

# Code of Business Conduct and Ethics

## INTRODUCTION

The purpose of this Code of Business Conduct and Ethics (the “Code”) is to provide a framework for making ethical business decisions in the course of LEEPAK JSC’s and its subsidiaries’ (“Leepak” or the “Company”) business, to establish the importance of exercising sound, ethical judgment and to recognize the shared values we have with our customers, stockholders, employees, suppliers and other third parties with whom we do business, having regard for the OECD Guidelines for Enterprises. All directors, officers, employees, agents, contractors and secondees of the Company, are subject to the Code (each such person is sometimes referred to in this Code as “you”).

Our business-related conduct both inside and outside the Company will be guided by the following values:

- integrity in all dealings;
- create value; innovate;
- respect people; create a positive culture for teamwork; and
- responsible, results-oriented performance.

Any waiver of the application of the Code with respect to directors or executive officers must be approved by the Board of Directors of the Company (the “Board”) or its designated committee and must be disclosed to the extent required by law or regulation.

## GENERAL PRINCIPLES

The Company expects and requires you to adhere to the following standards of conduct:

- honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships in accordance with law and the Company’s policy regarding conflicts of interest;
- full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with, or submits to, the Securities and Exchange Commission (or investors) and in other public communications made by the Company;
- compliance with applicable governmental laws, rules and regulations and the Company’s policies;
- the prompt internal reporting to an appropriate person or persons as identified in this Code (or use of the Company’s confidential reporting system) of violations of the Company’s policies; and
- accountability for adherence to the Code.

## I. POLICIES AND PRACTICES

### A. Compliance with Laws

You must obey the laws of the jurisdictions that apply to you. Where necessary, seek guidance from your supervisor or the General Counsel (or another individual specifically designated by the General Counsel to act in such capacity on his or her behalf (an “Authorized Delegate”). No person has authority to violate any law or to direct others to violate any law on behalf of the Company.

### B. Conflicts of Interest

A conflict of interest may arise where your loyalties are divided, or appear to be divided, between your personal interests and those of the Company. The Company expects that you will not knowingly place yourself in a position in which your personal interests would have the appearance of being, or could be construed to be, in conflict with the Company’s interests. The following is not exhaustive, but identifies potential areas of conflicted interests:

### 1. Accepting Gifts and Entertainment

Accepting any gift of more than nominal value or entertainment that is more than a routine social amenity can appear to be an attempt to gain favorable treatment from the recipient.

- a. Gifts, Entertainment and other Gratuities to the Company’s

You are urged to give careful consideration to the acceptance of any gift of more than nominal value. The key is to keep an arm's length relationship, to avoid excessive or lavish gifts and to ensure that the gift is reasonable and appropriate under the circumstances. Leepak prohibits gifts in the form of cash or securities, drugs or other controlled substances, discounts for product or services that are not available to other co-workers, personal use of accommodation or transportation and payments or loans to be used to purchase personal property. In cases where the gift is of more than nominal value, you should consult with the General Counsel (or an Authorized Delegate) prior to accepting the gift to determine if acceptance is appropriate.

In the case of entertainment, it must be of a reasonable nature and in the course of a meeting or another occasion for the purpose of bona fide business discussions or to foster better business relations.

#### **b. Payments to Government Personnel**

It is the Company's policy to comply strictly with laws governing the offering of gratuities and other items of value to federal, state and local government employees.

The promise, offer or delivery to an official or employee of a federal or state government of a gift, favor or other gratuity in violation of these rules would not only violate Company policy but could also be a criminal offense.

See Section I.E. of this Code for further information on "facilitation payments" to government officials and Company policies related to such payments.

#### **c. Gifts and Business Courtesies to Non-Government Persons**

You are permitted to provide meals, refreshments, entertainment and other business courtesies of reasonable value to non-government persons in support of the Company's business activities, so long as this practice (i) does not violate any law or regulation or the standards of the recipient's organization and (ii) is consistent with industry practices, infrequent in nature and not lavish or extravagant. While the latter is difficult to define with specificity, use common sense and good judgment. It is illegal for the Company or its representatives to pay to or receive anything of value from any labor organization.

## **2. Outside Employment/Conflicting Outside Activities**

Employees are not to engage in outside remunerative work or activities which may conflict with their obligations and duties to the Company, including, but not limited to, any such outside remunerative work or activities that: imply sponsorship or support by the Company; adversely affect the reputation of the Company, or otherwise compete with the Company. This prohibition also extends to the unauthorized use or application of Company resources and of any proprietary, confidential or trade secret information or intellectual property of the Company.

## **3. Employees' Interests in Other Businesses**

If you are considering investing in a credit source, supplier or competitor, great care must be taken to ensure that these investments do not compromise your responsibilities with the Company. Many factors should be considered in determining whether a conflict exists, including the size and nature of the investment; your ability to influence the Company's decisions; your access to confidential information of the Company or of the other company; and the nature of the relationship between the Company and the other company. The Audit Committee of the Board must approve in advance any such investment.

Furthermore, if you wish to serve as an officer or director to an outside business on your own time, you must receive prior approval in writing from the General Counsel (or an Authorized Delegate). If the circumstances of the outside business change substantially, you must seek re-approval. (Employees are permitted, however, to serve on charity boards or in family businesses that have no relationship to the Company).

## 4. Proprietary and Other Confidential Information

You must safeguard and hold in strict confidence proprietary, confidential and/or trade secret information, including information of the Company or any of its business partners. You should exercise prudence and care in dealing with such information. Your use of the information is strictly limited to your work for the Company and the relevant project on which the information was disclosed to you. Any such information must be returned when requested or upon the termination of your employment.

## 5. Other Competitive Information

The Company will not condone obtaining information concerning competitors through illegal means or other illicit or non-industry standard means, the propriety of which reasonably could be questioned. Any questions on competitive information should be directed to the General Counsel (or an authorized Delegate).

## 6. Third Party Intellectual Property

Unauthorized use of third-party intellectual property, including copyrighted materials, trademarks, and patented items, by employees is strictly prohibited. You should be aware that unauthorized use can result in both civil and criminal penalties and sanctions. Employees are to comply with guidelines established by the Company, to report violations to the General Counsel and to consult the General Counsel (or, in each case, an Authorized Delegate) for questions regarding appropriate usage and authorization.

## 7. Electronic Communications

You are responsible for using the Company's electronic information and communications systems, including facsimile, voice mail, electronic mail, internet, laptop and personal computer systems (collectively, the "Systems"), properly for business purposes only. Private use, and only if permissible under applicable laws, shall be limited to a minimum. Generally speaking, you should be aware of the following:

The Systems, and all communications, memoranda, files or other data created, uploaded, downloaded, sent, accessed, received or stored on any System ("Messages"), are property of the Company unless clearly labelled otherwise or determined as personal by applicable law.

Except for minimal incidental and occasional personal use, the Systems are for Company business use. Pornography and computer games are strictly prohibited.

Subject to local privacy laws, you should not have an expectation of privacy in any Messages you create, upload, download, send, receive or store, as they may be monitored by the Company at any time.

Messages should not contain content that another person (including the recipient thereof) may consider offensive, disruptive, defamatory or derogatory.

Attempting to access or "hacking" into Company Systems to which you do not have access or into computer systems of third parties is strictly prohibited.

## 8. Litigation and Claims

The Company, like all other businesses, is from time to time involved in disputes that may result in claims or litigation. If you ever receive a legal document related to the Company, such as a summons, complaint, subpoena or discovery request, whether from a governmental agency or otherwise, you must immediately contact the General Counsel (or an Authorized Delegate) to ensure an appropriate and timely response. Do not respond to any request, answer any questions or produce any documents without first discussing with the General Counsel (or an Authorized Delegate). Also, it is not appropriate to attempt to list legal matters or pending litigation in vendor or supplier qualification forms, RFPs or RFQs or in any questionnaires. Under no circumstance should you threaten or initiate legal action on behalf of the Company.

### E. Securities Laws

It is your obligation to safeguard the Company's non-public information and not to share this information with anyone except as required by your work responsibilities. Non-public information is information that has not been disclosed or made available to the general public.

The trading of stock by directors, officers and employees of the Company is subject to compliance with applicable U.S. federal securities laws, Australian securities laws and the Company's Statement of Policy to all Company Personnel Concerning Securities Trading and Disclosure of Confidential Information (the "Insider Trading of Securities Policy"). Employees having questions about the sale or purchase of a security that might involve nonpublic information or securities laws should review the Company's Insider Trading of Securities Policy and then consult the General Counsel (or an Authorized Delegate). Just as the Company values and protects its own non-public information, we respect the non-public information of other companies.

#### **F. Bribery, Kickback and Fraud**

No funds or assets shall be paid, loaned or otherwise given as bribes, kickbacks or other payments designed to influence or compromise the conduct of the recipient, and no employee of the Company shall accept any funds or other assets for assisting in obtaining business or for securing special concessions from the Company. See the Company's Anti Bribery and Corruption Policy for more information relating to the Company's stance on bribery and corruption.

Also, see Section I.B.1.b. of this Code for further information on prohibitions on payments to government personnel.

You should conduct Company business in such a manner that the Company's reputation and integrity will not be impugned if the details of these dealings should become a matter of public discussion. To illustrate the standard that the Company expects you to maintain, the following conduct is expressly prohibited:

- payment or receipt of money, gifts, loans or other favors that may tend to influence business decisions or compromise independent judgment;
- payment or receipt of kickbacks or other improper payments for obtaining business for or from the Company;
- payment of bribes to government officials to obtain favorable rulings; and
- any other activity that would similarly degrade the reputation or integrity of the Company.

Employees have a responsibility to report any actual or attempted bribery, kickback or fraud

#### **G. Workplace Health and Safety**

Leepak cares about the safety of its people and recognizes that injuries result in needless suffering to individuals and their families. Leepak is committed to providing a safe and healthy work environment for its co-workers, contractors and visitors. Therefore, you are required to follow carefully all safety instructions and procedures that the Company implements. You should promptly report accidents, injuries or other health and safety concerns, and refer related questions, to your supervisor or the responsible facility manager. Leepak recognizes its responsibilities as a leading global producer of packaging and packaging related products and as such we strive to achieve "No Injuries." The Company is committed to providing an incident, illness and injury free workplace for all co-workers, contractors and visitors. This enables us to operate in a safe manner that respects the health and safety of coworkers, and communities in which we operate, while producing high quality products.

The Company is also committed to providing a drug- and alcohol-free, safe and healthy workplace in accordance with applicable laws and regulations.

Leepak is committed to ensure that its employees work in compliance with all applicable laws and mandatory industry standards pertaining to the number of hours and days worked.

### **I. Employment Matters**

The Company is committed to fostering a business-like atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. The Company expects that relationships among persons in the workplace will likewise be business-like and free of unlawful bias, prejudice and harassment. You are expected to be conscientious, reliable and honest; to perform assigned responsibilities and duties in accordance with acceptable standards; to be courteous and cooperative with co-workers, management, customers and suppliers; and to ensure the integrity and ethical standards of the Company. You will not engage in activities that interfere with the performance of the operating procedures of the Company or those of our customers and suppliers.

### **1. Non-Discrimination/Anti-Harassment**

Leepak recognizes the dignity of each co-worker, and the right to a workplace free of harassment and abuse. Decisions on hiring, salary, benefits, advancement, termination or retirement are based solely on the co-worker's ability to do the job. There is no discrimination based on race, creed, national origin, disability, gender, marital or maternity status, religious or political beliefs, age or sexual orientation, or other status protected by applicable law.

Leepak has created a work culture that affords its co-workers the opportunity to work without fear of intimidation, reprisal or harassment and Leepak will continue to take action to ensure that such a culture is maintained within the Company.

### **2. Anti-Retaliation**

You may not interfere with or retaliate against another employee who invokes his or her legal rights, or participates in an investigation, and any such retaliation may result in the termination of your employment.

### **3. Workplace Relationships**

Leepak recognizes that conflicts of interest can arise where there is a direct or indirect reporting relationship between co-workers who have a special relationship, including where the co-workers are family members or are in an intimate relationship. Co-workers involved in such relationships are required to disclose the existence of the relationship to their local Human Resources representative at the earliest opportunity so that appropriate action can be taken to ensure that any real or perceived bias is avoided.

### **4. Substance Abuse**

You may not: use, possess, distribute, sell or be under the influence of alcohol or illegal drugs; use over-the-counter or prescription drugs in a manner inconsistent with the legally prescribed amount and accompanying instructions; or improperly or illegally use any inhalant or perception-altering substance in the performance of work for the Company or while on the premises of the Company. In addition, Leepak has a policy in place prohibiting the use of alcohol in the workplace.

### **5. Child Labor**

The Company recognizes the rights of every child to be protected from economic exploitation and respects the laws of each country in which it operates in regard to minimum hiring age for co-worker. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment or Code of Business the age established for completing compulsory education.

### **6. Human Rights**

Leepak believes that all workers should be treated with dignity and respect and should not be subject to discriminatory employment practices. We are committed to hiring and promoting employees based on talent and their contributions to the success of the business. We commit to and encourage our suppliers and business partners to commit to fair labor and Leepak communicates our expectation to prevent practices of forced labor or human trafficking, including enforcing illegal or excessive recruitment fees, delayed or withheld wages, forced or involuntary overtime and the withholding of identity documents.

### **7. Freely Chosen Employment**

The Company is not using and will not use forced, bonded, indentured or involuntary prison labour. Leepak complies with existing employment regulations regarding forced labour in all jurisdictions where it operates.

### **8. Compensation**

The Company provides wages and benefits that comply with applicable laws and binding collective agreements, including those pertaining to overtime work and other premium pay arrangements.

### **9. Freedom of association and collective bargaining**

The Company believes that open communication and direct engagement between workers and management are the most effective way to resolve workplace and compensation issues. The Company respects the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils. Workers are able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.

### **10. Referral of candidates from related parties**

Employment opportunities within the Company are filled on the basis of merit and recruitment is conducted properly and ethically when there is potential for a conflict of interest. If the Company receives referrals for potential candidates who are related to co-workers, customers, related entities or suppliers, then the policies and procedures set out below will apply. Related entities to the Company include joint ventures and subsidiaries in which the Company holds a 20% or more interest.

- The Company will only consider offering such candidates a role where: there is a vacancy or requirement for particular skills within the Company;
- the candidate meets the criteria required under the Company's hiring policies and practices, has the requisite skills for the role, and is the most appropriate person for the role;
- the candidate is employed under the employment conditions relevant to the role. For example, their remuneration package and employment terms will be consistent with the market demand and benchmarking for the particular role and consistent with the Company policies; and
- the candidate would not be placed in a position of potential conflict of interest by reason of the nature of the role being offered.

### **J. Books and Records**

The Company's internal accounting controls are intended to safeguard the assets of the Company and to ensure the accuracy of its financial records and reports, which form the basis for managing our business and fulfilling our obligations to stockholders, employees, and regulatory authorities. These records, including financial records, must properly, accurately and completely reflect all components of transactions in accordance with law and be promptly entered on our books. No person may interfere with or seek to improperly influence, directly or indirectly, the accuracy, completeness or auditing of such records. All reports made to regulatory authorities must be full, fair, accurate, timely and understandable. If an employee becomes aware of any improper transaction or accounting practice, he or she must report the matter immediately to his or her supervisor.

### **K. Document Retention**

There are legal requirements that certain records be retained for specific periods of time. Whenever it becomes apparent that documents of any type will be required in connection with a lawsuit or government investigation, all possibly relevant documents should be preserved, and ordinary destruction of documents pertaining to the subjects of the litigation or investigation should be immediately suspended. If you are uncertain whether documents under your control should be preserved because they might relate to a lawsuit or investigation, you should contact the General Counsel (or an Authorized Delegate).

### **L. Environment**

The Company strives to be recognized as an environmentally responsible company that respects the environment and the communities in which we operate while producing high quality products and services. Our commitment to managing operations in an environmentally sustainable manner will maximize value for the Company, our co-workers, our customers and the community.

The Company is committed to prevent and minimize adverse environmental impacts, including waste, emissions and discharges from our operations. The Company aims to minimize the environmental footprint of our operations and products. The Company reduces its environmental footprint by continually improving the efficiency of our natural resource consumption. The Company utilizes risk management processes to control the environmental hazards inherent in its activities.

## II. COMPLIANCE WITH THE CODE OF BUSINESS CONDUCT AND ETHICS

As a condition to employment, the Company reserves the right to require you to complete and submit a certification in a form designated by the Company pertaining to your compliance with this Code upon commencement of employment and as frequently thereafter as the Company may deem advisable. The Company expects all employees to comply with this Code and any violations may result in appropriate disciplinary action.

## III. REPORTING SUSPECTED NON-COMPLIANCE

### A. General Policy

As described in this Code, certain persons must review and approve in writing any circumstance requiring special permission. Copies of these approvals should be maintained by the Company in accordance with the Company's document retention policy. As part of the commitment to ethical and legal conduct, we expect employees to report information about suspected violations of this Code to their supervisor, the General Counsel (or an Authorized Delegate) or the Company's anonymous, confidential reporting system. Failure to report known wrongdoing may result in disciplinary action against those who fail to report.

### B. Complaint Procedure

#### 1. Notification of Complaint

The Company is committed to ensuring that co-workers can raise concerns regarding illegal conduct or misconduct in good faith without being subjected to victimization, harassment or discriminatory treatment and to having such concerns properly investigated. The Company recognizes that reporting such behavior in good faith is an important aspect of each co-worker's role within the Company. The Company has in place an independent, externally managed whistleblower service (the "Whistleblower Service") for co-workers to anonymously, where permitted by local law, report any potential incidents of misconduct.

Known or suspected violations of this Code should be reported promptly to

- (i) your supervisor or manager;
- (ii) the human resources, legal or audit services representative for your business group;
- or (iii) the Company's Whistleblower

#### 2. Investigation

Employees are expected to cooperate in investigations of any suspected violation.

#### 3. Confidentiality

Investigations will be conducted discreetly, as appropriate under the circumstances. Those investigating do not act as personal representatives or lawyers for employees. Parties to an investigation shall not discuss the matter with other employees.

#### 4. Protection against Retaliation

Retaliation in any form against an individual who reports a violation, or assists in the investigation, of the Code or of law, even if the report is mistaken, is itself a serious violation of this Code and will not be tolerated. Acts of retaliation should be reported immediately and will be disciplined appropriately. Employees who submit a complaint in bad faith may face disciplinary action, including termination.

January 2023

I have read and understood the Leepak Code of Business Conduct and Ethics.

I agree to comply with this policy.

Name (IN CAPITALS):

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Job Title:

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Signature:

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Date:

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