

# CODE OF CONDUCT



# SUPPORT STATEMENT

CEO, PER ÖHAGEN

Dear all,

As reflected in Nefab's purpose, core values and underlined in our Code of Conduct, we continuously strive to honor our reputation and trusted brand. Ethical business behavior, fair treatment of all employees and colleagues, health and safety in our workplace, and a clear sustainability and saving resources focus are essential cornerstones for us at Nefab. These cornerstones very well align with those of our global customers, as well as our owners.

At Nefab, we have a set of common ethical business practices and standards. Our policy for Code of Conduct defines how we conduct business worldwide. We consistently work with building and maintaining trust and credibility with our customers, colleagues, business partners and other stakeholders. We strive for continuous improvements related to all areas covered by this Code of Conduct, and it is therefore mandatory for all Nefab companies and employees to comply with the Code of Conduct. We also require that our Suppliers comply with the Code of Conduct, which may request higher standards than required by applicable law.

For Nefab, doing business the right way is the only way. This Code of Conduct is meant to outline our way of putting this approach into practice, for the benefit of our people, our customers and the world around us.



Per Öhagen  
President & CEO, Nefab  
Stockholm, April 2022

# HUMAN RIGHTS

WE SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS AND ENSURE THAT THE COMPANY IS NOT COMPLICIT IN HUMAN RIGHTS ABUSES.

## *Freedom of association*

As local or relevant laws allows, all employees are free to form and join unions of their own choosing, to bargain collectively and to engage in peaceful assembly, as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

## *Forced and compulsory labour*

No form of forced or compulsory labor is tolerated and all employees have the right to leave their employment without penalty if reasonable notice is given as per worker's contract or by local laws. Employees shall not be required to leave deposits of money or identity papers with their employer. When subcontractors, agents or labor recruiters are used, we ensure that they do not hold, destroy, conceal, confiscate or deny access by employees to their identity or immigration documents. We also ensure that workers are not obliged to pay any kind of fees for their employment.

## *Young workers*

Child labor is not to be used in any stage of Nefab's operations. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Participants shall implement an appropriate mechanism to verify the age of workers. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. In case student workers are employed, we will ensure a proper management of their records and rights in accordance with applicable law and regulations. If child labor is identified, assistance/remediation is provided.

## *Fair employment conditions*

Employees shall have a written employment agreement in their local language and be able to understand their employment terms and conditions. Compensation paid to

workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. All wage statements must be clear and understandable. Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime and all overtime must be voluntary, except in emergency or unusual situations. Employees shall be allowed at least one day off every seven days. One day off means at least 24 consecutive hours. Deduction from wages as disciplinary measure shall not be permitted. Workers are allowed legally mandated breaks, holidays and vacation days to which they are legally entitled, including time off when ill or for maternity leave. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

## *Humane Treatment*

There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

## *Non-Discrimination*

Diversity among our employees is a positive attribute and no one regardless of race, color, sex, sexual orientation, nationality, parental status, marital status, pregnancy, religion, political opinion, ethnic background, social origin, social status, age, union membership or disability shall be discriminated or harassed and none of these attributes will be used in any employment practices, such as promotions, rewards or similar.

Employees with the same qualifications, experience and performance shall receive equal pay for equal work. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

# HEALTH AND SAFETY

WE PROVIDE A WORKING ENVIRONMENT THAT IS HEALTHY, SAFE AND IN ACCORDANCE WITH INTERNATIONAL STANDARDS AND LOCAL LAWS FOR ALL EMPLOYEES.

## *Occupational Safety*

Worker potential for exposure to health and safety hazards are to be identified and assessed, mitigated using the Hierarchy of Controls, which includes eliminating the hazard, substituting processes or materials, controlling through proper design, implementing engineering and administrative controls, preventative maintenance and safe work procedures, and providing ongoing occupational health and safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards.

Reasonable steps must also be taken to remove pregnant women and 'nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers.

## *Emergency Preparedness*

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed emergency exits and routes, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

## *Occupational Injury and Illness*

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

## *Industrial Hygiene*

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled according to the Hierarchy of Controls. If any potential hazards were identified, participants shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

## *Physically Demanding Work*

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

## *Machine Safeguarding*

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.



#### *Sanitation, Food, and Housing*

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities.

Worker dormitories are to be maintained to be clean and safe, and provided with appropriate emergency exits and routes, hot water for showering, adequate lighting and heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

#### *Health and Safety Communication*

Workers are to be provided with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

## ENVIRONMENTAL

NEFAB SAVES RESOURCES BY OPTIMIZING SUPPLY CHAINS. WE DO THIS BY INNOVATING TOGETHER WITH OUR CUSTOMERS TO CREATE SUSTAINABLE PACKAGING AND LOGISTICS SOLUTIONS. WE ARE CONTINUALLY WORKING TO IMPROVE THE ENVIRONMENTAL PERFORMANCE IN OUR OPERATIONS AND SUPPLY CHAINS, WHICH HELPS TO ENSURE A BETTER TOMORROW FOR OUR CUSTOMERS, FOR SOCIETY AND FOR THE ENVIRONMENT.

#### *Permits and reporting*

All required environmental permits are to be obtained and maintained and their operational and reporting requirements are to be followed.

#### *Pollution Prevention and Resource Reduction*

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other methods.

#### *Hazardous Substances*

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage (including the prevention of leakage to soil and water), use, recycling or reuse, and disposal.

#### *Solid Waste*

Non-hazardous solid waste is managed in accordance with best practices and existing local regulations. When possible, waste is minimized, with reducing, reusing, and recycling being the preferred management alternatives.

#### *Air Emissions*

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be controlled, when feasible, using best available technologies. Ozone depleting substances are to be avoided in accordance with the Montreal Protocol and applicable regulations.

#### *Materials Restrictions*

We adhere to all applicable laws, regulations, and customer requirements regarding the prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

#### *Water Management*

Disposal of wastewater from industrial processes shall be avoided when feasible and, when it is present, treatment, monitoring and control will be applied in accordance with local regulations.

#### *Energy Consumption and Greenhouse Gas Emissions*

We strive to control energy consumption and sources of Scopes 1 and 2 greenhouse gas emissions and are always looking for ways to improve our energy efficiency and reduce our carbon footprint.

# ETHICS

WE ALWAYS RESPECT PEOPLE, HIGH ETICAL STANDARD AND WE HAVE A ZERO TOLERANCE OF CORRUPTION. WE ADHERE TO THE 10TH PRINCIPLE OF GLOBAL COMPACT: "BUSINESSES SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY."

## ANTI-CORRUPTION

We have a zero tolerance of corruption and support the 10th principle of Global Compact:

"Businesses should work against corruption in all its forms, including extortion and bribery." Transparency International's definition of corruption is "the abuse of entrusted power for private gain". This can mean not only financial gain but also non-financial advantages. Employees make business decisions based on the best interests of the Employer, not on personal considerations or relations and avoid situations in which their personal interest may conflict with, or even appear to conflict with, the interests of the Employer. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

### *Sales*

We will only participate in business where we can compete fairly for business based on the quality and price of our offerings and not by offering bribes or engaging in any other unethical behavior.

### *Board Membership and similar*

Service on a board of directors or similar body for a for-profit company or government agency is not permitted if creating a potential conflict of interest. All such service must be approved in advance by your grandfather (the manager of your manager). Serving on board of non-profit or community organizations only requires approval in case there is a potential conflict of interest.

### *Procurement*

Suppliers are evaluated prior to any business relation. In order to ensure a fair process, all competing suppliers must be provided with the same documentation, information and time frame in order to compete on the same conditions. Suppliers may attempt or challenge purchase personnel to leak information or to provide them with personal

benefits to become in a favorite position. No employee shall accept such challenges or benefits, or in any other way put themselves into a position of being under undue influence or even the suspicion thereof. Payments to suppliers must be appropriate, reasonable and justifiable in return for legitimate products or services.

### *Gifts, hospitality and expenses*

We do not offer or accept gifts, benefits, reimbursements or entertainment to or from a third party that would constitute a violation of laws or that could be perceived to affect the outcome of a business transaction or potentially expose our business to undue influence.

Particular attention should be taken in all relationships with public or government officials and employees. Gifts, hospitality and expenses paid for must never:

- be perceived as excessive or luxurious,
- be offered on a frequent basis,
- leave the recipient into a position of obligation or elsewhere provide anything in return

Gifts typically include low value items given professionally without any expectation of compensation or value in return. Gifts shall have no role in a business process other than as a mark of appreciation between companies.

A gift should be of modest value and must never leave the recipient in a position of obligation. Common and acceptable gifts are e.g. company promotional items.

A gift should never consist of money, loans or anything else that can be exchanged to a monetary value.

Gifts from suppliers or other third parties should whenever possible be respectfully declined. In those instances when this is not possible (e.g. mailed items or in specific countries or cultures), the gifts shall be put into a common display or donated to charity.

Hospitality typically includes meals and/or entertainment (e.g. music-, sports- or theatre events) when a company intends to initiate or develop its business relationships with existing or prospective customers and business partners.

- For hospitality to be permitted, it must always be in connection with a business meeting where the business content is predominant.
- Hospitality requires for the host to be present and that the hospitality is fairly provided and modest in value.

Expenses are sometimes incurred when customers are invited to reference sites for product demonstration/testing, trainings or conferences.

- All expenses paid must be in connection with a business meeting where the business content is predominant.

#### *Bribes, kickbacks, etc.*

We will not, directly or indirectly, demand or accept, offer or give any kind of bribe, kickback or any other unlawful or unethical benefit.

#### *Disclosure of information*

All business dealings should be transparently performed and accurately reflected on the Participant's business books and records. Information regarding participant's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

#### *Intellectual property*

We respect intellectual property rights. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information is to be safeguarded with reasonable entry and exit privileges.

#### *Privacy*

We are committed to protect the reasonable privacy expectations of personal information of everyone we do business with, including suppliers, customers, consumers, and employees. We will comply with privacy & regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

#### *Conflict minerals*

"Conflict minerals" contain tantalum, tin, tungsten (and the ores from which they originate) and gold, regardless of where they are sourced, processed or sold. We endeavor to source materials in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas or an equivalent and recognized due diligence framework.

#### *Competition*

We conduct our activities according to applicable laws and regulations and also refrain from entering into anticompetitive agreements.

#### *Reporting compliance concerns*

We encourage our employees, suppliers and customers to report any conduct that you believe to be a violation of laws or this Code of Conduct through our website:  
<https://report.whistleb.com/nefab>

We will not tolerate any form of harassment, discrimination or retaliation against any person raising concerns and acting in good faith in line with this Code of Conduct.





We save environmental and financial resources by optimizing supply chains. It's about innovating together to create smarter packaging and logistics solutions while always respecting people and ethical standards. This contributes to a better tomorrow for our customers, for society and for the environment.

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**NEFAB**  
SAVING RESOURCES