

## Code of Conduct

At J.A. Plastindustri ApS (“J.A. Plast”), we are guided by our mission to build a better world by leading a modern approach to industrialism, which is rooted in our core values: we *empower* our people to lead, to take risks to *evolve* the way we work, and to *connect* with colleagues and customers to *inspire* enduring change.

Responsible business practices, honesty, integrity, and respect for the law are central to these values and how we do business, wherever we are. This Code of Conduct sets out the expectations we have of individuals when dealing with business partners, public authorities, and one another.

All individuals who work for or contract with any entity of J.A. Plast or its related entities are responsible for meeting the expectations outlined in this Code of Conduct.

### **1. Compliance with Laws**

We adhere to applicable laws and regulations and act according to guidelines of J.A. Plast and its operating companies, including any policies that support this Code of Conduct.

### **2. Act with Integrity**

#### 2.1 Respect and Fair Treatment

We are committed to fostering a work environment where all are treated fairly, with integrity and respect.

We believe diverse backgrounds, experiences, and perspectives are critical assets to our businesses. We are committed to providing equal employment and advancement of opportunity to all people. We do not discriminate on the basis of race, color, religion, sex, age, national origin, genetic information, marital status, medical condition (as defined by applicable law), pregnancy, childbirth or related medical condition, gender identity or expression, sexual orientation, veteran status, or any other category protected by law.

Similarly, we are dedicated to providing all individuals with a safe, discrimination-free and harassment-free environment, and we do not tolerate any form of harassment.

We all have the responsibility to treat each other in a fair and respectful manner.

## 2.2 Anti-Retaliation

We are committed to protecting those who make a report of misconduct honestly and in good faith, and we do not tolerate retaliation against any person for engaging in activity protected by law, reporting or complaining about a policy violation, or cooperating in any investigation. If an individual feels that he or she has been retaliated against, they should report it immediately.

## **3. Our Businesses and Communities**

### 3.1 Health and Safety

We prioritize the health and safety of our people, physical assets, and the environments where we work. Individuals must fulfill their duties in accordance with applicable health and safety laws and regulations and internal requirements for the operations and facilities we control.

### 3.2 Quality Products and Services

J.A. Plast's reputation is founded on the quality products produced by its businesses. We are committed to delivering the highest quality work and must comply with all quality requirements and specifications related to our work.

### 3.3 Property and Data Security

We are responsible for protecting against the misuse, abuse, loss, and damage of J.A. Plast's property (both physical and intangible) and data.

Physical property includes but is not limited to buildings, facilities, vehicles, equipment, computer systems, resources, and records. Intangible property includes but is not limited to confidential business information, patents, and trademarks. Data includes but is not limited to strategic plans, financial data, and technical, or business information, as well as information regarding our employees. We must not exploit such information for personal benefit or the benefit of third parties.

### 3.4 Financial Reporting

We are required by law to provide accurate financial reporting. All bookkeeping, records, and financial reports must accurately reflect all business transacted and comply with relevant legal requirements and J.A. Plast's accounting principles.

### 3.5 Respect for the Environment & Our Communities

We strive to use our expertise, resources, and influence to make a positive impact on our people, our communities, our industry, and our planet. As a company, we endeavor to continuously improve our operations and evolve our product offerings to reduce our environmental impact. We comply with all environmental laws, rules, and regulations in the places where we do business and seek to be sustainability leaders in our industry. We are each responsible for keeping the environment, sustainability, and our community in mind when making business decisions. Together, we aim to strengthen our communities and ensure a sustainable future.

## **4. Working with Others**

### **4.1 Antitrust and Competition Laws**

We adhere to applicable antitrust and competition laws, and follow the principles of fair and open competition. We do not make agreements in violation of antitrust and competition laws. This includes the exchange of commercially-sensitive information such as pricing, pricing strategies, terms and conditions, or market analysis.

### **4.2 Bribery, Corruption and Sanctions Laws**

We expect all individuals acting on behalf of J.A. Plast to behave ethically. We do not confer, and third parties providing services on our behalf are prohibited from conferring, impermissible payments or illegal benefits (including bribes, kickbacks, grease payments, and facilitation payments) to any business partner, public authority, or third party to obtain an outcome favorable to any J.A. Plast company. All commissions and fees paid to or other benefits conferred upon third parties must be reasonable in relation to any service provided.

Individuals may not solicit or accept any benefit, which they would not otherwise obtain, for personal gain. The acceptance of occasional gifts of nominal value or invitations is allowed in accordance with applicable laws and the generally accepted customs of the relevant country.

Likewise, we comply with all applicable sanctions regulations. In turn, we expect that any third parties acting on J.A. Plast's behalf will not breach sanctions laws, cause

J.A. Plast to breach the same, or engage in any activities with sanctioned persons or territories absent prior permission from J.A. Plast.

### **4.3 Conflicts of Interest**

We avoid conduct, business engagements, or any other actions that are contrary to J.A.

Plast's interests. Individuals must seek appropriate approval before joining any industry association, board, or committee.

## **5. It's up to you**

J.A. Plast's reputation and the success of its businesses depend on all individuals understanding and acting in accordance with the expectations set forth in this Code.

J.A. Plast encourages individuals to ask questions and promptly report their concerns by taking advantage of the breadth of resources that exist within our organization.

Individuals may also utilize the J.A. Plast Industries Ethics Hotline as an additional mechanism for reporting potential violations of this Code confidentially, enabling you to report anonymously, where local law permits. The hotline can be reached electronically at [j.a.plast@ethicspoint.com](mailto:j.a.plast@ethicspoint.com) or via telephone; local telephone numbers can be found [here](#).

We take all reports seriously and will thoroughly investigate behavior that is in conflict with this Code of Conduct.

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