

Code of Conduct - Boxon Holding AB

Consisting of:

Boxon Group AB

Boxon Tech Group AB

Boxes & Labels International AB



Purpose Statement

This Code of Conduct defines the principles, standards and expectations that guide how Boxon Holding AB, consisting of Boxon Group, Boxon Tech and Boxes & Labels (referred from now on as The Group) conduct business and interact with stakeholders. It applies to all employees, managers, board members, consultants, contractors, and suppliers working with or for The Group.

The document establishes requirements across key areas including environment, labour and human rights, business ethics and supply chain responsibility, in alignment with internationally recognized frameworks such as the UN Global Compact and ILO (International Labour Organisation) conventions. It also sets the minimum standards for supplier requirements and forms the basis for how we ensure responsible, sustainable, and ethical business practices throughout our value chain.

This Code of Conduct replaces previous versions and serves as the governing framework for behaviour, compliance, and continuous improvement within The Group.

About Boxon Holding AB

Boxon Holding AB consists of Boxon Group AB, Boxon Tech Group AB, and Boxes & Labels International AB. Boxon Holding AB (**The Group**) operates in the packaging industry and provides a range of packaging solutions across multiple markets.

The Group has a shared responsibility to conduct its business in a socially, environmentally, and economically responsible manner. As an international organisation, we recognise our role in contributing to sustainable development and in complying with applicable laws, regulations, and internationally recognised standards.

Our operations include the development, sourcing, and supply of packaging solutions, supported by relevant technical expertise and collaboration with customers and suppliers across the value chain.

This Code of Conduct forms the basis for how we manage our responsibilities and conduct our business activities.

Table of Contents

About Boxon Holding AB	2
Our Code of Conduct	4
The Code of Conduct is for you	5
Working Methods.....	6
Evaluation and Follow-up.....	6
Environment	6
Environmental Policy Statement and Introduction	6
Strategic Targets and Commitments	7
Environmental Management.....	7
Environmental Operations	8
Circular Products and Transparency.....	9
Labour and Human Rights	9
Introduction and Targets	9
Respect for Human Rights	9
A Safe, Healthy, and Developing Working Environment	10
Social Engagement	11
Business Ethics	11
Introduction and Targets	11
Sound Business Principles & Fair Competition – Including Anti-bribery, Anti-corruption, and Anti-trust.....	12
Financial Responsibility	13
Conflicts of Interest	13
Data Protection and Information Security.....	14
Whistle-blower and Protection Against Retaliation	14
Transparent and Ethical Communication	14
Supply Chain	15
Introduction and Targets	15
Our Suppliers	15
Quality	16
Accountability, Responsibility, and Review	16
Supplier Code of Conduct (Annex of Code of Conduct)	17
Supplier Requirements Background and Validation	17
Supplier Requirements Standards	18
Human Rights and Labour	18
Environment	20
Business Ethics	21
Non-compliance	21

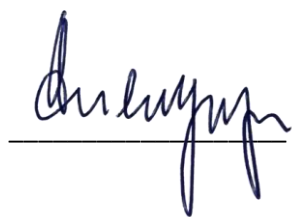
Our Code of Conduct

Boxon Holding AB consists of Boxon Group AB, Boxon Tech Group AB, and Boxes & Labels International AB (hereinafter named as The Group).

Our commitment is based on our core values, and we are compliant with 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.

The Group consists of packaging partners that add value to our customers through innovative and sustainable solutions. We want to challenge the conventional packaging and find value-creating packaging concepts together with our customers. We create customer value through our high quality and cross material offer, and through strong partnerships along the whole value chain.

Our code of conduct brings together our values and guidelines, which must govern our relationships with each other, with our business partners and with society at large. All business partners and employees at Boxon, Boxon Tech and Boxes & Labels must act in line with our code of conduct.

A handwritten signature in dark blue ink, appearing to read 'Anders Yllfors', is written over a horizontal line.

Anders Yllfors
CEO Boxon Holding AB

2026-10-21

Date of signature

The Code of Conduct is for you

Employees, Suppliers and Business Partners

This Code of Conduct applies to everyone working with or for The Group, meaning all employees, managers, board members, consultants, contractors, and suppliers. We have subsidiaries in Sweden, Denmark, Norway, Finland, Germany, France, Slovakia, China, Thailand, USA, Spain and Morocco, more than 300 suppliers in EMEA and Asia and we have recycling hubs for Boxon Tech globally.

12 countries / 16 warehouses / Global recycling hubs

The Code of Conduct is our platform for how everyone collaborating with us is expected to behave, along with applicable laws, rules, regulations. Everyone is expected to strive to exceed both international and industry best practice. Our Code of Conduct covers Environment, Labour & Human Rights, Ethics and Supply chain.

Commitments

Through our Code of Conduct, we are committed to:

- Comply with laws and the ten principles of UN Global Compact.
- Share values based on conventions of the UN and ILO, which are summarized in the international standard SA8000 by Social Accountability International.
- Actively work with sustainable development to fulfil the 2015 Paris Agreement on Climate, as well as the realization of the 17 Sustainable Development Goals (SDG's) and the 2030 Agenda.
- Conduct our business according to good ethical business principles.
- Integrate social responsibility throughout our organisation and in business practice with suppliers and other stakeholders.

Responsibilities

Through our Code of Conduct our employees, suppliers and business partners, take responsibility for:

- Read, understand, commit to, and follow the Code of Conduct and relevant steering documents.
- Conduct trainings for our Code of Conduct, which is available on the respective company's intranet and website.
- Communicate and demonstrate the intent and spirit of our Code of Conduct, as well as the importance of compliance with our Code of Conduct.
- Raise concerns as we strive to achieve transparency, openness, and solid business ethics in everything we do.
- Raise concerns about any conduct that you believe to be a violation of laws, regulation, and/or our Code of Conduct.
- The options for raising concerns are described in our whistle-blower procedure and available on respective company's website.

Working Methods

The provisions of this Code of Conduct set forth the minimum and qualifying standard for our Supplier Code of Conduct & Requirements. All suppliers with whom The Group conduct business shall commit to, follow and be compliant with our Supplier Code of Conduct & Requirements and the suppliers shall ensure that their sub-suppliers meet these standards.

We use materiality sustainability analysis (SASB Materiality Map) to identify the economic, environmental, and social topics where we as a company have 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 connected to Boxon's, Boxon Tech's and Boxes & Labels business strategy and important stakeholders.

We systematically work with and integrate the framework for ISO 14001, 9001, 45001 and FSC when relevant, additionally, other policies and procedures that are present in our management system. We are transparent and communicate with our employees and stakeholders, through annual sustainability reporting and continuous updates.

Evaluation and Follow-up

We set sustainability goals on company and functional level which are followed up continuously. We define and report our goals and progress according to the GRI (Global Reporting Initiative) standards and through UN Global Compact Communication on Progress (COP).

We formally follow up the sustainability work annually through third party ISO audits, FSC audits and TISAX audits, and through external ratings as EcoVadis.

When possible, we follow up and monitor CO2 emission and carbon footprint according to GHG Protocol (Greenhouse Gas Protocol) and Boxon also follow up CO2 emissions through the Science Based Targets Initiative.

Suppliers provide information as required by The Group regarding the standards in this Code of Conduct. Based on this information, the supplier is evaluated, and the results are measured and compared. Boxon, Boxon Tech, and Boxes & Labels must have the opportunity to conduct on-site evaluations and inspections of the supplier's facilities to review progress in relation to these standards.

The Group demands the supplier to evaluate and monitor their sub-suppliers, since information regarding the compliance of these parties with Code of Conduct might be required by any of the companies above.

Environment

Environmental Policy Statement and Introduction

At The Group, environmental sustainability and climate action is a vital part of our business strategy, operations, and long-term value creation. The common denominator across all companies within The

Group is the shared ambition and determination to continuously reduce and minimize our carbon footprint and environmental impacts across every stage of the value chain.

This policy defines our group-wide framework, operational standards, and key environmental commitments. While individual Group entities set operational goals aligned with their specific markets, packaging technologies, and customer supply chains, all subsidiaries operate under this single, unified environmental governance umbrella.

Strategic Targets and Commitments

Boxon Group	Boxon Tech	Boxes & Labels
Paris Agreement Alignment: Committed to limiting global temperature rise to well below 2°C—and pursuing efforts for 1.5°C—above pre-industrial levels to reduce climate risks. Operations (2030): Achieve zero waste to incineration and 100% renewable energy across all internal operations. Employee Engagement: Ensure 100% of employees complete training, understand, and act according to our Environmental Policy. Science Based Targets (SBTi): Cut absolute Scope 1 and Scope 2 CO₂e emissions by 50% by 2030 (versus a 2019 baseline), with a long-term commitment to reach net zero by 2045.	Zero-Waste Closed Loops: Design single-use packaging systems (such as FrameTray™) where 100% of used materials are collected, recycled, and remanufactured into new trays to eliminate material waste. 100% Circular Supply Chains: Engineer custom returnable and injection-molded tray flows to maximize packing density and cut transport emissions globally. Localized Global Footprint: Expand manufacturing and recycling hubs directly near customer assembly sites worldwide to shorten transit distances and secure material loops.	GHG Transparency: Maintain complete GHG accounting across Scope 1, 2, 3 (Scope 3 including areas of purchased goods, energy, transport, commuting and business travel = categories 1–3 and 5-7) Environmental Management: Maintain ISO 9001 and 14001 certification and continuously improve environmental performance, compliance and resource efficiency. Circular and Sustainable Packaging: Increase the use of recycled and responsibly sourced materials and support customers in meeting PPWR and other sustainability requirements.

Operational Sub-Targets: Individual operating subsidiaries establish specialized operational workflows (e.g., returnable tray flows, label substrate transitions, or local recycling infrastructure) tailored to their product categories. These localized initiatives collectively advance the overarching environmental ambitions of The Group.

Environmental Management

We evaluate the impact of climate change through regular risk analyses, tools, benchmark and external reviews and we take suitable actions.

We conduct our activities in such a way that environmental legislation is adhered to by a solid margin, and we have good foresight regarding new legislation, proactively meeting the demands and wishes of customers and other stakeholders.

We have good emergency preparedness, through the systematic identification and evaluation of the risks of accidents, fires, and uncontrolled emissions to the environment.

We actively work with decreasing air pollution by choosing more sustainable transportation and travel options, and by reducing energy consumption.

We travel consciously, and we always consider the most sustainable option.

We work systematically with environmental improvements and development. Environmental management systems according to ISO 14001, and FSC when relevant, shall be in place at our operations and business partners to ensure a solid environmental management system and operations.



Environmental Operations

We systematically work with sustainable resource management in using natural resources in a way that preserves them for future generations, which involves reducing waste and pollution, using renewable resources, protecting biodiversity, and managing resources in a way that ensures they are not depleted or degraded.

We respect nature by promoting sustainable use of natural resources and protection of biodiversity, by offering sustainable sourced wood fibre raw material (FSC) in our fibre based and wood products.

We continuously work with energy efficiency activities in our operations with the purpose to yearly decrease energy consumption and we use water, energy, materials, and other natural resources in a well-managed way and with a focus on sustainable development.

We actively choose renewable energy, 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 have a zero-waste ambition in our operations, and we systematically work with waste reduction and waste management, supported by the process of collecting, transporting, processing, recycling, and disposing of waste material in an environmentally friendly manner.

We are compliant with REACH and RoHS and we ensure that Per- and polyfluoroalkyl substances (PFAS) is not used in our products.

Circular Products and Transparency

We contribute to the circular economy by making use of secondary materials and by extracting high-quality resources from waste in our operations.

We design our products for circularity (reduce, reuse, material circulation) with the aim of performing life cycle assessments including end of life management, when developing products and solutions.

We engage and train our employees, customers, and business partners on environmental topics, with the ambition to increase knowledge, enable them to take conscious decisions, to mitigate negative health and safety impacts of products and services and act responsibly beyond their operational activities.

We provide open, regular, and information about our sustainability work and sustainable consumption to customers, employees, and business partners.

We are fully transparent and make the corresponding certifications, and environmental facts & figures, available to our stakeholders at any time and through our channels.

Labour and Human Rights

Introduction and Targets

The Group's proactive approach within the area of Labour and Human Rights is highly prioritized where a clear Zero tolerance towards violation against our Labour & Human Rights policy sets the foundation. All employees have conducted training, understand, and acts according to our policy for Labour & Human Rights.

Health & Safety

Target: Systematically eliminate workplace risks to drive toward a zero-accident culture.

Working Conditions

Target: Guarantee living wages for all staff, capped working hours, and fair compensation.

Social Dialogue

Target: Ensure open communication, freedom of association, and employee representation.

Training & Career

Target: Provide equitable professional development, skills training, and performance reviews.

Child & Forced Labor

Target: Maintain zero tolerance toward forced labour, trafficking, and underage employment.

Discrimination & Harassment

Target: Promote equal opportunity and maintain a workplace free from harassment.

Supply Chain Rights

Target: Enforce human rights due diligence and grievance access across all primary suppliers.

Respect for Human Rights

We treat all employees fairly, with dignity and with respect.

We have zero tolerance towards discrimination against anyone based on 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 other discrimination on the grounds of age, colour, national origin, religion, sex, disability, or other characteristics protected by applicable law, and we work actively to counteract this in all ways.

We respect freedom of association, collective bargaining, and the right of all employees to organise themselves.

We have zero tolerance towards child labour, modern slavery, illegal labour, or other forced labour.

We ensure the social dialogue between The Group and trade unions are connected to collective agreements and labour rights and we encourage that each company has an employee representative or an employee representative body.

We only accept young workers in our supply chain if the minimum admission to employment of work shall not be less than the age of completion of compulsory schooling, and normally not less than 15 years.

Young workers (below 18) must be protected from performing any work that is likely to be hazardous or to interfere with education or that may be harmful to health, physical, mental, social, spiritual, or moral development.

We hold our business partners to the same rigorous standards as our own operations. We actively evaluate tier-1 suppliers for human rights risks, mandate adherence to our Supplier Code of Conduct, and provide accessible, confidential channels for internal and external stakeholders to report concerns without fear of retaliation.

A Safe, Healthy, and Developing Working Environment

Our activities must be conducted in such a way that legislation in the Health and Safety area at work is adhered to by a good margin.

We work proactively and systematically to create a good and safe working environment.

We have a “zero-accident” vision regarding occupational accidents, and we never compromise on health and safety at work.

We proactively work with accident management and if accidents happen, we mitigate the harm and prevent similar accidents in the future, by follow the process in how to respond to unexpected events that cause harm or injury to people, property, or the environment.

We actively work with incident management to identify, report, and analyse any unexpected event that can cause disruption or harm within our organisation with the purpose of minimizing negative impact.

We ensure access to fire safety, emergency preparedness drinking water, sanitary facilities, and response, industrial hygiene, adequate lighting and ventilation, management of occupational injury and illness and machine safeguarding.

We have fire safety with functioning smoke detectors, fire extinguishers, sprinkler systems, as well as creating and practicing fire escape plan. Fire safety also involves educating individuals on fire prevention.

We have emergency preparedness which involves planning and preparing for potential emergencies, including natural disasters as well as human made emergencies. We prepare evacuation plans and ensure that the communication system is in place.

We invest in our people through structured annual performance reviews, equal access to skill development, and ongoing training programs that empower every employee to grow professionally and advance their career within The Group.

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 comply with all applicable requirements governing working hours as established by local law. Working hours should never exceed 60 hours per week, including overtime, except in emergency or unusual situations. We ensure that all overtime work is voluntary and compensated at the prevailing overtime rates.

We base our salaries on our values, performance and applicable collective agreements, and we ensure that all employees and contract workers at The Group receive a living wage.

In line with the definition of the [ILO](#), this means a level of pay for normal working hours—excluding overtime—that enables workers and their families to achieve a decent standard of living, considering country-specific conditions. This includes the ability to afford essential needs such as food, housing, healthcare, education, transport, and clothing, while reflecting local or regional differences.

We comply across our value chain with all applicable laws and regulations relating to wages and benefits, including overtime, piece rates and other forms of compensation, and we encourage our suppliers to ensure a living wage for employees throughout their value chains.

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.

Business Ethics

Introduction and Targets

Business Ethics is an area where The Group sets out guidelines and rules that form the foundation of how we conduct business.

Corruption, Bribery, Trust

Target: Enforce a zero-tolerance policy against all forms of bribery and corruption, ensuring 100% of employee's complete annual anti-corruption training to uphold full compliance across group operations.

Fraud

Target: Maintain rigorous internal accounting controls, strict financial oversight, and transparent reporting mechanisms to prevent, detect, and eliminate fraudulent business practices.

Conflicts of Interest

Target: Mandate annual disclosures and proactive risk management processes to identify, evaluate, and resolve potential or actual conflicts of interest at all levels of organization.

Money Laundering

Target: Train all finance, procurement, and commercial teams on proactive due diligence protocols to detect and prevent operations from being misused for money laundering or illegal financing.

Responsible Information Management

Target: Safeguard corporate, employee, and partner data through continuous workforce training on Data Protection (GDPR) and Information Security standard compliance.

Sound Business Principles & Fair Competition – Including Anti-bribery, Anti-corruption, and Anti-trust

We are committed to maintaining our reputation as a well-respected and trusted company, committed to being a leading corporate citizen and upholding the most ethical standards in our business practices and policies.

We practice ethical behaviour where we must conduct all our business in an ethical manner, treating all stakeholders fairly and with respect. We demand honesty and integrity in our own business and expect the same from our business partners.

All our employees have regular mandatory training in understanding and following our anti-corruption and anti-bribery policies and expect them to report any instances they encounter.

We are compliant with laws and regulations and adhere to all relevant laws and regulations that govern fair competition, antitrust laws, consumer protection laws, and intellectual property laws. All units and employees must observe and comply with competition laws.

Our anti-corruption policies strictly prohibit all forms of bribery, and corruption, 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.

We comply with all anticorruption laws, and to accurately record transactions and ensure that all our employees, suppliers and partners follow this policy.

We have zero tolerance towards fraud, and we have established procedures to prevent, detect fraud, and address fraudulent activities within our operations.

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.

Anti-competitive practices are avoided when engaging in any activities that could harm competition, such as price-fixing, market allocation, and collusion with competitors.

We respect the protection of intellectual property and the intellectual property rights of our competitors and prevent any unauthorized use or infringement of their patents, trademarks, or copyrights.

By disclosing and ensuring transparency in our corporate policies and structures, we provide stakeholders—including employees, customers, business partners, regulators, and competitors—with insight into how The Group operates, our financial position, and clear information about our products, services, and business practices.

We are committed to complying with applicable economic sanctions and export controls, which may restrict or prohibit business dealings with specified individuals, entities, or countries. They can also restrict or prohibit the export or import of certain goods or services.

Financial Responsibility

We take responsible financial management by following guidelines for managing financial resources, which ensures that we operate within our financial means and make sound financial decisions.

We are committed to responsible financial management by utilizing existing guidelines and procedures for budgeting, spending controls, cash management, financial reporting, with accurate records helping us to track our progress, make informed decisions and meet legal and regulatory requirements.

We use The Group's funds, equipment, systems, information, working time, and other resources responsibly. We protect these assets against loss, theft, misuse, damage, fraud, and unauthorized access. Suspected loss, misuse, or security incidents should be reported through appropriate internal channel.

We are compliant with relevant laws and regulations, including tax laws, accounting standards, and ethical principles.

We identify and assess financial risks, such as fraud or other financial crimes, and we establish procedures for mitigating or managing those risks.

We work proactively to prevent our business from being used for money laundering or other illegal financing. To prevent financial crime, relevant finance, procurement, and commercial personnel receive specialized training on counter-party due diligence and anti-money laundering controls to identify and report suspicious transactions.

Conflicts of Interest

All employees act according to our guidelines, which will prevent situations where an individual personal interest may conflict with their professional responsibilities. A conflict of interest occurs when an individual's personal interest or relationships interfere or appear to interfere with their ability to act in the best interest of our organisation or our clients.

All employees must avoid conflicts of interest between private financial matters and company business activities.

Data Protection and Information Security

We protect the confidentiality, integrity, and availability of all sensitive information we manage. We ensure secure collection, processing, and storage of third-party information for business purposes and personal data. We follow our common information security policy and, when appropriate, prepare company-specific information security guidelines.

We have clear guidelines including non-disclosure agreement used towards third party, how data is collected, processed, stored, shared, and disposed of when no longer needed.

We follow and are compliant with legal and regulatory requirements.

We manage all information obtained from our partners in a secure manner and in accordance with any confidentiality agreements entered and applicable market abuse legislation. This information is not disclosed to unauthorized persons.

We manage personal data in accordance with the applicable personal data legislation.

Employee mobile devices are protected with Mobile Application Management (MAM), a security service from Microsoft to protect company data and information on mobile devices.

The usage of company computers and company applications are protected by Multi Factor Authentication (MFA). MFA is also applied for external partners that enter our systems when they perform decided activities.

We fulfil requirements for TISAX certification Level 2 when applicable (Boxon Tech)

It is mandatory for all employees to continuously conduct training in data protection and information security.

Whistle-blower and Protection Against Retaliation

We create an environment where employees or other stakeholders feel safe and confident to report illegal or unethical behaviour and concerns without fear of retaliation.

We ensure that employees or other stakeholders can take responsibility and act in the best interest of themselves and/or of another person or entity. Without the risk of personal consequences an employee or other stakeholder can become a whistle-blower about significant irregularities.

We actively perform a yearly risk assessment through employee and supplier surveys, with additional peer-to-peer reviews.

We ensure full integrity as our whistle-blower system is available on our website and is managed by a third party.

Transparent and Ethical Communication

Our communication must be straight, honest, and respectful and comply with applicable legislation, rules, and standards.

We must apply sound business principles and be responsible and moderate in our marketing.

We maintain good relationships with our stakeholders, where communication is based on regular contact, clarity, and good ethics.

Only duly authorised managers and spokespersons may speak externally on behalf of The Group or its companies. External information that may affect the valuation of a Group company must be approved and communicated by the CEO of the relevant company or The Group

Supply Chain

Introduction and Targets

The Group focuses on building a resilient, ethical, and sustainable future. This requires active collaboration across our entire value chain. We partner with suppliers who share our commitment to high ethical standards and act in full alignment with our Group Code of Conduct and Supplier Code of Conduct (Supplier CoC).

Supplier Code of Conduct Adherence

Target: Achieve 100% sign-off on the Boxon Holding AB Supplier Code of Conduct across all direct suppliers.

Sustainable Product Portfolio Expansion: *

Target: Increase the sales volume share of certified sustainable packaging and labelling solutions to 80% of total group sales by 2030.

Forest Stewardship Council (FSC®) Chain of Custody Audits: **

Target: Conduct annual FSC audits across 100% of external warehousing facilities located within the European Union.

**** This target is valid only for Boxon Group and Boxes and Labels***

***** This target is valid only for Boxon Group***

Our Suppliers

We collaborate with suppliers who act according to our Group's Code of Conduct and our Supplier Code of Conduct (Supplier CoC). Our Supplier Requirements must be passed down to the supplier's value chain and followed up by the supplier.

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 expect suppliers to take active steps to develop and improve and integrate a more sustainable supply chain with regards to environment, human & labour rights, and ethics.

We ensure that all our suppliers formally commit to our Supplier Requirements (Appendix), which includes detailed requirements regarding environmental, human & labour rights and ethics.

We expect suppliers to implement measurements that ensure that their activities, products, and services do not adversely affect the environment, human health, and society.

We follow up suppliers' compliance with our requirements every year.

We prioritize suppliers that follow or implement certifiable ISO management systems referenced in our working methods.

We request our suppliers to be able to show evidence that the sources of wood used in the production of our products are sustainable.

We expect our suppliers to have an environmental and human rights policy, which is fully implemented and monitored.

We request suppliers delivering fibre-based or wood products, to be FSC or PEFC certified, and to be able to state country of origin of raw material.

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

We must always meet customer requirements, needs, and expectations by delivering services and products of the right quality.

Quality control and the 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 is available online and/or on demand.

We work with certified quality and environmental management systems (ISO 9001, and 14001) and, where relevant, industry-specific certifications, which must also be in place at our suppliers.

Accountability, Responsibility, and Review

The management teams in The Group are accountable for that the Code of Conduct is communicated, implemented, and followed up in respective company.

The CEO of Boxon Holding AB is the approver of our Code of Conduct.

The Chief Sustainability Officer at Boxon is the policy owner for our Code of Conduct and responsible for the revision of the Code of Conduct, which is done every second year during tertial 3 (next revision, please see page 1).

The Code of Conduct is available for our external stakeholders on each company's website and for our employees at each company's intranet.

Supplier Code of Conduct (Annex of Code of Conduct)

Supplier Requirements | Background and Validation

Boxon Group, Boxon Tech and Boxes & Labels Code of Conduct, including Appendix Supplier Requirements, outline our standards to ensure that working conditions at our suppliers are safe, that workers are treated with respect and dignity, that manufacturing processes are environmentally responsible, and that business is conducted in an ethical manner.

The Group fully complies with the UN Global Compact 10 principles. Within the scope of these basic principles, and the International Labour Organisation, we set the basis for a functioning Sustainable Procurement System. The purpose of this document is to ensure that the above principles and corresponding requirements are met within the context of the cooperation with our suppliers. The present Code of Conduct for The Group is a formal part of the Supplier Requirements. The supplier confirms by signature having read the Code of Conduct and to follow the Supplier Requirements in any business relationship with Boxon.

By signing below, we confirm that we have read, understood, and will comply with the Boxon Group, Boxon Tech and Boxes & Labels Code of Conduct and Supplier Requirements. We commit to implementing these requirements within our organisation and to ensuring compliance throughout our value chain.

Supplier name: _____

Name and title: _____

Signature: _____

Place and date: _____

Supplier Requirements | Standards

The provisions of this Supplier Requirements set forth the minimum standards and qualifying standards of all suppliers with whom The Group conducts business and their sub-suppliers in the supply chain. The suppliers shall ensure that their relevant sub-suppliers meet the principles in this Supplier Requirements, or relevant set of principles.

The standards are classified as follows:

- Human Rights & Labour.
- Environment.
- Business Ethics.

Human Rights and Labour

Human Rights and Labour policy

The Group requires suppliers to have a Human Rights and Labour policy statement. Without exception, all suppliers must respect, and support internationally proclaimed human rights and ensure that they are not complicit in human rights violations in any way, not even indirectly.

All suppliers are expected to equally endorse the regulations below.

1. *General Declaration of Human Rights - UN - Doc. 217, UN Human Rights Charter.*
2. *27 Principles of the Rio Declaration on Environmental Development decided upon by the United Nations Conference on Environmental and Development (UNCED), Rio de Janeiro, 1992.*

Labour

The Group requires suppliers to prohibit any use of forced, bonded or indentured labour or involuntary prison labour, and embrace employment practices consistent with ILO conventions pertaining to forced labour. All work, including overtime, must be voluntary and workers should be free to leave upon providing reasonable notice. Suppliers shall also not require that workers surrender personal certificates and identifications, such as government-issued identification, passports, or work permits, as a condition of employment.

Child Labour

The Group requires suppliers not to engage in any inconsistent practice regarding Child Labour. The minimum admission to employment of work shall not be less than the age of completion of compulsory schooling, normally not less than fifteen or fourteen years where the local law of the country permits, preferably to the highest age. Additionally, all young workers (below 18) must be protected from performing any work that is likely to be hazardous or to interfere with education or that may be harmful to health, physical, mental, social, spiritual, or moral development. All suppliers shall comply with all laws and regulations governing child labour and apprenticeship programs.

Discrimination

The Group requires suppliers to not tolerate any form of discrimination in hiring and employment practices on the grounds of age, colour, national origin, religion, sex, disability, or other characteristics protected by applicable law.

Harassment, harsh or inhumane treatment

The Group requires suppliers to create and maintain an environment that treats all employees with dignity and respect and does not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse. No harsh or inhumane treatment, coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

Freedom of association and collective bargaining

The Group requires suppliers to recognize and respect the rights of employees to freely associate, organise and bargain collectively in accordance with the laws of the countries in which they are employed, as well as core ILO conventions. Boxon, Boxon Tech and Boxes & Labels recognize the importance of open communication and direct engagement between workers and management and suppliers must respect the rights of workers to associate freely and communicate openly with management regarding working conditions without fear of harassment, intimidation, penalty, interference, or reprisal.

Working hours

The Group requires suppliers to comply with all applicable requirements governing working hours as established by local law. Working hours should never exceed 60 hours per week, including overtime, except in emergency or unusual situations. Suppliers must ensure that all overtime work is voluntary and compensated at the prevailing overtime rates. Suppliers are encouraged to ensure that workers are provided with one day off every seven-day week.

Compensation

The Group requires suppliers to comply, at a minimum, with all laws and regulations relating to wages and including those pertaining to minimum wages, overtime wages, piece rates and other elements of compensation, and to provide legally mandated benefits. Suppliers shall secure living wages for their employees, and they shall actively promote this in their supply chain.

Health and safety

The Group requires suppliers to follow all relevant legislation, regulations, and directives in the country in which they operate, or at any other location where production or work is undertaken, to ensure a safe and healthy workplace.

Suppliers should strive to implement recognized management systems and guidelines. The supplier is expected to ensure, at a minimum, reasonable access to drinking water, sanitary facilities, fire safety, emergency preparedness and response, industrial hygiene, adequate lighting and ventilation, management of occupational injury and illness and machine safeguarding. These same standards apply to any dormitory or canteen facilities.

All suppliers are expected to equally endorse the regulations below.

1. Forced Labour Convention, (C. 29-1930) and Abolition of Forced Labour Convention. (C. 105-1957).
2. The rights set forth in Convention EC 2000 (364-01).
3. See ILO Convention 100, 111, 158 and 159.
4. Freedom of Association and Protection of the Right to Organise Convention (C.87-1948) and Right to Organise and Collective Bargaining Convention, (C. 98-1949).
5. " Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection." Universal Declaration of Human Rights.

Environment

Environmental policy

The Group requires suppliers to have an environmental policy statement. Where possible, suppliers should support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies that implement sound lifecycle practices. Suppliers should strive to implement recognized management systems and guidelines, such as ISO 14001. We request our suppliers to be compliant with REACH and RoHS and to ensure that PFAS are not added intentionally to our products.

Sourced wood and fibre-based material

We require our suppliers to be able to show evidence that the sources of wood used in the production of our products are sustainable, and to be able to specify the country of origin of raw material according to EUDR. We request our suppliers delivering fibre-based or wood products, to be FSC or PEFC certified.

Chemical and hazardous materials

Chemical and other material posing a hazard if released into the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

Minimize waste, maximize recycling

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities must be monitored, controlled, and treated as required prior to discharge or disposal. Other types of waste are to be reduced or eliminated at source or through such practices as modifying production, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

Air emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion of by-products generated from operations are to be characterised, monitored, controlled, and treated as required prior to discharge.

Greenhouse gas emission

The supplier shall strive to reduce greenhouse gas emissions caused by its business operations, primarily carbon dioxide (CO₂) emissions, in line with the Paris Agreement. The monitoring and documentation of CO₂ emissions associated with The Group's share of production will be encouraged. Information about CO₂ management shall be provided to Boxon Group, Boxon Tech and Boxes & Labels on request.

Energy management

Energy management with a focus on minimizing the waste of energy shall be applied in all suppliers' business operations.

Business Ethics

Business ethics

The Group expects its suppliers to adhere to the highest standard of ethical conduct. Any form of corruption, extortion or bribery will not be tolerated. Any violation of this principle can lead to the termination of the business relationship and will be reported to national and /or international authorities.

Corruption

The Group requires suppliers to respect local law and not engage in any form of corrupt practices. We also expect suppliers to perform anticorruption training every second year, which is followed up in supplier assessments.

Conflict of interest

Suppliers are required to disclose to The Group any situation that may appear as a conflict of interest and disclose to us if any employees under contract with Boxon, Boxon Tech and Boxes & Labels may have an interest of any kind in the supplier's business or any kind of economics ties with the supplier.

Gifts and hospitality

The Group does not accept gifts, entertainment, hospitality, or other benefits that could influence, or reasonably be perceived as influencing, business decisions. Any permitted business hospitality must be modest, infrequent, transparent, consistent with applicable law and internal policies, and must never be offered or accepted in exchange for preferential treatment or to facilitate business with The Group.

Economic sanctions and export controls

The Group requires suppliers to comply with applicable economic sanctions and export controls ([See Sound Business Principles](#)).

Non-compliance

In the event of non-compliance with the requirements set out in this Code of Conduct and the Supplier Requirements, suppliers are expected to inform The Group without undue delay and cooperate in identifying the root cause of the deviation.

Where non-compliance is identified, the supplier shall, within a reasonable timeframe defined by The Group, establish and implement a corrective action plan, including clear responsibilities and timelines for resolution. Progress against the plan may be subject to follow-up, including documentation review or on-site assessments.

Non-compliance will be assessed based on its severity and potential impact. In cases of serious or repeated breaches, The Group reserves the right to escalate the matter, which may include suspension of business, termination of the relationship, and, where applicable, notification to relevant authorities.

The Group aims to collaborate with suppliers to achieve compliance; however, failure to demonstrate sufficient improvement within the agreed timeframe may result in the termination of the business relationship.