

Code of Conduct for Partners of Packhelp S.A.

Introduction

At Packhelp S.A. ("Packhelp"), we are committed to conducting our business in a legal, ethical and socially responsible manner. We care about our employees and treat them with dignity and respect, providing them with a safe and healthy work environment. We maintain the highest ethical standards and focus on environmental sustainability. We take responsibility for our products and the whole supply chain, and expect our Partners to share our values. We wish to promote the Partners who support us in our sustainable development policy by taking their own initiative, particularly in terms of environmental protection and the impact that their operations have on the society at large.

We understand that we don't do our business in a vacuum. Our suppliers, subcontractors and others who provide us with their products and services are also a reflection of who we are. For this reason, we carefully select the companies we work with. Our relationships are based on mutual respect and loyalty.

In order to ensure that our Partners share our values, we have prepared this Code of Conduct for Partners of Packhelp S.A., which includes a set of basic and non-negotiable practices relating to ethics, work and employment conditions, the environment and general business aspects. In drawing up this document, we relied on the Ten Principles of the United Nations Global Compact. The Partner should ensure that all its suppliers and subcontractors also comply with this Code. Packhelp reserves the right to take appropriate remedial measures if the Partner breaches the Code.

This Code is supposed to be complementary to, rather than supersede, any other agreements between Packhelp and the Partner. In the event of a conflict between the provisions of the Code and the agreement, the latter will prevail.

Packhelp S.A.| ul. Kolejowa 5/7 | 01-217 Warsaw, Poland | Management Board: Wojciech Sadowski, Maciej Zając, Maciej Woźniczko | 13th Commercial Division of the National Court Register District Court for the Capital City of Warsaw in Warsaw | KRS 0000831872 | NIP 1231308129 | share capital of PLN 153,061.60 (paid up in full) | hello@packhelp.com

1. <u>Compliance</u>

Partners must comply with the applicable laws and regulations. This includes but is not limited to provisions on anti-corruption, environment, occupational health & safety, work and employment conditions, respect for human rights, and product safety.

2. Anti-corruption

Partners must work against corruption in all its forms, including conflict of interest, active bribery, passive bribery, influence peddling, money laundering, fraud, etc. Relationships between Packhelp and Partners are based on the principle of good faith and loyalty in business.

3. Non-discrimination

The Partner undertakes not to discriminate, exclude or give privileged treatment to any persons on grounds of race, colour, gender, religion, political opinion or nationality.

4. Confidentiality of information

The Partner may be in possession of information constituting trade secret, including but not limited to, business data, specifications or other sensitive data of Packhelp. The Partner undertakes to ensure the confidentiality of such information and will assure that it is disclosed within the Partner's organisation only on the need-to-know basis. The Partner confirms it will not disclose confidential information to any third party without the written consent of Packhelp.

5. Environmental commitment

Packhelp expects Partners to conduct their business with respect for the natural environment. The Partner undertakes not to exceed the emissions of harmful substances into water, air and soil permitted by local regulations.

The Partner's business activities should not adversely affect the natural habitats of animals. In order to reduce the negative environmental impact, Partners undertake to take measures to minimise the amount of waste generated, use sustainable materials, and increase energy efficiency.

6. Raising environmental awareness

The Partner undertakes to make every effort to raise employees' awareness of the environmental impact of their activities.

7. Prohibition of child labour

The Partner undertakes to comply with the law on the employment of minors. The minimum age of an employee must not be less than the minimum age prescribed by the law of the country in which the Partner operates, but in any case must not be less than 16 years. Where any people under 18 years of age who have reached the minimum age for admission to work are hired, those employees cannot do any hazardous work that might may adversely affect their health, safety and development.

8. <u>Prohibition of forced labour</u>

The Partner undertakes to ensure that its employees work voluntarily, without coercion. Packhelp does not condone forced labour in any form and expects its Partners to do the same.

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9. Work and employment conditions

The Partner must take steps to ensure that all employees performing work for the Partner have appropriate qualifications and licences, in accordance with the local immigration, tax and other related regulations.

The Partner's procedures should take into account fair and reasonable work and employment practices, and ensure diversity in the workplace. The Partner declares compliance with the local law on labour and employment standards, including those relating to adequate remuneration, working time and occupational health & safety. The Partner undertakes not to use or threaten to use any form of physical, sexual, psychological or verbal abuse against employees.

10. <u>Product safety</u>

The Partner undertakes to meet the safety standards applicable to its industry, including those established by the relevant regulatory authorities, for all products supplied by the Partner.

If the Partner manufactures any food contact packaging, it undertakes to apply food safety procedures that meet industry standards.

The Partner undertakes to have appropriate procedures in place to ensure identification and withdrawal of potentially hazardous products. The procedures should ensure appropriate communication concerning those products with respect to Packhelp.

11. Occupational health & safety

The Partner undertakes to identify, assess and manage occupational health and safety hazards. The Partner undertakes to provide its employees with appropriate protective equipment and to ensure that its employees are properly instructed to use it.

The Partner undertakes to identify and assess potential emergency situations and to develop and implement response procedures that will minimise potential damage to life and health, environment and property.

12. Continuous improvement in sustainable development

Packhelp will assess Partners' maturity in terms of sustainable development. The specifically designed "Supplier Sustainability Questionnaire" collects information in three areas: governance, social issues and environmental responsibility. The questionnaire is based on international ISO 20400 and ISO 26000 standards. Its questions do not cover any confidential matters that might constitute trade secret. Packhelp conducts the assessment on a regular basis, once a year.

The Partner undertakes to disclose information on the ESG metrics contained in the "Supplier Sustainability Questionnaire". If the Partner decides that any question raises confidentiality issues, this information will be communicated to Packhelp.

If the Partner receives a low score, it will be required to undertake remedial actions. At the same time, Packhelp undertakes to assist the Partner in the development of an appropriate action plan.

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13. Sustainable supply chain

The Partner undertakes to take steps to ensure that any semi-finished products, raw materials and other materials that it purchases for the purpose of its operations are obtained from a responsible and sustainable source. The Partner undertakes that in its purchasing decisions it will be guided not only by acquisition costs, but also by economic, environmental and social costs.

The Partner undertakes to cooperate with Packhelp to define the supply chain of the products offered.

Company:
Name:
Place and date:
Signature: