

# Code of Conduct

Alpy Group, consisting of

Boxon

BoxonTech

Boxes & Labels



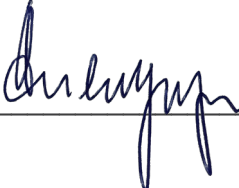
# Our Code of Conduct

Alpy Group AB consists of Boxon Group AB, BoxonTech Group AB and Boxes & Labels International AB (hereinafter named as Boxon, BoxonTech and Boxes & Labels).

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.

Boxon, BoxonTech and Boxes & Labels are 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, that must govern our relationships with each other, with our business partners and with society at large. All business partners and co-workers at Boxon, BoxonTech and Boxes & Labels must act in line with our code of conduct.



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Anders Yllfors  
CEO Alpy Group AB

Date: 2024-05-30

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# The Code of Conduct is for you - employees, suppliers and business partners

This Code of Conduct applies to everyone working with or for Boxon, BoxonTech and Boxes & Labels\*, meaning all employees, managers, board members, consultants, contractors, and suppliers. We have subsidiaries in Sweden, Denmark, Norway, Finland, Germany, France, Slovakia, China, Thailand, more than 300 suppliers in EMEA\*\* and Asia and we have recycling hubs for BoxonTech in EMEA, the USA and India.

- Subsidiaries in 9 countries
- 16 warehouses in 8 countries
- Recycling hubs in 9 countries

The Code of Conduct is our platform for how everyone working 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, Labor & 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 summarized 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 realization 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 organization and in business practice with suppliers and other stakeholders.
- This is our minimum standard, that everyone working with or for Boxon, BoxonTech and Boxes & Labels shall follow in our day-to-day business, including suppliers and their sub-suppliers.

## The responsibility for employees, suppliers, and business partners if you work with or for Boxon, BoxonTech or Boxes & Labels:

- Read, understand, commit to, and follow the Code of Conduct and other relevant steering documents.
- Conduct the training for our Code of Conduct, which is available on the respective company's intranet and website.

\*Alpy Group AB: Boxon Group AB.( Boxon AB, Boxon AS, Boxon A/S, Boxon Oy, Boxess i Värnamo AB, Boxon GmbH, Boxon SARL, Boxon Shanghai Packaging Ltd, Boxon (Thailand) co. Ltd, Boxon Tech Group AB (Boxon Tech AB, Boxon Tech s.r.o.), Boxes & Labels International AB (Boxes & Labels Borås AB and Boxes & Labels Olsfors AB

\*\* EMEA: Europe, the Middle East and Africa

- Lead by example – 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 a high level of business ethics in everything we do. You are expected to 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 – whistle blowing – are described in our procedure for whistle blowing 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 Boxon, BoxonTech and Boxes & Labels 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 essentially connected to Boxon’s, BoxonTech’s and Boxes & Labels business strategy and important stakeholders.
- We systematically work with and integrate the framework for ISO 14001 and ISO 9001, ISO 45001 and FSC when relevant, and other management systems in our policies and procedures. 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 for a company and functional level which are followed up continuously. We define and report our goals and progress according to the GRI standards and through UN Global Compact Communication on Progress (COP).
- We formally follow up the sustainability work annually through 3rd party ISO audits and FSC audits, and through external ratings as EcoVadis.
- 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 are asked to provide information as required by Boxon, BoxonTech and Boxes & Labels regarding the standards in this Code of Conduct. Based on this information, the supplier is evaluated, and the results are measured and compared. Boxon, BoxonTech 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.
- Boxon, BoxonTech and Boxes & Labels demand 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.

## About Boxon, BoxonTech and Boxes & Labels

**Boxon, BoxonTech and Boxes & Labels have a common assignment in develop and offer innovative and sustainable packaging solutions.** We all are aware of our responsibility as international active companies in the packaging industry. It is important for us to proactively drive and communicate socially and environmentally sustainable changes within the framework of our corporate responsibility.

**Boxon** has the vision to be the most innovative and sustainable packaging company with the best customer experience. Thanks to high competence and long experience, sustainable and innovative solutions in packaging is something that we can promise our customers. We offer everything from simple standard boxes to automated packaging machines. With the help of internal designers, we can develop special solutions for packaging and design labels based on your wishes.

**BoxonTech** focus primarily on the automotive industry and offers cost-effective and environmentally friendly packaging solutions. By conducting a thorough analysis of the flow chain, combined with creative use of injection-moulding technology, we can work with customers to produce custom made trays that are used as single-use or returnable packaging.

**Boxes & Labels** offers customer unique solutions for labels and packaging, leading to increased efficiency and profitability for our customers. We create value through efficient production, construction and design, printing and traceability. Our strength is to combine packaging and labels to an optimal solution.

# Environment

## Targets

- Committed to the Paris agreement and substantially reduce our global greenhouse gas emissions to hold global temperature increase to well below 2°C above pre-industrial levels and pursue efforts to limit it to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change.
- Zero-waste in and renewable energy in our operations latest 2030.
- All employees have conducted training, understand, and acts according to our Environment policy.
- Boxon is committed to Science Based Targets and to reach net zero of greenhouse gases latest by 2045, with approved targets for an absolute CO<sub>2</sub>e reduction with 50% in 2030 for scope 1 and 2, compared to 2019 years level.

## Company 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 good margin, and we have a 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 fiber 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 as much as possible.
- 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 co-workers, 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, co-workers 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 & Human Rights

### Targets

- Zero tolerance towards violation against our Labour & Human Rights policy.
- All employees have conducted training, understand, and acts according to our policy for Labour & Human Rights.
- 100 per cent of employees and contract worker across Boxon, BoxonTech and Boxes & Labels, at a minimum, earn a living wage.
- All suppliers respect Labour & Human rights throughout their value chain and have a human rights policy in practice.

### 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 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 possible 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 social dialogue between the group companies and trade unions connected to collective agreements and labour rights and we encourage that each company has an employee representatives 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.
- All Boxon companies, suppliers and business partners shall comply with all laws and regulations governing human rights, child labour and apprenticeship programs.

## **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 zero vision regarding occupational accidents and do not 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 analyze any unexpected event that can cause disruption or harm within our organization 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 in some places, 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 offer employees the opportunity to develop their professional knowledge, skills, and the possibility to influence.
- We accept 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 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 collective agreements with labour unions and we already today pay, at a minimum, living wage for employees and contract workers at Boxon, BoxonTech and Boxes & Labels.
- Our scope of living wage is defined according to ILO <https://www.weforum.org/agenda/2024/04/ilo-living-wage-explained/>. This means a level of pay that gives employees and contract workers and their families a decent standard of living. This includes being able to afford basic needs such as food, housing, healthcare, education, transport and clothing. A living wage reflects local or regional differences within countries. It also means pay for normal working hours – not including overtime.
- We comply, at a minimum and across our value chain, with wages and benefits with all laws and regulations relating to wages and including those pertaining to overtime wages, piece rates and other elements of compensation, and to provide legally mandated benefits. We encourage our suppliers to secure a living wage for employees throughout their valuechain.



## 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

## Targets

- Zero incidents of anti-corruption, anti-bribery, fraud, conflict of interest or unethical communication.
- All employees have conducted training and understand our policies and guidelines for anti-corruption, anti-bribery, and interest of conflicts.
- All employees working in finance, customers and suppliers understand and work proactively to prevent our business from being used for money laundering or other illegal financing.
- All employees have conducted training in Data protection & Information Security

## Sound business principles, fair competition, anti-trust, anti-corruption & anti-bribery

- 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 behavior 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 must be 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 we have zero tolerance of corruption. We apply anti-bribery, 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 practices 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 making transparent corporate policies and structures, we give co-workers, customers, business partners and other stakeholders insights in how Boxon, BoxonTech and Boxes & Labels operate, state of finances and clear and accurate information about our products, services, and business practices to customers, regulators, and competitors.
- 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 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. 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.

## **Conflicts of interest**

- All employees act according to our set 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 organization or our clients.
- All employees must avoid conflicts of interest between private financial matters and company business activities.

## **Data protection and information security**

- Our approach is to protect the confidentiality, integrity, and availability of sensitive information that we handle. We ensure secure collection, processing, or storage of third-party information for business purposes and or 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.  
for 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 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 unauthorized persons.
- We handle 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 fulfill requirements for TISAX certification Level 2 when needed.
- It's 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 co-worker and supplier surveys and peer-to-peer.
- We ensure full integrity as our whistle blower system is available on our website and is handled by a third party.

## **Straight and honest 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.
- In matters relating to Boxon's, BoxonTech's and Boxes & Labels operation, appointed managers and spokespersons are entitled to speak on behalf of Boxon. All external information that may affect Boxon's, BoxonTech's and Boxes & Labels valuation must be communicated by the CEO in the respective group.

# Supply chain

## Targets

- Our suppliers have signed our Supplier Code of Conduct & Requirements.
- Our suppliers have an environmental and human rights policy, which is fully implemented and monitored.
- Our suppliers delivering wood, paper and corrugated paper products shall be FSC certified.



## Suppliers

- We work with suppliers who act according to our Boxon, BoxonTech and Boxes & Labels Code of Conduct and our Supplier Requirements (Appendix). 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 management systems for quality (ISO 9001), the environment (ISO 14001), sustainable procurement (ISO 20400).
- 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 request suppliers delivering fiber-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 systematically. Certified quality and environmental management systems according to ISO 9001 and 14001- and/or industry specific certification systems – must be in place at the suppliers where relevant.



# Accountability, Responsibility and Revision

- The management teams in Boxon, BoxonTech and Boxes & Labels are accountable for that the Code of Conduct is communicated, implemented, and followed up in respective company.
- The CEO of Alpy Group is the approver of our Code of Conduct.
- The Chief Sustainability Officer Boxon is 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.



# Appendix

## Supplier Requirements



# Appendix

## Supplier Requirements

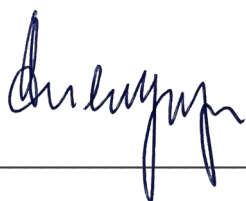
### Background and validation

Boxon, BoxonTech 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.

Boxon, BoxonTech and Boxes & Labels fully comply with the UN Global Compact 10 principles. Within the scope of these basic principles, the ISO 20400 standard 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 Boxon, BoxonTech and Boxes & Labels 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.

Our company fully complies with Boxon, BoxonTech and Boxes & Labels Supplier Requirements.

Supplier Requirements is approved by: CEO Alpy Group, Anders Yllfors.



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Anders Yllfors  
CEO Alpy Group AB

Place and date: \_\_\_\_\_

Suppliers signature and title (authorization to sign this Code of Conduct and Supplier Requirements): \_\_\_\_\_

Supplier name: \_\_\_\_\_

# Supplier Requirements

The provisions of this Supplier Requirements set forth the minimum standards and qualifying standards of all suppliers with whom Boxon, BoxonTech and Boxes & Labels 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.

## Standards & Requirements

**The standards are classified as follows:**

- Human Rights & Labor
- Environment
- Business Ethics

## Human Rights & Labour Requirements

### Human Rights and Labour policy

Boxon, BoxonTech and Boxes & Labels require: 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 complicit in human rights violations in any way, not even indirectly. All suppliers are expected to equally endorse the below regulations.

<sup>1</sup> General Declaration of Human Rights - UN - Doc. 217, UN Human Rights Charter

<sup>2</sup> 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

Boxon, BoxonTech and Boxes & Labels require 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 labor.<sup>3</sup> 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 labor**

Boxon, BoxonTech and Boxes & Labels require suppliers not to engage in any practice inconsistent.<sup>4</sup> The minimum admission to employment of work shall not be less than the age of completion of compulsory schooling, normally not less than 15 years or 14 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**

Boxon, BoxonTech and Boxes & Labels require suppliers to not tolerate any form of discrimination in hiring and employment practices on the grounds of age, color, national origin, religion, sex, disability or other characteristics protected by applicable law.<sup>5</sup>

### **Harassment, harsh or inhumane treatment**

Boxon, BoxonTech and Boxes & Labels require 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**

Boxon, BoxonTech and Boxes & Labels require suppliers to recognize and respect the rights of employees to freely associate, organize and bargain collectively in accordance with the laws of the countries in which they are employed, as well as core ILO conventions<sup>6</sup>. Boxon, BoxonTech 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**

Boxon, BoxonTech and Boxes & Labels require 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

Boxon, BoxonTech and Boxes & Labels require 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 <sup>7</sup>.

## Health and safety

Boxon, BoxonTech and Boxes & Labels require 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, such as OHSAS 18001. 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.

<sup>3</sup> Forced Labor Convention, (C. 29-1930) and Abolition of Forced Labor Convention. (C. 105-1957)

<sup>4</sup> The rights set forth in Convention EC 2000 (364-01)

<sup>5</sup> See ILO Convention 100, 111, 158 and 159

<sup>6</sup> Freedom of Association and Protection of the Right to Organize Convention (C.87-1948) and Right to Organize and Collective Bargaining Convention, (C. 98-1949).

<sup>7</sup> "Everyone who works has the right to just and favorable 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 Requirements

## **Environment policy**

Boxon, BoxonTech and Boxes & Labels require 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 per- and polufluoroalkul substances (PFAS) is not used in our products.

## **Sourced wood and fiber-based material**

We request 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 fiber-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 characterized, 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 (CO<sub>2</sub>) emissions, in line with the Paris Agreement. The monitoring and documentation of CO<sub>2</sub> emissions associated with Boxon, BoxonTech and Boxes & Labels share of production will be encouraged. Information about CO<sub>2</sub> management shall be provided to Boxon, BoxonTech 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 Requirements**

### **Business ethics**

Boxon, BoxonTech and Boxes & Labels expect its suppliers to adhere to the highest standard of ethical conduct. Any form of corruption is rejected, and 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**

Boxon, BoxonTech and Boxes & Labels require suppliers to respect local law and not engage in any form of corrupt practices, including extortion, fraud, or bribery. 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 Boxon, BoxonTech and Boxes & Labels any situation that may appear as a conflict of interest and disclose to us if any employees under contract with Boxon, BoxonTech 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**

Boxon, BoxonTech and Boxes & Labels accept gifts or entertainments if they are consistent with common business practices, are not excessive in value and cannot reasonably be construed as a bribe or payoff and if they do not violate applicable law. However, we will not accept any benefit intended for a Boxon, BoxonTech and Boxes & Labels employee to facilitate the supplier's business with Boxon.

### **Economic sanctions and export controls**

Boxon, BoxonTech and Boxes & Labels require suppliers to comply 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.



# Non-compliance

In the event of non-compliance with the qualifying standards at the time of signing a contract with Boxon, BoxonTech and Boxes & Labels, all suppliers are expected to provide established targets and action plans to ensure conformity to the qualifying standards.

Any breaches of the agreements in this Supplier Agreement led to an in-depth evaluation and, if possible, the first approach is to find a solution together with the supplier. If improvement cannot be stated after an adequate period, the business relationship can be terminated.