Rotapack Zrt. CODE OF ETHICS Identification: RP IIE 7.5-01_EK Page: 1/7 Alteration: Date of alteration: Date of alteration:

I. Labor Policy

On behalf of the management of RotaPack Zrt., we declare that

- We will implement the provisions of the ETI Basic Code,
- We will comply with the expectations of all our customers, including customer-specific codes of conduct,
- We will comply with the expectations of regulatory organizations,
- We will continuously improve our social responsibility.

We recognize all points of the ETI Basic Code as binding on us:

- The right to free choice of employment
 - ♦ We reject all forms of forced labor. Including, for example, forcing employees to take on work-related loans, punishment for refusing to work overtime, and the prohibition of leaving the company's premises.
 - ♦ We declare that all overtime not included in the employment contract is strictly voluntary.
 - We declare that the company does not enter into subcontracting agreements with prisons or companies known to be subcontracting with prisons, unless required by law.
 - We declare that we only work with licensed employment agencies that comply with all applicable laws and codes of conduct.
- Free exercise of the right to association and the application of collective bargaining
 - ♦ In the recruitment, remuneration, payment, and other agreements we conclude with our employees, we do not take into account their membership or membership in a trade union or other interest-protection organization negatively.
 - ♦ The employer demonstrates an open attitude towards the activities of trade unions and their organizational activities.
 - Pursuant to Section 231 of the Labor Code, we do not restrict our employees from forming a representative organization or joining an organization of their choice under the conditions specified by law, or from staying away from such organizations. Interest-representative organizations are entitled to establish or join associations, including international associations. Employees are entitled to establish a trade union at their employer and to conclude a collective agreement. The trade union may operate bodies at the employer and may involve its members in their operation.
 - Pursuant to Section 271 of the Labour Code: The employer shall not discriminate against our employee representatives, and they shall have the opportunity to exercise their representative powers at work. We shall not oblige our employees to declare their membership in a trade union. We shall not make the employment of our employees dependent on whether they are members of a trade union, whether they terminate their previous trade union membership, or whether they agree to join a trade union designated by the employer. We shall not discriminate against our employees based on their

www.rotapack.hu Page: 1/7

Rotapack Zrt. CODE OF ETHICS ROTAPACK Identification: RP IIE 7.5-01_EK Page: 2/7 Alteration: Date of alteration:

membership in a trade union or their trade union activities, nor shall we terminate their employment based on this. We shall not make entitlements or benefits dependent on membership in a trade union or on their absence from it.

- We provide safe and hygienic working conditions
 - We state that our employees can choose where they live and that companyprovided accommodation is only one option.
 - ♦ We state that we provide a safe and clean place for all employees staying in our accommodation.
 - ♦ We state that the cost of company-provided accommodation is below local rents and that all employees pay the same rate.
 - We declare that we provide our employees with unlimited drinking water.
 - ◆ All employees staying in the accommodation provided by us will have their own bed.
 - We ensure the separation of men and women in the accommodation.
 - ♦ We ensure the free movement of the residents of the accommodation while observing safety conditions.
- We do not employ child labor
 - We declare that we do not hire or employ persons under the age of 16.
 - ♦ We declare that we do not restrict our employees over the age of 16 from completing their compulsory school education.
 - ♦ We declare that we do not order extraordinary working hours or night work for persons under the age of 18. The employer only employs young employees for work that cannot have adverse consequences for them, considering their physical constitution, development, and health status.
 - ♦ We declare that if a young employee is employed by the employer, his employment is carried out in accordance with Section 114 of the Labour Code and the employer takes into account the special rules applicable to young employees during the existence of the legal relationship.
 - We declare that if child labor is discovered, the company will remedy the situation, taking into account the best interests of the child and his family.
 - We declare that we comply with all relevant legal and customer requirements in this regard.
- We pay wages that are sufficient to live on
 - We declare that we pay our employees wages that meet the current minimum wage or the industry minimum and are sufficient to meet the basic needs of employees and to be able to spend them at their own discretion.
 - ♦ We declare that we comply with the Labor Code in paying overtime and working on public holidays, as well as the provisions on wage protection specified in the law.
- Working hours are not excessive

www.rotapack.hu Page: 2/7

Rotapack Zrt. CODE OF ETHICS ROTAPACK Identification: RP IIE 7.5-01_EK Page: 3/7 Alteration: Alteration:

Date of alteration:

- ♦ The prescribed weekly working hours do not exceed the time specified in the Labor Code.
- ♦ We declare that we ensure that all employees are legally entitled to a break during their working hours.
- ♦ The employer ensures the daily rest period according to the law, at least eleven consecutive hours of rest between the end of work on that day and the start of work on the next working day.
 - ➤ We declare that our employees receive their weekly rest day as required by law.
- ♦ We declare that all overtime is voluntary, meaning that employees do not face any sanctions for refusing to work overtime, including threats, intimidation, and loss of company-provided transportation.

Avoid discrimination

- ♦ We are committed to equality in the workplace and reject all forms of discrimination. We consider discrimination to be any distinction that arises from personal or physical differences, exclusions, or attitudes and deprives people of equal opportunities or equal treatment in their application. This statement has been drawn up in accordance with Section 7 of the ETI Basic Code, Act CXXV of 2003 (Act on Equal Treatment and Promotion of Equal Opportunities), and the following ILO Conventions: C100: Equal Remuneration, C111: Discrimination (Employment and Occupation), C183: Maternity Protection Convention.
- ♦ We expressly prohibit discrimination against our employees in hiring, salary and other benefits, promotion opportunities, disciplinary matters, grievance handling, termination, or retirement benefits based on:
 - Age
 - Caste
 - Color
 - Disability
 - Gender
 - Sexual orientation
 - Health status (including HIV, hepatitis B)
 - Marital status
 - Nationality
 - Social, national, or ethnic origin
 - Migrant worker status
 - Political opinion
 - Race
 - Religion
 - Trade union membership.
- We declare that we protect all our employees from all forms of discrimination, including our own employees, temporary workers, apprentices, and trainees.

www.rotapack.hu Page: 3/7

Rotapack Zrt. CODE OF ETHICS Identification: RP IIE 7.5-01_EK Page: 4/7 Alteration: Date of alteration:

- We expressly prohibit questions about pregnancy when applying for a job with women and do not require pregnancy tests for our female employees.
- We provide regular work
 - ♦ We declare that all workers (employees, temporary workers, contract workers, and home workers) receive a formal employment contract that clearly defines the terms of employment.
 - We declare that the company does not use consecutive fixed-term contracts in place of full-time or part-time employment.
 - ♦ We declare that the salary and other benefits of probationary employees are determined similarly to those of permanent employees after the probationary period.
 - We declare that temporary employees have the same wages, benefits, and other employment conditions as permanent employees after a specified period.
 - ♦ We declare that the training period of those who spend their practical time during their studies at our company is of limited duration and is limited only to acquiring the practical skills necessary to acquire their profession or to preparing them for regular employment.
- No harsh or inhuman treatment is allowed
 - ♦ Discipline:
 - We draw the attention of our managers to the fact that we prohibit verbal and physical abuse and other inhuman disciplinary practices.
 - Discipline is aimed at increasing performance and is not done for the sake of punishment.
 - We do not apply fines and wage deductions for the sole purpose of punishment.
 - We adhere to the practice of proportionate discipline.
 - ♦ Handling of complaints:
 - We ensure that employees can report their grievances without fear of punishment, dismissal, or any form of intimidation.

II. Occupational safety and health policy

On behalf of the management of RotaPack Zrt., we declare that in this area:

We implement the provisions of the ETI Basic Code,

- We comply with the expectations of all our customers, including customerspecific codes of conduct,
- We comply with the expectations of regulatory organizations,
- We continuously improve our performance in occupational safety and health.

www.rotapack.hu Page: 4/7

Rotapack Zrt. CODE OF ETHICS Identification: RP IIE 7.5-01_EK Page: 5/7 Alteration: Version 1 / 2024.03.01. /Valid until revoked/

Date of alteration:

We declare the following:

- We hold occupational safety and health training. We do this regularly, but we also hold extraordinary training in the event of the introduction of new machines and technologies. During this, we explain the relevant regulations and specify the specific safety and health hazards for the workplace:
 - the relevant sections of the Occupational Safety and Health Policy,
 - the rules for safe working,
 - emergency procedures (including evacuation procedures),
 - ♦ the reporting and recording procedures required in the event of an injury, illness, or other emergency,
 - the general safety and health hazards present in the plant,
 - employees receive specific safety and health training for their workplace at the start of their employment,
 - ♦ If our employee is assigned to a new position, they also receive training for the new location before they start working.
- Regarding emergency and fire response:
 - We prepare for likely emergencies, including fire.
 - We make sure that all our employees are safe in the event of an emergency.
 - We comply with the rules set out in the law, ISO 14001, and this policy.
 - ♦ We keep all our employees up to date with introductory and refresher training and exercises.
- Regarding the safety of machines and forklifts:
 - We carry out a risk analysis to identify the hazards arising from the operation of our machines and forklifts.
 - ♦ We identify these before first use and ensure that those working on these machines and forklifts are trained on them.
 - We make sure that employees have mastered the prescribed precautions and understand the risks.
 - We develop safe work procedures for all tasks that may pose a potential safety risk to employees.
 - We investigate accidents involving all our machines and forklifts. We find the root causes and take corrective and preventive measures to prevent the same or similar accidents from happening again.
- Regarding hazardous materials:
 - We transport, store, and use our hazardous materials safely and carefully.
 - Our employees receive appropriate training on the handling, proper storage, and transportation of hazardous materials.
 - ♦ Our young employees, pregnant women, nursing mothers, and other employees at risk are not allowed to work with hazardous materials.
 - ♦ We provide our employees with the necessary personal protective equipment.

www.rotapack.hu Page: 5/7

Rotapack Zrt.	R © TAPACK [®]
CODE OF ETHICS	Identification: RP IIE 7.5-01_EK
	Page: 6/7
Version 1 / 2024.03.01. /Valid until revoked/	Alteration: Date of alteration:

- We draw the attention of our employees to the dangers arising from the use of materials. To this end, we make the safety data sheets of the materials freely available.
- ♦ Hazardous waste is collected separately and transported by an authorized company.
- Regarding the health of our employees (Industrial Health):
 - We ensure immediate and appropriate medical care for all workplace injuries and illnesses. We provide trained first aiders and the necessary medical equipment for this.
 - ◆ Pre-employment and regular medical examinations are mandatory for employees. The examinations take place at our premises.
 - We pay special attention to preserving the health of our young employees, pregnant women, nursing mothers, and people with disabilities..
- Regarding cleaning and hygiene:
 - ♦ We ensure that our employees maintain a clean and healthy working environment.
 - ◆ We ensure that an adequate number of functioning and clean toilets are available.
 - We ensure constant and unlimited access to drinking water.
 - ♦ We ensure that the area intended for heating food, eating, and washing dishes is kept clean.
 - ♦ We ensure the free passage of escape routes and stairwells. It is forbidden to store any materials, products, or waste in these places.
 - We ensure that work areas and traffic routes will not be slippery: no water, oil, dust, or debris should be allowed in these areas.

III. Supplier policy

We require all our suppliers to operate legally and adhere to the ETI Core Code (or equivalent regulations). We regularly audit and verify our suppliers' compliance.

We provide awareness and capacity-building training to our suppliers.

We work with our suppliers to initiate corrective actions in the event of identified non-compliance. We consider our suppliers' social and environmental performance when awarding or renewing contracts. We continuously improve the social and environmental performance of our company's supply chain.

www.rotapack.hu Page: 6/7

Rotapack Zrt. CODE OF ETHICS ROTAPACK Identification: RP IIE 7.5-01_EK Page: 7/7 Alteration: Date of alteration:

IV. Business Ethics Statement

Our company's core values include pursuing ethical business practices, which are unanimously supported by the owner, the board of directors, and senior management, and as a result, the company does not participate in any bribery or corruption.

We are committed to the following:

- We comply with domestic and international laws and regulations applicable to us.
- ♦ We comply with the ethical expectations of our customers, including the codes of conduct of our partners.
- We continuously improve our ethical business conduct standards.
- We declare the following:
 - Bribery, corruption, and extortion are prohibited in our company.
 - ♦ Business gifts may only be given and accepted in nominal value, primarily to safeguard our business relationships and reputation.
 - We protect the intellectual property and information of the company and its customers. We also ensure limited access to the sensitive data of our employees. We lock data stored on paper with a key and restrict computer access.
 - ♦ We use fair business practices. We do not engage in backdoor deals and do not provide false or misleading information in our advertising activities.
 - We protect the identity of whistleblowers. We thoroughly investigate and handle all ethical violations reported to the company.
 - We keep accurate financial records and have our business reports certified.
 - Our company cooperates with government agencies investigating bribery and abuse of power.
 - Our company demonstrates ethical business conduct through its transparent financial reports.

Date: Szeged, 1 March 2024.

Ferenc Kajtár

CEO

www.rotapack.hu Page: 7/7