

LOPAREX

Code of Conduct

JUNE 2023

Contents

- 3** INTRODUCTION
RESPONSIBILITIES
- 4** VISION, MISSION & VALUES
- 5** INTENT
- 6** PEOPLE
- 7** HEALTH & SAFETY
- 8** ENVIRONMENT
SUSTAINABILITY & SOCIAL RESPONSIBILITY
- 9** BRIBERY
GIFTS & ENTERTAINMENT
- 10** FAIR COMPETITION
- 11** PROTECTION OF INFORMATION & ASSETS
- 12** ACCURATE FINANCIAL RECORD-KEEPING
QUALITY
TRADE
GOVERNMENT CONTRACTING
- 13** REPORTING & RESOURCES
- 14** RETALIATION
INVESTIGATION
POLICY VIOLATIONS
- 15** CLOSING



LOPAREX



INTRODUCTION

As a global leader in the release liner industry, Loparex and its affiliates strive to promote and maintain responsible business practices for the benefit of our customers, suppliers, employees, and the communities in which we operate. This commitment is consistently reflected in our actions as a company and is an integral part of our identity.

Loparex and its affiliates seek to ensure sustained growth and profitability. While doing so, it is essential that we are committed to high standards of labor, health and safety, the environment, ethics, and quality. We actively seek business relationships with partners who share our values and promote the application of these high standards among those with whom they do business. We believe conducting business with integrity and high ethical standards is as important as providing other forms of value to our customers, employees, and society.

RESPONSIBILITIES

The **Loparex Code of Conduct** (the “Code”) applies to all employees of Loparex and its affiliates, suppliers, customers, and other third parties. The Code creates a framework around our beliefs and sets clear expectations for our behaviors.

- Throughout the Code, “*We*” and “*Our*” are used to represent the employees of Loparex and its affiliates.
- Throughout the Code, “*Company*” is used to represent Loparex and its affiliates.
- We are all required to read, understand, and comply with the behaviors specified in the Code.
- It is our responsibility to report behavior that violates the Code. Loparex policies prohibit any form of retaliation against individuals for fulfilling this obligation.
- Members of the leadership team and people managers are responsible for communicating their support and expectations of compliance with the Code to employees.



VISION, MISSION & VALUES

OUR VISION

To be the leading and most trusted solutions provider for engineered materials in all markets we serve.

OUR MISSION

We collaborate and partner with our customers, leveraging our market, material science, and processing expertise to consistently deliver world-class service and solutions that enable sustainable performance.

OUR VALUES

- We are committed to operating with a duty of care to uphold a safe and healthy environment.
- We are committed to focusing on our customers and listening to deliver value and best-in class service.
- We are committed to communicating with integrity and clear intent while leading with authenticity and respect.
- We are committed to giving colleagues feedback while recognizing and celebrating each other's successes.
- We are committed to fostering a culture of diversity, inclusion, and belonging.



INTENT

Our Code highlights the guiding principles that form the basis of our policies on labor, health and safety, the environment, ethics, and quality. We comply with all applicable laws and regulations in all our locations. When local laws and regulations are less restrictive than this Code, the expectations outlined in the Code should be followed. When local laws and regulations are more restrictive than this Code, then local laws and regulations should be followed.

We support the following frameworks:

- The Universal Declaration of Human Rights by the United Nations (UN)
- The UN Convention on the Rights of the Child
- The International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- The eight Fundamental Conventions of the ILO
- The principles of the UN Global Compact
- The OECD Guidelines for Multinational Enterprises
- Sustainable Development Goals of the UN
- Principles of the International Chamber of Commerce Business Charter for Sustainable Development



PEOPLE

We are committed to protecting human rights, engaging in fair employment practices, and providing a safe, respectful, and diverse work environment. We promote employee well-being and provide opportunities for personal and career development.

- We are committed to providing a work environment that is free of violence, threats of violence, harassment, discrimination, intimidation, bullying, and abusive conduct.
- We are committed to fostering a culture of diversity, inclusion, and belonging. We strive to create a diverse and inclusive workplace with mutual trust and respect.
- We ensure that our activities do not directly or indirectly violate human rights in any location where we conduct business. We comply with all employment and labor laws in all our locations, including but not limited to those respecting freedom of association, privacy, equal employment opportunity, working hours, right to reasonable compensation, child labor, forced labor, and human trafficking.
- We prohibit child labor, forced or compulsory labor, and human trafficking.
- We comply with all applicable local laws regarding the minimum hiring age for employees.
- We are an equal opportunity employer.
- We prohibit discrimination in employment and occupation. We ensure employment is non-discriminatory, based on mutual consent, without threat of penalty. No direct or indirect discrimination based on will be tolerated based on race, color, national origin, religion, sex (including pregnancy, sexual orientation, and gender identity), age, disability status, veteran status, marital status, genetic information (including family medical history), political opinion, membership in a union or collective bargaining unit, or any other characteristic protected by applicable law.
- We prohibit harassment of any employee by another employee or third party. We do not tolerate any form of harassment or behavior, including gestures, language, or physical contact, that is sexual, coercive, threatening, hostile, abusive, or exploitative in any manner.
- We comply with fair labor and compensation practices. We provide fair and equitable wages, benefits, and other conditions of employment in accordance with applicable laws and regulations.
- We recognize and respect freedom of association and the effective right to collective bargaining.
- We provide humane and safe working conditions.
- We prohibit working under the influence of drugs or alcohol. It is prohibited to possess, use, transfer, or sell drugs on Company property or while conducting Company business.



SAFETY & HEALTH

We always seek to provide and maintain a safe and healthy workplace and comply with applicable safety and health laws and regulations. We are dedicated to ensuring a safe workplace by minimizing the risk of accidents, injury, and exposure to health risks. We are committed to engaging with our employees to continually improve health and safety in our workplace, including identifying hazards and remediation of health and safety issues.

We take a proactive approach to safety every day through identification and mitigation of potential hazards and risks. We expect all hazards and risks identified to be reported and then addressed in a timely manner. We strive to prevent accidents and injuries by minimizing, so far as reasonably practicable, any risks inherent in the working environment. Safety and health risks are minimized through the application of engineering controls, safety practices, policies, and procedures. We are expected to follow all safety precautions outlined in these standards.

We operate with a 'zero incident' mindset and a positive, proactive, and preventive culture. We are expected to avoid behaviors that could increase the risk of injury or ill health to ourselves or to others. If at-risk behavior is observed, we will address it immediately.

We identify and assess potential workplace emergency situations and events and minimize their impact by implementing emergency plans and response procedures. We are expected to be prepared in the event of an emergency, follow emergency action plans, and attend required training and drills.

If an incident does occur, we analyze it to determine root causes and implement corrective actions in a timely manner so that we prevent the incident from happening again. We share learnings and best practices with our other locations. We are expected to report all injuries and incidents according to reporting guidelines.

By strengthening our safety culture and implementing a risk-based management system, effective training, and a focus on continuous improvement, we aim to empower each other to work safely, while improving both quality and productivity.



ENVIRONMENT

Loparex operates globally and is committed to producing high-quality products while minimizing our impact on nature and the environment, managing our business in a sustainable manner in accordance with all applicable laws, rules, and regulations.

COMPLIANCE WITH LAWS, RULES, AND REGULATIONS

Our company is committed to complying with all environmentally relevant laws, rules, and regulations in the countries where we operate. These include provisions for water protection, pollution prevention, waste management, and other environmental protection measures. We expect our employees and partners to comply with these laws and regulations and to promptly report any violations.

SUSTAINABLE MANAGEMENT OF RESOURCES

Programs for energy efficiency, waste avoidance and recycling, and use of sustainable materials are in place and are continuously expanding over time. We strongly encourage our employees and partners to support these sustainability improvement efforts.

ENVIRONMENTAL STEWARDSHIP

We believe that protecting the environment is a fundamental responsibility, and we are committed to minimizing our environmental impact. We strive to reduce waste, conserve natural resources, and promote sustainable practices throughout our supply chain. We expect our employees and partners to share this commitment and to actively participate in our efforts to protect the environment.

SOCIAL RESPONSIBILITY & SUSTAINABILITY

Consistent with our core values, we are committed to being a positive force for our customers, our colleagues, and our community and to practice environmental and social sustainability and to be good stewards of the environment and the social landscapes in which we operate.

We believe in conducting our business in an ethical and socially responsible manner, and this code of conduct outlines the standards and principles we expect our employees and partners to uphold.



BRIBERY

Bribery is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for action which is illegal or a breach of trust. A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Bribes can be disguised as a commission, gift, favor, or donation.

Facilitation payments are a form of bribery made for the purpose of expediting or facilitating the performance of a public official for a routine governmental action, and not to obtain or retain business or any improper business advantage. Facilitation payments tend to be demanded by low level officials to obtain a level of service which one would normally be entitled to.

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption. We take a zero-tolerance approach to bribery and corruption. We prohibit any form of corruption or bribery, including facilitation payments. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate.

GIFTS & ENTERTAINMENT

Gifts and entertainment are often exchanged as part of building business relationships, but they can also influence or appear to influence decision making.

- We prohibit offering or accepting gifts or entertainment that could be considered a bribe in exchange for preferential treatment or an attempt to influence a business decision.
- We prohibit offering or accepting cash or cash equivalent (excludes company employee recognition programs).
- We prohibit offering or accepting gifts or entertainment to influence a negotiation, purchase, or any other type of transaction.
- We prohibit offering or accepting gifts and entertainment that are inconsistent with customary business practice, more than modest value by local standards and customs, or are in violation of local laws.
- We prohibit gifts and entertainment that are sexually oriented.

Acceptable gifts and entertainment must be given or received in compliance with legal requirements and the code of conduct of both the giving and receiving entity. They must also be reported accurately in financial records according to regional or local policies. They must be given or received openly, infrequently, as an act of appreciation, and without obligation or expectations.

Acceptable gifts and entertainment would likely be perceived by the public to be acceptable and of appropriate value.



CONFLICTS OF INTEREST

We are committed to exercising fair, objective, and impartial judgement in all business dealings. We avoid involvement in any transactions or activities that could be considered a conflict of interest.

Conflicts of interest exist when the interest, responsibilities, obligations, or activities of an employee or an employee's family member could be in conflict with the interests of the Company.

- We are responsible for being aware of situations that could be considered a conflict of interest.
- We are required to disclose potential conflicts of interest.

All employees should avoid any actual, potential, or apparent conflict of interest between the employee's personal interests and the best interests of the Company. The following list of potential conflicts of interest is not intended to be an exhaustive list of all potential conflicts of interest. An employee may have a conflict of interest if the employee:

- Is employed by (including as a consultant) or participates in any company that competes, does business, or desires to do business with the Company;
- Has any financial involvement directly or indirectly, ownership of any interest in, or profits personally from (e.g. commissions, loans, reimbursements, etc.) any organization that competes with or does business with the Company;
- Enters into contracts on behalf of Loparex with the employee's relatives or household members, or represents Loparex in any transaction in which the employee or a related individual has a substantial personal interest;
- Takes personal advantage of Company business opportunities;

- Acts on behalf of anyone besides Loparex in any transaction with the Company (for example, helping someone sell products and/or services to the Company);
- Has any other additional employment that:
 - Conflicts with an employee's work schedule, duties, and responsibilities at the Company;
 - Impairs or has a detrimental effect on the employee's work performance with the Company; or
 - Requires the employee to conduct work or related activities on Company property during the employee's working hours or using Company facilities and/or equipment; or
 - Assists the Company's competitors.
- Is in a reporting relationship with a family member;
- Accepts any special favors, cash, gifts, discounts, services, loans, or anything else of non-nominal value as a result of their position with Loparex from other Loparex employees or any person or organization with whom Loparex has a current or potential business relationship;
- Has a family member employed by Loparex or applying for employment at Loparex;
- Has a family member who is employed by a customer, supplier, business partner, or competitor of Loparex.



FAIR COMPETITION

We are committed to open and fair dealing with our third parties. We ensure relationships are founded on high ethical standards, integrity, and compliance with all laws and regulations applicable to our business. We comply with all applicable antitrust laws. These laws require that we act independently and sell our products fairly and honestly on the basis of price, quality and service. We prohibit activities related to unfair competition.

When communicating with competitors, Loparex employees should never discuss or make an agreement on:

- Price or terms of sales
- Customers or the geographical areas or territories served
- Sales contacts
- Production costs or quantities, or agreeing to restrict or increase levels of production
- Boycotting other competitors, suppliers, or customers

We observe the laws, rules, and regulations that are applicable to the acquisition of goods and services by our customers, and we will compete fairly and ethically for business opportunities. Employees involved in negotiation of contracts with customers must ensure that all statements and communication are accurate and truthful.



PROTECTION OF ASSETS & INFORMATION

We are committed to protecting the personal, confidential, and proprietary information of Loparex, as well as those of our business partners.

- We comply with all applicable laws concerning privacy and data protection and will protect the privacy expectations of personal information of employees and business partners. If any issue or question regarding data protection arises, please e-mail your request to our Data Protection Officer: **dataprotection@loparex.com**
- We will protect confidential information of employees and business partners.
- We are committed to respecting, protecting, and securing the intellectual property assets of Loparex, as well as those of our customers and vendors.

We are committed to protecting our information system, physical property, and assets.

- We are required to follow all IT policies and procedures.
- We prohibit the inappropriate use of electronic resources.
- We secure access to our facilities as required by facility policies.
- We provide security guidelines designed to protect employees, facilities, information, and technology.
- We responsibly use assets under our control and secure them from theft, waste, or abuse.
- We prohibit the misuse of assets.



ACCURATE FINANCIAL RECORD-KEEPING

We require that all financial transactions be recorded in a manner that accurately reflects the true nature of the transaction, in accordance with **International Financial Reporting Standards** and all applicable laws and regulations.

- We prohibit false, misleading, or artificial records intended to conceal improper transactions.
- We maintain business records consistent with applicable laws, regulations, and company record retention policies.

QUALITY

We are dedicated to meeting and exceeding our customers' requirements and expectations by continually improving products, services, responsiveness, and management systems.

TRADE

We are committed to complying with all applicable trade control laws and regulations applicable to our business and locations.

GOVERNMENT CONTRACTING

We are committed to complying with all applicable laws and regulations when conducting business with government officials in any country. We comply with applicable procurement laws, regulations, and policies when selling goods or services to any government. We prohibit improper payments to obtain government contracts.



REPORTING & RESOURCES

We are committed to offering methods for employees and business partners to report violations, request guidance, and provide feedback.

We have partnered with a third party to provide an independent and confidential method for reporting concerns. The **Loparex Hotline** (the Hotline) is a secure and confidential reporting tool that is available to all employees and business partners.

We are expected to report violations of law, Code, or policies. Anyone who witnesses or becomes aware of potential violations of law, Code, or policies should report such behavior to their supervisor, human resources, or the Hotline.

All members of management who receive a complaint regarding a law, Code, or policy violation must report such behavior to Human Resources or the Hotline.

HOTLINE CONTACT INFORMATION

- **Web Intake Site:** loparex.ethicspoint.com
- **Mobile Intake Site:** loparex-mobile.ethicspoint.com
- **Hotline Phone Numbers:**
 - US:** +1 (844) 611-7025
 - China:** +86 140-0120-1868
 - Germany:** +49 800 1823151
 - India:** +91 (022) 5097-2893
 - Netherlands:** +31 800 0228372

RETALIATION

We strive to create a culture where employees feel comfortable directly reporting concerns without the fear of retaliation.

Retaliation by any person, including co-workers, managers, supervisors and third parties, for reporting a concern, or for participating in an investigation, is strictly prohibited. Any report of retaliation will be promptly and thoroughly investigated. If a complaint of retaliation is substantiated, appropriate disciplinary action, including termination of employment, will be taken.

INVESTIGATION

We are committed to investigating potential Code violations fairly, confidentially, and respectfully.

All complaints will be promptly and thoroughly investigated by qualified personnel in a fair and impartial manner. The investigation will be documented and tracked. All employees and supervisors have a duty to be cooperative and truthful during an investigation. Failing to cooperate or deliberately providing false information during an investigation is grounds for disciplinary action, including termination of employment.

POLICY VIOLATIONS

Violations of law, Code, or policies are enforced consistently throughout the organization. Violations will result in appropriate disciplinary action, including but not limited to termination of employment.



CLOSING

The Loparex Code of Conduct is publicly available. The Code is reviewed at regular intervals to determine effectiveness and identify areas of improvement. Loparex reserves the right to revise the Code at any time.

For questions regarding the Loparex Code of Conduct, please contact your supervisor, management, human resources, or the Hotline.

HOTLINE CONTACT INFORMATION

- **Web Intake Site:** loparex.ethicspoint.com
- **Mobile Intake Site:** loparex-mobile.ethicspoint.com
- **Hotline Phone Numbers:**
 - US:** +1 (844) 611-7025
 - China:** +86 140-0120-1868
 - Germany:** +49 800 1823151
 - India:** +91 (022) 5097-2893
 - Netherlands:** +31 800 0228372

ENABLING
SUSTAINABLE
PERFORMANCE

LOPAREX