

Boxon Code of Conduct



Our Code of Conduct

Boxon Groups commitment to sustainable development is based on our core values and is compliant with in the UN Global Compact 10 principles, the Sustainable Development Goals and Agenda 2030, the 2015 Paris Climate Agreement as well as international agreements and guidelines.

“Our vision is to develop the world’s most intelligent, sustainable and value-creating packaging concepts”

We are a global, as well as a local, partner for co-creation and delivering innovative and sustainable packaging solutions and our commitment to sustainable development is more relevant than ever.

We want to challenge the conventional packaging and to find the most intelligent, sustainable and value-creating packaging concepts together with our customers. We create customer value through our high quality and cross material offer, our range of more sustainable products and through strong partnerships along the whole value chain.

Boxon’s code of conduct brings together our values and guidelines, that must govern our relationships with each other, with our business partners and with society at large. All Boxon co-workers must act in line with our code of conduct and in accordance with our corporate core values V.E.T.A – Win together, Simplicity, Transparency, Responsibility.



Date: 25.08.2022

Pia Jeppsson
CEO Boxon Group AB

Table of Content

Our Code of Conduct	02
The Code of Conduct is for you	04
Working Methods	05
Evaluation and follow-up	05
Our Values, Mission, Vision and Promise	06
Environment	06
Labour & Human Rights	08
Ethics	09
Supply Chain	10
Accountability, Responsibility & Revision	12
Appendix	12

The Code of Conduct is for you

This Code of Conduct applies to everyone working with or for Boxon Group*, meaning all Boxon employees, managers, board members, consultants, contractors and suppliers. Boxon Group has operations in 7 countries: Sweden, Denmark, Norway, Finland, Germany, France, China, and suppliers in Nordics, EMEA and Asia. The Code of Conduct is our platform for how everyone working with or for Boxon Group are expected to behave, along with applicable laws, rules, regulations. Everyone is expected to strive to exceed both international and industry best practise. Our Code of Conduct covers Environment, Labour & Human Rights, Ethics and Supply chain.

Through our Code of Conduct we take responsibility, and we are committed:

- We comply with laws and UN Global Compact 10 principles
- We share the values based on conventions of the UN and International Labour Organization (ILO), which are summarised in the international standard SA8000 by Social Accountability International
- We actively work with sustainable development, to fulfil the 2015 Paris Agreement on Climate as well as the realisation of the 17 Sustainability Development Goals (SDG's) and Agenda 2030
- We conduct our business according to good ethical business principles
- We integrate social responsibility throughout our organisation and in business practise with suppliers and other stakeholders
- We ensure that this is the minimum standard, that everyone working with or for Boxon shall follow in our day-to-day business, including suppliers and their sub-suppliers.

If you work with or for Boxon Group, you are expected to:

- Read, understand, commit to, and follow the Code of Conduct and other relevant steering documents
- Lead by example – communicate and demonstrate the intent and spirit of our Code of Conduct, as well as importance of compliance with our Code of Conduct
- Raise concerns as we at Boxon strive to achieve transparency, openness, and high level of business ethics in everything we do. You are expected to raise concerns on any conduct that you believe to be a violation of laws, regulation and/or our Code of Conduct. The options for raising concerns – whistle blowing – are described in our procedure for whistle blowing.

Boxon Group: Boxon Group AB, Boxon AB, Boxon AS, Boxon A/S, Boxon Oy, Bâfi Pac AB, Boxon GmbH, Boxon SARL, Boxon Tech AB, Boxes & Labels Borås AB, Boxes & Labels Olsfors AB, Boxon Shanghai Packaging Ltd., China,

Working Methods

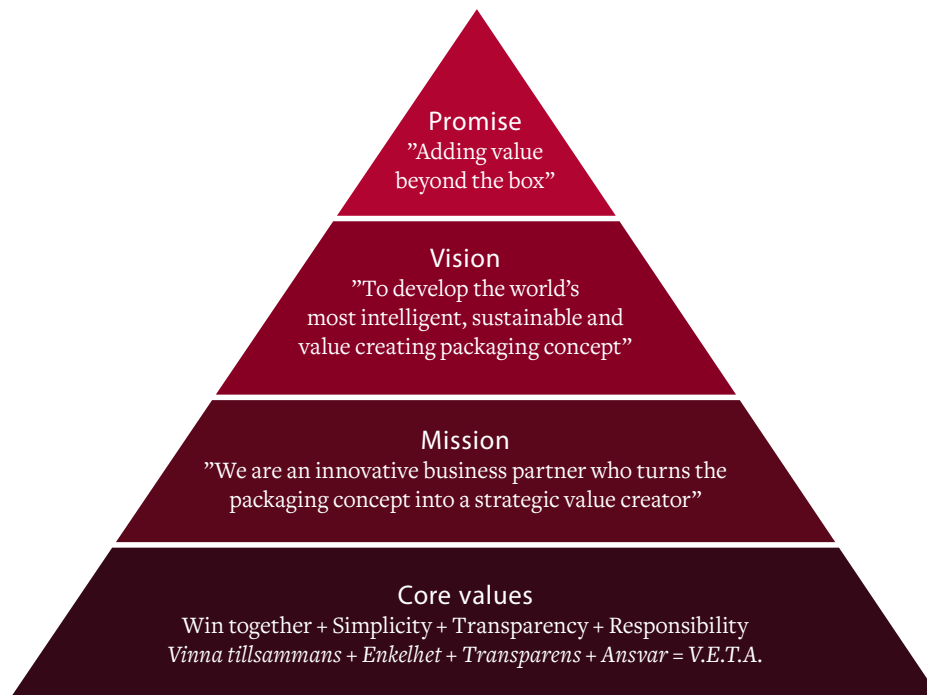
- The provisions of this Code of Conduct and the Boxon Supplier Code of Conduct & Requirements, set forth the minimum standards and qualifying standards of all suppliers with whom Boxon conducts business and their sub-suppliers in the supply chain. The suppliers shall ensure that their relevant sub-suppliers meet the principles in this Code of Conduct and the Boxon Supplier Code of Conduct & Requirements.
- We use materiality sustainability analysis (SASB Materiality Map) to identify the economic, environmental, and social topics where we as a company has an impact or may be impacted by. This is done through the annual strategy work and sustainability reporting.
- We continuously work with sustainability on a company and functional level, and with our suppliers. We focus on the most important opportunities and issues that are essential connected to Groups business strategy and important stakeholders.
- We systematically work with and integrate the framework for ISO 14001, ISO 9001, ISO 20400, FSC and other management systems, in our policies and procedures. We are transparent and communicate with our employees and stakeholders, through the annual sustainability report and continuously updates.

Evaluation and follow-up

- We set sustainability goals on a company and functional level which are followed up continuously. We define and report our goals and progress according to the GRI standards.
- We formally follow up the sustainability work annually through 3rd party ISO audits, and FSC audits when applicable, and through external rating as Ecovadis.
- We follow up and monitor CO2 emission and carbon footprint through MyClimate.
- Supplier will be asked to provide information as required by Boxon regarding the standards in this Code of Conduct and the Boxon Supplier Code of Conduct & Requirements. Based on this information, the supplier will be evaluated, and the results will be measured and compared. Boxon must have the opportunity to conduct on-site evaluations and inspections of the supplier's facilities to review progress in relation to these standards.
- Boxon demands the supplier to evaluate and monitor their sub-suppliers, since information regarding the compliance of these parties with this Code of Conduct might be required by Boxon.

Our Values, Mission, Vision and Promise

The pyramid is guiding our business, with our values V.E.T.A as the foundation. Our Code of Conduct has been developed with our Values in the core and with the ambition to fulfil our Mission, Vision, and Promise.



Environment

Objective 1: We will reduce our total carbon footprint as a company by 30% until 2025 (baseline year 2019)

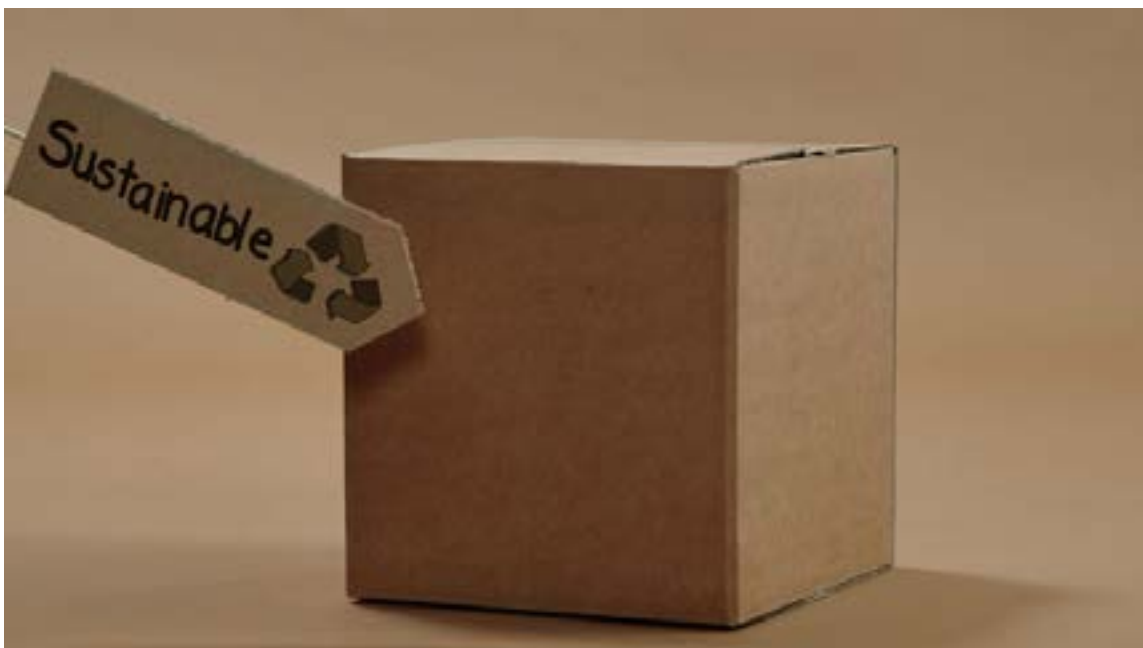
Objective 2: We will increase the share of packaging solutions based on recycled materials by 30% until 2025 (baseline year 2019)

Objective 3: We aim to stay innovative by introducing new packaging solutions with a climate neutral footprint

- We evaluate the impact of climate change through regular risk analyses, tools, benchmark and external reviews and we take suitable actions.
- We work proactively with long-term goals to reduce the impact on the environment, and with the ambition to be in alignment with the SBTi's (Science Based Targets) Corporate Net- Zero Standard.
- We design for circularity, with the aim to perform life cycle assessments when developing products and solutions.

- Our activities must be conducted in such a way that environmental legislation is adhered to by a good margin.
- We must have good foresight regarding new legislation and be timely in meeting the demands and wishes of customers and other stakeholders.
- We use water, energy, materials, and other natural resources efficiently, in a well-managed way and with a focus on sustainable development
- We take environmental and health aspects into account when procuring energy, raw materials, equipment, and services.
- We manage waste and chemicals in an environmentally responsible and sound manner with extra precautions when needed.
- We contribute to the circular economy by making use of the secondary materials and by extracting high-quality resources from waste as much as possible.
- We travel conscious, and we always consider the most sustainable option.
- We have good emergency preparedness, through the systematic identification and evaluation of the risks of accidents, fires, and uncontrolled emissions to the environment.
- We engage and train our co-workers and business partners on environmental topics, with the ambition to increase knowledge, enable them to take conscious decisions and act responsibly beyond their operational activities
- We provide open, regular, and factual information about our sustainability work. We are fully transparent and make the corresponding certifications, and environmental facts & figures, available to our stakeholders at any time and through our channels.
- We work systematically with environmental improvements and development. Preferably environmental management systems according to ISO 14001, and FSC, shall be in place at our operations and business partners.

Policy owner: Chief Sustainability Officer (CSO)



Labour & Human Rights

Respect for human rights

- We treat all employees fairly, with dignity and with respect.
- We have zero tolerance towards discrimination against anyone on the basis of religion, gender, age, disability, sexual orientation, nationality, political view, social background or ethnic origin.
- We actively encourage and develop diversity, with equal opportunities for all
- We have zero tolerance towards harassment, threats or discrimination and we work actively to counteract this in all possible ways.
- We respect the right of all employees to organise themselves.
- We have zero tolerance towards child labour, illegal labour or forced labour.

A safe, healthy, and developing working environment

- Our activities must be conducted in such a way that legislation in the area of safety and health at work is adhered to by a good margin.
- We have a zero vision regarding occupational accidents and do not compromise on health and safety at work.
- We work proactively and systematically to create a good and safe working environment.
- We offer employees the opportunity to develop their professional knowledge, skills, and the possibility to influence.
- We recognise the right to freedom of association and collective bargaining.
- We respect the freedom of each employee to express an opinion on matters that concern them personally.
- We encourage and strive to facilitate men and women to combine work with parenthood.
- We base our salaries on our values, performance, and collective agreements with labour unions.



Social engagement

- Where possible, we engage in the communities where we have operations.
- We prioritise support and sponsor partnerships with organisations that share our values and benefit the communities in which we operate.
- We take a neutral stance on political issues.

Policy owner: HR Director

Ethics

Sound business principles and anti-corruption

- We demand honesty and integrity in our own business and expect the same from our business partners.
- We have zero tolerance of corruption. All forms of corruption are prohibited, including extortion and the giving and taking of bribes. Compensation paid to contractors, suppliers and other partners must relate only to actual goods or services.
- Gifts and other benefits may be part of expected hospitality but may not go beyond local customs and must be fully in line with local legislation.
- We work proactively to prevent our business from being used for money laundering or other illegal financing. We do this through established routines for achieving good knowledge of our partners and suppliers, as well as knowledge and understanding of the purpose of any business relationship.
- All units and employees must observe and comply with competition laws.
- All employees must avoid conflicts of interest between private financial matters and Boxon's business activities.
- We must apply sound business principles and be responsible and moderate in our marketing.
- We handle all information obtained from our partners in a secure manner and in accordance with any confidentiality agreements entered and applicable market abuse legislation. The information is never disclosed to unauthorised persons.
- We handle personal data in accordance with the applicable personal data legislation.
- We ensure that employees can take responsibility and act in the best interest for themselves and/or of another person or entity. Without the risk of personal consequences an employee can become a whistle-blower about significant irregularities.
- We actively perform a yearly risk assessment through co-worker and supplier surveys and peer-to-peer benchmark.

Straight and honest communication

- Our communication must be straight, honest, and respectful and comply with applicable legislation, rules, and standards.
- We maintain good relationships with our stakeholders, where the communication is based on regular contact, clarity, and good ethics.
- In matters relating to Boxon's operation, Boxon's management and spokespersons are entitled to speak on behalf of Boxon. All external information that may affect Boxon's valuation must be communicated by the CEO or CMO (Chief Marketing Officer).

Policy owner: Chief Sustainability Officer (CSO)



Supply chain

Suppliers

We work with suppliers who act according to Boxon Group Code of Conduct and Boxon Supplier Code of Conduct & Requirements.

Evaluation and qualification are described in the Boxon Supplier Code of Conduct & Requirements. Boxon Supplier Code of Conduct & Requirements must be passed down the supplier's value chain.

- We expect suppliers to comply with relevant legislation in the areas of the environment, human rights and working conditions. Suppliers must work to combat corruption.
- We want suppliers to implement measures that ensure that their activities, products and services do not adversely affect the environment, human health and society.

- We call on suppliers to implement certifiable management systems for quality (ISO 9001), the environment (ISO 14001), sustainable procurement (ISO 20400) and preferably FSC when applicable.
- We regularly monitor the performance of suppliers in accordance with our procurement requirements. If they do not meet our requirements, this may result in demands for improvement measures or the termination of the partnership.

Quality and product responsibility

- We must always meet customer requirements, needs and expectations by delivering services and products of the right quality.
- Quality control and claim process must exist and meet our requirements.
- Our products must comply with agreed, legal and health standards regarding their use.
- The information on how to use the products must be accurate and clear, for example regarding safe and environmentally friendly use and final disposal.
- Product composition and product information sheets must be made available online and/or per demand
- We work systematically. Certified quality management systems according to ISO 9001 – and/or industry specific certification systems – must be in place at the suppliers where relevant.

Policy owner: VP Procurement & Supply



Accountability, Responsibility and Revision

- The CEO and Group Management are accountable for that the Code of Conduct is communicated, implemented, and followed up.
- The Policy owners are responsible for that their policies are communicated, implemented, and followed up in relevant part of the business.
- The Chief Sustainability Officer is responsible for the revision of our Code of Conduct, which is done once a year during tertial 2.
- The Code of Conduct is available for our external stakeholders on Boxon.com and for our employees at Boxon intranet.

Appendix - specific topics

1. Anti-corruption policy
2. GDPR-policy
3. Boxon Supplier Code of Conduct & Requirements - covers more in details how we work with sourcing and logistics.

