



How we behave is who we are

Elopak Code of Conduct



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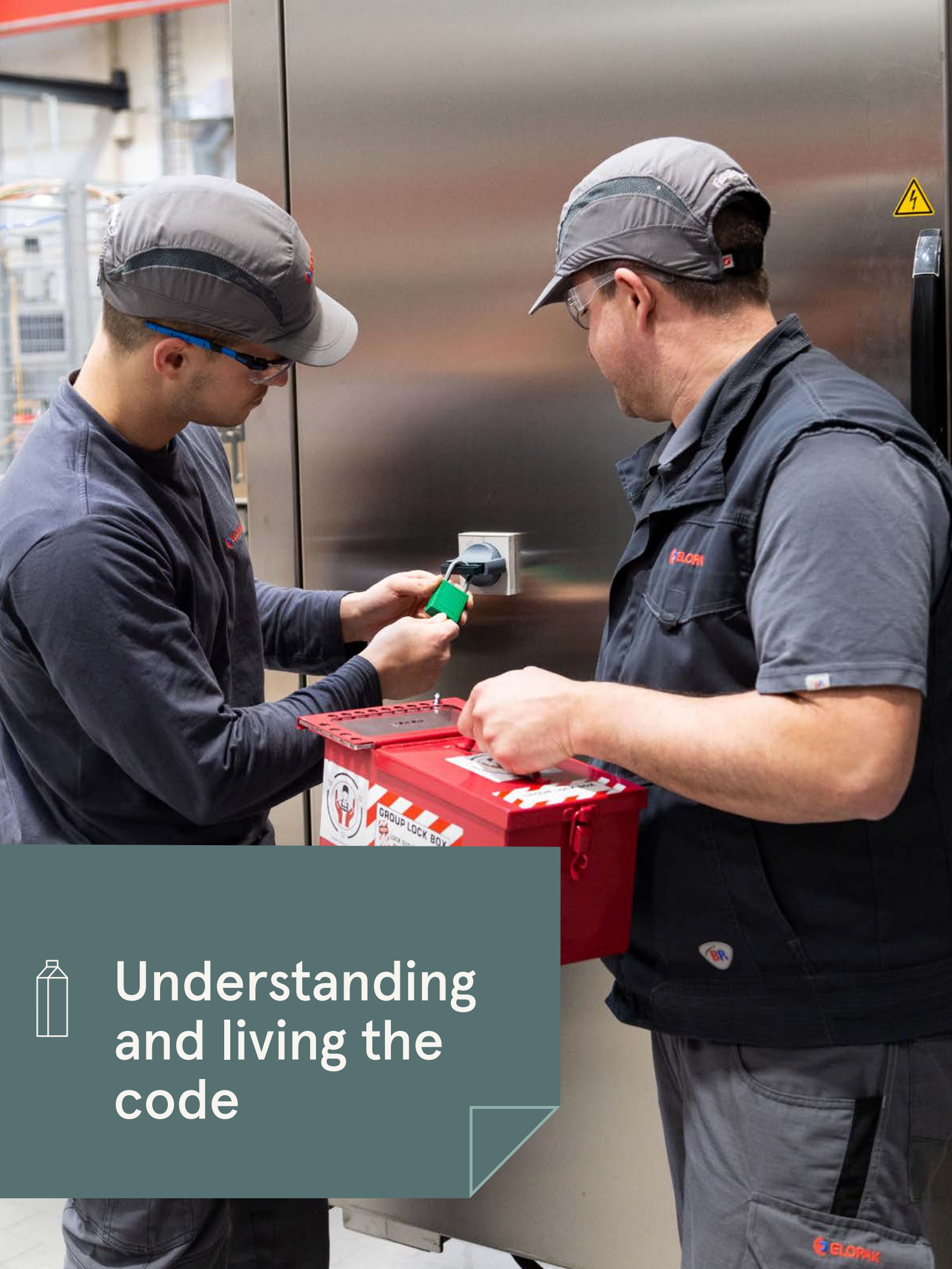
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Understanding and living the code

Message from the CEO

Dear colleagues,

As worldwide producers of carton-based packaging, we are committed to remaining our customers' partner and the consumers' favorite. We do this through relentlessly developing new solutions for an expanding range of content while applying market leading technology, skills and natural material sourcing. In short, we always aim to provide the highest quality products that leave the world unharmed.

Our vision is to be "chosen by people, packaged by nature". How we deliver is therefore just as critical as what we deliver. Being a global sustainable corporation, we are committed to always act in accordance with acceptable ethical standards, take responsibility for our actions and ensure that we comply with applicable laws and regulations.

The principles set out in our Code of Conduct serve as a guide to uphold the integrity and ethical foundation of Elopak, protect the environment, the communities we work with and ensure that our stakeholders are not put at risk.

As a company we are dependent on all employees to embrace the Code of Conduct to be recognized as the trusted company we are. We are all required to carefully read and fully understand the Code of Conduct and always comply with the outlined rules and behaviors.



Thomas Körmendi
Chief Executive Officer
Elopak Group





General

The Code of Conduct mirrors Elopak's commitment to applying ethical business practices and compliance throughout the organization and where we operate. Our Code of Conduct ensures that we as a global organization always act with integrity and in accordance with acceptable ethical standards, always take responsibility for our actions and that the company complies with both international and local laws and regulations.

This Code of Conduct describes expected personal conduct, conduct in the workplace and ethical business practices. It is designed to help you make the right decisions for yourself and for Elopak. The Code of Conduct serves as a guide to uphold the integrity and ethical foundation of our principles and actions, protect the environment and the communities we work with and ensure that our work does not put stakeholders at risk. Elopak policies and procedures can provide more detailed information about acceptable and unacceptable behavior.

You shall always strive to make informed decisions and exercise good judgment in your work for Elopak. If there are differences between applicable laws and regulations, and the standards set out in this Code of Conduct, the highest

standard shall apply. Violation of this Code of Conduct or applicable laws are not tolerated and may lead to disciplinary actions, dismissal or possible civil and criminal prosecution.

Elopak is committed to building a culture of trust. You are encouraged to raise questions and concerns and discuss ethical dilemmas. You are required to report in good faith any suspected violations of the Code of Conduct, laws and regulations, and material breaches of our policies and procedures. If you have any questions or concerns contact your line manager, Human Resources, Group Legal and Compliance or report through the **whistleblower helpline**. Reporting violations will not lead to any form of retaliation or serve as a basis for disciplinary action.

The Code of Conduct has been approved by the Board of Directors of Elopak ASA. Any major deviations from the requirements in this Code of Conduct must be approved by the CEO.

Scope

The Code of Conduct applies to Elopak wholly owned companies and employees worldwide. It also applies to intermediaries, agents, consultants and others who act on behalf of or represent Elopak, and to the members of the Board.



Responsibility and implementation

Employee responsibility

As an employee in Elopak, you are expected to conduct business with integrity and transparency and to demonstrate commitment to the highest ethical standards. You shall comply with applicable laws and regulations and adhere to our policies and procedures. You are expected to familiarize yourself with and comply with the Code of Conduct, meaning that you will perform your work in line with the outlined requirements. If you need advice on ethical and compliance issues, seek guidance with your line manager, Human Resources or contact personnel in Group Legal and Compliance.

Additional manager responsibility

As a manager, you have additional responsibilities that go beyond the requirements of all employees. Managers are responsible for communicating the principles in the Code of Conduct to their direct reports. They are also responsible for promoting and monitoring compliance with the Code of Conduct to ensure that direct reports complete mandatory training. As a manager, you are also expected to encourage your direct reports to raise concerns and create a culture of openness and trust.

CEO and Board of Directors responsibility

The Board of Directors of Elopak are responsible for implementing and overseeing the management of the Code of Conduct. Elopak's CEO shall ensure that employees are aware of and comply with the Code of Conduct. The CEO shall also ensure that annual training for the company's employees is conducted on the Code of Conduct and that all employees confirm that they have read and understood the Code of Conduct.

Declaration of compliance

As an employee in Elopak, you will be requested on an annual basis to confirm that you have read and understood the principles and ethical standards contained in this Code of Conduct.

Elopak expects its business partners to adhere to similar principles in their own operations as those outlined in this Code of Conduct. Suppliers with a direct contractual relationship with Elopak must accept the Supplier Code of Conduct, and these suppliers must ensure the requirements are communicated and understood throughout their supply chain.



Our
workplace

We build our operations based on mutual trust. We do so by working in a responsible and safe manner, acting with integrity and treating others with respect, reflecting our promises where we as leaders and employees “empower”, “unite” and “accelerate”. This section describes our workplace and responsibilities towards employees, the communities we work with and others affected by our operations.

Health and safety

Safety is our number one priority. In Elopak we are committed to getting everyone home safe every day. We fully acknowledge the statutory responsibilities and obligations regarding health, safety and welfare at work, and are devoted to establishing the best possible procedures to safeguard such responsibilities and commitments throughout the organization.

Elopak internal procedures shall protect our employees and others affected by our activities, whether carried out within our own workplace, during transit or whilst on a client’s worksite.

Your responsibility

- Comply with our health and safety requirements and procedures
- Understand the local risks and help prevent and mitigate these in order to protect our workplace and Elopak
- Report any incidents, near misses, including possible unsafe conditions to your line manager immediately



Human and labor rights

Elopak respects and promotes international human rights and labor rights, including that of the UN Declaration and Convention on Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and the UK Modern Slavery Act. We therefore support the freedom of association and the effective recognition of the right to collective bargaining for all employees, the elimination of forced or compulsory labor, the abolition of child labor, and the elimination of discrimination in respect of employment and occupation. We do not engage in or tolerate any forms of human trafficking and child labor abuse. We shall not employ or contract any forced or compulsory labor. Elopak respects the rights of employees to form and join trade unions of their choice and will comply with applicable laws, rules, regulations and industry standards concerning working hours, minimum wages and rules related to the working environment.

Elopak is further committed to implement systems that minimize risks of human and labor rights and remediate any negative impact on individuals affected by our operations.

Your responsibility

- Be aware of human rights risks in our operations
- Do not cause or contribute to the infringement of human and labor rights
- Respect the personal dignity, privacy and rights of all persons you cooperate with in your work and those affected by our operations
- Raise concerns without delay



Diversity and equal opportunities

An inclusive workplace with gender diversity and ethnic and cultural diversity enables higher levels of innovation and learning, which again impacts and contributes to compliance. We also believe that diversity creates an inspiring and healthy work environment. Elopak embraces diversity and inclusion to ensure competitive and sustainable growth.

At Elopak, we treat everyone with respect, honesty and dignity. Elopak has zero-tolerance against harassment (including abuse, intimidation, degrading treatment or sexually offensive behavior) towards employees or anyone affected by our operations.

We provide equal opportunities for our employees and do not discriminate based on age, gender, disability, sexual orientation, race, nationality, religion or ethnic background, political orientation, union membership, or any other basis prohibited by law.

Your responsibility

- Contribute to an inclusive and healthy working environment
- Treat everyone with dignity, honesty and respect
- Be aware of unconscious bias and base your work-related decisions on merit
- Do not engage in harassment, bullying, sexually offensive behavior or other behavior that colleagues or other stakeholders may perceive as offensive
- Speak up and/or report the concern if you become aware of a situation in breach of the principles described in this section



Our personal conduct



As employees of Elopak, we are the organization's representatives both during and outside working hours. We are expected to behave respectfully towards each other, our customers, suppliers, business partners, and others affected by our operations. This section describes our personal conduct and responsibilities.

Confidentiality

Confidential information is non-public information, which is sensitive to Elopak, its employees or business partners.

Unauthorized disclosure of such information could have an adverse impact on Elopak and its partners, such as impacting Elopak's share price or that of its partners.

Elopak is committed to protecting confidential information. We will not misuse confidential information in our possession, neither if it belongs to us nor our partners.

Your responsibility

- Sign and act in line with the global "Confidentiality Undertaking" form, which is part of Elopak's standard for employment and consultancy contracts

- Carefully consider how, where and with whom Elopak related matters are discussed
- Ensure that confidentiality agreements are in place when necessary
- Mark documents as "confidential" where appropriate
- Maintain confidentiality and discretion of personal matters of any individual(s) and do not use Elopak information to your own personal benefit
- The confidentiality obligations listed in this section also apply after termination of employment/assignment with Elopak
- Report any suspected violations of breaches to confidentiality



Inside information

Inside information is precise information about Elopak which is not publicly available or commonly known in the market, and which is likely to noticeably affect the price of Elopak's financial instruments. It is a criminal offense to trade Elopak shares or other securities based on insider information.

If you believe that there is a need to pass on the inside information, whether internally or externally, you must either ensure that the person is already on the insider list for the project in question or propose that the person in question becomes an insider and is included on the insider list.

Further guidance is specified in Elopak's internal policies and procedures on this topic.

Your responsibility

- Handle inside information as confidential and with due care so that the inside information is not misused or comes into the possession of others
- Refrain from trading or giving advice concerning trades in the shares of Elopak and other relevant listed companies based on inside information regardless of whether you are formally registered as an insider
- Never spread rumors, mislead with false information or manipulate prices
- Seek advice from Group Legal and Compliance when in doubt for all matters involving risk of insider information



Pure-Pak®

Chosen by people,
packaged by nature



Conflict of interest

A conflict of interest occurs when an individual's personal interests (family, friendships, financial, or social factors) can influence or be perceived to influence your judgement, decisions, or actions when acting on behalf of Elopak. Being open and transparent is imperative in dealing with actual, potential, or perceived conflicts of interest.

We acknowledge that conflicts of interest may lead to corruption or undermine the trust that others place in Elopak. Therefore, we are committed to mitigating all conflicts of interest in our operations. Any conflicts of interest that cannot be avoided shall be reported. Managers are responsible for evaluating the notification, considering mitigating actions and ensuring these are implemented.

Any additional employment, directorship or assignment outside of Elopak must not interfere with your ability to perform your professional duties for the company. Any employment or paid assignment held by Elopak employees in other organizations must be disclosed and approved in writing by your line manager.

Your responsibility

- Act in the best interest of Elopak. Use good judgment and avoid situations and positions that may create or perceive to create a conflict of interest
- Avoid taking actions or having interests that make it difficult to perform your work objectively and efficiently
- Do not engage in transactions on behalf of Elopak where you have, or could be perceived to have, a personal gain or advantage based on your position
- Avoid having interests outside the company in any business that competes with or provides services to Elopak or its subsidiaries, that could affect your objectivity in carrying out your responsibilities for the company
- Avoid doing business on behalf of Elopak with a close friend or relative
- In the situation where you find yourself in a decision-making process that is an actual or potential conflict of interest, you are expected to leave the process and disclose it to your manager and involved parties
- For any conflicts of interest that arise, notify your manager in writing and disclose all appropriate facts



Safeguarding property, information and assets

Elopak's property, information and assets include both those that are tangible and intangible. Tangible assets comprise buildings, machinery, PCs, documents, furniture and other equipment, while intangible assets include know-how, copyright and confidential information. Information produced and stored on Elopak's IT systems is regarded as the property of the company.

Our assets determine our business value. Without adequate protective measures in place to safeguard these assets, they risk the possibility of getting lost or stolen and can end up being misused. We acknowledge that without appropriate measures implemented, this can affect Elopak's business performance and lead to undermine the trust that others place in us. Elopak is committed to safeguarding the assets, property and information of Elopak and its customers, suppliers and other business partners.

Your responsibility

- Protect Elopak's property, information and assets from theft and loss
- Never share personal passwords and be familiar with how to protect external storage devices from unauthorized access. Familiarize yourself with our acceptable use of IT equipment
- Never remove or borrow assets of Elopak unless authorized by appropriate Elopak representative
- Business-related information shall only be stored on PCs, mobile devices, or other systems and tools approved by Elopak
- Never share customer or other business partner information externally unless explicitly authorized or required to do so by law
- Report any security breaches of property as stated in our internal procedures
- Report any theft, loss or misuse of company information and assets as stated in our internal procedures



**Our business
conduct**



Elopak shall comply with all applicable laws and regulations in the countries where we operate. We interact with all our stakeholders in an ethical and legal manner. Elopak expects the same commitment from our suppliers and other business partners.

Anti-corruption

The harm inflicted by corruption is globally recognized, including by the United Nations. “Corruption erodes trust, weakens democracy, hampers economic development and further exacerbates inequality, poverty, social division and the environmental crisis”¹. Bribery involves the

improper use of gifts, payments or favors in exchange for personal gain to influence a decision or outcome and is the most common form of corruption. The types of favors given are diverse and may include money, gifts, sexual favors, company shares, entertainment, employment, political benefits or any other advantage.

¹Transparency international:www.transparency.org



Elopak has a zero-tolerance approach to corruption and other illegal or unethical business conduct. Elopak is committed at the highest level to comply with Norwegian and international anti-corruption laws in all countries where we operate. That means that it is strictly forbidden to, directly or indirectly, give, promise, offer, authorize, grant, receive, accept a promise of or demand, any bribe or improper reward. Both giving, offering and promising as well as receiving, accepting or demanding a bribe are criminal offences.

A facilitation payment is a small bribe known as a “grease payment” or a “speed payment” made to secure the performance of a routine governmental transaction or public service to which the person or company making the payment is legally entitled to receive. These payments are typically low in value. Facilitation payments are prohibited in Elopak, and you must never initiate or encourage such payments on behalf of Elopak, whether the payment is made directly or indirectly through a business partner.

Your responsibility

- Prevent, detect and report bribery and other forms of corruption. Therefore, avoid any activity that might lead to, or suggest, a breach of Elopak’s anti-corruption policies
- Ensure that all payments made are proper and legal. They must be approved by appropriate Elopak personnel and recorded accurately in Elopak’s books and records
- Never offer anything of value to improperly influence the actions or decisions of any person, including any public official, in pursuit of Elopak’s interests, either directly or indirectly through a third party
- Facilitation payments are prohibited in Elopak. If a payment is required from you to prevent an immediate threat to the life or health of any person, such payments are not prohibited. The payment, and any other inappropriate payments, must be reported immediately to Group Legal and Compliance



Sanctions and trade restrictions

Trade restrictions are restrictions on the export or import of goods and/or services with certain countries, persons or entities. Certain laws may prohibit Elopak from doing business with specific persons and organizations that are associated with narcotics, trafficking, terrorism or other criminal activities together with those involved in the proliferation of weapons of mass destruction. Elopak is committed to complying with national and international trade restrictions and sanction regulations that are applicable in the countries in which we operate.

Your responsibility

- Stay updated on sanctions and export control regulations and ensure compliance with rules applicable to your business activity
- Before engaging in a project, transaction, purchase or delivery, assess sanctions risk of country, individuals and entities. Follow internal procedures to ensure that these parties are not subject to sanctions
- Perform appropriate due diligence of prospective business partners when relevant by following internal procedures
- Be attentive to performing business with parties that are from sanctioned countries, or that are otherwise designated for financial sanctions
- Seek advice if in doubt about the legality of any proposed business activity
- Seek advice from Group Legal and Compliance in all questions related to compliance with trade restrictions and sanction regulations



Anti-money laundering

Money laundering is illegal and supports criminal activities, including trafficking, terrorism, human rights violations and corruption. Money laundering is the process of disguising the proceeds of crime into legitimate currency or other assets.

Elopak is committed to comply with applicable anti-money laundering laws and prevent Elopak from being used by others to launder money.

Your responsibility

- Know your business partners and perform appropriate due diligence of prospective business partners
- Be familiar with your business partners so that you can identify typical behaviors, transactions and payment patterns and spot when behavior becomes suspicious or out of character
- Seek advice from Group Legal and Compliance in all questions related to anti-money laundering controls
- Report suspicious transactions or incidents of money laundering





Gifts and hospitality

Accepting or receiving gifts, hospitality and expenses can involve the risk of compromising professional integrity and the expectation of a return favor. Gifts, hospitality and expenses can also be perceived to affect the outcome of business transactions as they can be used to cover for bribery.

Generally, giving and receiving gifts should be limited and modest in terms of value and frequency. On an annual basis, the value of gifts should not exceed EUR 50. Normally, hospitality involves business associates and the cost of hospitality events should be kept modest.

As a rule, Elopak pays for travel, accommodation and other expenses for Elopak's own employees in accordance with internal regulations. Similarly, third parties pay for their employees or representatives.

Offering gifts or hospitality to public officials is limited by Elopak's policy and by law and may be prohibited according to local law.

Your responsibility

- Be open and transparent about gifts and hospitality
- Use practical judgment and consider Elopak's professional integrity and reputation as a guideline
- Never accept or offer gifts in form of cash or of discounts on personal purchases under any circumstances
- Never offer or accept gifts, hospitality, expenses or other benefits where these could influence or perceive to influence business decisions or violate any local laws of the recipient company
- Never offer or give a public official gifts or hospitality to obtain a license, permit, or other benefits
- If you are invited to a hospitality event, an approval is required from your line manager



Social responsibility- charitable donations, sponsorships and community investments

Being a socially responsible company means contributing and acting in a manner that benefits welfare of society and the environment. Elopak is committed to add value to local communities through positive economic contributions or social development, which involves engaging in the local community through volunteering, donations, sponsorships or investments.

A charitable donation is a gift of cash or property made to a non-profit organization to help it accomplish its goals for which the donor receives nothing of value in return. These donations are one-offs. Sponsorships are business-related activities in the community to support the organization in promoting its corporate identity in partnership with non-profit and community-based organizations. Community investments are intended to support economically disadvantaged communities through economic development, building local capacity, promoting human rights, and anti-corruption.

Your responsibility

- All charitable donations, sponsorships and community investments must be approved in advance and in accordance to any internal procedures
- Ensure that there is no personal conflict of interest, or perceived conflict of interest, involved in the decision to donate, sponsor or invest. In such situations, the person with a conflict must withdraw from any decision-making process
- Ensure the contribution complies with our anti-corruption requirements
- No charitable donations, sponsorships or community investments shall be made to political or religious groups or organizations



Fair competition

Antitrust laws are regulations that protect free enterprise and prohibits behavior that limits trade or restricts fair competition. Antitrust laws combat illegal practices such as price fixing, market sharing or bid rigging.

Elopak is strictly committed to conducting business in compliance with all applicable competition laws and regulations. Elopak is dedicated to a free, fair and open competition. Elopak shall not be involved in any anti-competitive behavior such as price fixing, agreements with competitors, abuse of market position, market or bid collusion, or commit any breach of competition laws and regulations.

Your responsibility

- Familiarize yourself with relevant competition laws and regulations
- Never discuss commercially sensitive information such as prices, bids, customers, sales territories or conditions including price confirmation with any competitor, and take reasonable care when doing so with any customer
- Refrain from discussing the same topics as those described above in any trade association where you participate or in other arenas where competitors are likely to be present
- If conversations arise with competitors speaking about internal or commercially sensitive issues, withdraw from the conversation and report to your line manager immediately
- Seek guidance with Group Legal and Compliance if you have any concerns about the content or scope of these laws or any related business activities



Protecting the environment

Elopak is committed to reducing its direct and indirect negative influence on the environment. Elopak shall always comply with all relevant environmental legislations in the countries we operate in.

We aim to minimize the environmental impact of our operations and products by actively reducing consumption of energy and raw materials, as well as reducing any direct emissions, and influencing such reductions throughout the value chain. We use only renewable electricity at our factories and business units, and work towards more electrification as well as energy efficiency at all sites. This is driven through our Science Based Targets, committing to keeping global warming below 1.5°C. We also work systematically to ensure local and national collection and recycling systems for beverage cartons, as well as to increase actual recycling. Another focus area is to increase the use of renewable and/or

recycled raw materials in our products, along with sourcing raw materials through sustainable and certified supply chains.

Elopak follows the most restrictive requirements on forestry and forestry practices and supply all material from FSC certified and other controlled sources. We also motivate and encourage our employees to be valuable contributors to improve our environmental performance.

Your responsibility

- Understand the environmental impact in your area of work and strive to minimize impact
- Share best practices on the environment related to your area of work
- Participate in environmental or sustainability programs and contribute to continuous improvement



Working with business partners

Elopak's success is dependent upon the cooperation from our business partners, i.e., suppliers, customers, agents, distributors, consultants or joint venture partners and others. Third parties are the single greatest area of bribery risks for organizations. These risks increase as organizations move into new markets and put more of their operations in the hands of third parties.

At Elopak, we carry out risk-based integrity due diligence processes to ensure that the business partners' reputation, background and abilities meet our standards. We must exercise caution when entering into agreements with intermediaries, i.e., entities or persons who help connect two or more trading partners and operating on Elopak's behalf, including agents, distributors, resellers, joint venture partners, and others, as Elopak may be held responsible for their actions.

Our business partners and intermediaries are expected to comply with all applicable laws and regulations and adhere to standards that are consistent with Elopak's Code of Conduct. Failure to comply with these requirements is regarded as a material violation of the obligations towards Elopak and may result in the termination of the business relationship.

Suppliers with a direct contractual relationship with Elopak must adhere and act according to

the principles outlined in our Supplier Code of Conduct. Elopak is committed to conducting business in a socially and environmentally responsible manner and has developed a global Supplier Code of Conduct to specify and clarify what we expect from our suppliers, which is based on principles included in the UN Guiding Principles for Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Suppliers are expected to actively communicate and promote the principles set out in the Supplier Code of Conduct to their sub-suppliers and to implement corresponding measures in their own supply chain.

Your responsibility

- Ensure that our business partners and intermediaries are made aware of Elopak's Code of Conduct
- Perform appropriate due diligence of prospective business partners to understand their background, reputation and capacity to meet our standards
- Communicate the Elopak Supplier Code of Conduct to our suppliers. All suppliers with a direct contractual relationship with Elopak must accept the Supplier Code of Conduct
- Report any misconduct by a business partner according to our internal procedures



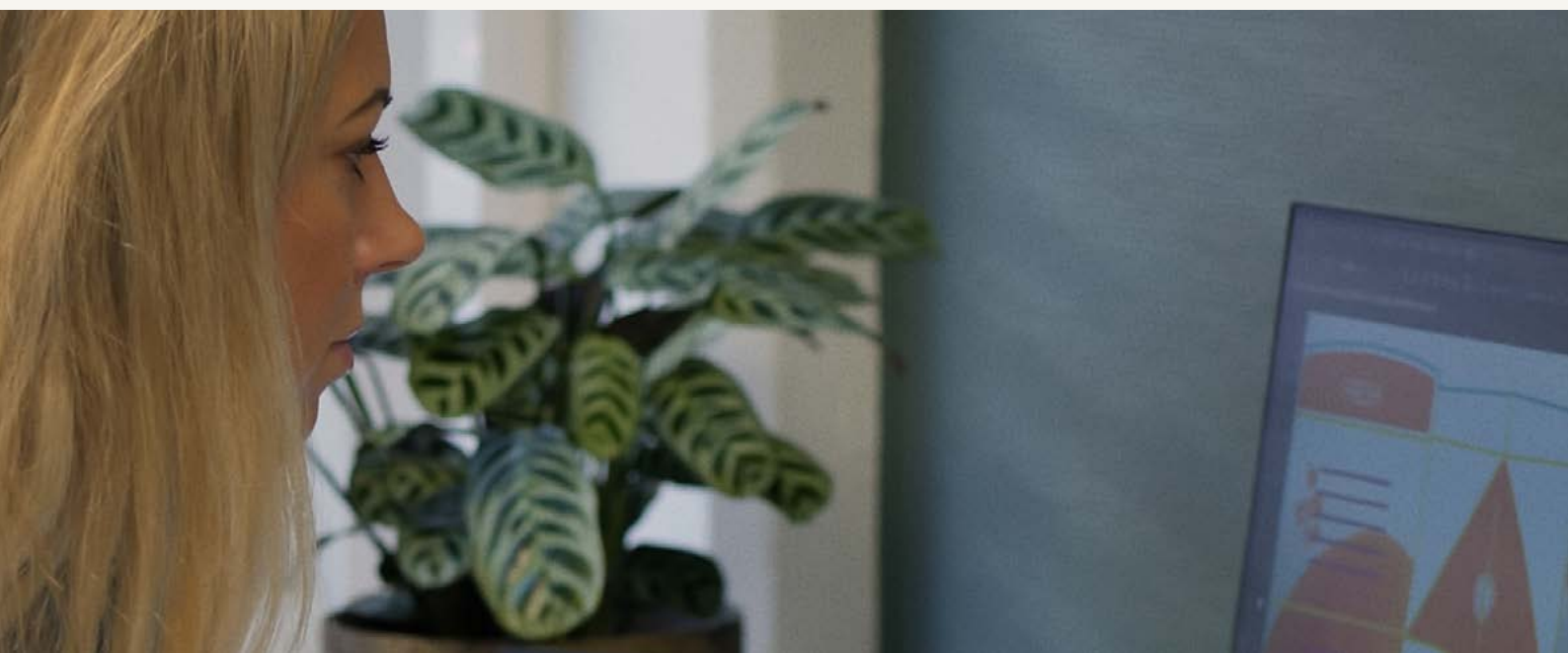
Privacy and data protection

Data protection focuses on protecting assets from unauthorized use, while privacy defines who has authorized access. We only use personal data for appropriate purposes, and we are transparent about what data we collect and how we use them. We have adopted both organizational and technical measures to ensure an appropriate level of security around the processing of personal data.

Elopak is committed to protecting the privacy rights of our employees and everyone we conduct business with. All processing of personal data in Elopak is to comply with current privacy legislation, hereunder the General Data Protection Regulation (GDPR) and the various local privacy legislation in our countries of operations.

Your responsibility

- Respect everyone's right to privacy
- Conduct training if your role and responsibilities include the handling of personal data to ensure compliance with internal requirements
- Conduct training if you have regular access to personal data or if you are involved in the collection, copying, storing, analyzing or disclosing of personal data
- If you consider that Elopak has failed to comply with applicable rules on processing of personal data, you have the right to object and complain at any time, using e.g., our **privacy e-mail**
- Seek guidance from Elopak's Data Protection Officer or Local Data Protection Coordinator if you have questions or concerns related the processing of personal data





Intellectual property

Intellectual property is a description for a set of intangible assets owned and legally protected by a company for use or implementation from the outside without a consent. In Elopak, intellectual property covers trademarks, patents and designs. Intellectual property is a highly valued asset for us. We comply with relevant laws and regulations that govern the rights to, and protection of our own and others' intellectual property.

Your responsibility

- Respect the intellectual property rights of Elopak and others
- Seek guidance from Elopak's IPR responsible if you have concerns related to intellectual property

Transparency, financial and non-financial reporting

As a publicly listed company, Elopak is responsible for communicating appropriate business information in full and on a timely basis to its employees and stakeholders. Elopak is obligated to provide complete, fair, accurate, timely and understandable disclosure in its periodic financial and non-financial reports, other documents filed with regulatory authorities and agencies, as well as in its other public communications. We are committed to transparency and accuracy in our business activities and providing the financial markets with quality information.

Your responsibility

- Ensure that data you register in our books and records are accurate, reliable and complete
- Never enter false or misleading entries in our books and records
- Immediately report any indications of fraud, improper financial business records and reporting or allegations of such



Reporting



Speaking up and reporting unethical behavior

Elopak is committed to building a culture of trust where employees are comfortable to ask questions, seek guidance, raise concerns and report suspected violations. At Elopak, every one of us are required to speak up about ethical issues and report any suspected violations of our Code of Conduct, laws and regulations, and material breaches of our policies and procedures. Concerns should be discussed with your line manager. In the case you are uncomfortable reporting concerns to your line manager, or your line manager has not addressed a concern appropriately, you may also raise concerns to Human Resources or **Group Legal and Compliance**.

If you are concerned about the response or lack of response, or if you feel unable to talk to the persons mentioned above, you can also use the Elopak **whistleblower helpline**. The whistleblower helpline is available on our official website. The whistleblower

helpline is used for internal and external reporting provided to allow all employees and external stakeholders to report their concerns anonymously.

Elopak will not tolerate retaliation against anyone who speaks up, nor any impact on the individual's professional career, for reporting possible violations in good faith.

Your responsibility

- Familiarize yourself with the Elopak speak up policy
- If you have reasonable concern that misconduct has taken place, the issue shall be reported
- When in doubt, seek guidance from Group Legal and Compliance
- For more information on handling of reported concerns, please refer to internal guidelines

