and to guarantee the correct functioning of the IT network, the IT manager has the right to verify all actions on the IT system, including e-mail and Internet access, within the framework provided by the law. The IT manager can and will report any infringement to the management.

REYNDERS label printing is and stays the sole owner of all business information that is provided on the IT system. This information cannot be used for private means nor be communicated to any third party, unless this is explicitly mentioned in the employee's job description.

Control of the e-mail system and Internet access by the employer / protection of the employee's privacy.

REYNDERS label printing respects its employees' privacy at work. However, all data circulating or stored on the IT system is to be regarded as professional information that is supplied by the employee to the employer.

We have the right to check the IP addresses of sites that were accessed through the organization's computers. These controls are not intended to check from which computer what site(s) were visited. If however it becomes clear that by visiting certain sites, the company policy has been violated, then the employer can order to identify the computer(s) involved. At that moment the involved employee can be asked to supply more information.

These rules are valid for all employees and breaches can lead to certain sanctions, as stipulated in the labour contract: the questioning of the employee, the checking of his/her responsibility and – in certain, aggravated cases – this could lead to a discharge.

Prevention and well-being

Security

REYNDERS label printing tries to create a safe and healthy working place for all cooperators, customers, contractors, suppliers and other visitors. It is the responsibility of all who enters one of the sites to respect the rules and procedures regarding health and safety.

Among others, this means that:

- everyone has to know, understand and respect the prescribed procedures for safe and healthy working
- everyone has to wear and use the protective tools that the company supplies
- no one is allowed to by-pass the procedures in any way

Inappropriate behaviour on the floor

REYNDERS label printing tries to create a working environment without violence or intimidation. In order to promote respect, we should treat each other with dignity. We will not tolerate any forms of intimidation or hostility from our cooperators; not within the organization, nor outside of it.

REYNDERS label printing asks also its employees and all visitors to restrain from violence, pestering, inappropriate conduct or intimidation. Anyone who (thinks he/she) is the victim of such behaviour should contact the appointed mediator or an external service for prevention and protection.

Precautionary alcohol and drugs policy

A policy of drugs and alcohol prevention is part of the global policy to promote the well-being of our cooperators.

We cannot stress enough that work related alcohol and drugs abuse form an imminent danger for all employees. It can harm productivity, have negative impact on quality and harm the image of the organization.

We therefore ask all our employees to take their responsibilities in these matters, in order to avoid problematic situations for themselves as well as for colleague workers. Supervisors should act exemplary and intervene appropriately in case of problems.

We sincerely believe that – as long as all employees act responsibly – there is no need to issue more detailed rules at this moment.