

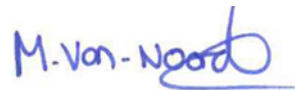
CODE OF CONDUCT

Paranova Print and Packaging
Date: June 2026

Approved by:



Jo Ormrod
CEO



Michaela Van Noordt
HR Director

Revision Chart

Version	Date	Function	Modification
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MESSAGE FROM THE CEO

At Paranova Print and Packaging, we have earned our reputation through hard work, integrity, and a shared commitment to the highest standards of business conduct. I am proud of this, and I believe everyone in our organisation shares that pride.

We are dedicated not only to achieving our business goals, but to doing so ethically, responsibly, and with respect for one another. We trust each other to make sound decisions and to uphold our values. A single lapse in judgement can undermine that trust and harm our business.

This Code of Conduct ("Code") sets out the principles and practices that guide our work and aligns with our Environmental, Social and Governance strategy. Compliance is mandatory for all colleagues, officers, directors, and contractors. Leaders at every level are expected to model these standards and reinforce them in their teams.

When we work ethically and collaboratively, we all benefit. Thank you for your commitment to maintaining our high standards.

Jo Ormrod
Chief Executive Officer
Paranova Print and Packaging

About this code of conduct

This Code sets out the standards that govern the way we conduct ourselves and deal with each other and our customers, stakeholders, governments, suppliers, competitors, the media and the general public.

Take time to read this Code carefully. Compliance with this Code is mandatory and a condition of your employment or contractual relationship with Paranova Print and Packaging. Each year, you will be required to certify that you have read this Code, understood it and are committed to conducting business according to its rules and standards.

This Code applies to everyone working for and on behalf of Paranova Print and Packaging, e.g. every employee, officer, director and contractor.

The CEO of Paranova Print and Packaging has overall responsibility for ensuring this Code complies with our legal and ethical obligations and that it is complied with in Paranova Print and Packaging.

The HR Director of Paranova Print and Packaging has primary and day-to-day responsibility for implementing this Code, monitoring its use, effectiveness and compliance and dealing with any queries about it.

What it means to you

You have responsibilities to Paranova Print and Packaging, your colleagues, and our business partners. The decisions and actions you take every day have a direct impact on your personal reputation and our business reputation and standing in the community.

Before you make a decision, ask yourself: Is it legal? Is it ethical? Is it fair? Would I be comfortable if it became public?

This applies to any and all decisions made, from major decisions to day-to-day activities and transactions with other parties.

No single document can possibly anticipate every possible situation; this Code is only intended **as a** guide. Good judgment and rational decision-making will help you apply the principles in this Code to your work. Do not hesitate to ask questions if you are not sure what to do.

Consequences

A disregard of the rules and standards set forth in this Code will not be tolerated. Everyone who violates the standards of this Code may be subject to disciplinary action. Depending on the type of violation and the surrounding circumstances, such discipline may range from a warning to termination of employment, and, in appropriate cases, to civil legal action or referral for regulatory or criminal prosecution.

If you are aware of unethical behaviour or violations of this Code, we encourage you to report it as outlined below. We all want to work in an ethical and collaborative business environment. Only with the commitment of every employee we can make that happen.

What we expect

We expect you to carry out your responsibilities in accordance with our high standard of ethics, integrity and professionalism. In order to build an ethical and collaborative work environment, we expect you to:

1. Comply with **all** Laws, Regulations, Policies and Procedures
2. Act with Integrity in the Performance of Paranova Print and Packaging's Business
3. Protect our Assets
4. Maintain the Highest Standards of Professionalism

Comply with all laws, regulations, policies and procedures

We build respect and trust in our company and each other by setting high standards and acting on those values. Paranova Print and Packaging is committed to conducting business as a responsible global citizen. This includes making ethical business decisions and abiding by all applicable laws and regulations.

Paranova Print and Packaging expects all colleagues to do the same.

We expect our colleagues and business partners to comply with all applicable laws in all countries to which they travel, in which they operate, and where Paranova Print and Packaging otherwise does business.

Workplace

All colleagues are responsible for maintaining an ethical and collaborative work environment-one that is safe, professional and supportive. We all benefit from such an environment.

Health and Safety

Health and Safety at work, even more in a production company, is a top priority for your own well-being and the well-being of those around you, you must always comply with all health & safety laws, policies and procedures. You must take the necessary precautions to ensure that you and others around you are safe. We should all look out for each other and make sure we work in a safe environment.

Non, equality, diversity and protection against harassment and abuse

Harassment and discrimination are destructive in the workplace as a whole and hurt the individuals at whom they are directed.

This includes harassment and discrimination of any kind, including race, religion, age, gender, pregnancy, childbirth, marital status, family status, sexual orientation, mental or physical disability, national or ethnic origin, or any other protected characteristic.

We strive to create an inclusive environment where we cherish diversity and expect you to value those around you for what they contribute professionally, not for what they might believe or look like.

You must obey all human and civil rights laws that protect people from discrimination. Sexual harassment is also against the law.

It includes unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual or discriminating nature. It can take the form of making a decision about a person's employment because he or she submitted to or rejected unwelcome conduct or when the conduct interferes with a person's work or creates an intimidating, hostile, abusive or offensive work environment.

Alcohol and substance abuse

You are responsible for conducting yourself in a responsible and professional manner at all times, including at workplace events or in situations that involve alcohol. You cannot: (1) give alcohol to anyone who is impaired or under the legal drinking age or (2) consume, possess, sell or distribute illegal substances.

Personal behavior

You are critical to the success of Paranova Print and Packaging, and Paranova Print and Packaging's policy is to treat you with fairness and respect. In turn, Paranova Print and Packaging expects you to treat all those you work with, both colleagues and third parties, with fairness and respect. An integrity-based culture promotes a workplace that you can be proud of and enjoy.

Communication

Our e-mail, internet and phone services are intended for business use and should not be used for any purpose that violates this Code. Communicating with others as a Paranova Print and Packaging employee means respecting the values and standards within this Code.

Environmental protection

Recognising our impact on the environment, we are committed to protecting our environment for the benefit of current and future generations. We are dedicated to implementing sustainable practices aimed at minimising waste and energy and reducing our environmental footprint in our daily behaviour as individuals as well as in our operations (e.g. with measures to optimise material use, process efficiency). Furthermore, we aim to design our products based on sustainable criteria.

All relevant environmental laws and regulations as well as internal environmental policies in place must be strictly adhered.

We strive to apply the highest standards in our business operations and have the same expectations for all our Suppliers and Subcontractors. Social and environmental responsibility, as well as fair and ethical business principles, must be considered throughout the entire supply chain. We are dedicated to ensuring together with our Suppliers that no sourcing in relation of products is made from deforested land and/or does adversely affect ecosystem conversion.

Community engagement and development

We acknowledge our responsibility towards the communities in which we operate. Our commitment includes ensuring that our operations do not negatively impact these local communities. We engage with them in a respectful manner, honouring and valuing their rights, cultures, customs, and traditions. Additionally, we actively participate in community development and provide support for local initiatives.

Act with integrity in the performance of Paranova Print and Packaging

Paranova Print and Packaging values integrity in its operations and colleagues.

Theft, Bribery and Corruption

You should avoid even the slightest appearance of corruption. The guidelines below are intended to help you understand the difference between prohibited and allowed conduct.

Theft and Fraud

Do not steal, embezzle, or misappropriate funds or property that belong to Paranova Print and Packaging. You are expected to protect and use Paranova Print and Packaging's assets responsibly. We work hard to provide you with the assets you need in order to do your job, including tools, phones, computers, equipment, supplies and other items. They are to be used only for the purposes intended.

Purchasing and Procurement

All purchasing decisions should be made consistently with our business standards and goals. Competitive bids, verification of quality, and confirmation of legal and financial conditions are paramount to these standards. All purchasing arrangements and factors in making a decision need to be documented.

Anti-Competitive Behaviour

Price fixing, bid rigging, collective refusals to deal, division of customers or markets, or reducing competition in any way is unacceptable. We strive to reach our business goals through sound business practices, not illegal or unethical methods.

Competition laws are often complex; please speak with commercial or procurement for advice about how the laws apply to any situation.

Our competition compliance policy also provides more detail on this topic. It forms part of this Code and compliance is mandatory.

Bribery and corruption

Bribery is strictly prohibited under both domestic and foreign anti-corruption laws. It can have serious and far-reaching legal consequences, including government enforcement proceedings and criminal charges.

Depending on your role and where you work, you may find yourself in a situation where bribes are common, and you may be pressured to both give and/or receive a bribe. Do not succumb to such pressure. Any perceived business advantage, no matter how small or large, is not worth this risk. We must comply with anti-corruption laws **all** of the time.

Gifts, meals and entertainment are challenging topics because they risk the appearance of a bribe. A gift to a public official, an existing or potential customer, a supplier, an employee, or others we do business with to show respect or gratitude may be acceptable, but such gifts cannot be lavish or excessive. If you are unsure about the propriety of a gift, meal or entertainment expense, ask yourself:

1. Is it consistent with accepted business standards?
2. If this gift became public, would it be embarrassing to you or the other party?
3. Is it legal? Is it ethical?
4. Is there a *bona fide* business justification?
5. Is the amount reasonable?

Our Anti-Corruption Policy offers more detail on this topic. It forms part of this Code and compliance is mandatory.

Anti money-laundering

We reject all transactions that are carried out for the purpose of channeling money and other assets that have been obtained through preceding potential criminal offences into the legal economic cycle and expect you to obey all Anti-Money Laundering rules.

Tax evasion

We reject all transactions that are carried out for the purpose of tax evasion being defined as any offence of deliberately cheating the public revenue, or any offence where someone is knowingly involved in or taking steps with a view to the fraudulent evasion of tax.

Trade compliance: Sanctions and export controls

We comply with all applicable import and export control laws, customs and trade regulations, and economic sanction laws and regulations. Consult the Trade Compliance Policy for more information. It forms part of this Code and compliance is mandatory.

Corporate interactions

You may find yourself interacting with other companies, both while representing Paranova Print and Packaging or otherwise. Always maintain the highest standards of professional conduct and respect Paranova Print and Packaging's interests.

Conflicts of interest

A "conflict of interest" arises when a personal interest makes it difficult for you to perform your duties objectively or interferes with Paranova Print and Packaging's business interests.

Avoid situations that appear to compromise your ability to act in Paranova Print and Packaging's best interest, including:

1. Using Paranova Print and Packaging's property or information for your personal or family benefit
2. Conducting a transaction between Paranova Print and Packaging and any entity that you or your family member has an interest in.
3. Influencing a decision relating to a contract or transaction that you or your family may have an interest in
4. Competing with Paranova Print and Packaging directly, including providing services for, or serving as a director or consultant to, anyone that does business with Paranova Print and Packaging or is a direct competitor.

You and your family (including your spouse, partner or children) should not own, control or have a material financial interest in any of our suppliers, contractors or competitors, or in any business enterprise that does business with or seeks to do business with us.

If the possibility arises where we may form a business relationship with one of your family members, inform your Line Manager and the HR Director.

Most conflicts of interest can be worked out to the satisfaction of both parties. Disclosing all real, potential or perceived conflicts of interest allows all parties to address the issue and prevent the conflict from becoming a violation of this Code.

You should disclose any actual or potential conflicts of interest when you review this Code and certify your compliance each year.

Human rights

In line with the UN Guiding Principles on Business and Human Rights, we base our human rights policy commitment on the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

At a local level this includes conformance with the Ethical Trading Initiative (ETI) base code and the Modern Slavery Act (UK).

We are committed to respecting all internationally recognised human rights as relevant to our operations and supply chains.

We will not tolerate any form of human rights abuse within our company or supply chains.

Fair Labour Practices, Prohibition of modern slavery, forced and child labour

We adhere to fair labour practices concerning wages, working hours, and benefits, complying with all local labour laws and regulations.

We respect our colleagues' rights to fair remuneration, ensuring that all wages meet or exceed the minimum legal standards.

We firmly oppose all forms of child labour, forced or compulsory labour, including human trafficking in all operations and the supply chain.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and the prevention, detection and reporting of modern slavery in any part of its business or supply chains is the responsibility of all colleagues working for Paranova Print and Packaging.

Colleagues are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the business or supply chains of any supplier tier at the earliest possible stage.

Freedom of Assembly

We recognise and respect the right of all colleagues to form and join trade unions and to bargain collectively, in accordance with local laws and international labour standards. We respect the employee's right to elect their representatives freely and independently within the scope of the applicable statutes and laws and guarantee that these representatives will not be subjected to discrimination of any kind.

Protect our assets

You are responsible for protecting our property and other assets from harm, loss or misuse. This includes cash, time, supplies, facilities, equipment, records, computer resources and information systems. Some Managers have specific responsibilities for establishing and maintaining internal controls over certain assets; you are responsible for abiding by and supporting those rules and systems.

Confidential Information

As a Paranova Print and Packaging employee you may learn confidential information that is the property of Paranova Print and Packaging. You cannot disclose or misuse any confidential information about our business or any confidential information that we receive from customers or business partners. You can only disclose confidential information if you are authorised to do so.

You are required to keep all of Paranova Print and Packaging's information confidential even after you leave Paranova Print and Packaging.

Intellectual property

Our intellectual property is one of our most important assets, creating significant value in our business and giving us a competitive advantage in meeting our customers' requirements for the best products in an ever-evolving marketplace. This includes patents, designs and trademarks, copyright in any work that we create, as well as concepts and ideas that we develop, and our trade secrets and know how to do business and the processes that we use.

We will rigorously protect our intellectual property assets. We will not allow any third party to exploit any of our intellectual property unless an appropriate agreement has been put in place. We will also ensure that we have appropriate agreements in place in relation to research and development projects involving third parties that may result in the creation of intellectual

property.

We will also keep confidential details of any product or process that is in development: failure to do so could materially prejudice our rights.

We will also respect the intellectual property of others and use it only if we have secured a valid right to do so.

Please contact the Chief Commercial Officer if you have any questions on intellectual property or if you need an agreement preparing or reviewing.

Information technology

Computer networks and information resources (e.g. e-mail, intranets, websites) are vulnerable to misuse by our colleagues and third parties. They are intended for company-related business only.

You cannot use our technology resources to view, retrieve or send illegal material, sexually related or pornographic material, violent or hate-related material, bigoted or racist material, or any message that is intended to offend or that is likely to do so.

Be aware that **you are not working on private assets and the information on your computer or any of our computer systems is not private**. Always ask yourself before you transmit information: **"Would this embarrass me or the Company if it became public?"**

Data protection

We respect every individual's right to privacy, and we process personal data in compliance with applicable data protection laws, especially within GDPR standards.

Personal data is information that can be used, directly or indirectly, to identify an individual, including names, addresses, dates of birth and identification numbers (e.g. national insurance and passport numbers). It also includes data such as online identifiers and location data, and CCTV images.

Certain types of personal data are considered as special categories and, as such, are subject to more stringent rules on their use, and depend from one country to another one : data relating to race and ethnicity, sexual orientation, health, religious beliefs, political opinions and trade union membership.

Personal data may concern our colleagues, workers or contractors, or individuals working for our customers, suppliers or other business partners, or visitors to our sites.

Whenever we use ('process') personal data in any way including collecting, recording, organising, altering, disclosing, storing and erasing or disposing of it we must do so fairly and lawfully.

Personal data that we process will be relevant and limited to what is necessary in relation to the purposes for which it is being processed.

We will use the data only for the specific purposes for which it was obtained and will retain it only for as long as is necessary for such purposes. We will also ensure that the data that we keep is accurate, including updating it when necessary.

We must keep all personal data secure. You must report immediately any actual or suspected unauthorised use of or access to personal data or any loss, damage or destruction of personal data (or any device on which it is stored).

Please refer to the Paranova Print and Packaging Data Protection Policy for more information on what to do when handling personal data and whom to contact with any questions or issues.

MAINTAIN THE HIGHEST STANDARDS OF PROFESSIONALISM

In addition to maintaining professional standards in conducting day-to-day business, follow these guidelines when such situations arise.

Political Lobbying

Lobbying by corporations is highly regulated. Paranova Print and Packaging does not encourage any political lobbying.

Exceptional requests for financial support for political organisations or candidates need to be approved by the HR team prior to any engagement.

Any political activities you pursue personally must be done on your own behalf and not on behalf of Paranova Print and Packaging.

Fair Dealing

Colleagues and our business partners should deal fairly with each other, our customers, suppliers, competitors, and other stakeholders at all times. Do not act outside reasonable commercial standards of fair dealing.

Any business partner who seeks to have you or anyone else violate the standards of this Code will face consequences, including the cancellation of contracts and a prohibition on any future business.

Relationships in the Workplace

An ethical and collaborative workplace environment includes forming personal relationships with the people you work with.

However, all human resource decisions must be based on sound management practices. Do not give any special employment considerations to a friend, relative or someone you have a close personal relationship with. Conversely, you should not accept any special treatment from a friend, relative or someone with whom you have a close personal relationship.

If you have or are about to enter into a supervisory or subordinate relationship with a relative or someone you have a close personal relationship with which would establish a conflict, immediately inform the HR Director.



REPORTING A CONCERN

We encourage you to report any violation of this code, the law, or any rules or regulations that apply to Paranova Print and Packaging.

Non-Retaliation Policy

Paranova Print and Packaging will not impose sanctions or permit retaliation against a person who reports violations and who has not engaged in such conduct. Any employee who reports a potential violation or raises a concern in good faith is doing the right thing. Whatever means are used to ask questions or report a potential violation should be done without fear of retaliation.

Paranova Print and Packaging will take prompt disciplinary action against any employee who retaliates against the informant, up to and including termination of their employment.

Feel free to use one of three reporting channels offered to you by Paranova Print and Packaging to report wrongdoings safely and anonymously:

Reporting platform at Paranova Print and Packaging Website or via the below email address:

ethics@ParanovaPrintandPackaging.com