

# CODE OF CONDUCT



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## A WORD FROM THE CEO

We are aPak – The Packaging Company. One of Sweden’s oldest packaging companies. aPak is a family-owned packaging company with just around 70 employees. It was founded over 100 years ago. Our head office and warehouse are located in Mölndal, just outside Gothenburg. We provide all types of packaging to our customers in Sweden, Europe, North America and Asia. Everything from the most advanced custom solutions to a wide range of high-quality standard products. Our range includes all products and materials on the market, such as corrugated cardboard, cardboard, VCI, plastic, shock-absorbing foam and combinations of the above. Our goal is simple – to ensure that every customer gets the best possible packaging solution from a cost, quality and sustainability perspective.

With innovative solutions and extensive expertise, we want aPak to be seen as the go-to partner for smart, sustainable packaging solutions. This ambition places high demands on our most important resource: our employees. You are the people who make aPak’s goals a reality, and your dedication and knowledge are what put us at the forefront of the packaging market, both in Sweden and abroad. This is why at aPak, staff health and well-being are our top priority. We consider this a reasonable position to take since our staff, or the ”aPak family” as we say, are our most important resource. If our staff are doing well, the company is doing well too. We want to continue building and strengthening the company we are so proud of today. A company that makes a big difference to the community, and one where people thrive. We want to be a workplace where health and well-being are in focus, and where we take care of each other as an aPak family.

The Code of Conduct that you are now reading lays out the ground rules. As an employee, I would like to ask you to read through it carefully and see it as a guide in our daily work. As a customer and supplier, I invite you to examine our Code of Conduct. It sets out the values that drive our work, along with the goals we are striving towards and which form the foundation that aPak stands for. By letting our core values characterise what we do, we lay the groundwork for a very strong sustainable aPak. Together we create a world-class company.



## APAK - A PARTNER TO TRUST

aPak's market now extends to the whole of Sweden and much of the world. Wherever we go, demands are placed on our company that we need to live up to. We need to behave in a manner consistent with morality and good business ethics.

Competition in today's market is getting tougher and tougher, and it's not always the hard facts that determine which company wins customers' trust. Indeed, in many cases it's not the hard facts but the way customers feel. If the differences in price and delivery terms are minor, customers are happy to go with the brand they like. aPak always strives to be the customer's first choice.

The company's culture is at the heart of any brand. It's not always easy to put your finger on, and it takes a long time to build up. A culture doesn't get built overnight, nor does it remain constant once in place. This is something that a company needs to work on consistently, which aPak does. At aPak, we are very keen on our culture, and are always working to develop the aPak family.



# SOCIAL RESPONSIBILITY

APak is a responsible company that complies with laws and regulations wherever we do business. Our work is geared towards the long-term, sustainable and positive development of our company and of society at large.



# FUNDAMENTAL HUMAN RIGHTS AND WORKING CONDITIONS

Fundamental human rights must be known, respected and applied equally to all employees, regardless of the form of employment. All employees have the right to join associations and organisations of their choice and to bargain collectively through the trade unions with which aPak has agreements. We do not accept any form of modern slavery such as forced labour, debt bondage or human trafficking. Forced labour and the exploitation of children is not tolerated, and we do not employ anyone under the age of 15. These basic ethical rules for our workforce must also be applied by our subcontractors and business partners.

We renounce the purchase of sexual services and other activities that may entail support of human trafficking, whether during or after working hours in connection with business travel. This applies irrespective of the country in which it occurs and whether it is permitted or prohibited in that country.

If there has been a violation of human rights in aPak's operations, we must always address the specific problem and ensure that it does not recur.

## How this impacts you:

- You have the right to support and guidance from recognised trade unions and employee representation bodies.
- As a manager, you must not interfere with employees' decisions regarding representation of or membership in trade unions.
- You have the right to receive written confirmation of your terms of employment.
- Your salary must meet or exceed the statutory or agreed national minimum standards for the industry.
- Make sure that we do not use or support modern slavery, including via our suppliers or other business partners.
- You may never buy sexual services or visit sex or strip clubs, whether as part of work or outside of work in connection with business travel.



## DIVERSITY, GENDER EQUALITY, AND INCLUSION\*

aPak must be a gender-equal workplace where men and women have the same rights, obligations and opportunities to develop. Women and men should not be judged and valued based on their gender, but based on their capacity, experience and performance.

At aPak, it is not acceptable for anyone to be harassed with regard to their gender, opinions, appearance, religion or other beliefs, ethnicity or sexual orientation.

Discrimination is not allowed in our business. Regardless of ethnic origin, nationality, gender, creed, sexual orientation, age, disability, trade union or political affiliation, we emphasise the equal rights and obligations of everyone. We believe that diversity enriches our company. It benefits our employees, our organisation and our external relations alike. For the sake of a pleasant workplace, bullying or inappropriate behaviour between employees is completely unacceptable. Everyone has equal value at our company.

### **Ethical recruiting**

We are practicing recruitment where we treat job candidates fairly, respectfully, and without bias. We are assessing all candidates without discrimination and we believe that everyone has the same value.

### **How this impacts you:**

- You show good judgment towards your colleagues, our customers and other external stakeholders. Among other things, this means refraining from the kinds of attitudes, language or behaviour that can be perceived as offensive, sexist or exclusionary.
- If you learn that another employee is insulting, acting offensively towards or discriminating against a colleague or external contact, you have a responsibility to act. If required, you need to inform your nearest manager. You can get support from HR if you are unsure how to proceed.
- If you as a manager receive a report of offensive unequal treatment, you are responsible for ensuring that the matter is investigated impartially and confidentially.
- As a manager, you must set an example and work actively to promote diversity, gender equality and inclusion.

\*Gender equality and equality policy/plan



## HEALTH, WORK ENVIRONMENT AND SAFETY\*

We want to ensure good health and promote the wellbeing of all our employees. Our staff are our primary resource. If our staff are doing well, the company is doing well too.

A good, safe work environment is a strategically important part of aPak's development and that of our employees. The employer bears the main responsibility for the work environment. We must work systematically on work environment and fire protection issues. The objective is to create a physically, mentally and socially healthy and stimulating workplace for all employees, where risks of occupational injury and work-related ill health are prevented. All employees share in the responsibility for the work environment. For example, they are required to follow safety regulations and to point out risks and deficiencies in the work environment to their nearest manager. Our managers are responsible for the safety of employees and must, in addition to giving instructions and ensuring that these are complied with, also foster an understanding of any necessary safety measures. All employees at the company are responsible for their own safety when performing their work and must therefore comply with all safety regulations and take appropriate precautions to help prevent accidents. Work adaptation and rehabilitation issues should be included as an important and natural part of work environment management.

### **Safety equipment and machine safety**

Our employees and our suppliers must know and follow all safety requirements, including the use of personal protective equipment. All machinery should be used as intended and always in a way that is safe.

### **Workplace ergonomics**

We take responsibility for the health and ergonomics of our employees. We work with prevention to avoid injuries and we promote the health of our employees through continuous improvements in the working environment. We also offer healthcare and health promotion measures.

## **Development and promotion**

We believe in the importance of promoting personal development, and we conduct annual performance reviews with all our employees. We want to encourage our employees' innovative capacity and reward good performance. Promotions and recruitments are governed by our company's market needs and are based on the qualifications required for the work to get done.

## **A drug-free workplace**

For the sake of our common safety and the health of the individual, smoking, alcohol and drugs are prohibited in our workplaces. If an employee should have a substance abuse problem, we want to help with the right support initiatives to bring about a lasting recovery. For more information see our "Alcohol and drug policy".

## **Reporting of serious deficiencies - Whistleblowing**

At aPak, it is important to have a pleasant and safe workplace. If there are serious deficiencies in our operations that are of public benefit, it is important that the company becomes aware of these from a person who "blows the whistle". Examples of public interest could be, for example, if there is a product on the market that is dangerous to use or if there is suspicion of bribery. The irregularities can also concern transport safety, environmental protection, food and feed safety, animal health and public health.

In order for everyone to be anonymous when reporting, a tool is provided by an external and independent actor. For more information see our "Whistleblower Policy".

## **How this impacts you:**

- As an employee, you are required to participate in work environment management by pointing out risks and shortcomings in the work environment to your nearest manager and reporting near-misses and accidents.
- You must comply with safety regulations and use protective equipment.
- You must actively participate in your own rehabilitation and work adaptation.
- You may not smoke on company premises as these are non-smoking areas. You may not be under the influence of alcohol or drugs during working hours.
- If you notice that someone is under the influence of alcohol or other drugs during working hours, immediately report this to your nearest manager, who is responsible for taking the necessary measures

\*Work environment policy



## COMMUNITY INVOLVEMENT - STADSMISSIONEN

### **Reducing poverty**

APak is a "future partner" to Göteborgs Stadsmission, providing financial support to the organisation. Our collaboration with them dates back nearly fifteen years. APak also conducts activities together with Stadsmissionen where our staff are given the opportunity to pitch in to reduce poverty.

### **We are volunteers**

At aPak we are all volunteers. Since 2020, our employees have had the opportunity to carry out meaningful volunteer work under four occasions each year. The focus of the projects is based on Göteborgs Stadsmissions needs at the current time of the year.

### **How this impacts you:**

- You have the opportunity to volunteer during working hours on four set occasions per year.

# ENVIRONMENTAL RESPONSIBILITY

aPak has a strong vision of being a profitable company that can develop in a sustainable, long-term manner in harmony with the environment, society and human beings. We are convinced that an equitable way forward is the only right way, and will do all we can to maintain and develop our sustainable way of working. At aPak we are willing to take our responsibility for greener development.

It has always been important to us here at aPak to run a sustainable business. That attitude needs to permeate our entire business, in everything from transport and recycling to construction and operations. But thanks to our position, we also have good opportunities to nudge our customers and our suppliers in the right direction. For this reason, we need to work both inside the company and out to contribute to more sustainable production and consumption.



## SUSTAINABLE MANAGEMENT\*

Environmental issues at aPak must be an integral part of our business operations, and contribute to the creation of value for our stakeholders. aPak works actively to reduce the use of energy and to limit emissions of pollutants. We need to comply with applicable legislation and customer requirements.

At aPak we work actively to prevent defects, shortcomings and environmental impacts instead of addressing them after the fact, as mandated by the zero-defect principle. When we talk about a better environment at aPak, this includes everything from raw material and production to materials and delivery. We always set stringent requirements for our suppliers and only buy materials produced under good conditions. The environment is an important consideration when we develop new packaging solutions and logistics systems. We always try to ask ourselves this question: can we make it with lower environmental impact?

More specifically, this means that we always think twice in the process of selecting, for example, materials, suppliers and packaging sizes. Sometimes really simple, small adjustments can make a big difference. We are proud of the environmental management being done today, but we believe that even more can be done. Working together, we can take our responsibility for more sustainable development!

### **Environmental laws**

We are committed to the global goals of the Paris Agreement, and our goal is to reduce our carbon footprint to achieve net zero emission in scope 1 and 2 by 2030, and in scope 3 by 2050. We must take measures to generate transparency about the emissions of our business activities, including our supply chain. We prefer suppliers who have a carbon management system and take measures to continuously reduce their greenhouse gas emissions.

We follow laws and regulations as well as all applicable industry standards, agreements, and guidelines regarding the environment. We are committed to act in an environmentally responsible manner and be encouraged to work consciously and actively to reduce environmental impact of our business operations and increase energy efficiency. We shall handle resources responsibly and avoid wastage. We prefer suppliers who actively promote recycling within their sphere of influence.

## **Biodiversity, land use and deforestation**

Biodiversity must be respected and valued. We only work with suppliers that values and practices sustainable production and forestry. All our suppliers have to commit to the avoidance of forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters. Noise emissions should also be kept to a minimum not to disturb the environment.

### **How this impacts you:**

- Do what you can to reduce the environmental impact of your own work.
  - Everyone needs to be familiar with and comply with relevant legislation and internal rules.
  - As a manager you need to ensure that you and your employees are given relevant environmental training.
  - Making demands on our suppliers is everyone's responsibility.
  - We sort and recycle all materials to the extent possible for the sake of a sustainable business.
- Both our warehouse and our offices have waste sorting stations where we sort household waste. We have a cardboard press for cardboard recycling. We also sort soft plastics for recycling.

\*Sustainability policy



# FINANCIAL RESPONSIBILITY

We respect and comply with competition rules, environmental legislation, labour market laws, agreements and safety requirements, as well as other regulations that govern our operations.



## BUSINESS ACUMEN

We need to be a company that you can rely on fully, one that always keeps its word. We only engage in business operations that comply with national laws, international conventions and the agreements we have concluded, and those which are in accordance with our Code of Conduct. We respect and comply with competition rules, environmental legislation, labour market laws, agreements and safety requirements, as well as other regulations that govern our operations. aPak believes in long-term business relationships in which we, working alongside our business partners, create the basis for good financial results. All financial transactions must be accounted for in accordance with the company's accounting principles, and must comply with applicable laws, regulations and standards. The accounts must report all types of transactions in a correct manner that is not misleading. Our external financial reporting must be reliable and complete.

### **How this impacts you:**

- All employees have a responsibility to do business in a manner that is reliable and honest, and is long-term in its approach.
- All employees have a responsibility to maintain accurate accounting and documentation so that our business can be run efficiently.



## CUSTOMER AND QUALITY\*

*”Our goal is to provide our customers with higher profits and efficiency by being our market’s preferred supplier of sustainable, smart and innovative packaging solutions.”*

Quality management is an integral part of our business. We must always work in accordance with applicable laws, regulations, standards and other requirements imposed in the course of our business operations. Everyone is required to comply with our quality management system. Uniform, effective working methods and processes, a shared understanding of roles and responsibilities, and a desire to make continuous improvements throughout the business will help us to achieve our goals and to meet the quality requirements that we, our customers and shareholders set.

APak strives to have a committed workforce that systematically makes continuous improvements based on the zero-defect principle. In other words, their work seeks to prevent defects and shortcomings instead of addressing them after the fact.

\*Sustainability policy



## INFORMATION AND COMMUNICATION\*

The information activities conducted within the company should aim to support the company's visions, business concept and strategies. Information activities should strengthen the brand and be conducive to business and customer benefit. We must follow marketing laws and regulations in the countries in which we operate. We must also strive to make our communication clear and sincere. Our information and communication are based on openness, clarity, relevance, accessibility and on the principle of being active.

### How this impacts you:

- Read through and comply with the content of the communication policy and the Code of Conduct.
- As a manager you are responsible for ensuring that your employees are well-informed about the company's communication policy, business operations, vision, goals, strategies and ethos.
- Do not comment on exceptional events until management has decided on its stance or until management itself has made commented on the matter.
- Do not disseminate inside information or other information that is not intended for communication to the market, another external party or internally within the company.
- As aPak employees, we are the ambassadors of our brand. We act respectfully towards our colleagues, stakeholders and the outside world in all channels, such as social media, news media and in dialogue with other stakeholders.

\*Communications policy



## RELIABLE AND SECURE INFORMATION MANAGEMENT\*

Information security must be an integral part of our business operations and must help create value for customers, shareholders and other stakeholders.

### Information security means that:

- the information is available when needed.
- the information is accurate, which is to say that it is current, correct and complete.
- the information is only accessible to authorised persons.
- information management is traceable. Which is to say that it can be determined who has received the information, what changes have been made and who made these changes.

We need to comply with applicable legislation and any other requirements imposed by customer and suppliers. We respect people's fundamental right to privacy. Personal data must be collected correctly and legally, be relevant to the purpose for which it has been collected, and be processed with utmost care in accordance with our GDPR policy. We are prepared and have contingency mechanisms to handle unplanned events in IT support. We must therefore have plans in place to resume normal operations as quickly as possible. We must continuously monitor, revise and improve our operations from an information security perspective.

### How this impacts you:

- Everyone needs to be familiar with and comply with internal rules.
- As a manager you need to ensure that you and your employees are given the training needed.
- Any decision with a significant impact on information management must be preceded by a documented risk assessment.

\*GDPR policy



## PURCHASING\*

Purchasing at aPak must always be carried out responsibly. Responsible purchasing allows us to ensure reliable, long-term business relationships. We expect our suppliers to comply with national laws and regulations, and to respect international conventions. We employ a risk-based approach and set requirements for our suppliers, contracted services and products from a sustainability perspective. Among other ways, these requirements are imposed through supplier evaluations and continuous audits at our suppliers. We must have a clearly-communicated purchasing process, and we work actively with our suppliers to bring about improvements. We must always have written agreements and must follow up on set requirements and take action in the event of deviations. Where relevant, we can carry out independent quality tests on products if necessary.

### **How this impacts you:**

- You have an obligation to inform your nearest manager in the event of supplier or product shortcomings, or if product information is defective.
- Orders must be placed in accordance with internal rules and must be approved by a competent decision maker.
- If you are uncertain about how to go about making a specific purchase, contact your nearest manager.

\*Purchasing policy



## EXPORT CONTROL

APak delivers globally, and our responsibility is to have control over our export from start to finish. It also means that we must be updated on both local and international laws and regulations. We have an obligation to investigate export license requirements before exporting a product across national borders. Violations can lead to criminal prosecution for the companies and individuals responsible.

### **How this impacts you:**

- You must know and follow the trade restrictions that apply.
- You have an obligation to inform your nearest manager in the event of violation.
- You have an obligation to stay informed and updated on both local and international laws and regulations.



## COUNTERACTING CORRUPTION/ BENEFITS, GIFTS AND BRIBES

Corruption is defined as behaviour that causes decisions and actions to be influenced in an inappropriate manner. This includes conflicts of interest, embezzlement, kickbacks, bribery, extortion, anti competitive practices, money laundry, fraud, nepotism or cronyism. No form of corruption will be tolerated. aPak regularly conducts risk analyses to assess the risks of corruption. No employee may, through his or her position or role in the business, demand, accept or receive personal benefits in the form of gifts, offers or goods from a supplier. All business entertainment must be characterised by moderation and sound judgment so that the respective parties maintain full credibility and an independent position in respect of each other. All payments and transactions must be properly accounted for.

### **How this impacts you:**

- Do not give or receive anything that may be perceived as a bribe.
- It is not permissible to ask for benefits/gifts from partners or suppliers.
- Contact your nearest manager if you are unsure.

\*Anti-corruption policy



## COMPLIANCE

The Code of Conduct applies to all employees at aPak, irrespective of function, position and job title. All managers and leaders at aPak are responsible for ensuring compliance with the Code. We, aPak AB, also expect that these commitments are shared through the whole supply chain.

aPak's CEO is ultimately responsible for ensuring compliance with the Code of Conduct. However, it is up to all managers and employees to be familiar with and to take responsibility for the Code's application. The company's management continuously monitors work related to the Code.

### **How to report**

Report deviations from the Code by contacting your nearest manager, the HR Department or the CEO.

### **An accessible Code of Conduct**

aPak's employees must be given training in the Code of Conduct. It is available on the intranet and on our website, where customers, suppliers and other external stakeholders can easily acquaint themselves with the ethical rules and approaches that characterise aPak.

# APAK TAKES RESPONSIBILITY

We want to continue to build and strengthen the company that we are so proud of. A sustainable company that makes a big difference for the society and where people thrive. We want to be a workplace where we put health and well-being in focus and where we all take care of each other – we are the aPak-family!



**THE PACKAGING COMPANY**

**- Est. 1917 -**