



Employee Code of Conduct

Acting with Integrity at Faerch

Faerch

CEO Letter

Dear Colleague,

At Faerch, our strength comes from working together with trust and transparency – with each other and with the customers and stakeholders we serve. We also share a responsibility to the environment and the society around us.

Our Employee Code of Conduct puts our values and commitments into words. It describes how we are expected to act, honestly, respectfully and responsibly, and helps ensure that our actions reflect what we stand for as a company.

As a global company, each of us has a personal responsibility to live by our values and the Employee Code of Conduct. When we do so, we strengthen a workplace, a culture and a business we can all be proud of.

Please take the time to read the Employee Code of Conduct. And if you experience that something is wrong, speak up – raising concerns openly is one of the most important ways we protect each other and everything we have built together.

Best regards,
Pernille Lind Olsen
Chief Executive Officer



Driven by **purpose**, grounded in **principle**

This Code of Conduct sets the principles that guide how we work at Faerch. It applies to all employees and reflects our shared responsibility to act with integrity, respect and accountability. We expect similar standards from business partners, as set out in our Code of Conduct for Suppliers and Business Partners.

This Code of Conduct focuses on core principles. It is supported by Faerch Group policies, procedures and international commitments such as the UN Global Compact. As an employee of Faerch Group you are, expected to understand the rules relevant to your role and to seek clarification whenever something is unclear.

We comply with all applicable laws in the countries where we operate, and when requirements differ, we follow the strictest standard.

This Employee Code of Conduct exists to help us make responsible and ethically correct choices individually and collectively. By following it, we protect our people, our customers, our partners and the reputation of Faerch Group. It cannot cover every situation. We are therefore expected to use sound judgement, exercise common sense and act responsibly and honestly in everything we do.

Personal Responsibility

Failure to comply with this Code of Conduct may result in disciplinary action, up to and including warnings, demotion or termination.

Where required, violations may be reported to relevant authorities.

Managers are responsible for leading by example and ensuring compliance in their teams.



The **purpose** that drives us

We have a clear purpose: we **want to lead the way in sustainable rigid food packaging and recycling solutions in a truly circular environment**. This purpose guides how we design our products and how we operate every day.

We create packaging that protects food safely, supports efficient production, strengthens supply chains and contributes to reducing waste.

The **values** that guide us

Our values form the foundation of how we work and behave. They shape our culture, influence our decisions, and guide how we collaborate across Faerch Group and with our customers and partners.

Our four company values describe what we stand for and how we show up every day - with **integrity, accountability, a customer-centric mindset, strong collaboration, and a commitment to doing what is right in everything we do**. They help us develop better products, deliver reliable service, and build trusted relationships across the food packaging industry.

Our Code of Conduct and values are anchored in by a strong governance framework with the aim to support and facilitate the overall understanding of and compliance with our Code of Conduct.



**We have the
customer at the
heart of what we do**



**We dare to do what's
right for today and
for tomorrow**



**We create success
through
collaboration**



**We see it,
we own it**

Safe to speak up

We want everyone to feel safe to speak up. If you believe there may be an issue, or if you have a concern or question about behaviors, decisions or actions, you are expected to raise it. Speaking up helps us maintain a responsible culture built on trust, integrity and care for one another. Speaking up is the right thing to do, and we want everyone to feel confident doing so.

No Retaliation: Retaliation against anyone who raises a concern in good faith is not tolerated.

Multiple Channels to use

There are several ways to speak up, and you should choose the one you feel most comfortable with.

Reach out to:

- Your manager
- Colleagues in People & Culture
- Faerch Group Compliance Officer
- Faerch Group Employee Grievance Mechanism
- Faerch Group Whistleblower Scheme

Whistleblower Scheme

Reports submitted via the Faerch Group Whistleblower Scheme are received first by an independent law firm, which ensures your identity remains protected in the case you decide to file anonymously. All reports are handled confidentially. The system is designed to make it simple and safe to raise concerns, unethical behaviours, violations and/or misconduct so they can be reviewed and addressed appropriately. All matters will be taken seriously and reviewed promptly.

Go to Whistleblower Scheme
www.faerch.com/en/whistleblower

Learn more
Faerch internal only

Faerch Group Employee Grievance Mechanism

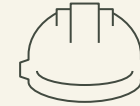
The grievance mechanism can be used if you have a questions, something you would like to share, or a concern that you do not feel comfortable raising with your manager or local People & Culture via the confidential platform.

Grievances are typically concerns or complaints about your own employment situation, for example: experience of wrongful treatment, contractual disputes or conflicts with colleagues or managers.





Health & Safety



Safety is a core part of how we work. Every task, process and workplace decision must reflect our commitment to keeping our colleagues safe.

We operate industrial equipment, handle materials and work in environments that require attention, planning and safe behaviors. This means being aware of risks, preparing properly and acting when seeing or experiencing something concerning.

We pay attention to what happens around us, use the right controls, and speak up when something is not right.

We promote safe and healthy working conditions across our operations and supply chain.

What this means for you

- Never compromise on safety - protecting your health and safety comes first
- Work safely, attend required training, use personal protective equipment (PPE) and always follow safety procedures
- Know the risks in your area and use the right controls to keep yourself and your colleagues safe
- Use safe work practices and apply Stop-Think-Act when conditions changes or work does not go as expected
- Perform the work without the influence of alcohol or drugs
- Speak up - report hazards, incidents and near misses
- Lead by example - act safely, listen to others and support a culture of shared responsibility for safety

Want to know more?

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Faerch

No harassment & discrimination



Our success depends on working together across diverse backgrounds, experiences and perspectives. We foster an inclusive environment where people feel respected, valued and able to contribute.

We have zero tolerance for discrimination or harassment. No one should be exposed to behaviour that is offensive, intimidating or unwelcome.

Not all harmful behaviour is intentional, but the impact matters. Everyone has a responsibility to consider how their actions affect others and to act with professionalism and respect.

What this means for you

- Treat everyone fairly, professionally and with respect
- Do not engage in or tolerate discrimination or harassment
- Contribute to an inclusive and respectful environment by valuing different perspectives
- Speak up if you experience or witness discriminatory behavior or anything that makes someone feel uncomfortable, threatened, or unwelcome

You want to know more?

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Human Rights & labour standards



We respect human rights and are committed to fair and responsible labour practices across our operations and value chain. We have zero tolerance for forced, bonded or child labour. We support freedom of association and collective bargaining, and ensure fair wages, reasonable working hours and safe working conditions.

What this means for you

- Treat everyone fairly, with dignity and respect
- Respect everyone's right to freedom of association and collective bargaining
- Do not engage in, or tolerate, any form of forced, bonded or child labour
- Speak up if you become aware of any potential human rights concerns or violations

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Product safety



Delivering safe, compliant and high-quality food packaging is fundamental to who we are and to the trust our customers and consumers place in us.

We work to ensure product integrity, eliminate potential hygiene hazards and meet or exceed all applicable regulations, standards and customers requirements. Quality and product safety are embedded across our entire value chain - from sourcing and production to distribution and customer delivery.

We follow recognised standards to maintain consistency, transparency and continuous improvements. By living up to these expectations, we protect consumers, support our customers and strengthen our reputation.

What this means for you

- Follow all food safety, hygiene and quality procedures and raise concerns immediately
- Ensure that suppliers and partners comply with Faerch Group's quality and food safety requirements
- Contribute to maintaining a strong quality culture through responsible actions and good practices

Want to know more?
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Resource use & efficiency



Using resources responsibly is key to reducing our environmental impact and delivering on our Roadmap to Net Zero. As an integrated recycler, we reduce energy and water use, minimise material waste and keep materials in use for longer. By improving efficiency across our operations, we reduce emissions and strengthen our circular approach.

What this means for you:

- Use water and energy responsibly and follow site procedures
- Sort and handle waste correctly and help reduce material loss
- Report leaks, issues or opportunities to improve efficiency or reduce emissions

Biodiversity



We consider ecosystem health in our sourcing and land-use decisions. By supporting responsible sourcing and avoiding harmful practices, we help protect natural habitats and reduce risks such as deforestation.

What this means for you

- Follow sourcing and operational practices that protect local environments
- Raise concerns if activities could negatively affect habitats or biodiversity

Air pollution



We work to reduce dust, noise and other air pollutants to protect employees' health and minimise impacts on the surrounding environment.

What this means for you

- Wear all personal protective equipment (PPE) as directed
- Follow the procedures in place to reduce dust, noise and other emissions
- Report any conditions that may affect air quality or wellbeing

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Working with suppliers and business partners



Business partners must follow our Code of Conduct for Suppliers and Business Partners and uphold ethical, sustainable and accountable practices. We value long-term, collaborative relationships built on trust, openness and clear communication.

What this means to you:

- Ensure that suppliers and third parties understand, sign and comply with our Code of Conduct for Suppliers and Business Partners and are integrated in the suppliers' onboarding process without exception
- Engage with partners in a responsible, fair, and transparent manner
- Communicate openly and raise concerns if a partner's behaviour does not align with our expectations
- Protect confidential supplier and partner information

Want to know more?

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We have the customer at the heart of what we do



We build trusted relationships with our customers through integrity, transparency and reliable delivery. We act honestly and meet our commitments.

What this means to you:

- Act honestly and professionally in all customer interactions
- Deliver products and services in line with agreed quality and safety standards
- Do not make misleading or inaccurate statements to customers.
- Protect confidential customer information
- Raise concerns if you become aware of issues affecting customers or product integrity



Information and cyber security



Information and Cyber security is essential to keeping our systems, information and operations safe. We must protect the information we receive in confidence as part of our work.

This applies to all confidential information, including trade secrets, relating to our customers, business partners, colleagues and operations within Faerch. We must protect confidential information from unauthorised access or disclosure, both internally and externally.

We all share the responsibility to be informed and cyber-aware and understand what is needed to protect the networks, devices and data we use every day.

We continually assess our technology and processes to identify cyber risks and strengthen our ability to prevent, detect and respond to threats.

Want to know more?

AI Policy - Faerch internal only

Want to know more?

Use of IT devices and digital resources - Faerch internal only

What this means for you

- Only share information where there is a legitimate business need – never disclose it without authorisation
- Protect the information, devices and systems you use, including using strong passwords and multi-factor authentication
- Use AI responsibly and in line with company policies and remember not to input confidential, personal or sensitive company information into AI system without approval
- Stay alert to phishing attempts and verify emails, links and requests before acting
- Report suspicious activity or potential security incidents to Global Digital immediately
- Lock your computer and mobile devices when not in use and handle sensitive information securely

Data ethics, protection & privacy



We handle personal data with care and respect. Protecting privacy is both a legal requirement and a matter of human dignity. We only collect the information we need for legitimate business purposes, and we use it in a transparent and responsible way.

What this means for you:

- Do not collect, use and share personal data unless it is specifically necessary for your work
- Store personal data securely and protect it from unauthorised access
- Delete personal data when it is no longer needed.
- Report any personal data breaches immediately to Global Compliance, Insurance & Risk at LegalCompliance@faerch.com

Want to know more?

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Intellectual Property and assets



We protect our intellectual property and confidential information.

Our intellectual property includes designs, technical know-how, trademarks, patents and other proprietary information that support our competitive position. These assets must be used responsibly and only for legitimate business purposes.

We respect the intellectual property rights of others and do not use, share or disclose third-party information without proper authorisation.

What this means for you:

- Do not share confidential information without authorisation
- Protect sensitive information from unauthorised access, use or disclosure
- Comply with NDAs, internal policies and legal requirements
- Safeguard Faerch Group's intellectual property and respect the rights of others
- Store information securely and report any suspected misuse or loss

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Conflicts of interest



When making business decisions, we must always act objectively and in the best interests of Faerch Group, guided by ethics and integrity. Personal interests must never influence professional judgement.

Equal opportunities and merit-based decisions are priorities. Performance should be recognised fairly, and decisions must be made without favouritism.

Sometimes personal interests or relationships influence - or appear to influence - professional decisions. When this happens, it may create a conflict of interest.

Being open about potential conflicts helps protect fairness, trust and the integrity of decisions. If something could affect your impartiality, or be perceived that way, it must be disclosed so it can be managed appropriately.

What this means to you:

- Follow Faerch Group's rules on hiring, reporting lines, and workplace relationships and declare personal interests or relationships with colleagues that could influence your work to Global Compliance, Insurance & Risk at LegalCompliance@faerch.com
- Declare personal interests or relationships with managers, colleagues, vendors, suppliers, customers or other business partners that could influence - or appear to influence - business decisions to Global Compliance, Insurance & Risk at LegalCompliance@faerch.com



Anti-corruption



Corruption and bribery are illegal and stands in direct opposition to the principles of integrity, transparency and fair competition.

We have zero tolerance for corrupt behaviour and are committed to acting responsibly and in a fair and legal way.

What this means for you:

- Do not give or accept anything that could influence decisions, and ensure all interactions protect your judgement and integrity
- Do not offer, give, request or accept bribes, kickbacks or facilitation payments in any form
- Do not misuse your position, favour friends or family, or act in ways that create unfair or unethical advantages
- Pay attention to red flags such as unusual payments, unclear ownership or suspicious third parties - and report concerns immediately

Want to know more?
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Gifts & hospitality



Gifts and hospitality, whether given or received, can be part of business interactions, but they must never influence - or appear to influence - decisions. Anything that could affect your independence or create doubt about our integrity must be avoided or reported.

All interactions must be handled transparently and with good judgement.

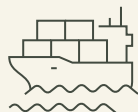
What this means for you:

- Ensure gifts or hospitality are modest, appropriate and approved according to Faerch Group's rules
- Never give or accept gifts or hospitality during a tender or bidding process, as this is when the risk of influencing decisions is highest.
- Be transparent - if something feels unclear or inappropriate, ask your manager or Faerch Group Compliance Officer for guidance or report it
- Get approval from your manager and Global Compliance, Insurance & Risk for gifts and hospitality
- Be especially cautious when interacting with public officials, as stricter rules apply

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Trade compliance



Trade laws and sanctions place restrictions on who we can do business with and under which conditions. They may limit or prohibit transactions with certain countries, entities or individuals. Complying with them is a legal obligation and part of our commitment to integrity and responsible business.

Sanctions and Export/Import Controls

International sanctions and export/import controls may restrict or prohibit business with certain countries, organisations, or individuals. Employees must ensure that any dealings with controlled items or high-risk destinations are carried out in full compliance with applicable laws and internal requirements.

What this means for you:

- Do not engage with sanctioned or restricted parties or destinations
- Screen every party before entering into a business relationship
- Ensure licenses or approvals are in place before exporting/importing goods
- The Faerch Group employee responsible for the transaction must keep accurate records of trade compliance reviews in relevant systems

Want to know more?

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Fair competition



As a company with operations across the world, Faerch Group supports fair and open competition in all markets where we operate. We expect everyone to compete honestly and responsibly.

In markets where Faerch Group holds a strong position, we have an additional responsibility to avoid behaviours that could misuse that position or negatively impact customers, suppliers or competitors.

What this means for you

- Never enter into agreements or practices that could restrict competition. This includes coordinating prices, dividing markets or customers, reducing output or sharing commercially sensitive information with competitors
- Leave the discussion immediately if sensitive or inappropriate topics arise, and make sure your departure is recorded
- Be especially careful about information exchanged during trade association meetings, seminars and at trade fairs
- Do not coordinate business decisions with Faerch Group's competitors
- Seek guidance about competition rules and pre-approval for all meetings with competitors from Global Compliance, Insurance & Risk at LegalCompliance@faerch.com

Want to know more?

Faerch internal only

Anti-Money laundering and responsible financial conduct



We do not engage in or support activities involving funds from illegal or unclear sources. We are committed to preventing money laundering and ensuring transparent, legitimate business practices.

We only work with customers and business partners whose identity and business activities are verified, and we challenge any transaction that appears unusual or inconsistent with normal business practices.

What this means for you

- Only work with verified customers and business partners
- Be alert to unusual or suspicious transactions and question anything unclear or inconsistent
- Do not engage in transactions involving illegal or unclear sources of funds
- Follow internal controls and report any concerns or suspicions immediately

Financial integrity and control



Financial integrity is fundamental to our business and reputation. We maintain robust financial controls and keep complete, accurate and transparent records that reflect the true nature of our activities. This supports responsible decision-making and reflect the true nature of our activities. Acting with financial discipline and transparency protects our stakeholders and safeguards Faerch Group's reputation.

What this means for you

- Ensure all transactions are recorded accurately, completely and in a timely manner
- Follow applicable accounting rules, internal controls and reporting procedures
- Never falsify, omit or misrepresent financial or operational information
- Raise concerns to Global Finance at finance@faerch.com immediately if you become aware of inaccuracies or irregularities

In case of any questions or further information please contact
Global People & Culture or Global Compliance, Insurance & Risk.
LegalCompliance@faerch.com

Owner: Global Compliance, Insurance & Risk
Version: 1
Date of approval by EMT: 09.07.2026
Valid as from: 09.07.2026

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