

CODE OF CONDUCT

2026



TABLE OF CONTENTS

1 Letter from the CEO	3
2 Introduction	4
2.1 Principal information.....	4
2.2 Scope of application.....	4
2.3 Accountability.....	4
2.4 Borregaard's risks.....	5
3 Caring for people	6
3.1 Health and safety.....	6
3.2 Human rights and labour rights.....	6
3.3 Respect, diversity, inclusion and equal rights.....	7
3.4 A drug-free working environment.....	7
3.5 No to purchase of sexual services.....	8
3.6 Protection of privacy and personal data.....	8
4 Acting with integrity	9
4.1 No to corruption and bribery.....	9
4.1.1 Giving or receiving gifts.....	10
4.1.2 Events.....	10
4.1.3 Money laundering.....	10
4.2 Avoiding conflicts of interest.....	11
4.3 Fair competition.....	12
4.4 No insider trading.....	12
4.5 Trade legislation and sanctions.....	13
4.6 Formal requirements and reliability in agreements and financial matters.....	13
5 Borregaard's assets and interests	14
5.1 Protection of assets and information.....	14
5.2 Protection of reputation.....	14
6 Borregaard's stakeholders	15
6.1 Protection of the climate and environment.....	15
6.2 Local communities.....	15
7 Compliance	16
7.1 Duty of compliance with regulations.....	16
7.2 Reporting.....	16
7.3 Implementation, training and control.....	16

1 LETTER FROM THE CEO

Dear colleagues,

Borregaard shall conduct its business in accordance with the principles of responsible, ethical and sound business practices and comply with all applicable laws and regulations. This assumes a collective effort on the part of all employees and others representing the company, and that each individual understands their responsibility for correct decisions and behaviour in situations in which this may be challenged.

Borregaard's Code of Conduct is rooted in the Borregaard culture and values document "The Borregaard Way". This sets out the overarching standard for how we conduct business and make responsible business decisions that create value while also protecting the environment. The Code of Conduct provides clear principles and rules for how individuals shall act on behalf of the company. Nevertheless, ethical challenges may change over time and vary between business areas and departments. Therefore, it is important to address ethical challenges in employees' own departments and to assess them together with colleagues and management. The HR department can be contacted for further guidance.

Borregaard depends on the trust of its many stakeholders. Trust must be earned every day through positive relationships and actions that show that we can be trusted. We rely on each and every one of you in order to achieve this.

Thank you for your contributions in making Borregaard the good company that it is.



Tom Erik Foss-Jacobsen
CEO

2 INTRODUCTION

2.1 Principal information

Borregaard's values are sustainability, long-term perspective and integrity. Sustainability describes Borregaard's entire business model and, throughout its extensive history, the company has demonstrated that it takes a long-term approach to development and decisions. Integrity is about demonstrating personal integrity and "doing the right thing", even when no-one is looking. Integrity is the link between life and wisdom, meaning that we stand for what we believe is right and do not allow ourselves to exert wrongful influence in ethical situations. We will be honest, truthful and reliable. We will act responsibly, and we will be respectful of individuals, business associates and different cultures in society.

Employees, board members and others acting on behalf of Borregaard shall comply with applicable legislation and internationally recognised conventions, as well as this Code of Conduct, in all business dealings on behalf of Borregaard. In cases where there are discrepancies between the Borregaard Code of Conduct and legislation, we shall always choose the strictest option.

The Borregaard Code of Conduct is not exhaustive. The company has several governing documents and specific guidelines that complement the Code of Conduct and describe the company's stance in various areas. The Code of Conduct primarily describes individuals' responsibilities within the prescribed framework and subsequently references any further documents relevant to the matter in question.

There will also be areas or situations that are not specifically described in the guidelines. For this reason, it is important that we all help to ensure that challenging matters are raised with a manager or colleagues and openly discussed in order to identify good solutions based on the overarching values we have in common.



In cases where there are discrepancies between the Borregaard Code of Conduct and legislation, we shall always choose the strictest option.

2.2 Scope of application

The Borregaard Code of Conduct applies to all employees and board members in the Borregaard Group. This shall also apply to employees and board members in entities controlled by Borregaard. The Code of Conduct also applies to consultants, intermediaries and others acting on behalf of Borregaard.

Borregaard also encourages and expects all business partners to adhere to principles that correspond to the standards set out in the Code of Conduct. Our suppliers are required to sign the Borregaard Supplier Code of Conduct or confirm that they have adopted standards corresponding to the Code of Conduct.

2.3 Accountability

The Board of Directors of Borregaard own and approve the Code of Conduct and the Code of Conduct is presented annually to the Board of Directors for approval.

The President and CEO has the overarching responsibility for the Code of Conduct, while the Senior Vice President of Organisation and Public Affairs is responsible for the implementation, follow-up and maintenance of the Code of Conduct.

The Code of Conduct is distributed to all employees, managers and board members. Reference to the Code of Conduct shall also be included in employment contracts and the Employee Manual.

2.4 Borregaard's risks

Borregaard works systematically and with a broad approach to ensure an overview of the various risks that may affect operations. This is applicable to all relevant areas: commercially, within EHS and with regard to reputation and ethical matters.

An internal compliance board has been established to review and assess the company's activities in particular and to ensure compliance with applicable laws, regulations and internal guidelines. The compliance board identifies priority areas based on an assessment of risk, materiality and relevance.

Through the social engagement programme, regular dialogue with stakeholders, media analyses and investor meetings, Borregaard obtains an overview of stakeholders' assessments of the company's risks and challenges.

Borregaard's most important topics relating to sustainability and corporate responsibility have been described in the sustainability reports and identified and ranked using separate stakeholder and materiality analyses.

The topics and principles covered in this Code of Conduct shall reflect the company's risks at any time and shall be updated as needed in the event of changes to the overall risk situation.



3 CARING FOR PEOPLE

3.1 Health and safety

Safety is our highest priority at Borregaard, and our vision is zero injuries to employees or third-parties. Borregaard shall be a safe workplace. Health, safety and the environment (EHS) has been integrated into our management system and we comply with applicable legislation. Borregaard takes a proactive approach to work in this area and applies the “precautionary principle” as a guideline. Thorough and systematic causal analyses are carried out in order to achieve improvements.



Safety is our highest priority at Borregaard, and our vision is zero injuries to employees or third-parties.

3.2 Human rights and labour rights

Borregaard supports and respects internationally recognised human rights and labour rights. This includes the UN’s Universal Declaration of Human Rights, the ILO’s core conventions on fundamental rights and principles at work and the OECD Guidelines for Multinational Enterprises. We comply with applicable local legislation in the countries we operate.

The use of child labour or forced labour is not tolerated. We work systematically and we have established systems to minimise all forms of human rights violations and to ensure decent working conditions within our own organisation, as well as at our suppliers and other business partners.

Borregaard supports employees’ right to organise and other forms of democratically elected employee representation. Trade union representatives and other stakeholders are involved in relevant matters. In countries that impose restrictions on the right to organise, Borregaard seeks to establish alternative opportunities for employees to influence their work situation.

Your responsibilities

- Work actively to ensure that you always carry out your work safely.
- Familiarise yourself and comply with the company’s EHS regulations.
- Inform your immediate manager of important health and safety issues at or in connection with your workplace.
- Look out for your colleagues and business partners by providing direct and constructive feedback based on the “Thank you for caring” principle.

More information

[Borregaard’s Environment, Climate, Health and Safety engagement Policy.](#)

Your responsibilities

- To not cause or contribute to the violation or circumvention of human rights or labour rights.
- To report any violation or circumvention of human rights or labour rights you become aware of in our own organisation, as well as at our suppliers or other business partners.
- To respect personal dignity, privacy and other rights of individuals you interact with.

More information

[Borregaard’s Human rights policy.](#)

[UN’s Universal Declaration of Human Rights](#)

[ILO’s core conventions on fundamental rights and principles at work](#)

[OECD Guidelines for Multinational Enterprises](#)



It is important to be aware that, in addition to being a health and safety risk, the use of narcotics and alcohol can affect judgment and behaviour in such a way that is incompatible with representing the company or being a good colleague or member of management.

3.3 Respect, diversity, inclusion and equal rights

Borregaard is committed to ensuring that the workplace is characterised by diversity and respect for different perspectives, and we comply with the applicable working environment legislation.

We will treat one another with respect and consciously avoid behaviour and communication that could be perceived as discriminatory, harassing, offensive or threatening. No discrimination shall take place, whether based on gender, sexual orientation, age, ethnicity, culture, religious convictions or other aspects.

A positive working environment that is characterised by respect and diversity is not only about the absence of harassment and discrimination but also ensuring that we all accommodate and actively contribute to ensuring that differences, diversity and equal opportunities become a strength for the company.

3.4 A drug-free working environment

Borregaard does not accept the use of narcotic drugs in connection with the execution of work. This also applies to work assignments and business trips conducted on behalf of Borregaard.

For ordinary work, alcohol shall not be consumed in the workplace or combined with operating machinery, driving or other work that is incompatible with the consumption of alcohol. Alcohol may be served in conjunction with corporate hospitality or internal company events, provided that consumption is moderate and the time and place are appropriate.

It is important to be aware that, in addition to being a health and safety risk, the use of narcotics and alcohol can affect judgment and behaviour in such a way that is incompatible with representing the company or being a good colleague or member of management.

Your responsibilities

- To treat everyone respectfully, fairly and with dignity.
- To make decisions based on qualifications and diversity, without emphasising factors that discriminate and conflict with the principle of equal treatment.

More information

[Borregaard's Human rights policy.](#)

Your responsibilities

- Do not perform work under the influence of alcohol or drugs.
- Do not drive a car or other vehicle under the influence of alcohol or drugs.
- Be conscious and temperate when alcohol is served at corporate events.

More information

[Borregaard's Human rights policy.](#)



3.5 No to purchase of sexual services

Borregaard does not permit the purchase of sexual services in connection with work or assignments carried out on behalf of the company. This will help prevent human trafficking and human rights violations.

3.6 Protection of privacy and personal data

Borregaard respects the privacy of its employees and business partners and personal data is used only in accordance with applicable data protection regulations.

Individuals are entitled to information about the processing of their personal data and have the right to ensure that their personal data is correct.

Personal data shall be used only for the purposes for which the data has been collected. Access to personal data is restricted and such data is not stored for longer than necessary for the purposes for which the data was collected. Borregaard has implemented systems to ensure that both manual and automated processing can take place in accordance with applicable legislation.

Your responsibilities

- Do not purchase sexual services during business trips or other assignments carried out on behalf of the company.
- Do not encourage others to purchase sexual services or accept sexual services paid for by others.

Your responsibilities

- To respect individuals' right to privacy.
- To familiarise yourself with the rules relating to the protection of privacy and personal data and to process personal data in accordance with such rules.

More information

- *Employee Manual (internal)*
- *Borregaard's GDPR Management System (Internal)*

4 ACTING WITH INTEGRITY

4.1 No to corruption and bribery

Borregaard has zero tolerance for corruption, including bribery, facilitation payments and improper trading in influence. We comply with applicable regulations relating to anti-corruption and we work actively to ensure that our business partners do the same.

Bribery occurs when an individual directly or indirectly offers, gives, receives, requests or agrees to accept an improper advantage of any kind by virtue of their position. An improper advantage is an advantage that does not have a legitimate business purpose and is normally offered in order to influence the recipient, but there is no requirement for the improper advantage to result in the recipient acting in a specific manner. An improper advantage refers not only to money, it can also include anything of value, such as donations, trips, benefits-in-kind, favourable conditions, etc. and the recipient may be the individual, their friends or their family.

Trading in influence constitutes an offer of an improper advantage or the acceptance of such an offer between individuals who have the opportunity to influence the execution of a position, office or assignment.

Facilitation payments refer to small amounts paid to civil servants to accelerate or secure products or services that the civil servant is required to provide without such payment. Borregaard distances itself from facilitation payments and the fact that such payments are common or advantageous in a specific situation shall not justify the use of such payments.

Corruption can have serious consequences for Borregaard as a company and for individuals. It can lead to criminal prosecution, liability, loss of profits and damaged reputation.



“ Borregaard has zero tolerance for corruption, including bribery, facilitation payments and improper trading in influence.

Your responsibilities

- To ensure that all payments are fair and appropriate, authorised by the right person in the company and recorded correctly for accounting purposes.
- Not to offer or accept bribes.
- Not to make facilitation payments even if such payments are lawful in the jurisdiction in question.
- To act openly and transparently and to seek advice from your immediate manager in the event of a challenging situation arising. Such discussions constitute an important part of the company's efforts to prevent corruption and bribery.
- To familiarise yourself with the Anti-Corruption Manual.

More information

🔗 [Borregaard's Anti-Corruption Manual](#)

4.1.1 Giving or receiving gifts

Gifts in a business context shall not be given or accepted with a view to influencing the recipient for the benefit of the giver. It may be permissible to offer or receive personal courtesy gifts, provided they are of minimal financial value, are not given frequently and are clearly appropriate under the circumstances.

It is not permitted to give or receive cash or gifts that are given in return for services. Gifts shall not be given in a context or a way that might provide grounds to suspect that the recipient will keep such gift or benefit a secret from his or her superior. Gifts from Borregaard should be addressed to the recipient's official work address.

4.1.2 Events

Events for business associates shall always have a specific and relevant business purpose and shall be reasonable and appropriate in terms of both value and frequency. For invited guests, attendance shall be cleared with their superiors if Borregaard is to pay in whole or in part.

The same principle applies for Borregaard employees' attendance at similar events organised by suppliers or other business associates. Travel and accommodation shall be paid for by Borregaard. Employees may, subject to management approval, attend events at which business topics constitute the main part of the programme.

4.1.3 Money laundering

Money laundering refers to schemes implemented to make money or other assets acquired through criminal activities look as though they have been lawfully earned.

Borregaard opposes all forms of money laundering and complies with applicable anti-money laundering legislation. We will only conduct business with recognised business partners involved in legitimate business activities using funds from legitimate resources. For this reason, we carry out integrity due diligence in relation to all new business partners.

Your responsibilities

- To not give or receive gifts if such gifts could be perceived as influencing a decision.
- To ensure transparency and openness regarding any gifts received or given and to ensure that these are in accordance with the aforementioned guidelines and the Anti-Corruption Manual.
- To notify your immediate manager without delay in the event that you have been offered or have received gifts or services.

Your responsibilities

- To ensure that any business events you participate in or host, have specific and relevant business purposes, are reasonable and affordable and that your participation has been authorised by your manager.

Your responsibilities

- To be conscious of any attempts to pay in cash or other factors that entail unusual or changed payment instructions via banks or otherwise.
- To investigate and report suspicious transactions to the VP of Finance. This includes activities for which the purpose is to avoid paying taxes, customs duties or other public fees.

4.2 Avoiding conflicts of interest

A conflict of interest may arise when personal interests could influence or be perceived to influence an individual's ability to make decisions on behalf of Borregaard in a manner that is in the best interests of the Group.

The individual shall be loyal to Borregaard and avoid situations in which there is an actual or potential conflict of interest, as well as situations that may be perceived as a conflict of interest externally.

Employees shall not undertake work or other assignments on behalf of organisations with which Borregaard has or may be expected to enter into commercial relationships without notifying their immediate manager. Any such work or assignments shall not be in conflict with Borregaard's interests. A thorough assessment should be made to avoid activities that may be perceived as promoting the interests of a competitor, a supplier or other stakeholders at Borregaard's expense.

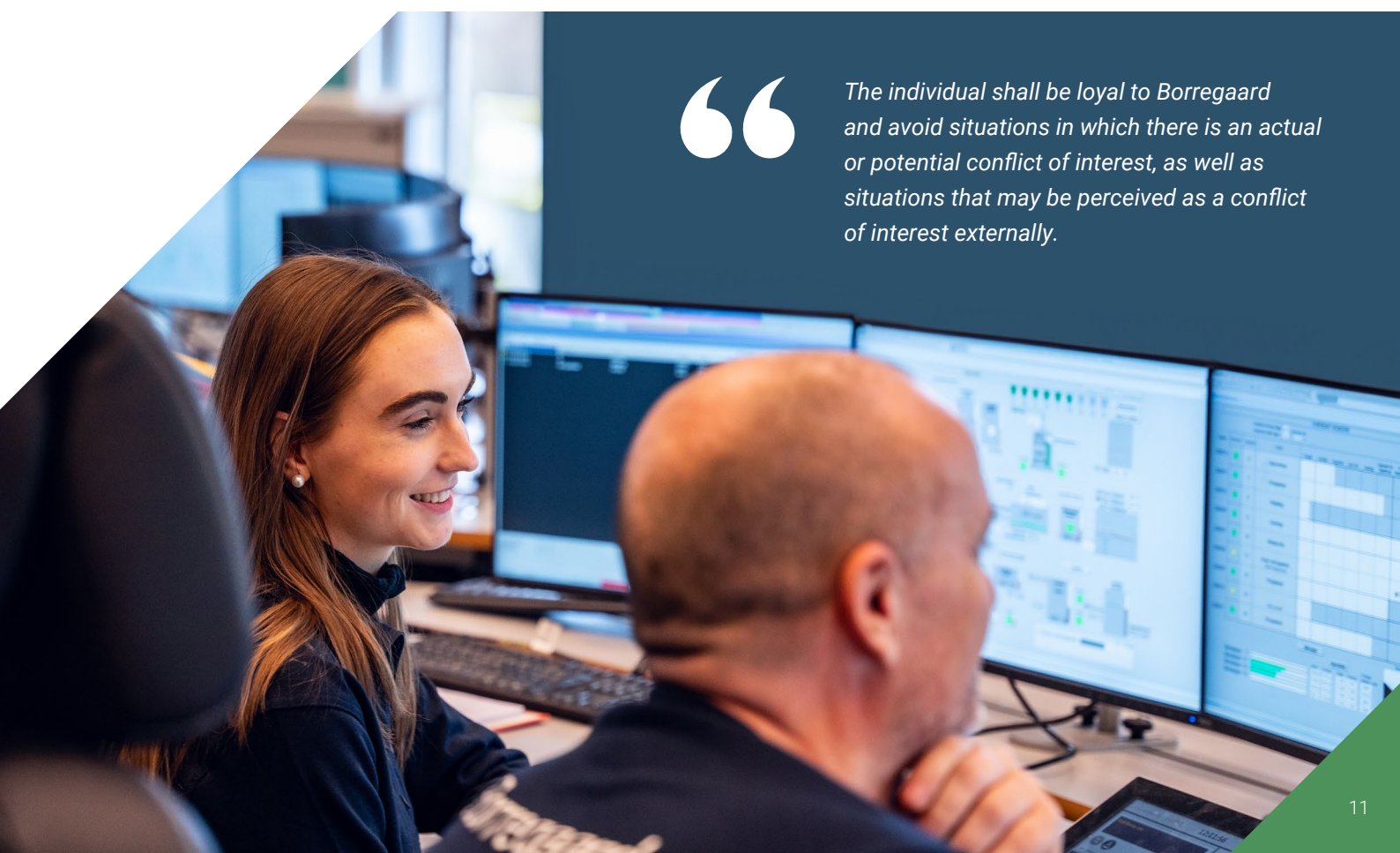
Borregaard does not permit employees to market products or services that compete with Borregaard's business activities or that may otherwise adversely affect the company, e.g. Borregaard's reputation.

Your responsibilities

- To ensure that you act with the best interests of Borregaard in mind.
- To assess any personal relationships and associations that may lead to an actual or potential conflict of interest and to avoid participating in or seeking to influence decisions in relation to which you have or may have such personal interests.
- To inform your manager of any potential conflicts of interest, including situations that may be perceived externally as a conflict of interest.
- To assess whether other work assignments or positions of trust may conflict with the interests of Borregaard and to obtain the necessary approval before undertaking such assignments.



The individual shall be loyal to Borregaard and avoid situations in which there is an actual or potential conflict of interest, as well as situations that may be perceived as a conflict of interest externally.



4.3 Fair competition

Competition laws protect free competition and prohibit conduct that restricts trade or fair competition and apply at all levels of business. Furthermore, competition laws combat unlawful practices such as price fixing, market sharing, exchange of sensitive information, cooperation in tenders and abuse of dominant market positions.

Borregaard shall compete in a fair and ethically defensible manner in accordance with applicable competition legislation. Borregaard is committed to fair and open competition and to not participating in activities that entail unlawfully obtaining, receiving, using or sharing non-public, competitively sensitive or commercially sensitive information.

Your responsibilities

- To familiarise yourself with and ensure compliance with applicable competition legislation and internal guidelines.
- Not to engage in activities that entail obtaining, receiving, using or sharing non-public, competitively sensitive or commercially sensitive information.
- To contact Legal Director immediately if you are in possession of or become aware that others are in possession of non-public, competitively sensitive or commercially sensitive information. The same shall apply to other activities that contravene competition legislation. You shall not discuss or share information with others.
- To seek advice from the legal department on matters that entail Borregaard being exposed to a breach of competition legislation.

More information

[🔗 Borregaard's Competition law compliance manual \(internal\)](#)

4.4 No insider trading

Insider trading is prohibited by law and individuals shall refrain from this. This includes the purchase or sale of securities issued by Borregaard (or other publicly traded companies) or advising others about trading in such securities on the basis of information that has not been made known to the public and is likely to have an effect on the price of the securities.

Your responsibilities

- To protect confidential business information and to not use such information to your own advantage or guidance in connection with the purchase or sale of securities issued by Borregaard or other companies.
- To familiarise yourself and comply with Borregaard's instructions for the handling of inside information in connection with the purchase or sale of securities.
- To contact the Legal Director in connection with all matters that entail a risk of insider trading and in the event of doubts about how to interpret or apply Borregaard's rules or public laws.

More information

[🔗 Borregaard's instructions for managing inside information](#)

4.5 Trade legislation and sanctions

International economic sanctions impose restrictions and prohibitions on the sale, transfer, supply or export, directly or indirectly, of certain goods, technologies, software, services and funds, as well as brokerage services and technical assistance, including the disclosure of information in certain countries and territories. Sanctions legislation also prohibits dealings with certain parties that are subject to sanctions, restrictions imposed by governments and international organisations.

Export legislation imposes restrictions and prohibitions on the sale, shipment, electronic transfer or other export of certain types of goods, assets, software, funds and services across national borders.

Borregaard will comply with rules relating to sanctions and export and import control that are applicable to the business and has established systems to ensure compliance.

Your responsibilities

- To adhere to the company's established procedures before establishing new business relationships, in order to ensure that the parties are not subject to sanctions.
- To pay particular attention to exports and imports to and from territories and countries that are subject to sanctions regulations and export control and to continuously assess whether goods, services or funds are subject to restrictions or prohibitions. Please note that sanctions rules are complex and constantly changing.
- To seek advice from the Trade Compliance Officer or Legal Director before conducting a business transaction if you are unsure whether the transaction may be subject to sanction or export legislation.

4.6 Formal requirements and reliability in agreements and financial matters

Borregaard's agreements with employees, business associates, public authorities and partners shall be made in writing and filed properly. Verbal agreements can be difficult to document and can sometimes lead to suspicions that something illegal or unethical has taken place.

Borregaard's financial statements shall always be complete and accurate and drawn up in accordance with applicable law and generally accepted accounting principles.

Employees involved in cost accounting, financial transactions or accrual accounting shall ensure that all transactions are fully and accurately documented and registered in accordance with applicable law, generally accepted accounting principles and internal requirements. Inaccurate or misleading bookkeeping is unacceptable under any circumstances.

Travel expenses shall be reported in accordance with the formal requirements for expense reports and only when they meet eligibility requirements for reimbursement from the company. For internal events, the bill shall be signed by the senior manager holding the highest position.



Borregaard's agreements with employees, business associates, public authorities and partners shall be made in writing and filed properly.

Your responsibilities

- To ensure that agreements are made in writing, authorised in accordance with the company's authorisation matrix and that agreements are properly archived.
- To ensure that travel expenses and other expenses for reimbursement are documented and linked to assignments carried out on behalf of the company.

5 BORREGAARD'S ASSETS AND INTERESTS

5.1 Protection of assets and information

Borregaard's assets and information shall be protected against misuse, theft, damage or destruction. Intellectual property rights such as patents, designs, trademarks, formulations, know-how, ideas and other internal company information shall also be protected. Borregaard's property should not be used for an employee's own purposes without specific permission.

A trustful relationship with customers, business associates, colleagues and the community is created through dialogue and by sharing perspectives. At the same time, unlawful disclosure of confidential information to others could be harmful to Borregaard. Business information relating to Borregaard or Borregaard's business partners that is not public and has been accessed through work shall be considered confidential. Examples of such information include business plans, budgets, marketing and sales plans, formulations, design specifications, customer data and similar. Confidential information shall never be disclosed to persons outside the company, unless expressly permitted by an authorised manager or required by law. The obligation not to disclose such information shall apply without time limits and also after the termination of the employment or assignment for the company.

5.2 Protection of reputation

Borregaard's reputation is important if the company is to inspire confidence and succeed in its business. A good reputation is built when stakeholders such as customers, suppliers, partners, public authorities, and current and prospective employees perceive congruence between the way Borregaard is profiled and referred to and the manner in which this is reflected by individuals in practice.

In order to ensure comprehensive, consistent and orderly communication with the media, all enquiries and statements shall be coordinated with Borregaard's Communication department.

It is important to be aware of how social media works and what policies the company has for the use of social media, both privately and in conjunction with business. Posting images and statements on social media may



Borregaard's assets shall be protected and include intellectual property rights such as patents, designs, trademarks, formulations, know-how, ideas and other internal company information

Your responsibilities

- To conduct yourself responsibly and with caution in order to protect Borregaard's assets, information and intellectual property rights.
- To not use Borregaard's assets for your own purposes without specific permission.
- To not share confidential information without authorisation from an authorised manager, unless required by law. This shall apply without time limits.

More information

- *Confidentiality provisions set out in the employment contract (internal)*
- *Information Security Policy (Internal)*

damage Borregaard's interests or reputation and may breach the obligations of loyalty and confidentiality that you must observe as an individual.

Your responsibilities

- To conduct yourself professionally and properly when making reference to Borregaard.
- To refer all enquiries from the media to Director Communications at Borregaard.
- To clearly distinguish between your role as an individual and employee and your role as a representative of Borregaard when posting on social media.

6 BORREGAARD'S STAKEHOLDERS

6.1 Protection of the climate and environment

Our understanding of sustainability and our corporate responsibility is based on our business model, the way in which we conduct business and the products we manufacture being sustainable and designed to meet global needs. Borregaard will enable both the company and its employees to contribute to climate-friendly and environmentally friendly resource management.

Borregaard shall promote a corporate culture characterised by respect and consideration for other people, their property and for the state of the environment and climate. We shall act, as a company and as employees, in a manner that instills confidence in colleagues, suppliers, customers, public authorities and others who are in contact with or are affected by Borregaard's activities.

6.2 Local communities

Borregaard is important to many stakeholders in some local communities, especially in Sarpsborg, Norway. We play an important role in the city and region as an employer, customer of many suppliers and socio-economic contributor through taxes and fees from our business activities and through our many employees who support various initiatives and voluntary organisations.

We are able to support initiatives that increase the attractiveness of an area or generate interest in fields that are of importance to the company. Such support shall be coordinated and determined by the Department of Communication. Employees shall not provide funding or sponsorship contributions, financially or through products and services, on behalf of the company.

Borregaard strives to ensure positive contact and dialogue with politicians and government bodies, both directly and via special interest organisations. Borregaard does not give financial support to political parties. Borregaard recognises employees' rights to engage with political parties as individuals.

Your responsibilities

- To treat other people and the environment with respect and due consideration.
- To work to understand and minimise the environmental and climate impacts of your work and to contribute to Borregaard's sustainable business model by sharing ideas and experiences that may have a positive impact.

Your responsibilities

- To assess whether decisions and actions may have an impact on the local community.
- To assess whether initiatives in the local community may be worthy of support and contributions from Borregaard and to contact the Department of Communication for further coordination and decision-making.

7 COMPLIANCE

7.1 Duty of compliance with regulations

A personal responsibility to comply with the requirements in Borregaard's Code of Conduct. No-one shall commit any act, or encourage others to commit any act, in violation of the Code of Conduct. This requirement shall apply even if violations of a principle may appear to be in Borregaard's best interest.

Any doubt as to whether a particular activity complies with the principles of the code of conduct must, as far as possible, be discussed in advance, primarily with the employee's immediate superior. Borregaard believes it is valuable to discuss what constitutes responsible behaviour in an informal and improvement-oriented manner. However, violations of the rules described in the Code of Conduct may lead to internal disciplinary action, and, in the most serious cases, to termination of employment and possible prosecution.

7.2 Whistleblowing

Any actions that are unlawful or that represent a breach of the principles set out in Borregaard's Code of Conduct shall be reported, verbally or in writing, to the immediate manager where possible. If it is not possible to notify the immediate manager, you may approach the Head of HR, other managers, the President and CEO or Chair of the Board of Directors. .

Reporting can also take place confidentially or anonymously using the company's digital whistleblowing system, "MittVarsel". The system can be used by both employees and external parties and can be used to report misconduct and suspected Code of Conduct violations. Any reporting

of unlawful activity or violations of Borregaard's Code of Conduct will be taken seriously and investigated responsibly.

Borregaard prohibits any form of retaliation against employees or others who have, in good faith, reported a known or suspected violation of the law or of Borregaard's Code of Conduct. Any employee who feels that whistleblowing has in any way been used against him or her by a Borregaard employee may report this to his or her immediate manager, or directly to any of those persons mentioned above. Deliberately false or misleading reports will not be accepted and will result in disciplinary action.

More information

[*🔗 Borregaard's Whistleblowing Portal*](#)

7.3 Implementation, training and control

All employees shall familiarise themselves with the Code of Conduct and participate in training offered by Borregaard and/or individual group companies. In connection with appointment, the Code of Conduct shall be signed to confirm that it has been read and understood and that the employee is committed to ensuring compliance.

Borregaard will prepare relevant support materials and can also assist individual group companies with training and awareness programmes.

The status of group companies' activities relating to the Code of Conduct will be reviewed annually at the subsidiaries' board meetings and in Borregaard's sustainability reporting.



borregaard.com



SUSTAINABILITY
DOCUMENTATION



BORREGAARD'S
BUSINESS POLICIES