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Code of Conduct

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. 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 reasonable 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.

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. 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.

6. 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.

7. HEALTHY & SAFE WORKPLACE

The Optimum Group provides its employees with a working environment which is safe, hygienic and conducive 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.



8. 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.

9. INDIGENOUS PEOPLES RIGHTS

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

10. 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.

11. 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.

12. 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. If you want to report violation or make remarks of the Code of Conduct, you can contact our designated officer, QESH Manager Annelies Börgeling, e-mail annelies.borgeling@optimumgroup.nl, phone 0031 (0) 6 13 99 65 28.

Signed by:

19 July 2022

Name: Anthonie Zoomers
Position: CEO, Optimum Group

Signature:

A handwritten signature in blue ink, appearing to read 'Anthonie Zoomers', is written over a horizontal line.