konvertia ICELAND RUSSIA NORWAY SWEDEN BELARUS POLAND UNITED Warszawa UKRAINE **GERMANY** "NETHERLANDS . CZECHIA BULGARIA SPAIN

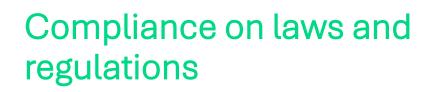
Konvertia Group's Code of Conduct

Our code of conduct has a strong reference on our core values at Konvertia Group, which are respect, passion, and sustainability.

We are committed to maintaining a high standard of ethical conduct and integrity in our business activities across all countries and cultures where Konvertia operates in respecting people and the environment. We believe that operating responsibly will impact positively on our business activities and therefore have a positive impact on all our stakeholders as well. This Code of Conduct outlines the values and expectations that guide our behavior and decision-making processes.

- 1. Compliance on laws and regulations
- 2. Human rights, relationships, collaboration, and diversity
- 3. Employees' and stakeholders' health and safety
- 4. Anti-corruption
- 5. Procurement
- 6. Environmental impact
- 7. Data protection
- 8. Trustworthiness, prevention, and reporting of misconduct
- 9. References





We comply fully through our business activities with local laws and regulations where we operate as well as with international agreements. We are fully aware that this code of conduct will not replace any laws or agreements. Our employees are aware of the local laws and regulations. In case they have uncertainty of company not following the laws and regulations they have a possibility to contact their closest supervisor or use the misconduct channel for reporting.



Human rights, relationships, collaboration, and diversity

We respect and uphold the principles of human rights in all our operations and do not tolerate any form of discrimination, harassment, bullying or abuse. We foster a positive and inclusive workplace environment and encourage on open communication and respect for individual differences

We do not have forced or child labor in any form and in case hiring any minors, we fully comply with the local agreements on working terms including the salary. We respect the right of our personnel to organize and have freedom of speech in every location where we operate.

Human rights, relationships, collaboration, and diversity

Wages which our company offer will meet the local living wage norms and are above the minimum pay standards. Maximum working time is fully according to ILO Convention 1. However, overtime is allowed occasionally based on local agreements where it also compensated based on same regulations. Individual potential, skills and competences matters when we are hiring new employees.

For us at workplace parity means fair treatment of all employees, ensuring equal opportunities, rights, and responsibilities regardless of gender, race, ethnicity, age, disability, or any other personal characteristic like family status. We believe that strong parity in the organization increases working morale as gives a wider perspective on innovation of our business activities and therefore is a clear added value for the whole company.

In case of experiencing discrimination, harassment or abuse, every person is guided to contact closest supervisor or using the misconduct channel for reporting



Employee's and stakeholders' health and safety

We prioritize the safety and well-being of our employees. We comply with all occupational health and safety laws and regulations and strive to maintain a safe and healthy workplace. We are also certified on ISO45001:2018 management system in every Konvertia unit. We strive together with many different means to make our working environment safer, where no one needs to be afraid to get hurt. Everyone should get safe to work and safe back to home. This is our ultimate target in the organization. Taking care of the well-being of our employees is an important part of our business leadership principles.



Anti-corruption

We are a trustworthy partner to our customers and other stakeholders, having a zero tolerance for corruption in any form.

We comply with all applicable anticorruption laws and regulations. Our organization is also fully aware on accepted behavior when it comes to relationship management with different stakeholders.





At Konvertia we aim for responsible sourcing. We expect our critical partners in every country to respect principles we have for ethical business activities. We will take the necessary actions to overcome any shortcomings there might arise from our suppliers.





Environmental impact

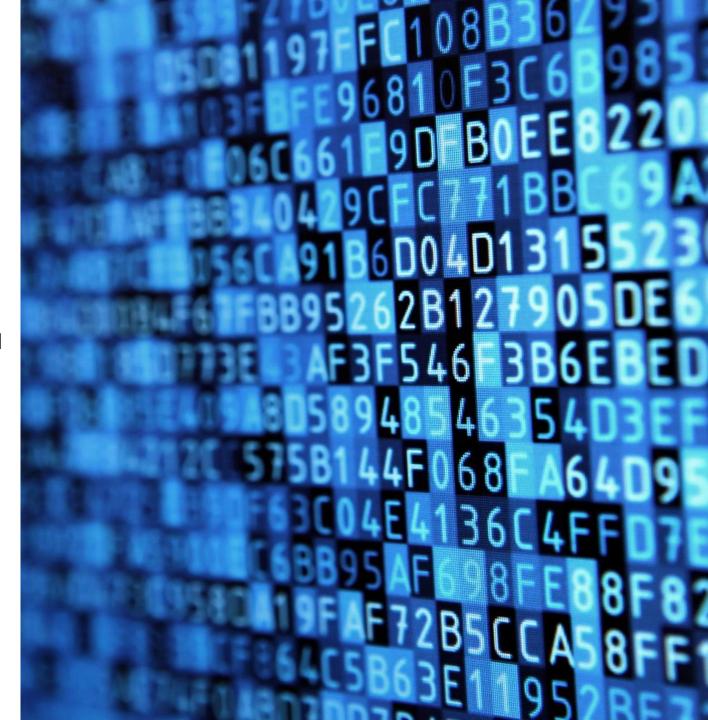
We are in a value chain of delivering sustainable, recyclable materials of our customers' especially for the packaging industry and therefore our aim is also to be a responsible partner, which is taking care necessary actions to mitigate the environmental impact. We comply with all environmental laws and regulations and strive to reduce our carbon footprint through sustainable practices. We will continuously develop and look for improvement in energy efficiency and for recycling the waste materials we generate in our processes. We are ISO14001:2015 environmental system certified across our operations.





Data Protection

We respect the privacy of our customers, employees, and business partners. We comply with all data protection laws and regulations and take all necessary measures to protect the personal data.



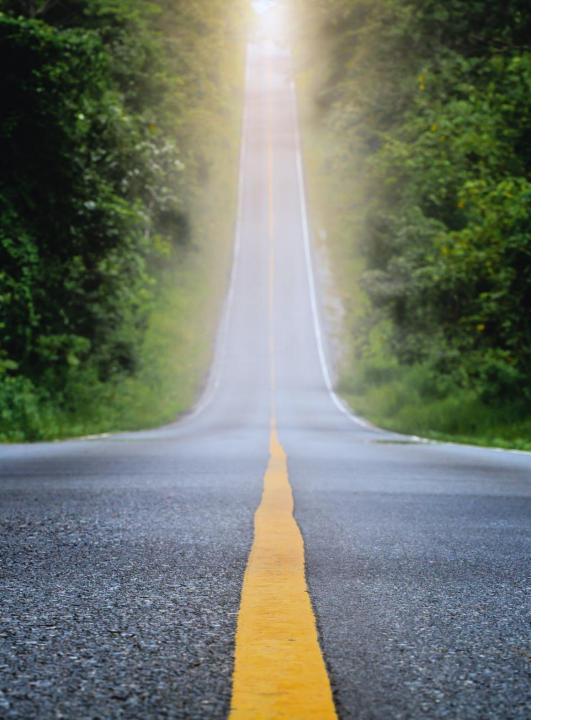


Trustworthiness, prevention, and reporting of misconduct

Our employees are encouraged to report any violations of this Code of Conduct promptly.

As a responsible employer we are responsible for creating open communication in the organization and give full protection to whistleblowers. Violations of Konvertia Group's code of conduct may result in disciplinary action, up to and including termination of contracts and agreements with different stakeholders of the company. We investigate all reported violations thoroughly.

This Code of Conduct is not exhaustive, and we expect all employees to exercise good judgment and uphold our company's values in all their actions.





Konvertia Group is a member of UN's global compact program. Global compact's 10 principles about human rights, labor, environment and anti-corruption form the foundation to our business ethics. This helps us also to prioritize our actions based on the business environment we are in. Ten principles linked to 17 sustainability development goals give guidance to Konvertia Group in performing its business activities in ethical manner also in the future.







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