Code of Conduct Optimum Group

Optimum Group's mission is to deliver labels and flexible packaging products that help our customers build their brands through a broad portfolio, best-in-class delivery reliability and highly engaged people. And our vision for the future is to be a market leader of labels and flexible packaging products for the Northern European market providing value to our stakeholders through innovative and sustainable products. This all to be fit in our values of being resourceful, future-oriented, together and reliable. Sustainability is the key priority for our group. In all our activities, we strive to minimize the use of resources and produce as little waste as possible. We expand the use of our Green portfolio every year. Furthermore, we offer our customers the use of our Greenliner program for recycling the backing material free of charge. This tradition includes a sustainable way of working and doing business. Optimum Group wants to offer attractive and competitive products and services without compromising on quality, food safety, product requirements, human rights, working conditions and the environment.
Hereby we declare that all members of the Optimum Group follow the following principles;

1. COMPLIANCE WITH LEGAL REQUIREMENTS AND ETHICAL STANDARDS
Compliance with all applicable national and European laws and regulations, industry minimum standards and any other relevant statutory requirements of the countries in which they operate. Should any requirements stipulated in this Code conflict with national legislation, the law shall take precedence. We encourage Optimum Groups to go beyond legal compliance and support the principles of the Optimum Group.

The code of conduct (CoC) strengthens the continued implementation of Optimum Group's commitment to international standards such as the UN Universal Declaration on Human Rights, the Core Conventions of the International Labour Organisation (ILO) and the OECD Guidelines for Multinational Enterprises in order to conduct its business in accordance with the following UN Global Compact principle:

- Respect the internationally proclaimed human rights principles;
- Support the rights of all individuals independent of gender, race and religion;
- Uphold the freedom of association and the right to bargain collectively;
- Provide working conditions that surpass basic health and safety standards;
- Operate good governance practices, in particular in relation to bribery and corruption and conflict of interests;
- Support a precautionary approach to environmental challenges, and undertake initiatives to promote greater environmental responsibility;

Based on the principles, all our Optimum Group members are responsible for ensuring the following commitments outlined in this CoC.

2. REGULAR AND VOLUNTARY EMPLOYMENT
All employees are entitled to a written employment contract in a language they understand. The Optimum Group must not use any form of forced labour. Employees have the right to leave the premises of the Optimum Group after completing a standard workday and are free to terminate their employment provided that they give legal notice to the Optimum Group.

3. FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING
All employees have the right to form, join and organise trade unions of their choice and to bargain collectively on their behalf with the Optimum Group. The interests of the employees shall be respected without the fear of threats or harassment. In countries where the freedom of association is limited or under development, the Optimum Group ensures that a freely elected employee representative can meet with management to discuss wages and workplace issues without negative consequences. Agreements are recorded in the employee handbook. Furthermore, depending on the number of employees, a works council or staff representation is present at each site.

4. FAIR AND EQUAL TREATMENT
All employees are treated with respect and dignity, based on their individual ability and qualifications. Any form of discrimination, on the ground of race, gender, age, religion, caste, national origin, disability, political affiliation, sexual orientation, family responsibilities, marital status or union membership, must not be tolerated. Employees shall not be subject to any physical, sexual, psychological or verbal harassment or inhuman treatment.

5. DIVERSITY AND OPPORTUNITIES
Optimum Group believes it is important that its workforce reflect an accurate reflection of society. Regardless of race, creed, orientation, age or distance from the job market, we want to provide everyone with an equal opportunity to work for Optimum Group. When candidates have equal opportunity and equality during a job application, employees from minority groups will be chosen.

6. PEOPLE WITH A LABOUR MARKET DISADVANTAGE
Depending on the person we hire, if necessary, we will provide the immediate supervisor with the necessary training to supervise the person from the target group. Where necessary, we make budget available to hire external expertise.

Prior to employment, we pay extra attention to determine whether the person from the target group has the same expectations as Optimum Group in terms of tasks and responsibilities. In doing so, we will check that there are no physical/mental limitations to the performance of the tasks and responsibilities and make adjustments if necessary and possible.

We will make the necessary investments in the building, production, workstations and necessary resources that the person from the target group needs to function properly. Examples include an adapted workplace, provision of a lactation room for breastfeeding, driving platform at the front door for people who are wheelchair-bound.

We give people from the target group every opportunity to work at their own pace. In consultation with the manager, we determine the realistic productivity (eg. on the number of quotations to be taken up), possibilities, speed of development and the need to explain aspects several times.

7. PUBLIC POLICY
In a direct sense, Optimum Group does not contribute to political parties or political lobby groups. We perform our work without expressing favor or disapproval.

8. FLEXIBLE WORKERS
The organization takes care of the welfare of its flexible workers by respecting the legal requirements and not participating in constructions of false self-employment. We strive to ensure that flexible workers receive permanent employment, but also respect the fact that some parties like to continue working for us on a self-employed basis.

9. TRAINING AND EDUCATION
Investing in knowledge through training and education is crucial to us. On the one hand to keep the quality of our services at a high level, and on the other hand to respond to the development needs of our employees and contribute to their future prospects. We make every effort to properly educate people. During annual performance and appraisal interviews, we investigate whether employees need training. The managers actively consider this.

10. FAIR REMUNERATION AND BENEFITS
All employees are timely paid at least the national legal minimum wages. All employees are also provided legally mandated benefits, including holidays and leaves and statutory severance when employment ends. Deductions from wages and benefits as a disciplinary measure shall not be permitted. Agreements concerning remuneration and benefits should be comprehensible to the employees.

11. DECENT WORKING HOURS
Working hours will not exceed the statutory limit. Overtime is voluntary, and always be compensated at a premium rate as defined by national law. In countries where working hours are not limited by national law, for the sector in question, adequate rest periods are regulated between the Optimum Group and the employees.

12. HARASSMENT
Optimum Group is committed to ensuring that all of its employees feel free and safe within the organization. By harassment, Optimum Group means, among other things, sexual harassment and abuse of power. Harassing one another in the workplace is not permitted. Optimum Group expects all its employees to refrain from intimidating others. Such behavior will not be tolerated. Employees are encouraged to report any form of harassment to management and/or supervisor. Incidents reported will never have negative consequences for the person making the report and will always be handled in a confidential manner. Management will investigate and handle all problems, complaints or incidents of harassment in a fair and prompt manner, with as much respect for everyone's privacy as possible. A system of confidants is in place inside and outside

the organization. Employees obviously retain the right to seek help outside the organization in the event of harassment.

13. HEALTHY & SAFE WORKPLACE

The Optimum Group provides its employees with a working environment which is safe, hygienic and conductive to good health. As a minimum, potable drinking water, adequate lighting, temperature, ventilation, sanitation and personal protective equipment shall be provided together with securely equipped workstations. The Optimum Group establishes and follows clear procedures on occupational health and safety and take effective steps to prevent potential accidents and injury. If the Optimum Group provides accommodation, it shall be clean and safe and meet the basic needs of the employees.

We strive to have no workplace accidents within our organization. Optimum Group strives to ensure that it can never be blamed for having been negligent in the area of safety. Furthermore, we strive to properly monitor the health of our employees and allow employees to work in a healthy and safe manner by observing the Occupational Health and Safety regulations for safe working and working hours. We strive to minimize absenteeism and monitor this on a regular basis.

14. SECURITY POLICY

Information is one of the most important resources of an organization. The databases, computers and servers are secured with passwords that are changed regularly. The system is secured with a firewall through automatic up-dates of the anti-virus program. All information regarding employees and customers are secured. Security in the area of automation is checked annually by an independent party. The rules from the General Data Protection Regulation are respected and guaranteed. For further information concerning General Data Protection Regulation see employee handbook.

15. NO CHILD LABOUR

The Optimum Group's operations are free from child labour. No child below 15 years is allowed to work, subject to exceptions allowed by national or international law. No person under the age of 18 is employed in hazardous or heavy work except for the purpose of training or under strict supervision within approved national laws and regulations.

16. INDIGENOUS PEOPLES RIGHTS

The Optimum Group take into account indigenous peoples' rights in their operations and activities.

17. BRIBERY AND CORRUPTION NOT ALLOWED

The Optimum Group prevents all forms of corruption, including extortion and bribery. The Optimum Group shall never, directly or through intermediaries, offer or promise any improper advantage in order to obtain or retain a business or other advantage from a third party. The Optimum Group will not, directly or through intermediaries, pay or accept bribes, arrange or accept kickbacks. The Optimum Group will not, directly or indirectly, offer gifts to Optimum

Group employees or persons representing Optimum Group or anyone closely related to these, unless the gift is of insignificant value.

18. EMPLOYEE CONTENTMENT

Optimum Group continuously monitors employee contentment. Management and supervisors regularly solicit input from the organization on what concerns employees and where needs lie. By continuing to communicate with employees and responding to action items, we keep our employees satisfied.

An employment contract has also been drawn up with all employees. Within the labour contract, we formulate the ground rules for the execution of the cooperation between our company and the individual employees. The tasks, responsibilities and authorities of all employees are also defined in the job descriptions in our management system. We strive to be good employers in order to have satisfied employees.

19. ANTI-COMPETITIVE CONDUCT

Optimum Group complies with applicable laws and regulations. For our primary business operations, this means that we do not engage in any anti-competitive activities towards our competitors. In the event of a warning or sanction, we will consider whether corrective action is necessary to avoid such warnings in the future.

20. HEALTH AND SAFETY OF CONSUMERS

During production, we make every effort to ensure the health and safety of consumers. Optimum Group complies with applicable laws and regulations. Most sites are BRC certified, so the safety of our product is assessed by an independent party.

20. CARING FOR THE ENVIRONMENT

The Optimum Group has procedures in place to secure compliance with the requirements of applicable environmental legislation and regulations. Also, the Optimum Group has knowledge of the environmental impacts of its operations and shall continuously strive to reduce impacts and improve environmental performance in a systematic way. Improvements should cover reduction of energy and water use, emissions and waste as well as the reduction and/or substitution of hazardous chemicals. The Optimum Group promotes the use of FSC-certified materials. Where possible the Optimum Group purchases from FSC certified companies. The Optimum group is constantly searching for and testing more environmentally materials. In addition, we want to encourage customers to use raw materials smartly and recycle the products. The products are developed according to the principles of circular product design, in which the entire life cycle is analyzed. We do this in part through our Greenliner certificates. Waste is separated into different waste streams and collected by approved processors.

21. ENERGY

Optimum Group will report every year from 2023 on our CO2 emissions and our energy reduction we achieve. We have taken various measures to save and/or use energy sustainably. In addition, we have included various actions as policies around energy consumption, such as;

- Continuously striving to reduce energy based on our measurements and KPIs

- Following our environmental instructions
- Turning off lights when rooms are left for long periods of time.
- Turning off machines or equipment, if technically possible, when they are not being used.
- Doors and windows closed.
- All offices and production areas are equipped with LED lightening or will be replaced in the near future.
- When purchasing new equipment, energy consumption is taken into account.
- We buy green electricity.

The objective is to use energy (electricity and gas) as efficiently as possible, which can be achieved by consistently seeking improvements, purchasing energy-efficient equipment and making responsibility clear to employees.

22. WATER CONSUMPTION.
Objective is to use water as efficiently as possible. Employees are instructed on this.

23. WASTE
We separate our waste as best we can. Within our company we have different waste streams such as paper, plastic and chemical waste.

24. VEHICLE FLEET
In the context of corporate social responsibility and in line with our vision of sustainability, Optimum Group's policy is to go green and make its vehicle fleet more sustainable. Electric driving is therefore becoming the norm. If an electric car is not available within the category or the use of an electric car restricts the employee's functioning, ordering a car with a fossil or hybrid fuel engine may be allowed with the approval of the manager and administrator. For those employees authorized to deviate from the electric car, a fuel car with limited CO2 emissions is preferred.

25. HAZARDOUS SUBSTANCES
We strive to use as few hazardous substances as possible. This means that we have made an inventory of the substances we use and are always looking for alternative (environmentally/user-friendly) options. Furthermore, various environmental measures have been taken to prevent the leakage of hazardous substances. In terms of health and safety, we provide all PPE so that our employees can work safely. Specific instructions on how to handle hazardous substances are laid down in our management system.

26. IMPLEMENTATION AND MONITORING
The Optimum Group is expected to implement the principles described in this Code of Conduct in its own business or have at least equivalent standards adopted and conduct its business in accordance therewith. The Optimum Group makes available these principles to all its employees.

27. EFFECTS ON SOCIETY
A fine or warning from the (local) government, will be recorded. Any complaints from customers, suppliers or other stakeholders regarding our Corporate Social Responsibility will also be recorded.

28. CONTRIBUTION TO LOCAL ECONOMY AND BUSINESS ACTIVITY

Where possible, Optimum Group offers work, learning and/or internship opportunities to people distant from the labour market. Furthermore, Optimum Group promotes various initiatives that support the local economy in various ways. Of course, we are always open to suggestions from our employees for activities and sponsorship.

If you want to report violation or make remarks of the Code of Conduct, you can contact our designated officer, Operation Manager Benelux Annelies Börgeling, mail annelies.borgeling@optimumgroup.nl, phone 0031 (0)6 13 996 528.

Signed by:

Date: January 7, 2026
Name: André Prophitius
Position: CEO, Optimum Group

Signature: