

# Boxon Code of Conduct



# Our Code of Conduct

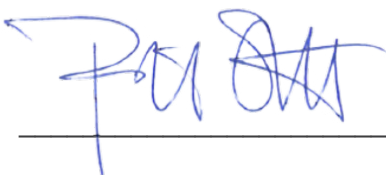
Boxon Groups commitment to sustainable development is based on our core values and is compliant with in the UN Global Compact 10 principles, the Sustainable Development Goals and Agenda 2030, the 2015 Paris Climate Agreement as well as international agreements and guidelines.

*“Our vision is to be the most innovative and sustainable packaging company with the best customer experience”*

We are a packaging partner that adds value to our customers through innovative and sustainable solutions. Our offer is based on four individual parts: Packaging Solutions, Labelling & Traceability, Machines & Equipment and Services. You can choose to use our offers separately or combine them into a comprehensive concept.

We want to challenge the conventional packaging and to 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.

Boxon’s 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 Boxon co- workers must act in line with our code of conduct and in accordance with our corporate core values V.E.T.A – Win together, Simplicity, Transparency, Responsibility.



Fredrik Ståhl  
CEO Boxon Group AB

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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 Group\*, meaning all Boxon employees, managers, board members, consultants, contractors, and suppliers. Boxon Group has operations in 8 countries: Sweden, Denmark, Norway, Finland, Germany, France, China, Thailand, and suppliers in Nordics, EMEA and Asia. The Code of Conduct is our platform for how everyone working with or for Boxon Group 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, Labour & 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 organisation and in business practice with suppliers and other stakeholders.
- This our minimum standard, that everyone working with or for Boxon 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 Group:**

- Read, understand, commit to, and follow the Code of Conduct and other relevant steering documents.
- Conduct the Code of Conduct training available on Boxipedia (Boxon's intranet) and website.
- Lead by example – communicate and demonstrate the intent and spirit of our Code of Conduct, as well as importance of compliance with our Code of Conduct
- Raise concerns as we at Boxon strive to achieve transparency, openness, and high level of business ethics in everything we do. You are expected to raise concerns on 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 Boxon website.

*Boxon Group: Boxon Group AB, Boxon AB, Boxon AS, Boxon A/S, Boxon Oy, Bâfi Pac AB, Boxon GmbH, Boxon SARL, Boxon Tech AB, Boxes & Labels Borås AB, Boxes & Labels Olsfors AB, Boxon Shanghai Packaginging Ltd., China, Boxon Thailand co, Ltd.*

## Working Methods

- The provisions of this Code of Conduct and the Boxon Supplier Code of Conduct & Requirements, set forth the minimum standards and qualifying standards of all suppliers with whom Boxon conducts business and their sub-suppliers in the supply chain. The suppliers shall ensure that their relevant sub-suppliers meet the principles in this Code of Conduct and the Boxon Supplier Code of Conduct & Requirements.
- We use materiality sustainability analysis (SSAB 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 essential connected to Groups business strategy and important stakeholders.
- We systematically work with and integrate the framework for ISO 14001, ISO 9001, ISO 45001, FSC and other management systems, in our policies and procedures. We are transparent and communicate with our employees and stakeholders, through the annual sustainability report and continuously updates.

## Evaluation and follow-up

- We set sustainability goals on a company and functional level which are followed up continuously. We define and report our goals and progress according to the GRI standards.
- We formally follow up the sustainability work annually through 3rd party ISO audits and FSC audits, and through external rating as Ecovadis
- We follow up and monitor CO2 emission and carbon footprint according to GHG Protocol (Greenhouse Gas Protocol) and through Science Based Targets Initiative.
- Suppliers are asked to provide information as required by Boxon regarding the standards in this Code of Conduct and the Boxon Supplier Code of Conduct & Requirements. Based on this information, the supplier is evaluated, and the results are measured and compared. Boxon 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 demands the supplier to evaluate and monitor their sub-suppliers, since information regarding the compliance of these parties with this Code of Conduct and Boxon Supplier code of Conduct & Requirements might be required by Boxon.

# Our Promise, Mission and Vision



## Our Values

Our values are summarized in the word **VETA**, which stands for:

### Win together

We focus on results, a positive team spirit and creating a winning partnership. Innovation, passion and courage are our most important tools for success. Genuine commitment is always a winner.

### Simplicity

We make things easier by being flexible and getting it right from day one. Our curiosity about the challenges our customers face is driving us to develop the best solutions.

### Transparency

We listen, communicate clearly and are up-front about our expectations. Transparency is a characteristic feature of our business. It enables us to develop, both individually and as a company.

### Responsibility

We care and take responsibility. We actively set targets and keep our promises. By that we grow stronger together.

# Environment

## Targets

- Committed to **Science Based Targets** and to **reach net zero** emissions of greenhouse gases latest by 2040, with an absolute CO<sub>2</sub>e reduction for Scope 1 and 2 with 30% in 2025 and with 50% in 2030, compared to 2019 years level.
- **Increase** packaging solutions based on recycled material with 30% by 2025, compared to 2022 years level.
- **Zero-waste** in our operations and decrease energy consumption with 20% until 2025
- All employees have conducted training, understand and acts according to our Environment policy

## 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 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 conscious, and we always consider the most sustainable option.
- We work systematically with environmental improvements and development. Preferably environmental management systems according to ISO 14001, and FSC, 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 offer sustainable sourced wood fibre raw material (FSC) in our 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.

## 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 to perform 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 factual information about our sustainability work and sustainable consumption towards 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.

*Environmental Policy owner: Chief Sustainability Officer (CSO)*





## 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
- All suppliers respect Labour & Human rights throughout their value chain and have a human rights policy in practise.

### 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 the 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 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 a 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 analyse any unexpected event that can cause disruption or harm within our organization with the purpose to minimize 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 system in some places, as well as creating and practicing and 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 ensures that 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.
- We comply, at a minimum, wages and benefits 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.

## 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.

*Labour and Human Rights/Health and Safety Policy owner: HR Director*

## Business Ethics

### Targets

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

### 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 behaviour 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 in compliance 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 operates, state of finances and clear and accurate information about our products, services, and business practices to customers, regulators, and competitors.

## **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 management, 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 Boxon's 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 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.
- 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 stakeholder feel safe and confident to report illegal or unethical behaviour and concerns without fear of retaliation.
- We ensure that employees or other stakeholder can take responsibility and act in the best interest for 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 the communication is based on regular contact, clarity, and good ethics.
- In matters relating to Boxon's operation, Boxon's management and spokespersons are entitled to speak on behalf of Boxon. All external information that may affect Boxon's valuation must be communicated by the CEO or CMO (Chief Marketing Officer).

*Ethics and Anticorruption Policy owner: Chief Sustainability Officer (CSO)*



## Supply chain

### Targets

- Boxon suppliers have signed Boxon Code of Conduct and Supplier Code of Conduct & Requirements
- Boxon suppliers have an environment and human rights policy
- Boxon suppliers delivering wood, paper and corrugated paper products shall be FSC certified

### Suppliers

- We work with suppliers who act according to Boxon Group Code of Conduct and Boxon Supplier Code of Conduct & Requirements. Evaluation and qualification are described in the Boxon Supplier Code of Conduct & Requirements. Boxon Supplier Code of Conduct & Requirements must be passed down the supplier's value chain.
- 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 a integrate a more sustainable supply chain with regards to environment, human & labour rights, and ethics.
- We ensure that all our suppliers formally commit to Boxon supplier requirements, 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 towards our requirements every second 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 prioritize suppliers that follow or implement FSC or PEFC standards.
- 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 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 sheets must be made available online and/or per 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.

*Supply chain policy owner: VP Procurement & Supply*



# Accountability, Responsibility and Revision

- The CEO and Group Management are accountable for that the Code of Conduct is communicated, implemented, and followed up.
- The Policy owners are responsible for their policies and that these are communicated, implemented, and followed up in relevant part of the business.
- The Chief Sustainability Officer is responsible for the revision of our Code of Conduct, which is done once a year during tertial 3.
- The Code of Conduct is available for our external stakeholders on Boxon.com and for our employees at Boxon intranet.

## Appendix - specific topics

1. GDPR-policy
2. Boxon Supplier Code of Conduct & Requirements - covers more in details how we work with sourcing and logistics.

