
		Subject: <b>Sustainability policy</b>			Level: <b>Policy</b>	
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## 1) Purpose

The sustainability policy is based on:

- The UN initiative on Responsible Investment (UNPRI – United nations Principles for Responsible Investments).
- OECD Guidelines for multinational companies
- The ten principles of responsible enterprise according to the UN Global Compact.

On the basis of the above points, this policy regulates how the company respects ethics and responsibility for social, environmental and CoC factors. The purpose of the policy is to determine how these sustainability factors and minimum criteria should be taken into account within the company and how they should be adapted to our business.

## 2) Scope

The overall sustainability work within Beneli is managed by Ettiketto Group and Volati. This policy applies to Beneli, a part of Ettiketto group and all its employees and also all class A and B suppliers and subcontractors to the company.

## 3) Responsibility

The CEO is responsible for this policy.

The Quality department is responsible to distribute and collect signed policies from suppliers.

All employees have a responsibility to read, understand, suggest improvements and to follow the policy.

#### 4) Definitions

N/A

#### 5) Procedure

**Ettiketto Group's sustainability work is based on:**

- United Nations Principles for Responsible Investment (UNPRI).
- OECD Guidelines for Multinational Enterprises
- The Ten Principles of Responsible Business under the UN Global Compact

The sustainability policy, to which this appendix belongs, gives an overall account of how the Company works with the issues affected by the above initiatives, guidelines and principles.

#### **Acquisition**

Sustainability factors should be considered in the event of acquisitions. Ettiketto Group does not intend to acquire other undertakings which carry out activities that are not in line with the OECD guidelines for multinational enterprises or with the principles of the UN Global Compact.

#### **Minimum criteria**

Ettiketto Group will define and implement sustainability criteria in its operations:

#### **Environmental issues**

Strive to reduce negative impacts on the environment by:

- Comply with applicable local environmental legislation
- To strive for sound resource management and limit emissions of harmful substances and hazardous waste
- Having closed systems in the production to avoid discharging wastewater into the wells and thereby reducing our water use and contribute to a more sustainable environment
- Energy efficiency and, insofar as there are no significant commercial reasons for monitor other important environmental issues

#### **Corporate governance issues**

The framework of this sustainability policy will promote the following aspects of corporate governance:

- High demands on business ethics
- Work against corruption in all its forms, including extortion and bribery
- Compliance with applicable cartel and competition laws

#### **Human rights and business ethics**

With reference to healthy labour and good practice on human rights and business ethics, the following measures shall be ensured:

- Working conditions comply with laws, regulations and any collective agreements
- Good awareness and compliance with international conventions on human rights
- Processes and practices to counteract discrimination or harassment
- To respect the employees' right to free association and bargaining rights according to local labor legislation

### **Child labor**

Basic principles for child labor:

- Ettiketto Group does not accept child labor.
- Any work which is considered hazardous or likely to harm the health, safety or morals of children should not be done by anyone under the age of 18 (or 16 under strict conditions); and
- The minimum age for work should not be below the legal age for finishing compulsory schooling and, in any case, not less than the age of 15 (applicable for suppliers).

### **Ettiketto Group's principles for controlling suppliers not to use child labor:**

As part of the supplier approval process with Ettiketto Group, the suppliers take responsibility for ensuring that child labor is not used in the production of the products or services offered and delivered to Ettiketto Group. With a contractual agreement, Ettiketto Group assumes that the supplier has a documented routine for preventing child labor, which is continuously implemented. The supplier's routine states that child labor identified with the supplier is remedied immediately. The responsibility routine describes the measures to move the child from his or her work situation and ensure that the child has more viable and sustainable alternatives for his or her development.

### **Ettiketto Group's principles for managing handle the cases when child labor is discovered by suppliers:**

If child labor at a supplier to Ettiketto Groups has been identified, this must be remedied immediately. Together with the supplier, the company within Ettiketto Group must ensure that the child is removed from its working position and ensure that the child has more viable and sustainable alternatives for his or her development. The company must, together with the supplier, follow the following list of measures:

- Notify the company within Ettiketto Group of what happened
- Document all cases
- Notify authorities (if applicable)
- Set a plan for all cases with the child's best interests in focus. Move the child from their working position and plan for more sustainable alternatives.
- Set up updated routines with the supplier that show how what happened should be avoided in the future

- Implement the plan that has been prepared
- Report the development of the above work on a monthly basis until the measures are completed
- Final report all cases to the company within Ettiketto Group

### Modern slavery

Ettiketto Groups principales on modern slavery:

- **Employment should be freely chosen.** Modern slavery is a crime and violation of fundamental human rights. It takes various forms, including slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of one (or more) person's liberty by another to exploit them for personal or commercial gain.
- Ettiketto Group has a **zero-tolerance** approach to modern slavery. We act ethically and with integrity in all our business dealings and relationships and will **swiftly, decisively, and resolutely** enforce systems and controls to ensure modern slavery is not taking place anywhere in our own business or our chain.
- Ettiketto group, is dedicated to ensuring transparency in our own business and approach to tackling modern slavery throughout our entire network of supplier partners.
- Ettiketto group insists on – at a minimum – the same high standards from all our supplier partners. As part of our contracting processes, Ettiketto group include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude and obligate our supplier partners to hold their own suppliers to the same high standards regardless of the tier.

### 6) References

- Volati Sustainability policy
- United Nations Principles for Responsible Investment (UNPRI)
- OECD Guidelines for Multinational Enterprises
- The Ten Principles of Responsible Business under the UN Global Compact

### 7) Change log

Rev 2: Added appendix

Rev 3: Completely reworked policy. Ettiketto groups principles for modern slavery have been added and clarified

Rev 4: Revised with definition of ages for child labour and added reference to Volati's Sustainability policy