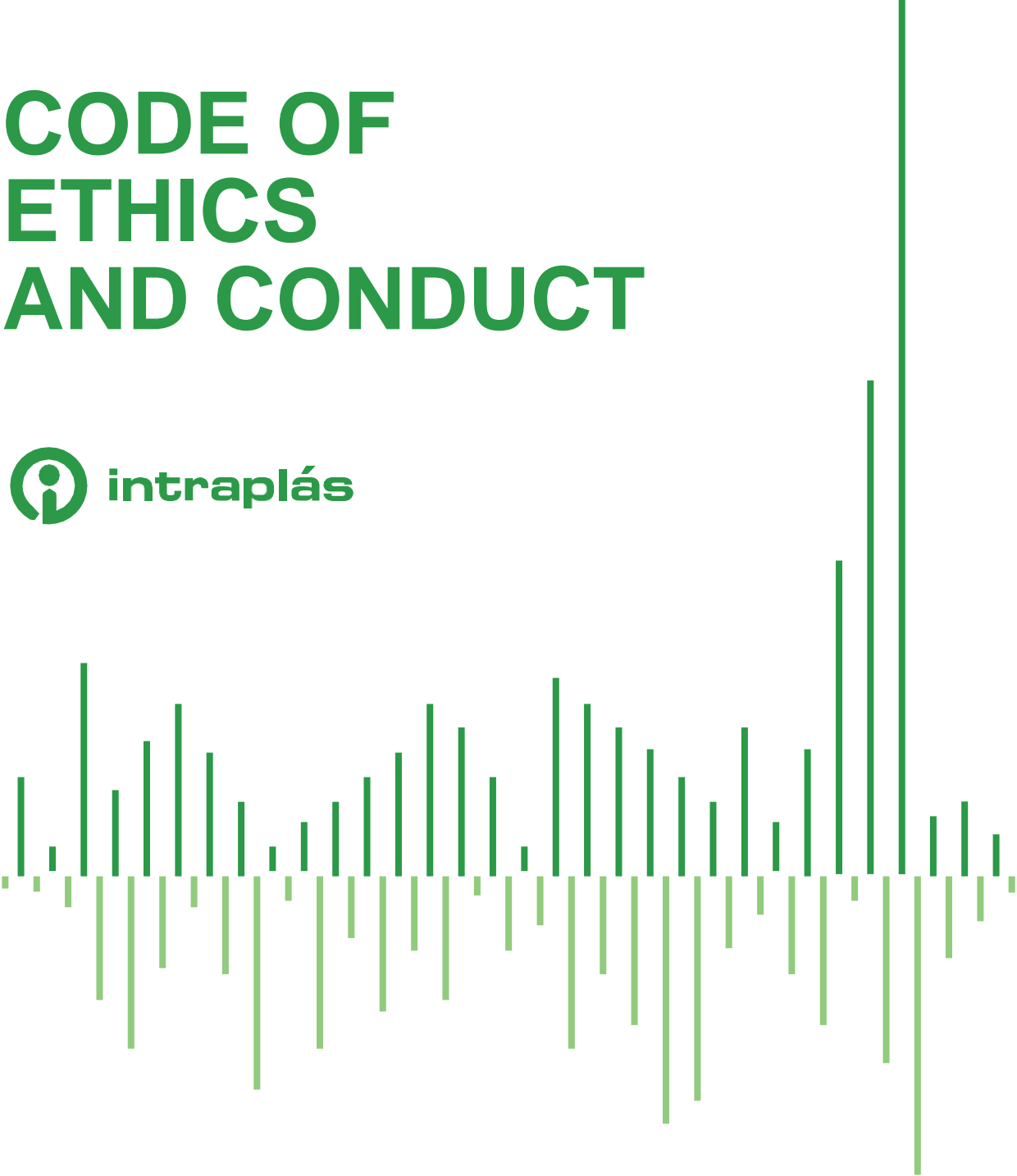


CODE OF ETHICS AND CONDUCT



INTRAPLÁS

CODE OF ETHICS AND CONDUCT

AGENDA

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Message from the Board of Directors

Our ambition is to see our organisation grow and prosper!

Grow in order to improve the lives of our employees, the community in which we operate and our clients. Growth is essential to create more jobs, generate more wealth, enable more investment, develop more people and reach more clients in more countries.

But this ambition will only be possible if there is sustainable growth based on achieving our values through our behaviour.

How we act has a significant impact on our professional life and on the success of our company as a whole. The actions of each of us will enable us to achieve our purpose. Our honesty and integrity are dependent on the right individual decisions on a day-to-day basis, regardless of the conditions of pressure that may exist at work.

Each company is unique. The principles we choose should reflect our values and objectives as an organisation. We should not, in any way, compromise our commitment to integrity, whether it's due to the anxiety to achieve results, individual competitiveness, personal ambition, or even on the orders of a superior officer.

It's also fundamental that there is no conflict between excellent performance and respect for others.

We expect serious commitment to this Code of Ethics and Conduct. We trust that each one of us will know how to not only adopt but also to defend the values and principles of our organisation.

Our company's growth is a source of pride and motivation for all of us and is a reflection of the hard work and passion we put into what we do. Let us, therefore, continue to work together to build a bright future for our company.



Grow to
improve the lives
of our
employees, the
community where
we operate and of
our clients.

Objectives and Scope of the Code of Conduct

The Intraplás' Code of Ethics and Conduct is the document that includes a set of rules and values that govern Intraplás' activity and determines the existence of ethical rules to guide Employees in their relations with Clients, Suppliers and other Stakeholders.

It is also applicable to third parties contracted by or acting on behalf of Intraplás, in the event that Intraplás may be held responsible for their actions.

This document was prepared in order to:

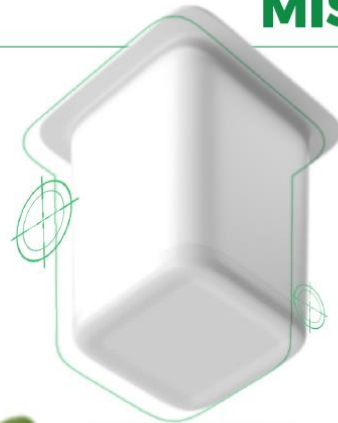
1. Promote ethics and integrity in the work environment and help ensure that the company complies with applicable laws and regulations.
2. Encourage the adoption of fundamental principles with regard to the good behavioural rules defined in this Code
3. Consolidate Intraplás' Values and institutional image

The application of this Code of Conduct does not prevent or waive the application of any rules from a legal source or of any nature applicable, namely deontological and ethical rules applicable to certain professional roles, activities or groups.





Sustainable and Innovative Packaging Solution Provider with Focus on People's Wellbeing.



MISSION

VISION

POSSIBLE



Eco friendly Sustainable packaging is possible

Integrity
Collaboration
Flexibility
Proactivity
Results orientation
Fairness



VALUES

FUTURE



Guiding principles for Intraplás employees

The set of principles that define Intraplás' culture and values help express the strategic objectives and encourage employees concerning a common purpose: believing in the Future!: **believe in the Future!**

Integrity: Because we believe that our words should always match the actions we take:

1. Be honest and transparent in our actions and decisions
2. Take responsibility
3. Treat others with respect and dignity
4. Keep information confidential in accordance with the appropriate rules and regulations
5. Act in accordance with ethical and moral principles, even when it is challenging or uncomfortable

Collaboration: Because we believe that teamwork is the only way to achieve success:

1. Work with others to achieve common goals
2. Communicate clearly and openly to ensure that everyone is aligned and acting in a coordinated way
3. Share knowledge and experience
4. Offer help and support to co-workers when they need it
5. Co-creation – work as a team to create new ideas and innovative solutions

Flexibility: Because we believe that understanding and accepting the ideas of others is fundamental to evolve together:

1. Be able to adapt quickly to changes in the market or project objectives
2. Be willing to consider new ideas and approaches, even when this requires leaving the comfort zone
3. Be able to find creative solutions to unexpected challenges or complex problems
4. Be able to manage multiple tasks at the same time
5. Be resilient

Proactivity: Because we believe that leadership is only possible when our focus is on anticipating and implementing solutions

Results Orientated: Because we believe in the need to always act with the focus on achieving or exceeding objectives

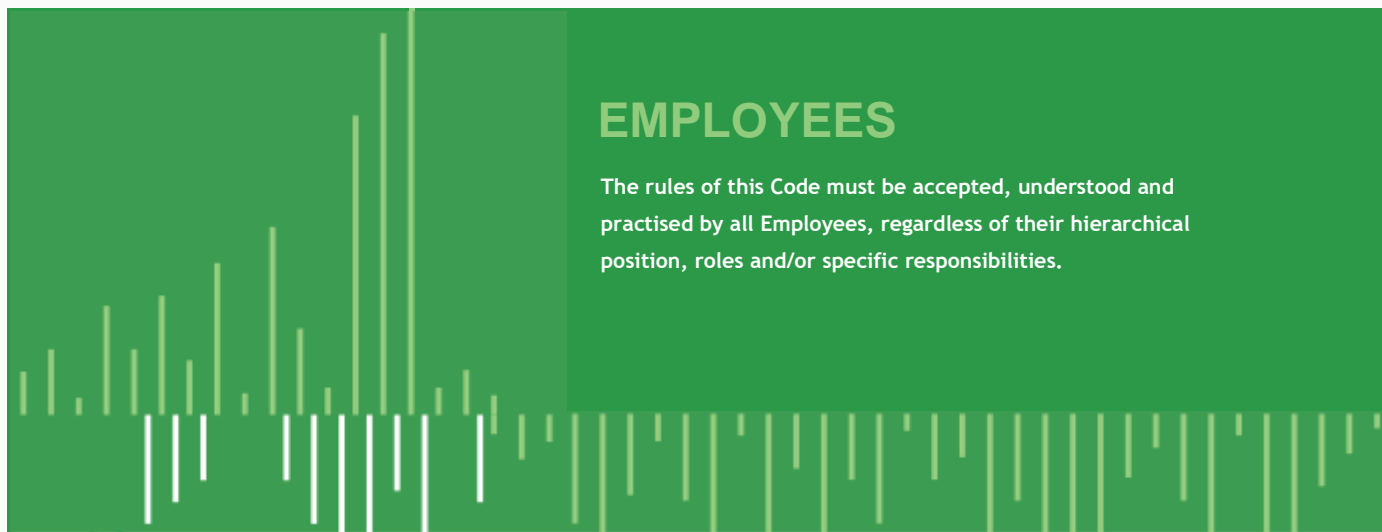
Fairness: Because we believe that there is only justice if everyone has access, proportionally, to the same opportunities



BELIEVE IN THE FUTURE!

The set of principles that define Intraplás' culture and values help express the strategic objectives and encourage employees around a common purpose: **believe in the Future!**

Our stakeholders



Career Evolution and Personal Development: The defined policies of selection, salary and professional progression are based on meritocratic criteria and market benchmark practices. The Intraplás Academy was created to promote the personal and professional development of employees. Continuous training is an element that fosters better performance and motivation.

Rights: No discriminatory behaviour is admitted on the grounds of gender, race, ethnicity, nationality, religion, political affiliation, or other. Intraplás promotes equal opportunities and ensures integrity and dignity in the workplace.

Equal treatment of genders: The fight for equal treatment of men and women is an important issue for social justice and the promotion of equal opportunities for all. Intraplás promotes fair and equal treatment, independent of gender, through measures and the implementation of processes aimed at the right to equal career opportunities, training and salary.

Combating Child Labour: Child Labour and Forced Labour are neither accepted nor tolerated at Intraplás, and will be immediately flagged and reported to the relevant authorities, in particular, in Portugal, to the Public Prosecutor's Office, and equivalent entity in other countries. This is in order to not only immediately stop any ongoing illegal practice, but also in order to immediately guarantee access to decent conditions for any human being and, in particular, any child or young person at risk, replacing the need to have the Child Labour and Forced Labour Remediation Plans.

Work Life Balance and Parenthood: It is important to find a balance between work and personal life to avoid consequences such as burnout and exhaustion. Intraplás is committed to creating conditions where Employees can dedicate sufficient time to personal relationships and leisure activities in order to protect their mental health and general well-being. Intraplás is committed to protecting Parenthood, which aims to ensure that Employees who are parents have the right and the support necessary to participate actively in raising their children. This includes maternity and paternity leave, flexible working hours and other support measures.

Health and Safety: Intraplás provides a healthy, safe working environment that promotes the well-being and productivity of our employees

Anti-Corruption: Allegations of corruption or bribery seriously damage Intraplás' image. Accepting any advantages in return for preferential treatment of any third party is not permitted.

Participation and Sharing: Intraplás values the participation of all Employees, promoting effective processes in communication and sharing. In this sense, we respect the presence of Employees on the Web as a means of professional development in harmony with the company's values.

Growth, Sharing and Value Creation: Intraplás' business pillars are based on a vision of growth, sharing and creation of value in the long term, taking into account ESG principles.

Training: Employees make a commitment to attend the training opportunities made available and recommended by the company, with the aim of updating their knowledge and skills.

Initiative: Intraplás values the proactivity of Employees with regard to any type of initiative and suggestion of innovative solutions aimed at helping to achieve collective goals.

Relationship between Employees and Company: Interpersonal relationships must be based on mutual respect and mutual help, honesty and clear communication. Freedom of association and expression are values respected by Intraplás.

Integrity and Responsibility: Employees shall behave in an appropriate and dignified manner in the performance of their duties, safeguarding the prestige and image of Intraplás. They shall also protect the company's assets through sensible and rational use.

Harassment at work: Harassment, in any form or expression, is prohibited, which is why Intraplás is obliged to prevent and combat harassment at work and ensure compliance by all employees as set out in the existing Anti-Harassment Code.

Confidentiality and Privileged Information: Intraplás Employees shall keep secret and confidential all information and facts relating to the Organisation's activities they may have access to and which are not public knowledge. Intraplás hereby establishes that any Employee who has access to privileged information is expressly forbidden to pass it on, use it or facilitate its use to third parties for personal gain.

Conflicts of Interest: Employees must not take part in decision-making processes that involve, directly or indirectly, organisations with which they collaborate or have collaborated, or people with whom they are or have been connected by ties of kinship or friendship. If it is impossible to refrain from taking part in the above-mentioned processes, all Employees must inform their hierarchical superior of the existence of such connections.

Employees must abstain from participating in or carrying out roles in organisations with activities that may conflict with the performance of their duties at Intraplás or with aims that may be contrary to those of Intraplás.

Non-Competition: Employees may not engage in activities that compete with Intraplás' business.

Gifts and Offerings: Intraplás Employees may not accept or grant any type of offers, gifts, benefits or invitations of a personal nature, from third parties to themselves, their family members or in favour of another person. All unauthorised gifts that, for whatever reason, cannot be refused or returned shall revert to the Organisation and must be handed in to Human Resources.

Protection of Assets: Intraplás' assets are intended for professional use only, and their use for personal benefit or the benefit of others is prohibited. It is the responsibility of everyone to ensure the protection and conservation of the company's physical, financial and intellectual assets.

Our stakeholders

CLIENTS

All Intraplás Employees, regardless of their hierarchical level and role, shall have as their focus the development of a relationship of empathy and trust with Intraplás' Clients, based on creating value and ensuring Customer satisfaction.

Intraplás employees must always uphold the following principles in their relations with clients:

- Consistency and Commitment
- Consolidate Client trust
- Transparent information
- Ensure Intraplás' excellence and positioning as a packaging solutions and service provider company
- Treat Clients with professionalism, respect and loyalty
- Provide solutions to their problems.

SHAREHOLDERS

Growth and Value Creation: Intraplás is committed to sustainably enhancing growth and value creation for its Shareholders.

Transparent and Precise Information: The Annual Reports and Accounts, as well as financial records and supporting documents of the company's accounting, accurately, truthfully and transparently describe and reflect the company's results and the policies adopted.

SUPPLIERS & PARTNERSHIPS

Suppliers and partnerships are essential to maintaining the high quality standards we pursue.

Selection of Suppliers and Partnerships: Intraplás selects its suppliers and business partners by seeking relationships with entities that share the same framework of ethical principles it follows.

The selection of suppliers is carried out impartially based on criteria of quality, innovation capacity, price, supply capacity, performance, trust, continuity and sustainability over time.

Intraplás supports and develops activities with national or international business partners that comply with the defined selection criteria, with the purpose of promoting the development of the packaging sector as a way of improving competitiveness.



PUBLIC ENTITIES

Intraplás has a co-operative attitude and responds to requests from the Government and other public entities to provide information, comments or contributions on issues relevant to its business and the communities in which it operates, namely by supporting the development of proposed legislation or regulations related to its business area.

Intraplás has an independent position in relation to public institutions and political parties, without prejudice to the professional relationships it establishes. Intraplás does not fund, under any circumstances, organisations whose mission is essentially political.

COMMUNITY AND ENVIRONMENT

Intraplás actively contributes to the improvement of the local community where it operates, through actions that promote the region's economic development, employment opportunities and social well-being.

Intraplás is committed to doing business in a responsible and sustainable way, transforming challenges into opportunities. Our ambition is to lead the transformation to a circular society, where we care for the environment, fight climate change and help our community thrive. We are transitioning to a carbon neutral and circular economy, using renewable energy, focusing on waste management, ensuring our products are more recyclable or reusable and minimising our environmental footprint across the value chain.

COMPETITION

The respect for competition is an important aspect of any business. This means recognising and valuing the existence of other companies that compete with Intraplás for the same clients or opportunities.

Intraplás respects the laws and regulations that govern the market, contributing to fair and healthy competition. The relationship with competing companies shall obey the rules of cordiality and mutual respect.

Our purpose in quality, environment, hygiene, occupational safety and food safety

Intraplás' purpose is to ensure that it is complying with the highest applicable standards and regulations in the field of Quality, Environment, Hygiene, Occupational Safety and Food Safety and that we are continuously working to improve them.

Offer high quality products and services to clients, meeting their expectations and needs. The certifications we have acquired (e.g., ISO 9001) ensure that the company's processes are aligned with high quality standards that we want to maintain.

Protect the environment and minimise the company's environmental impact. We have implemented the use of renewable energy sources - a photovoltaic farm, as part of the action plan.

Ensure health and safety in the working environment. Focus on the implementation of adequate health and safety measures, such as the provision of personal protective equipment and safety training for employees.

Ensure the production of safe products in compliance with the applicable legal and statutory requirements, respecting the appropriate levels of quality, food safety and hygiene.

Intraplás is seriously and consistently committed to this purpose in order to ensure stakeholders' trust.



Code of conduct ombudsmen

Intraplás' Board of Directors has appointed two Code of Conduct Ombudsmen, in order to guarantee the monitoring and observance of the Code of Ethics and Conduct. Their mission, acting independently and impartially, is to:

1. Ensure the dissemination of the Code of Ethics and Conduct to its target audience.
2. When formalising the employment contract, each Employee signs a declaration stating that he/she is aware of the Code and that he/she is committed to complying with it. Any doubts regarding the interpretation or application of this Code should be reported to the Code of Conduct Ombudsmen.
3. Verify the existence of internal mechanisms for the communication of irregularities, ensuring their procedural handling in accordance with that defined.
4. Propose to the Board of Directors the approval of amendments to the Code of Ethics and Conduct whenever deemed necessary.



Report any irregularity:

1. Reports of irregularities may be filed by any stakeholder (e.g., employees, shareholders, suppliers, etc.), in good faith, and they must be well-founded and sent, identifying the sender or anonymously, to the e-mail address of the Code of Conduct Ombudsman - provedores@Intraplas.pt.
2. The reports of irregularities will be analysed rigorously and impartially.
3. The confidentiality of the identity of the person reporting the irregularity and of those involved in the reported facts is guaranteed, under the terms authorised by the National Data Protection Commission.
4. Any form of retaliation against the person reporting the irregularity is prohibited.
5. The person reporting the irregularity shall be kept informed of the status and follow-up of the report made, under the terms and within the deadlines set out in applicable national law.



