

POLICY STATEMENT

PilloPak B.V has the ambition, in the interest of the continuity of the company and taking into account its social responsibility, to continuously meet the high expectations of the external and internal environment in the areas of quality, food safety, labour and human rights, environment and ethics.

To establish our values and principles that guide our actions and decisions, we have developed policies on the following topics: quality & food safety, human rights, occupational health & safety, environment & sustainability and ethics.

Our policy broadly focuses on:

- The development and production of **innovative (food) safe products**, with a strong focus on functionality, weight reduction and use of materials from sustainable sources;
- The wishes, needs and expectations of **external and internal stakeholders**;
- Maintaining a corporate culture based on **respect, openness and trust** and with **safe and healthy** working conditions;
- Reducing our environmental impact generated by our business processes.

We commit ourselves to the applicable national and European laws, regulations and directives and to the codes of conduct developed by our parent company Palm:

<https://www.palm.de/nachhaltigkeit/selbsterklaerungen.html>

Scope

This policy applies to all employees who perform work for us on the authority of PilloPak. Also, this policy applies to external stakeholders who supply services and raw materials to us.

Responsibility

Within PilloPak, the Management Team is responsible for implementing the policy set out in this document and providing resources to make this possible. The Management Team ensures that the policy is actually implemented and monitors progress.

Communication

We inform all employees of this policy and the resulting agreements. We also disclose our policy to the public and other interested parties via our website: <https://www.pillopak.nl/>

We communicate the results of the objectives to our employees through a visual representation based on our 5 key indicators:

- EBITDA
- Productivity
- Customer complaints
- Waste
- Work-related accidents

Review

This policy will be reviewed and revised, if necessary, at least every year.

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Quality and food safety policy

PilloPak has set itself the goal of being an 'independent and long-term partner in high-quality corrugated board solutions'. Our quality objective is as follows:

We strive to deliver products that meet the quality and requirements agreed upon with the customer, within the delivery period agreed upon with the customer. High customer satisfaction is important to us.

We aim to comply with laws and regulations regarding the production of (food) safe products. To achieve our quality objective, we have implemented a quality and hygiene management system. In addition to this management system, we realise that the quality and food safety culture within our company makes an important contribution to meeting our objectives, which is why we work on the continuous development of the quality and product safety culture to ensure optimum implementation of the quality and hygiene management systems.

We aim to achieve our quality and food safety objectives by, among other things:

- A motivated team of sufficient and properly trained staff;
- A suitable working environment, in which staff enjoy working;
- Selecting the right suppliers of raw materials, auxiliary materials and services and assessing them permanently for their performance;
- Employing efficient, effective and flexible internal processes;
- Providing the right resources and physical environment to develop, manufacture and sell the products;
- To be committed to continuous improvement in all facets of our processes;
- To install, communicate and maintain procedures, instructions and maintenance schedules to ensure a hygienic production environment;
- Conducting internal audits, inspections and a management review to continuously improve the level of quality and hygiene.

The implementation of this policy is supported by our ISO 9001:2018 and BRCGS Packaging certificates and the issuance of Declarations of Compliance for packaging intended to come into contact with food.

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ESG policy

PilloPak strives to make a positive contribution to the economy, society and the environment to enable sustainable growth. Sustainability is an important theme for us and we have elaborated this in our ESG policy. ESG stands for Environmental, Social and Governance and we have elaborated this in three sections:

- 1) Environment and sustainability policy;
- 2) Labour and human rights;
- 3) Ethical business conduct / Governance.

PilloPak is part of the Palm Group. The Palm Group is also committed to Corporate Social Responsibility and has developed a Code of Conduct for this purpose. This Code of Conduct can be found in this link and we follow it at: <https://www.palm.de/nachhaltigkeit/selbsterklaerungen.html>

Chain responsibility

Responsibility for environmental, labour, human rights and ethical behaviour lies not only with ourselves, but also in our suppliers and supply chain. We ask our suppliers, based on risk and turnover, to comply with our general ESG policy points by having them to sign a Code of Conduct.

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1) Environment and sustainability policy

Reducing environmental impacts through our business activities and managing environmental risks are integral to our day-to-day business objectives. Bringing our lightweight corrugated paper solutions to market reduces the pressure on the use of fossil fuels.

Energy Consumption

Due to the nature of our processes, energy consumption is a material issue. We are aware of this and strive for efficient and effective processes, machinery and equipment to reduce our internal energy consumption as much as possible. We actively monitor and document our energy consumption and annually look for new opportunities to reduce our energy consumption.

Greenhouse gases and other emissions

We monitor our greenhouse gas emissions through a CO2 footprint report, prepared under the supervision of our parent company by an independent agency.

We contribute to reducing greenhouse gas emissions in the chain by striving to develop products that are stackable and as light as possible. We also deliver full trucks whenever possible to reduce the impact of transport on the environment as much as possible.

We minimise possible emissions from our processes, such as noise emissions and emissions to soil and air, and comply with laws and regulations in this respect.

Raw materials, natural resources, biodiversity protection and deforestation-free supply chains

We treat the raw materials we use responsibly. We are committed to protecting and preserving natural ecosystems and biodiversity. Our raw materials are mainly made of natural products (wood) and we consider it important that these do not contribute to deforestation. We therefore purchase from reputable European paper suppliers under FSC logo and comply with EUDR legislation.

We aim to minimise the waste of materials and raw materials by working with efficient and effective processes.

Water use and handling of industrial wastewater

Water quality and water availability are becoming an increasingly important issue, also in the Netherlands. Although our processes use relatively little water, we want to handle water use responsibly and monitor our consumption periodically.

During our processes, wastewater is released. We aim to generate as little wastewater as possible. Measures are in place to prevent wastewater generated from entering groundwater.

Hazardous substances and prevention of environmental pollution

We are aware that the use of hazardous substances can have consequences for people and the environment. We keep the use of hazardous substances as low as possible. In those areas where hazardous substances are handled, measures have been taken to minimise the consequences of incidents during transport, storage and use.

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Where refrigerants are used, they comply with laws and regulations. Cooling installations are periodically inspected to prevent exposure of these coolants to the environment.

Waste

It is our policy to keep waste to a minimum; we monitor our waste percentage periodically. The waste we generate is taken to recycling companies wherever possible. Hazardous waste we dispose of responsibly according to the law, so that the impact on the environment is as low as possible.

We have detailed our environmental responsibility and commitment to sustainable operations in our management systems. These management systems are certified according to ISO 14001: 2015, ISO 50001: 2018 and FSC.

Objectives

To strengthen our environmental and sustainability policy, we have formulated objectives. From these objectives, improvement measures are taken annually. The realisation of the objectives is monitored by the Management Team.

1) Reduction of energy consumption

Goal: reduction of the energy consumption (gas and electricity) of our processes. Each year, a percentage to be achieved is set.

This target is monitored by measuring our monthly energy consumption and realised by implementing various energy-saving projects to be determined annually.

2) Reduction of waste percentage

Target: reducing the waste percentage from our processes (paper waste). The target is measured in amount of disposed (old) paper compared to the amount of purchased paper. A reduction target is set each year compared to the previous year.

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2) Labour and human rights (social responsibility)

PilloPak aims to be a good employer for all its employees and contribute to our community. The safety, health, well-being and satisfaction of all people involved in our organisation are paramount. We strive to create a culture where staff are intrinsically motivated to make safety a top priority in their work. All employees have equal opportunities and are treated with respect and dignity in a diverse and inclusive working environment.

Within our company, we respect and promote fundamental human rights such as, among others, the principle of free choice of employment, freedom of association and collective bargaining and compliance with the minimum age of employment stipulated in national legislation and various ILO standards. In this, we follow the Palm policy: <https://www.palm.de/nachhaltigkeit/selbsterklaerungen.html>

Freely chosen employment

All our employees, including hired workers, work for us by choice. This means that:

- We do not accept forced labour, forced employment, involuntary or exploitative prison labour, slavery or human trafficking within our company and supply chain;
- All our employees, hired workers or third-party employees do not have unreasonable restrictions on entering or leaving the premises at PilloPak. Due to security considerations, access restrictions through badges may be set to specific areas based on 'need to do and need to know' principles;
- Recruiting and hiring staff is done through transparent processes and honest communication about the work to be carried out, contract conditions, working hours and wages to prevent forced labor. We also ask this of our employment agencies;
- Employees are not asked to pay recruitment surcharges to either PilloPak or the employment agency;
- We do not keep, retain, destroy or deny access to original identity documents or other personal documents such as residence permits or work permits. We also require this from our employment agencies.

Child labour

We respect the recommendations of the ILO Conventions on the minimum age of employees coming to work for us; including hired staff from third parties. This means children under 15 years of age, as well as children still required to attend school, will not be employed. If child labour is found, we will take and document corrective action to allow the child to return to school. If children under the age of 18 come to work, it can only be as part of an apprenticeship from training, where a contract with the training body is present. If such persons are employed at PilloPak, specific rules are followed to ensure their health and safety.

Fair pay and working hours

We respect national rules on working hours, breaks, wages and fringe benefits. Employees' working hours, including overtime, are paid at least according to the legal minimum wage or the wage stipulated in the applicable collective agreement. Our employees receive insightful periodic pay slips, which clearly show the composition of the salary. We also request this from our employment agencies. We will not make unlawful

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deductions from wages. Wages are calculated transparently and employees can obtain explanations at all times.

Humane treatment and anti-discrimination

Discrimination

We do not discriminate on the basis of gender and gender expression, nationality, ethnic or social origin, skin colour, health, religion, disability, political opinion, ideology, age, pregnancy, marital status or sexual orientation. These aspects do not influence our hiring policy of new staff, the setting of salary, contract extension or the possibility of promotion. We ask the same of our employment agencies.

Diversity and equal treatment

We promote diversity and equal opportunities to the best of our ability and offer employees internal and, where applicable, external training to enable them to perform their jobs to the best of their ability and grow in their positions.

Appropriate prayer space is provided if required.

Bullying

We do not allow our employees to intimidate, discriminate and bully each other. We consider any form of (sexual) threat and intimidation inadmissible. Swearing, physical- online- or verbal harassment, threats or violence are inadmissible; whether during working hours or outside working hours.

Employees can at all times submit a complaint about this with their manager and/or confidential advisor and will not be disadvantaged in any way as a result.

Freedom of association

Employees at PilloPak have the right to associate, bargain collectively or strike. Employees will not be discriminated against if they form, join or are members of such an organization. Employee representatives will have free access to the employees' workplace.

Whistle-blowing and grievance procedure

Employees can at all times share their concerns, complaints and ideas with their managers, with the Works Council (OR) or with the specially appointed confidential advisers. The members of the Works Council and confidants are made known to staff.

An employee whistleblowing policy is in place for reporting complaints within the company, employee misconduct and all potential violations of applicable legislation and/or company guidelines. We follow the whistleblower scheme of our parent organisation in this regard: [Notice guideline: Palm Gruppe](#)

We take responsibility for respecting the law, in particular internationally recognised human rights and environmental standards, both within our company and through appropriate risk management within our supply chain. Violations of the law and, in particular, of human rights and environmental standards can have serious consequences for us, our parent organisation Palm and our sister organisations, our employees, our business partners and other affected parties and should therefore be identified at an early stage in order to be able to take appropriate countermeasures and prevent potential damage.

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In accordance with the Supply Chain Due Diligence Act (LkSG), our parent organisation Palm has established an effective complaints procedure to monitor compliance on an ongoing basis. This complaints procedure can be used to raise concerns about human rights and environmental violations about our company:

[German Supply Chain Due Diligence Act: Palm Gruppe](#)

Employees and other individuals who complain about our organisation will be protected and not disadvantaged in any way.

Career management and training

We strive to ensure that our employees have sufficient knowledge to do their jobs well. We achieve this by providing internal training courses. We think along with employees for opportunities to grow in their position or possibly other positions within PilloPak and, where possible and applicable, offer them the possibility of attending external training or education. Training courses or education offered by PilloPak are not charged to the employee concerned, except when leaving the company in accordance with a previously agreed arrangement.

Health and safety

Working safely is a priority at PilloPak. Together with intrinsically motivated employees, we aim to create the safest possible working environment and culture. To achieve this, we have implemented various measures:

- Providing training on safety.
- Having safe machines and assets by carrying out machine RI&E, maintenance, testing and inspections.
- Installing and maintaining processes to report accidents and near misses to prevent recurrence and taking measures for improvement.
- Striving to maintain a healthy climate in our production halls and offices.
- Prohibiting the use of drugs and alcohol before and during working hours or working under the influence of these substances.
- Offering a health monitoring programme that can be participated in on a voluntary basis.
- Conducting employee satisfaction surveys to monitor employee satisfaction.
- Taking appropriate measures to protect pregnant women and breastfeeding mothers.
- Appointing prevention staff.

Our health and safety policy is supported by an H&S management system certified to ISO 45001: 2018.

Targets:

0-accidents:

PilloPak aims for zero accidents within the company in all processes. We aim to continuously improve performance; each year we aim for a 50% reduction compared to the previous year.

Near-accident reporting:

By encouraging near-accident reporting, continuous improvement can be achieved. A target number of reportable near-accidents is set each year.

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3) Ethical Business Conduct / Governance

We are committed to transparency about our environmental, social and economic impact, progress and performance. We are convinced that business integrity is the foundation of any commercial relationship. In our relationships, both in the supply chain and towards our customers, we strive for sustainability, reliability and integrity.

In the area of Governance, we adhere to the code of conduct drawn up by Palm:

<https://www.palm.de/nachhaltigkeit/selbsterklaerungen.html>

With this, we declare that bribery, fraud, money laundering, conflicts of interest and corruption have no place in our company and will not be tolerated. We will maintain effective internal and external controls and effective financial reporting processes to ensure the accuracy and reliability of our financial results.

Fair trade

We respect the standards of fair trade, fair advertising and fair competition and applicable antitrust and competition laws. We do not condone agreements and other activities that affect prices or terms and conditions and thus lead to unfair competition.

Confidentiality and data protection

We aim to handle personal data responsibly. In collecting, storing, processing and transferring personal data, we observe applicable laws and regulations.

Intellectual property

Confidential information obtained through stakeholders, including customer information, is treated confidentially. We will not unlawfully transfer and/or sell confidential information to other parties. If confidential information is transferred, we do so in a manner that respects the rights to intellectual property and customer information.

Bribery and corruption

We do not tolerate any form of bribery, corruption, extortion and embezzlement. We conduct our business transactions impartially and not on the basis of gifts, gratuities or hospitality given or received. The receipt or giving of such gifts by PilloPak staff is prohibited unless it represents a very small amount (guideline < 10 euros).

Donations:

We do not make contributions to political parties, candidates for political positions or other political organisations. We can only make donations to nationally recognised charitable funds if required.

Disclosure of information

We will record and report all necessary information, including accounts, promptly, accurately and completely. All records will be kept in accordance with laws and regulations. To ensure transparency, we will have our financial accounts audited annually by a competent external auditor.

We will never knowingly conceal defective work or material, falsify data or make false certifications or claims regarding our products.

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Goals:

Anti-competitive incidents

Fair trade is important to us. We aim for zero confirmed anti-competitive incidents every year. This target is monitored by our Controller.

PilloPak BV



J.M. Tuininga

Managing Director

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