



CODE OF CONDUCT

PAWI Group AG

PAWI | | |
DESIGN PACKAGING LOGISTICS

PREFACE

PAWI Group AG is a family-owned company with headquarters in Winterthur (PAWI Packaging Schweiz AG) and sites in Singen (PAWI Packaging Deutschland GmbH) and Warsaw (PAWI Packaging Poland Sp. z o.o.). PAWI Group AG also includes the subsidiary company PAWI Immobilien AG.

We have been developing and producing top-quality, well-designed, sustainable packaging solutions since 1960. The way we do business is informed by three values: sustainable, innovative and personal. We always look at the entire value chain and ensure that our customers receive not only high-quality packaging but also a customised and efficient logistics solution.

Through this Code of Conduct, we affirm our commitment to responsible engagement with our employees, partners, customers and society as a whole. It expresses our core values and reflects who we are and what we stand for: we live by our values not only in the products we create but also in our daily interactions with one another.

The Code of Conduct provides guidance, promotes trust and strengthens our shared culture.

On behalf of the Administrative Board and the Executive Board, we are proud to embrace and embody this Code of Conduct together.



A handwritten signature in black ink that reads "D. Keller".

Désirée Keller
Member of the Administrative
Board, PAWI Group AG



A handwritten signature in black ink that reads "U. Ettlin".

Urban Ettlin
Co-CEO of Sales & Marketing
PAWI Packaging Schweiz AG

1. Scope

This Code of Conduct is mandatory for:

- all employees of PAWI Group AG (hereinafter referred to as PAWI) and its subsidiaries in Switzerland, Germany and Poland
- executives and members of the Administrative Board
- all shareholders
- business partners, suppliers and external service providers, insofar as they act in the name of or on behalf of PAWI

It takes into account the local legal frameworks and supplements these with our company-specific values and standards. The Group is committed to the goals of the Science Based Targets initiative (SBTi), which are aligned with the goals of the Paris Agreement.

2. Core values

Our culture is the foundation of our success. It is upheld by the people who work at PAWI, as well as by the family, which plays a central role as both a cultural and strategic pillar.

The values we live by:

- Responsibility: we take responsibility, act rather than look the other way and collaborate to find solutions
- Appreciation: we treat each other with respect and as equals, celebrate successes and learn from our mistakes
- Team spirit: one team – one spirit. We work by the same rules and on an equal footing
- Courage: we pursue our goals with creativity, perseverance and a keen understanding of the market
- Reliability: we honour our commitments and proactively communicate any changes
- Setting a good example: we uphold honesty, embrace constructive feedback and practise self-reflection – every individual is a role model
- Workplace enjoyment: humour and satisfaction are essential elements of our everyday work

These values are linked to our three core principles:

- Sustainable: we take responsibility throughout the entire value chain.
- Innovative: we design packaging with purpose – creative, efficient and forward-thinking.
- Personal: we focus on open communication and collaborative partnership.

3. Ethical principles

PAWI is committed to upholding the highest ethical standards.

Human rights and non-discrimination

We respect the dignity of every human being and are committed to equal opportunities and non-discrimination. This applies regardless of gender, origin, religion,

age, sexual orientation or other personal characteristics.

Working conditions and occupational safety

We foster a safe, healthy and respectful working environment. Compliance with legal requirements and the promotion of well-being and development are at the heart of what we do.

Environmental protection and sustainability

Compliance with all legal and binding obligations – including the ISO 14001 and FSC standards – as well as the continuous optimisation of our packaging solutions in line with new regulatory requirements such as the Packaging and Packaging Waste Regulation (PPWR) and the European Union Deforestation Regulation (EUDR) form the basis of our broader commitment.

By implementing our climate targets as part of the Science Based Targets initiative (SBTi), we voluntarily commit to clearly defined, science-based targets for reducing greenhouse gas emissions. These targets go well beyond the minimum legal requirements and demonstrate our willingness to proactively take responsibility for a future worth living. We report on our progress transparently in our annual Environmental Report.

Resource conservation, energy efficiency and the circular economy are key components of our strategy.

Anti-corruption and integrity

We do not tolerate any form of corruption, bribery or undue advantage. Decisions are made transparently and with accountability. Business relationships are based on fairness and trust.

Data protection and information security

The protection of personal data and confidential information is standard practice for us. We comply with applicable data protection laws and handle information responsibly.

4. Conduct in day-to-day business

In our daily actions and activities, we are guided above all by the values outlined above and take responsibility for our conduct. The Code of Conduct serves as our definitive guide in this regard.

Internal and external collaboration

We foster a culture of collaboration, respect and solution-oriented teamwork, both within PAWI and with external partners. Trust, openness and mutual support are the basis of our collaboration.

Communication and conflict management

We communicate clearly, honestly and respectfully. Conflicts are addressed constructively and directly – and not through third parties. We promote a culture of listening and mutual appreciation.

Handling of resources and property

We handle company resources carefully and responsibly – be it materials, infrastructure or time. Sustainability

and efficiency are key principles here.

Conduct towards customers, suppliers and the public
Our actions are guided by professionalism, transparency and trustworthiness. Our communication is consistent with our values and our commitment to quality. We represent PAWI with dedication and a strong sense of ethical awareness.

5. Responsibility and roles

Responsible action begins with each individual. Instead of a traditional hierarchy we follow a sociocratic corporate and leadership culture, in which every individual participates in decision-making and shares responsibility.

Employees

- Act in accordance with the Code of Conduct and PAWI values
- Take responsibility for their actions and their impact in the team
- Address grievances and make suggestions for improvement
- Foster a culture of dialogue and mutual support

Managers and group leaders

- Set an example through their daily actions and the way they communicate
- Foster an open, respectful and learning-focused work environment
- Support employees in upholding ethical principles
- Take responsibility for upholding and continuously improving the Code of Conduct in their area of responsibility

Administrative Board

- Assumes strategic responsibility for the ethical orientation of PAWI
- Ensures that the values and principles of the Code of Conduct are reflected in the corporate strategy
- Monitors compliance with legal, regulatory and ethical standards
- Acts as a guiding compass for our culture and identity, reflecting the values of the owner families

Business partners and suppliers

- Are informed of the content of the Code of Conduct
- Undertake to comply with comparable ethical standards
- Are also assessed based on social and environmental criteria during both selection and ongoing collaboration

6. Implementation and monitoring

The PAWI Code of Conduct is mandatory and is upheld through consistent application in everyday practice. It is implemented in a participatory, transparent and continuous manner, in line with our sociocratic organisational structure.

Awareness and training

- New employees are familiarised with the Code of Conduct as part of their onboarding process
- Managers and group leaders play an active role in communicating and embedding the Code of Conduct
- Important components of the Code of Conduct are incorporated into conversations with employees
- Content is communicated via screens displaying up-to-date information

Responsibility for implementation

- Every employee is responsible for compliance with the Code of Conduct
- The working groups and management levels ensure integration into processes and decision-making structures
- The Administrative Board monitors strategic compliance and ongoing development

Reporting of violations

- Violations of the Code of Conduct can be reported to the Administrative Board openly or anonymously
- PAWI ensures that reports are treated confidentially and reviewed fairly
- Whistleblowers are protected from any form of retaliation or disadvantage

Consequences of violations

- Violations of the Code of Conduct may lead to disciplinary action under employment law
- PAWI prioritises dialogue and clarification before taking any disciplinary action
- Repeated or severe violations will be dealt with consistently

Evaluation and ongoing development

- The Code of Conduct is reviewed on a regular basis and adapted as necessary
- Feedback from the organisation is incorporated into ongoing development
- PAWI strives to continuously improve ethical standards

7. Publication and communication

The PAWI Code of Conduct is much more than an internal set of rules; it reflects our attitude towards employees, partners and society as a whole. It can only be effective if it is clearly visible and comprehensible.

Internal publication

- The Code of Conduct is made available on the PAWI intranet
- It is part of the onboarding process for new employees
- Reference is made to its content in regular meetings and training sessions

External publication

- The Code of Conduct is published on the company website
- It is part of relevant contract documents for customers and suppliers
- In tenders and partnerships, it serves as evidence of compliance with ethical standards

Communication and dialogue

- The content of the Code of Conduct is communicated in clear, understandable language
- Managers and group leaders encourage dialogue

about values and conduct



- Feedback from the organisation is actively sought and incorporated into the ongoing development of the Code of Conduct



Connection to certifications and standards



- The Code of Conduct makes reference to PAWI's obligations under the SBTi
- It supplements existing environmental reports and compliance documents
- Communication is consistent with PAWI's core values and the guiding principles of the owner families.



Verantwortung 
Mut 

Wertschätzung 
Verbindlichkeit 

Teamgeist 
Vorbild 

Umgang miteinander 
Freude an der Arbeit 

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