



General Code of Ethics

of Pakera AI Packaging Optimization GmbH

Integrity, trust and responsible growth for
Pakera's B2B software business



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Purpose of this document

This Code sets out the ethical standards that guide how Pakera works, builds, sells and collaborates. It is designed for a B2B SaaS environment where customer trust, data protection, reliable product claims and responsible supply chain thinking are central to the business.

1. Introduction

At Pakera, how we work is as important as what we build. We develop software that helps companies make earlier, more data-based and more transparent packaging decisions in industrial supply chains. Our customers may rely on Pakera when handling sensitive CAD data, packaging concepts, material flows, pack instructions, cost assumptions and compliance-relevant decisions. This trust requires integrity in everyday decisions, not only in exceptional cases.

This Code of Ethics is designed to help everyone at Pakera make decisions that are lawful, responsible and aligned with the long-term trust we want to earn from customers, partners, colleagues and society.

2. What this Code is and what it is not

What this Code is	What this Code is not
A set of guiding principles for day-to-day decisions, customer interactions, product work, partnerships and internal collaboration.	A complete legal manual, a replacement for applicable laws, a substitute for contracts or a rulebook that covers every possible situation.

3. Scope and enforcement

This Code applies to all Pakera employees, founders, leaders, contractors, freelancers, interns and advisors in every location. It also sets expectations for suppliers, vendors, implementation partners, sales partners and other third parties when they act for or represent Pakera.

Everyone covered by this Code must comply with applicable laws, customer obligations, confidentiality requirements and Pakera policies. If a local law, employment right or binding customer obligation sets a stricter requirement, the stricter requirement applies.

Violations of this Code, related policies or legal requirements may result in corrective action.

Depending on severity, this may include training, restricted access, termination of assignment, termination of employment or contract, and reporting to authorities where legally required.

4. Core principles

4.1 We build a respectful and accountable workplace

Our culture is the operating system behind Pakera's product and customer trust. We work as one team, respect different perspectives and make it safe to raise concerns early.

- **We speak up** — We raise concerns about wrongdoing, ethical risks, unsafe behavior, data incidents, misleading claims or anything that does not feel right. We do this without fear of retaliation.
- **We respect people** — We treat colleagues, customers, suppliers and partners with dignity. We do not tolerate harassment, bullying, discrimination, intimidation or exclusionary behavior.
- **We stay safe** — We protect physical and psychological safety in offices, remote work, customer sites, events and online channels.
- **We collaborate professionally** — We keep communication factual, respectful and constructive. We do not use pressure, fear, personal attacks or hidden agendas to win internally.
- **We celebrate responsibly** — Company events and social interactions must respect boundaries, personal choices and cultural differences. Participation in social events or alcohol use must never feel mandatory.

4.2 We act honestly and transparently in business

Pakera competes through product quality, domain expertise, customer value and execution. We do not win through shortcuts that damage trust.

- **The law is our baseline** — We comply with applicable laws and regulations, including data protection, competition, anti-corruption, tax, employment, software, consumer protection where relevant, and packaging-related rules that affect our claims.
- **We avoid conflicts of interest** — We disclose situations where personal relationships, outside work, investments, side projects or vendor relationships could influence, or appear to influence, our judgment.
- **We reject bribery and corruption** — We do not offer, request or accept bribes, kickbacks, facilitation payments or improper advantages. Gifts, hospitality and invitations must be modest, transparent, lawful and never linked to a business decision.

- **We handle money carefully** — We use company funds, customer funds, expenses, invoices and payment information accurately and responsibly. We watch for fraud, money laundering, tax evasion and other financial misconduct.
- **We keep accurate records** — We document business decisions, approvals, product claims, customer commitments, finance matters and security-relevant actions clearly and truthfully.
- **We compete fairly** — We do not participate in price fixing, market allocation, bid rigging, improper information exchange or anti-competitive side agreements.
- **We sell with integrity** — We make claims about ROI, cost reduction, time savings, CO2, PPWR readiness, compliance, security and product capabilities only when they are accurate, evidence-based and approved for use.

4.3 We protect customer trust, data and confidentiality

Pakera's business depends on trust. Customers may share sensitive information about products, CAD files, packaging concepts, logistics flows, costs, suppliers, production plans and internal standards. We protect this information before, during and after our work with Pakera.

- **We safeguard confidential information** — We access confidential information only when needed for our role. We do not disclose, copy, export or use it for personal benefit or third-party gain.
- **We protect customer data** — Customer data, CAD data, project data, pack instructions, approval histories and usage data must be handled with care, least-privilege access and appropriate technical and organizational safeguards.
- **Privacy is built in** — We process personal data only for legitimate business purposes, with transparency, data minimization, appropriate retention and respect for data subject rights.
- **Cybersecurity is everyone's responsibility** — We use secure authentication, protect credentials, report suspicious activity, keep devices and tools up to date, and follow approved security processes.
- **We respect intellectual property** — We protect Pakera's software, algorithms, documentation, brand assets and know-how. We also respect the intellectual property, licenses, trademarks and confidential materials of customers, partners and competitors.
- **We use vendors responsibly** — Before using external tools, cloud services, analytics tools or AI services with Pakera or customer information, we check whether the use is approved, secure and contractually permitted.

Please refer to Pakera's [Privacy Policy](#) for further information.

4.4 We build reliable and responsible B2B software

Pakera's product can influence operational decisions in logistics, packaging, transport, storage and handling. We therefore build and communicate our product with care, transparency and accountability.

- **We prioritize product integrity** — We test, review and improve core functionality so that customers receive reliable calculations, clear limits and understandable outputs.
- **We do not overstate automation** — Optimization logic, Smart Checks, scores, reports and pack instructions support decisions. They do not remove the customer's responsibility to validate operational, legal, safety and engineering requirements in their own context.
- **We make limitations visible** — Known limitations, assumptions, data dependencies and required customer inputs must be explained clearly enough that users can make informed decisions.
- **We handle incidents responsibly** — If we identify a material bug, security issue, data incident or misleading output, we escalate quickly, investigate honestly and communicate in line with legal and customer obligations.
- **We design for enterprise trust** — Where possible and appropriate for our stage, we work toward robust controls for roles, permissions, auditability, data segregation, backups, incident response, access management and secure development.
- **We use AI and automation responsibly** — When Pakera uses AI, analytics or automated support, we aim for transparency, data protection, human accountability and safeguards against misleading or harmful outputs.

4.5 We protect and promote Pakera responsibly

Every customer conversation, public statement, online post, demo, support reply and partner interaction can strengthen or weaken Pakera's reputation. We act as ambassadors for a high-trust B2B software company.

- **We communicate externally with care** — Public comments, social media posts, conference statements and community replies must be professional and must not disclose confidential information or make unsupported claims.
- **We protect the brand** — We use Pakera's name, logo, documents, pack instruction templates and visual assets consistently and only for approved business purposes.
- **We use customer names responsibly** — We do not use customer names, logos, data, case studies, screenshots, quotes or results publicly without proper permission.
- **We direct media and legal inquiries** — Media, investor, regulator, legal and sensitive customer inquiries must be handled by the appropriate authorized person.
- **We respect company assets** — We use devices, software accounts, licenses, funds, working time and company knowledge responsibly and for legitimate Pakera

purposes.

4.6 We value people, society and the planet

Pakera works in a market where packaging, transport, emissions, waste and resource use matter. Our ethical responsibility is to support better decisions without turning sustainability into unsupported marketing.

- **We respect human rights** — We reject child labor, forced labor, exploitation, abuse and unsafe working conditions in our own operations and expect the same from suppliers and partners.
- **We use resources carefully** — We avoid waste in our own operations, vendor choices, travel decisions and use of cloud infrastructure where practical.
- **We support sustainable decision-making** — We build and communicate features that help customers understand packaging efficiency, material use, transport effects and documentation needs in a responsible way.
- **We avoid greenwashing** — Claims about environmental benefits, CO2 reduction, PPWR support, waste reduction or sustainability must be specific, evidence-based and presented with relevant assumptions.

Pakera standard for claims

Before making a public or customer-facing claim, ask whether the statement is accurate, current, evidence-based, understandable and not likely to create a false expectation. This matters especially for savings, compliance, security, CO₂ and sustainability claims.

5. Responsibilities

Everyone at Pakera is responsible for

- Reading, understanding and following this Code.
- Applying the Code in day-to-day decisions, including product, sales, support, engineering, partnerships, finance and internal collaboration.
- Asking for guidance when a situation is unclear.
- Speaking up when something may breach the Code, a customer obligation, a law or a Pakera policy.
- Protecting confidential information, personal data, customer data and Pakera assets.
- Cooperating honestly in investigations or reviews.

Leaders, founders and managers are responsible for

- Leading by example and making ethical conduct visible in business decisions.
- Creating a working environment where concerns can be raised safely.
- Ensuring that team members understand the Code and the policies relevant to their work.
- Addressing behavior that conflicts with the Code, even when it is commercially inconvenient.
- Escalating serious concerns, security incidents, customer trust issues and legal risks promptly.

People with customer, admin or production access are additionally responsible for

- Using elevated access only for legitimate business needs.
- Avoiding unnecessary downloads, exports or copies of customer and production data.
- Recording important support, security and customer-impacting actions where required.
- Reporting suspected unauthorized access, data loss or misuse immediately.

6. Reporting and non-retaliation

If you believe that someone acting for Pakera is behaving contrary to this Code, raise the concern promptly. You can speak with your manager, one of the founders, management, the designated People or Compliance contact, or the reporting channel designated by Pakera.

For urgent issues involving customer data, security, privacy, safety, fraud or a legal deadline, escalate immediately through the fastest available internal channel.

Pakera does not tolerate retaliation against anyone who raises a concern in good faith or participates honestly in a review. Retaliation can include dismissal, demotion, threats, isolation, unfair treatment, reduced opportunities or pressure to stay silent.

Concerns will be handled with appropriate confidentiality. Information will be shared only with people who need it to assess, investigate, resolve or legally report the issue.

Suggested reporting routes

Situation	First route	Alternative route
General ethical concern	Manager or founder	Designated People or Compliance contact
Harassment, discrimination or retaliation	Manager, founder or People contact	Alternative management contact if the first route is not appropriate
Customer data, security or privacy issue	Security or technical owner immediately	Founder, management or designated privacy contact
Fraud, bribery, conflict of interest or financial concern	Management or finance owner	Founder or designated compliance contact
Concern involving a senior leader	Another founder or designated independent contact	External legal or whistleblowing route where legally available

7. Ethical decision guide

When the right answer is not obvious, use the following questions before acting. A single uncomfortable answer is usually a signal to pause and ask for guidance.

1. Is it lawful and consistent with customer obligations?
2. Is it aligned with this Code and Pakera's values?
3. Would I be comfortable explaining this decision to a customer, colleague or regulator?
4. Does it protect customer data, personal data and confidential information?
5. Does it avoid conflicts of interest, hidden benefits and unfair pressure?
6. Are the assumptions, limitations and risks clear?
7. Is any product, ROI, security, compliance or sustainability claim evidence-based?
8. Does the decision support long-term trust rather than short-term convenience?



pakera

Rethink packing.

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**Pakera AI Packaging
Optimization GmbH**
Brunnenweg 35
83666 Waakirchen
Deutschland

info@pakera.com