

BUSINESS PARTNERS & SUPPLIERS CODE OF CONDUCT



2026

pacteam
group

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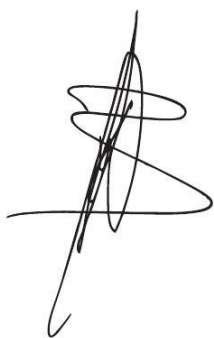
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A MESSAGE FROM THE CHAIRMAN

As the Chairman of Pac Team Group, I want to emphasize the crucial importance of ethics and responsibility in our business relationships. This Code of Conduct, which we share with our partners and suppliers, reflects our commitment to promoting practices that respect human rights, commercial integrity, and environmental protection. Together, we must build partnerships based on trust and transparency to contribute to a sustainable and fair future for all.

Alain Borle

Chairman of Pac Team Group

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke at the bottom.

Alain Borle

Chairman Pac Team Group

PREAMBLE

For more than seventy-five years, under a single identity, we at Pac Team Group have been placing our expertise at the service of our customers. More than ever, we are committed to giving meaning to our mission: contributing to the enhancement and improvement of our customers' products through personalized and innovative solutions, while fostering partnerships built on trust and 360-degree service.

The choices we make are guided by our values: service, quality, expertise, responsiveness, and passion. The development of our activities is fully aligned with our commitment to building long-term relationships with our customers and business partners, suppliers, subcontractors, and other stakeholders. It is based on mutual trust and the creation of shared values, supported by a continuous improvement approach across the entire supply chain.

The Pac Team Group Business Partners and Suppliers Code of Conduct sets out a common framework of rules, practices, and principles relating to ethics, human rights, business integrity, and environmental protection. In this document, the term "Partners" refers collectively to all business partners, suppliers, subcontractors, and service providers of Pac Team Group.

In conducting its business activities, Pac Team Group is committed to complying with all applicable national and international laws, regulations, and conventions, as well as with recognized best practices in the areas covered by this Code.

As it is fundamental to us that our Partners share the same values, Pac Team Group expects its Partners to comply with applicable laws, ethical principles, and the requirements of this Code, and to apply them with the same level of commitment within their own operations and throughout their supply chains.

Pac Team Group works with Partners who are committed to respecting and promoting the principles set out in the United Nations Universal Declaration of Human Rights, the European Convention on Human Rights, the conventions of the International Labour Organization (ILO), the United Nations Convention on the Rights of the Child, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights (UNGPs), the United Nations Women's Empowerment Principles, and the United Nations Declaration on the Rights of Indigenous Peoples.

Where national legislation or any other applicable regulation addresses the same subject matter as this Code of Conduct, the stricter standard or the more restrictive provision shall apply. Where this Code of Conduct conflicts with applicable law, the latter shall apply.

For the purposes of implementing this Code, Partners undertake to cooperate with Pac Team Group in good faith, make their best efforts, and, where necessary, implement appropriate corrective measures as part of a continuous improvement and remediation approach. Partners are responsible for implementing this Code throughout their supply chains and must ensure that their subcontractors, service providers, and suppliers comply with its principles and requirements. Partners may not subcontract any of their obligations towards Pac Team Group without prior written authorization.

Adhesion to the principles set out in this Code is essential to the continuation of the relationship between Pac Team Group and its Partners.

HUMAN RIGHTS

Pac Team Group expects its Partners to respect and uphold human rights, fundamental labour rights, and the rights of communities affected by their activities across their entire value chain.

PROHIBITION OF CHILD LABOUR

Partners strictly prohibit all forms of child labour. No worker may be employed below the applicable legal minimum working age, below the age of 16, or below the age for completion of compulsory schooling where this is higher. Under no circumstances shall persons under the age of 18 be assigned to hazardous work or work that may jeopardize their health, safety, or development.

Partners shall implement appropriate procedures to verify the age of workers during the recruitment process, prevent any use of child labour, and ensure ongoing monitoring of compliance with this requirement.

At a minimum, Partners shall comply with the principles set out in International Labour Organization (ILO) Convention No. 138 on the Minimum Age for Admission to Employment and Convention No. 182 on the Worst Forms of Child Labour. Where applicable national legislation establishes more stringent requirements, particularly regarding minimum age or the protection of young workers, such requirements shall prevail.

Where permitted by local law, the employment of young workers aged 16 to 18, as well as apprenticeship and vocational training programmes, shall be strictly regulated to ensure that the work performed does not adversely affect their health, safety, development, education, or training.

Any violation of these principles is subject to a zero-tolerance policy and may result in the immediate implementation of corrective measures, the suspension of orders or collaboration, or the termination of the business relationship in cases of confirmed non-compliance.

PROHIBITION OF FORCED OR COMPULSORY LABOUR

All workers have the right to freely choose and leave their employment. Partners shall refrain from using or benefiting from any form of forced or compulsory labour, slavery, servitude, human trafficking, or any other form of involuntary labour.

It is strictly prohibited to confiscate identity documents, passports, work permits, or any other personal documents, to require workers to lodge deposits or financial guarantees, or to use any other form of coercion, intimidation, or restriction of freedom. Workers must not be subjected to threats, harassment, physical or psychological abuse, or any practice that restricts their freedom of movement or employment.

Any form of forced or compulsory labour is strictly prohibited and is subject to a zero-tolerance policy.

PROHIBITION OF ILLEGAL, UNDECLARED, AND UNREGISTERED EMPLOYMENT

Partners shall comply with all applicable regulations to prevent any form of illegal, undeclared, or unregistered employment.

PROHIBITION OF HARASSMENT AND ABUSE

Partners shall treat their employees with respect and human dignity; they shall refrain and prohibit all forms of intimidation, humiliation, threats, abuse, violence, corporal punishment and physical, sexual, verbal, or moral harassment expressed through behaviour, actions, or gestures, or in writing.

PROHIBITION OF DISCRIMINATION

In recruitment and professional development, Partners shall refrain from any discrimination, exclusion, or preference based on ethnic origin, gender, religion or belief, political opinion, trade union activity, disability, age, or sexual orientation, and shall ensure equal treatment.

FREEDOM OF EXPRESSION AND ASSOCIATION

Partners shall recognize and respect employees' rights to freedom of expression, association, and collective bargaining. They shall ensure respect for the independence and pluralism of trade unions and undertake to promote collective bargaining as a central element of social dialogue.

WORKING HOURS

Partners shall comply with all applicable laws, regulations, and collective bargaining agreements relating to working hours and employment conditions. They shall ensure compliance with requirements concerning regular working hours, overtime, breaks, rest periods, annual leave, sick leave, and parental leave. Appropriate records and documentation shall be maintained to demonstrate compliance with these requirements and allow verification upon request.

FAIR WAGES AND BENEFITS

Partners commit to maintaining fair pay practices and shall comply with all applicable laws, regulations, and collective bargaining agreements relating to wages and benefits. They shall ensure payment of at least the applicable minimum wages and provide all mandatory benefits and allowances, including social security contributions. Appropriate records and documentation shall be maintained to demonstrate compliance with these requirements and allow verification upon request.

EMPLOYEE HEALTH, SAFETY, AND WELL-BEING IN THE WORKPLACE

Partners undertake to maintain a safe, healthy working environment that respects human dignity, in compliance with relevant regulations. They shall implement a health, hygiene, and safety policy aimed at ensuring that all personnel work in an environment free from risks to their health and safety. This policy shall include zero tolerance for serious breaches of health and safety rules. In this regard, Partners shall take all necessary measures to prevent and limit workplace accidents that may occur during professional activities.

Partners must define, implement, and communicate clear health and safety instructions, compliance with which shall be regularly assessed. Workers must be provided with personal protective equipment appropriate to their activities. These requirements shall also apply to any accommodation provided, which must ensure conditions compliant with health, hygiene, and safety standards.

LOCAL COMMUNITIES AND INDIGENOUS PEOPLE

Partners undertake to respect local communities and to prevent any adverse impact of their activities on populations in the areas where they operate. They are required to adopt responsible practices and ensure respect for human rights throughout all their activities. When interacting with Indigenous Peoples, as defined by the United Nations Declaration on the Rights of Indigenous Peoples, they must obtain their free, prior, and informed consent and respect their rights, cultures, and livelihoods.

BUSINESS INTEGRITY

Pac Team Group expects its Partners to conduct their business activities with integrity, transparency, and accountability, in full compliance with applicable laws and regulations, recognized principles of business ethics, and best practices relating to governance, compliance, and the protection of information.

LEGAL REQUIREMENTS

Partners undertake to comply with all applicable local, national, and international laws and regulations in the conduct of their business activities.

PROHIBITION OF CORRUPTION

Partners undertake to comply with all applicable laws relating to any form of corruption, whether active or passive. Pac Team Group applies a zero-tolerance policy towards all forms of bribery and corruption.

Gifts, hospitality, and invitations may be considered acceptable expressions of courtesy in the context of legitimate business relationships, provided that they are reasonable in nature and value, offered openly and transparently, permitted under applicable local laws, consistent with local business customs, intended solely to express esteem or gratitude, and not offered with the expectation of obtaining an improper advantage or any form of consideration in return.

PROHIBITION OF FRAUD, MONEY LAUNDERING AND TERRORIST FINANCING

Partners shall ensure that the source of all funds used in their business activities is lawful and complies with all applicable laws and regulations relating to anti-money laundering and counter-terrorist financing. They shall establish and maintain appropriate policies, procedures, and internal controls to prevent fraud, money laundering, and the financing of illicit activities.

PREVENTION OF CONFLICTS OF INTEREST

Partners undertake to comply with all applicable laws and regulations concerning conflicts of interest. They shall identify, disclose, and appropriately manage any actual, potential, or perceived conflict of interest that could affect their business relationship with Pac Team Group.

RESPECT OF COMPETITION

Partners undertake to comply with competition rules. We manage the risk of economic dependency that could jeopardise either party by implementing control measures in order to monitor and mitigate this risk, and to take appropriate actions where necessary.

TRADE RESTRICTIONS AND INTERNATIONAL SANCTIONS

Partners undertake to comply with all applicable international trade restrictions, economic sanctions, embargoes, and export control laws and regulations.

CUSTOMS COMPLIANCE AND SECURITY AUTHORITIES

Partners undertake to comply with applicable customs laws and regulations, including those relating to imports and the ban on transshipment of merchandise to the importing country.

DATA PROTECTION, CONFIDENTIALITY AND INTELLECTUAL PROPERTY

Partners undertake to comply with all applicable laws and regulations relating to the protection of personal data and privacy, including applicable European and international standards.

They shall ensure the confidentiality of all information communicated to them during their business relationship, including technical, commercial, financial, and strategic information, and shall use such information solely for its intended purpose. Partners shall implement appropriate technical and organizational measures to protect such information and prevent any unauthorized disclosure, use, alteration, loss, or access.

In addition, Partners shall respect Pac Team Group's intellectual and industrial property rights and shall refrain from any unauthorized use, reproduction, disclosure, distribution, or exploitation of such rights.

PUBLIC STATEMENTS

Partners shall exercise caution in all public statements and communications, particularly on the Internet and social media platforms. They shall ensure that any communication complies with the confidentiality, non-disclosure, and professional secrecy obligations undertaken towards business partners, suppliers, and other stakeholders.

TRANSPARENCY AND ACCURACY OF INFORMATION

Partners are required to provide clear, accurate, truthful, and transparent information regarding the methods and resources used, production sites, and the characteristics of the products or services supplied. They shall also ensure the accuracy of all commercial and technical communications and refrain from providing any misleading, deceptive, or inaccurate information or statements.

Pac Team Group reserves the right to request any supporting documentation necessary to verify the accuracy and truthfulness of declarations, certifications, and documents provided, including laboratory analyses or independent third-party verifications where deemed necessary.

Any falsification, alteration, or misrepresentation of documents is strictly prohibited and is subject to a zero-tolerance policy.

PROTECTION OF ASSETS

Partners shall take all necessary measures to protect Pac Team Group's assets, resources, property, equipment, information, systems, and other tangible and intangible assets against loss, theft, damage, misuse, fraud, or unauthorized access.

QUALITY

Partners shall implement appropriate quality assurance processes and controls designed to identify, correct, and prevent defects, ensuring that products and services consistently meet or exceed the requirements defined in applicable contracts, specifications, and regulatory standards.

ARTIFICIAL INTELLIGENCE

Partners shall inform Pac Team Group in advance of any use of artificial intelligence in connection with the services they provide. They shall comply with all applicable laws and regulations governing artificial intelligence. Furthermore, they undertake to ensure the responsible, ethical, transparent, and lawful use of any artificial intelligence solutions employed in the provision of their services. In addition, they shall not use Pac Team Group's data, information, or confidential materials to train, develop, improve, or validate their own artificial intelligence systems or models without the prior written authorization of Pac Team Group.

ENVIRONMENTAL PROTECTION

Pac Team Group requires its Partners to adopt a proactive approach to environmental protection, based on pollution prevention, the reduction of environmental impacts, the responsible use of natural resources, regulatory compliance, supply chain transparency, and the continuous improvement of their environmental performance.

COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS

Partners undertake to comply with all environmental laws and regulations applicable to their activities at international, national, and local levels. They shall obtain, maintain, and comply with all required permits, licenses, and authorizations. Partners shall seek to minimize the environmental impact of their operations, particularly regarding atmospheric emissions, soil, water and waste management, and the prevention of all forms of pollution. They shall implement appropriate monitoring, control, and continuous improvement measures to ensure regulatory compliance and environmental protection.

WASTE MANAGEMENT AND ATMOSPHERIC EMISSIONS

Partners undertake to manage waste responsibly by adopting waste reduction, reuse, and recycling strategies. They shall implement action plans to monitor, minimize, and appropriately manage noise, dust, odours, particulate emissions, and any other forms of local pollution arising from their activities.

GREENHOUSE GAS EMISSIONS AND SUSTAINABLE USE OF RESOURCES

Partners undertake to reduce the environmental impact of their activities by lowering greenhouse gas (GHG) emissions, energy consumption, and water usage, while promoting the use of renewable natural resources and environmentally preferable products and materials.

CHEMICAL COMPLIANCE AND DATA TRANSPARENCY

Partners undertake to ensure the use of safe and compliant materials and to provide full transparency regarding their composition. They shall provide all necessary documentation, including substance declarations, technical data sheets, and any information required under applicable regulations governing the manufacture, use, or importation of chemical substances, including, but not limited to, the European REACH Regulation (EC No. 1907/2006).

Such documentation shall enable the assessment of the environmental impact of products and demonstrate compliance with applicable regulatory requirements. Furthermore, Partners undertake to reduce and, where technically feasible, replace synthetic chemical compounds that may pose risks to the environment or human health (such as PFAS) with safer alternatives.

MATERIALS MANAGEMENT

Partners shall prioritize the use of materials with a lower environmental impact, including, but not limited to, recycled materials, recyclable materials, and FSC-certified materials. They undertake to limit the use of chemical substances in accordance with applicable regulatory requirements, including the European REACH Regulation (EC No. 1907/2006) and any other regulations relating to hazardous substances and product safety.

ECO-DESIGN AND END-OF-LIFE MANAGEMENT OF PRODUCTS

Partners shall design products and packaging with a view to reducing volume, facilitating transportation, and optimizing end-of-life management. Products and packaging shall, where feasible, be designed for recyclability, disassembly, reuse, or recovery, in accordance with applicable regulatory requirements, including the Packaging and Packaging Waste Regulation (PPWR), where applicable.

Partners shall provide information regarding material composition to facilitate sorting, recycling, and recovery processes.

Partners undertake to actively monitor applicable regulatory developments and to comply with new requirements without undue delay. This includes, for example, compliance with the European Union Deforestation Regulation (EUDR).

Partners shall adapt their information systems, internal procedures, and sourcing practices to meet these specific requirements. They shall be able to provide Pac Team Group, upon request, with geolocation data relating to the relevant plots of land for monitoring and verification purposes. More broadly, Partners undertake to integrate any relevant new regulatory requirements into their processes to ensure ongoing compliance.

TRACEABILITY OF MATERIALS AND PRODUCTS

Partners shall implement robust traceability systems covering all raw materials and products used, regardless of their nature (including, but not limited to, wood, plastics, metals, and other materials). Such traceability systems shall enable the precise and documented identification of the origin of materials, the various stages of processing, and the entities involved throughout the supply chain.

Partners are required to ensure that raw materials originate from safe, responsible, and legally compliant sources and comply with applicable international regulations, trade restrictions, and economic sanctions. This includes, for example, compliance with Council Regulation (EU) No. 833/2014 concerning restrictive measures in view of Russia's actions. Partners shall be able to provide reliable, complete, and verifiable information regarding the origin and provenance of materials. Attention shall be paid to materials presenting specific environmental, social, legal, or geopolitical risks.

WHISTLEBLOWING PROCEDURE

Pac Team Group provides a whistleblowing mechanism through which Partners may, in good faith and on a confidential basis, report any suspected breach of this Code of Conduct or of applicable laws and regulations by email at:

ethics.ch@pacteam-group.com

ethics.italy@pacteam-group.com

ethics.china@pacteam-group.cn

Reports are reviewed diligently and without retaliation against any person who has made a report in good faith. The Ethics Committee is responsible for handling reports promptly and without undue delay. Investigations are conducted confidentially, and, where permitted by applicable law, the anonymity of whistleblowers is protected, to assess the reported concerns and determine and implement appropriate corrective or remedial measures.

INSPECTION AND AUDIT

Partners acknowledge their obligation to respond promptly to requests and agree to be assessed or audited by Pac Team Group, or by a third party appointed by Pac Team Group, with respect to the principles set out in this Code.

Partners shall maintain accurate, complete, and properly documented records and information, accessible to auditors, to demonstrate compliance with all requirements of this Code. They also undertake to provide Pac Team Group's representatives with access to complete, original, and accurate records and supporting documentation.

In the event of a confirmed breach of one or more principles of this Code, Pac Team Group reserves the right to implement a graduated response, which may include the implementation of mandatory corrective actions, the temporary suspension of purchases or collaboration, the refusal to accept current or future orders until the non-compliance has been remedied, or the termination of the business relationship in cases of serious or repeated violations, without prejudice to any other rights or remedies available to Pac Team Group.

Partners acknowledge that they have read and understood this Code and undertake to implement its requirements within their own organization and to promote its principles throughout their supply chain, including among their subcontractors and suppliers.

Signature of the Business Partners & Suppliers Code of Conduct

I, the undersigned,

.....[name and address of Business Partner or Supplier]

Confirm that:

- have read this Code, and understood the principles, values and all the content;
- adhere to its principles and commit to enforce them in my company, and to promote the principles among my subcontractors and suppliers.

Done in:

The : / /

Signature and seal: