

### **Anti-Counterfeit Policy**

As a consequence of price increases (e.g. through higher taxation) the market prices for factory made cigarettes are constantly increasing in many countries. Consequently, many consumers look for alternatives in either undeclared (smuggled) or even counterfeited cigarettes.

Glatz Feinpapiere and its national and international subsidiaries is committed to protect the integrity of the legal supply chain and will do its best efforts to fight illicit trade and counterfeiting on all levels. We support all our customers who are already investigating in this matter or who will so in the future.

Glatz Feinpapiere is dedicated to the following activities:

- The company delivers its products for the cigarette industry to known cigarette factories and their suppliers only. Every new customer will be checked thoroughly and to the best of our knowledge whether the declared products are really produced at the delivery address and that the theoretical maximum capacity of the production is in accordance with the quantity ordered.
- For all enquiries coming from unknown traders Glatz requires mandatory information about the end user prior to shipping. A regular check is performed at least once a year.
- Selling on basis FCA: before loading any paper sold under FCA terms, Glatz requires the confirmation from the buyer to whom the paper will be sent and by whom it will be finally used.
- Labelling: Glatz is taking every effort possible to ensure the labelling of the goods sold is clearly identifiable as goods produced by Glatz Feinpapiere or its subsidiaries Julius Glatz Group. We strictly forbid altering or re-labelling of our products if they are to be re-sold or traded as by the originating Glatz factory.
- Each enquiry for grades normally used by multinationals but coming from other factories is registered checked with the global purchasing department of the respective multinational prior to any delivery of such grade.
- Every offer to new and previously unknown customers has to be approved through the Managing Directors.
- New customers: the sales department will organize personal visits to new customers if possible prior to delivery, otherwise as soon as possible to inspect local, machinery, warehouse and potential production capabilities for cigarettes and related products.
- All agents are informed regularly about the activities of the company and our customers regarding counterfeiting, about the information deriving from the market and about known cases of illegal production of cigarettes. In return, the agents of the company have to inform the company immediately once they retrieve information concerning any counterfeiting activities in their respective territory.
- The Anti-Counterfeit Policy is being checked within the annual ISO audit.

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- The company will install a data base with the list of the customers and potential customers including information regarding production capacities of each customer.
- Glatz Feinpapiere will inform customers about the Anti-Counterfeit Policy and will send signed copy of it on demand. This will be mentioned on the homepage.
- Glatz Feinpapiere cooperates with governmental and law enforcement authorities in response to valid and specific inquiries and would therefore disclose the terms and conditions of any sale of our products to the authorities if deemed necessary, and any other relevant facts involving the sale, including volume and intended market.

Neidenfels, 28.01.2019

**JULIUS GLATZ GROUP**

Nina Ritter-Reischl  
Managing Director