

# Employee Code of Conduct



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# A Letter from the CEO: Sustana Code of Conduct

Sustana is proud to be recognized as pioneer and leader in environmental sustainability, recycling, and circularity. Our premium, sustainable recycled fiber and paper make sustainability an ingredient in products people use every day.

We define success by the quality of our products and our ability to exceed our customers' expectations, as well as by the effect our behavior, operations and products have on people and the planet. This means behaving responsibly, thinking strategically for the long term, and being good stewards of the shared resources that benefit communities and drive the economy.

Our success depends on the trust and confidence we earn from our employees, customers, and suppliers. Trust and confidence are built through repeated positive interactions that demonstrate value, respect and appreciation time and time again. Building this trust and confidence allows us to work effectively as a team and build lasting success and value.

The Sustana Employee Code of Conduct is a summary of expectations for how all individuals in our organization should and must conduct themselves when interacting with each other, customers, suppliers or taking any actions on behalf of the company. It is derived from our organizational Values and applies to every employee, at every level, at every location.

For that reason, it is vital that all of us know, understand, and embrace our Sustana Employee Code of Conduct and its underlying expectations. We continue to focus on improvements going forward and will work to be the best possible organization – one that is admired by customers, competitors and suppliers and a source of pride for all employees and our communities. We strive to be an organization all are proud to work with and desire to work for.

Thank you for your commitment and support of our Employee Code of Conduct. The Code will only strengthen our ability to deliver on our commitments to deliver sustainable solutions involving premium, environmentally friendly recycled fibers and papers.

With gratitude for your efforts on behalf of Sustana,

**Fabian de Armas** - CEO, Sustana  
August 2023

# Sustana – Our Values

At Sustana, we are guided by our Values. We appreciate hard work and commitment. We respect and support each other. We remain dedicated to building our team-focused organizational culture while embracing the uniqueness of each of our employees.

We seek transparency and the use of effective communication as the foundation for all our relationships. Our resources are focused on the development of the individual, team, and organization while sharing a commitment to each other's success.

## **INTEGRITY**

- Transparency, accountability and trust are the pillars of our business. We say what we mean and do what we say.

## **SAFETY**

- Our culture is built upon caring for people, providing a safe workplace and making them accountable, proactive and vigilant.

## **CUSTOMER FOCUS**

- Customer service is a team effort. We work together to do what is needed to deliver exceptional service and meet and exceed the needs of our customers.

## **TEAMWORK**

- The strength of our organization lies in the shared knowledge and expertise of our employees. We reward team effort and embrace new ideas that deliver results. We are fully committed business partners.

## **SUSTAINABILITY**

- Sustainability is in every fiber of our business. We look for ways to continue to shrink our environmental footprint. All employees and stakeholders are invested in a sustainable business and planet.

# Your Personal Responsibilities

## FOLLOW OUR CODE

The Sustana Employee Code of Conduct (Our “Code”) applies to each and every employee at Sustana regardless of job level, title, role or responsibilities and governs every business decision and action we take. Therefore, everything we individually and collectively do must comply with our Code, our policies and applicable laws. Our Code applies to activities at Sustana facilities and anywhere else work is being done on the company’s behalf or where work-related social functions are occurring. This Employee Code of Conduct is applicable to all employees at Sustana sites, including directly engaged or indirectly hired employees, such as onsite contractors. This document refers to all employees working onsite at Sustana sites as “employees” collectively.

## LEAD BY EXAMPLE

When we personally commit to doing the right thing and walking the talk it makes others want to do the same and builds trust and credibility.

- Take actions that support Sustana and its employees;
- Be safe and follow all safety rules and procedures;
- Offer solutions to issues and opportunities you see;
- Respect others;
- Focus on situations, not people;
- Do what you say you are going to do;
- Take personal responsibility – don’t blame;
- Be honest;
- Assume positive intent – most people are well-intentioned;
- Be kind;
- Don’t hold grudges – speak up or let it go;
- Talk to others directly, not behind their backs;
- Take care of yourself mentally, physically and nutritionally.

While it is every employee’s responsibility to lead by example, an extra level of expectation is placed upon those in leadership and management roles. Not only must they be positive role models, they must also listen and respond to concerns brought to their attention in an appropriate manner, and must discuss people or situations with the appropriate leadership team, not other employees.



### **SEE SOMETHING, SAY SOMETHING**

It is each and every one of our responsibilities to ask questions, raise concerns, and report violations of our Values, Code, policies and/or the law as they arise.

Our Code cannot foresee or describe every situation we encounter. If you have questions on how to interpret the Code, need help with a situation not expressly written into the Code, or are being asked to perform a task that you believe violates our Code or the law you can seek guidance from your immediate manager, next level manager, or Human Resources. If you do not feel your concerns are being addressed, elevate to senior leadership or use our other channels. E.g. the whistleblower channels, see information below.

### **NON-RETALIATION**

Founded or unfounded concerns reported in good faith will be thoroughly investigated and, if appropriate, acted upon. We are committed to carrying out a timely investigation of any reports and ensuring the confidentiality and protection of the employee or third-party. Retaliation against an employee who reports what they believe is or could be a violation of our Values, Code or the law, who raises questions or seeks advice or who participates in an investigation is in and of itself against our Code of Conduct and should be reported. We have zero tolerance for any retribution within the company and recognize the right of whistleblowers and will work with them to ensure there are no legal repercussions for their actions.

# Respect for Labor and Human Rights in our Workplace

Respect is a cornerstone to success and accomplishing our goals. Self-respect means setting boundaries and taking appropriate measures if you believe you are not being treated appropriately. Respect for others is about being open to another's perspective and treating them with that same level of worth.

## ADHERENCE TO LAWS AND THE CODE

Sustana sites will, at a minimum, comply with the requirements set forth in this Code of Conduct or with the provisions of the laws and regulations of the jurisdictions in which these entities operate. In cases in which the laws or the provisions of this Code differ, the Supplier and its Facilities will adhere to the requirements that provide greatest protection to the worker and the environment.

## CHILD LABOR

Sustana sites will not tolerate the use of child labor anywhere in its operations. The minimum age for work at Sustana's owned operations will be defined by local legal requirements in the areas in which Sustana operates, or set at 15 years of age, whichever is higher. All sites will have in place robust age verification systems. Training and apprenticeship schemes shall be permitted, and these will be managed in line with local legal requirements. Young employees, meaning those employees that may be under 18 years of age, will not be permitted to work at night – defined as a period of not less than seven (7) hours, falling in between 00:00 and 05:00, unless otherwise defined by local law – or in job that requires hazardous work – defined as any type of employment or work, which by its nature or the circumstances in which it is carried out, is likely to jeopardize the health or safety of the persons performing that work, unless it is otherwise defined by local law.

### **INVOLUNTARY LABOR**

Sustana sites will not engage in, nor will they support or tolerate forced labor. All employees shall enter into employment voluntarily and may terminate employment with reasonable notice. No one will work under the menace of any penalty or sanction. Prison labor will not be used by any Sustana sites. No fees or related costs will be charged – directly or indirectly, in whole or in part – to applicants or employees for services directly related to recruitment that may lead to situations of forced or compulsory labor. No monetary deposits, financial or other collateral guarantees shall be required as a condition of employment. Sustana's sites will perform age and right to work checks with personal documentation but, will not maintain the original versions of these documents; they will be expeditiously returned to the Worker. Sustana sites will not restrict the freedom of movement of the employees to the extent that employees will not be required to remain at the workplace past the conclusion of their working hours, and reasonable restroom and hydration breaks will always be permitted.

### **FREEDOM OF ASSOCIATION**

Employees at Sustana sites will have the right to join or form trade unions or other worker organizations of their own choosing – or refrain from doing so, in line with local law – and to bargain collectively in accordance with applicable legal requirements. Sustana sites will not discriminate against worker representatives or members of trade unions or otherwise penalize them because of their membership in or affiliation with a trade union or worker organization. Duly-elected worker representatives of trade unions and other worker organizations will have access to the workplace to carry out their representative functions in accordance with legal requirements.

### **EMPLOYMENT RELATIONSHIP MANAGEMENT**

Sustana sites will inform employees about their employment terms and conditions in writing in an understandable manner before employment begins. No employment arrangements will be used in order to avoid obligations to employees under applicable national labor and social insurance / social security laws.

### **COMPENSATION AND BENEFITS**

Sustana sites pay wages that meet local legal requirements, including wages outlined in collective bargaining agreements (CBA) in force; will pay wages regularly, in a timely manner, and in full; and will provide to employees clear details in writing on the calculation of their wages. Sustana will only levy legally-permitted deductions from employees' wages, and employees will be informed in writing of the nature of any deductions levied. There will be no deductions from wages as a disciplinary measure.



## WORKING HOURS

Sustana sites will conform to legal requirements regarding limits on standard working hours and overtime. Overtime hours are to be conducted on a fully voluntary basis. Employees are entitled to legally required breaks, and will have rest one day each week, or if permitted by local law and collective bargaining agreements (CBAs), two (2) rest days in a period of 14 days. Sustana sites will provide paid leave in line with local legal requirements and the stipulations of CBAs in force.

## HEALTH AND SAFETY

Our culture is built around our care for others which includes fostering a safe and healthy work environment where employees are accountable, proactive, and vigilant. We have high operating standards to meet or exceed all applicable laws, regulations, and standards to ensure the health and safety (H&S) of our employees and maintain an environment that supports zero injuries, accidents, and unsafe behaviors. We all play a key role in the success of our safety program and keeping all who enter our facility free from harm.

Sustana sites will maintain a positive H&S culture where all employees feel involved and empowered.

Sustana will:

- Assign clear responsibility for the development, implementation, and maintenance of the occupational health and safety management system;
- Set health and safety objectives;
- Provide all employees with effective health and safety training as required to carry out the duties and responsibilities of the job;
- Provide health and safety training in a timely fashion and on a regular and repeated basis, especially for new or reassigned employees, and when changes in the process or machinery used present new risks;
- Provide safety training free of cost and during remunerated working hours;
- Perform risk assessments as appropriate to detect and assess potential threats to the health and safety of employees, and undertake effective measures to address the findings from the risk assessments;
- Maintain written records of all health and safety incidents in the workplace and all other facilities, as mandated by local law;
- Determine the cause of health and safety incidents, and undertake corrective actions to prevent the recurrence of similar incidents;
- Provide appropriate and effective personal protective equipment (PPE) free of charge to employees, and maintain this equipment and replace it as necessary;

- Instruct all employees on the proper use of PPE;
- Monitor the use of PPE among the workforce onsite;
- Maintain adequate, documented emergency and fire safety procedures for all sites;
- Train employees on emergency and fire safety procedures;
- Properly mark fire exits, escape routes, firefighting equipment, and fire alarms;
- Maintain fire exits and escape routes open, accessible, and clear of obstacles so as to permit safe evacuation in case of an emergency
- Allow for employees to remove themselves from imminent danger without seeking permission;
- Undertake appropriate measures to evaluate and monitor the strength, stability, and safety of buildings and equipment, and undertake corrective action, where required.

To help us provide a safe working environment for everyone, the following applies for all employees:

- Follow all safety-related rules and procedures at all times.
- Report any accident, injury, incident, unsafe condition, or act, near miss, or property damage to your direct supervisor immediately.
- Wear all personal protective equipment (PPE) or clothing as required.
- Do not remove, displace, damage, destroy, or disconnect any safety device or safeguard.
- Check to ensure that all machine guards are in place before starting or operating equipment.
- Only use, adjust, or repair equipment when authorized.
- Follow all lockout / tagout policy standards.
- Keep access to all exit doors, aisleways, walk-path egresses, fire extinguishers, and sprinkler control valves clear of obstructions at all times.
- Keep stairwells clean and free of clutter that may cause a hazard.
- Use proper lifting techniques; if an object is too heavy, get help.
- Inspect all ladders and step stools before use; ensure they are in good working condition and use them properly.
- Use only hand tools that are in good condition. Inspect tools prior to use.
- Place cones and caution tape to alert others of any hazard or spill.
- Only operate powered industrial vehicles (PIVs) if appropriately authorized and trained.

- Possession of, or consumption of alcohol or drugs at any time on company property or reporting to work under the influence of alcohol or drugs is strictly prohibited.
- Only smoke or use tobacco in designated areas outside the facility.
- Any violation of the firearms and weapons code is strictly prohibited.
- Complete all required safety training in a timely manner.
- Maintain good housekeeping practices throughout the facility and grounds. Deposit waste in proper receptacles provided. Keep your work area clean and orderly and clean up spills immediately.

For more information see our [Health and Safety Policy](#).

### DIVERSITY AND INCLUSION

Sustana is committed to fostering a diverse and equitable workplace and cultivating an inclusive culture where every employee feels valued, respected, and has equal opportunities to contribute and succeed. Everyone should feel respected and appreciated. This makes everyone much more engaged in our company's success, and much more willing to question the status quo and share their thoughts and ideas.

By respecting everyone's talents, abilities, and experience and valuing their input we foster an atmosphere of trust, openness and candor that is necessary for Sustana to achieve its goals.

For more information, see our [Diversity, Equity and Inclusion Policy](#).

### ANTI-DISCRIMINATION

Discrimination is prohibited in both our owned sites and in the sites of our Suppliers related to: recruitment, hiring, training, promotion, compensation, separation, or any other aspect of employment. This includes any form of discrimination based on personal characteristics that do not interfere with a worker's ability to do a specific job, including, but not limited to:

- Age
- Disability
- Ethnicity
- Race / color
- National origin
- Religion
- Gender or gender identity
- Sexual orientation
- Marital status
- Parental status
- Pregnancy
- Affiliation or non-affiliation with a trade organization
- Political beliefs
- Veteran status
- Medical or genetic information
- Any other personal characteristics

Sustana supports workplace diversity to solicit a variety of perspectives and foster creativity to better inform business decisions, including support for equality in all aspects, of note the aspect of gender, in the promotion of employees to managerial positions.

This commitment is further detailed in our [Diversity, Equity and Inclusion Policy](#) and [Human Rights Policy](#).

### ANTI-HARASSMENT

Sustana does not tolerate any form of harassment or abuse in its operations or at Supplier worksites. This includes all forms of harassment and abuse including, but not limited to: corporal punishment, mental or physical coercion, bullying, and sexual harassment.

While the legal definition may vary from country to country or state to state, we consider the following to be unacceptable harassing behaviors:

- Sexual harassment
- Offensive language or jokes
- Racial, ethnic, gender or religious slurs
- Degrading comments
- Intimidating or threatening behavior
- Showing hostility toward others

More specifically, sexual harassment may consist of verbal, visual, or physical conduct of a sexual nature that is unwelcome or that makes someone feel uncomfortable. It can take many forms such as:

- Sexual advances, requests for sexual favors, or unwelcome demands for dates
- Sexually oriented comments, jokes, pictures, text or email messages
- Explicit or degrading comments about appearance
- Display of sexually suggestive pictures or pornography

Sustana has a zero-tolerance policy towards any behavior - physical or verbal - that intimidates, injures, attempts to control, or otherwise threatens a person's emotional, mental or physical well-being. All threats, or insinuations of a threat, will be taken literally and seriously.

If you or a co-worker is being harassed or threatened it is your responsibility to report it. There is zero-tolerance for retaliation for reporting in good faith potential harassment of any kind. Any potential harassment or threats should be reported to your immediate supervisor, next level supervisor and/or Human Resources immediately.

For more information see our [Diversity, Equity and Inclusion Policy](#) and [Human Rights Policy](#).

## SUBSTANCE ABUSE

Sustana strives to provide a safe and productive work environment. Employees that work under the influence of drugs and/or alcohol pose an unacceptable safety risk to not only themselves but others. Drugs include not only illegal drugs, but controlled substances and misused prescription medication. All employees are expected to perform their job duties free from the influence of any substance that could impact safety and/or impair job performance. Therefore the following activities are prohibited:

- Working under the influence of alcohol, illegal drugs, or controlled substances on or off Sustana's premises
- Possessing, selling, using, transferring or distributing illegal drugs or controlled substances while working on or off Sustana's premises
- Working while impaired by a lawful prescription medication or over the counter drug

We recognize the powerful nature of drugs and alcohol and realize that abuse and addictions occur. If you have a drug or alcohol problem we remind you that it is your duty to get help before it negatively impacts your life and your job. Contact your local Human Resources team to learn of available assistance programs in your area.



### FIREARMS AND WEAPONS

Our company also prohibits the possession of weapons in the workplace. To the full extent permitted by local law this prohibition extends to company parking lots as well as our facilities. Weapons include, but are not limited to, firearms, explosives, knives, and other weapons that might be considered dangerous and can cause harm.

### DRESS CODE

Our goal is to provide a workplace environment that is professional and comfortable and inclusive for all employees. Sustana encourages employees to dress in a manner appropriate for the day's business activities; customers make decisions about the quality of our products and services based on their interactions with employees and the way you dress goes a long way in establishing trust and credibility with customers, suppliers and vendors. Office employees should dress as if they will come into contact with customers, suppliers and key stakeholders of the company. It is also expected that employees will not wear anything that other employees might find offensive.

We expect that your business attire will exhibit common sense and professionalism and will not interfere with your ability to perform your work safely (for example wearing loose fitting clothing poses a safety hazard in our manufacturing facilities). We realize that clothing selection is highly personal and what is considered appropriate to one might be considered inappropriate by another. For this reason we will deal with employees whose attire may not be appropriate on an individual basis rather than subjecting all employees to a more stringent dress code.



## NEPOTISM AND PERSONAL RELATIONSHIPS IN THE WORKPLACE

Sustana's policy is to hire, promote, and transfer employees on the basis of individual merit and to avoid any hint of favoritism or discrimination in making such decisions. The company also acknowledges the advantages of accepting employee referrals of friends and family when filling vacant positions. With that practice, however, comes the risk that favoritism or interpersonal conflicts might interfere with production or sound decision-making.

To mitigate any real or perceived risks in hiring family and friends of employees or to manage any consensual romantic relationships that may occur in the workplace Sustana has adopted the following guidelines:

- Family members include an employee's parents, children (natural, adopted, or legal guardianship), spouses, domestic partners, brothers, sisters, grandparents, grandchildren, in-laws and step-relationships within the preceding categories.
- Family members and friends are eligible to be considered for employment at Sustana if they possess all required qualifications for the position and procure the position on their own merits.
- Managers and employees will exclude themselves from any hiring process where a friend or family member is being considered for employment.
- Employees will not be assigned to a department, work area or work station where they will be under direct or indirect supervision of a family member or romantic interest if this creates a conflict of interest or if it can be reasonably assumed that it could eventually lead to a conflict of interest.
- If during the course of employment, an employee becomes assigned to a department, work area or workstation where they will be under the direct or indirect supervision of a family member or a person with whom they're involved in a romantic relationship, the Manager, Director or the person of authority in that department has the obligation to immediately inform the Human Resources department so that appropriate measures may be implemented.
- If during the course of employment, an employee becomes a family member or becomes involved in a romantic relationship with another employee and that relationship could create a potential conflict of interest, these employees must inform the Human Resources department, so measures can be taken, if necessary, to minimize potential conflicts.

## **CONFIDENTIAL AND PROPRIETARY INFORMATION**

During the course of employment we will all come into contact with information that, if improperly disclosed, could harm Sustana's business or that of our customers, suppliers or other business partners. Business and marketing plans, earnings forecasts, pricing, new product development, proprietary technical knowledge and organizational information are just a few examples of such information. To be safe it is best to assume that all company information you have access to is confidential, proprietary, or sensitive in nature. To protect the company you should only share information on a need-to-know basis, checking with your manager before sharing or discussing anything that is particularly sensitive be it verbally, via email or on social media platforms.

## **COMPANY ASSETS AND EQUIPMENT**

All equipment, vehicles, machinery, computers and any other items owned by the company or located at company facilities should be treated with respect and care. Equipment and vehicles should be used in a manner consistent with operating manuals and official company policies. All employees have a responsibility to ensure the equipment, vehicles, machinery, computers and other items used are properly maintained with the assistance of maintenance and IT teams.

Equipment is to be used for company business only and not for personal use. Office employees can use company telephones for reasonably limited personal communications at the discretion of their supervisor. All emails written on company computers are the property of the company. The company reserves the right to look back at emails for whatever reason it deems appropriate.

## **COMPUTER, EMAIL, PHONE, INTERNET AND GENERIC COMPANY NETWORKS USAGE**

Technology is critical to running our business. A system issue can curtail our ability to do business, impacting customer service, production and financial results. Therefore, it is more important than ever to safeguard our technology platforms by using them for authorized business purposes only. Be aware that any information you create, share, search for, or download onto company systems becomes the property of the company. Company systems and networks may contain confidential or sensitive Company data or personally-identifiable information that the company must legally protect. Be aware that, as a company employee, you have a responsibility in safeguarding the confidentiality of company and personal information. You must avoid divulging sensitive company or



Personally-Identifiable Information (PII) outside of the Company without prior due consent.

The following guidelines apply to use of our technology:

- Never download or install any unauthorized or unapproved software from the Internet.
- Never open a file you cannot identify, is from an unknown person or whose email address does not correspond to the name or description of the person it pretends to come from.
- Ensure your computer is secure when you leave your work area.
- Never visit sites that contain sexually explicit, illegal, unethical, discriminatory, threatening, or any otherwise inappropriate material.
- Never divulge directly or indirectly Personally-Identifiable Information (PII) or sensitive / confidential company information. If in doubt, contact the IT or HR department to verify what is considered PII or confidential.

The employees' personal use of company systems must not impact the company. Any occasional personal use of company systems must not adversely affect the company and may not involve outside commercial activities. Sustana reserves the right to monitor system use at any time and delete questionable material without notice.

### **SOCIAL MEDIA USAGE**

Social media is an important way we connect with others. It helps us maintain existing relationships, start new relationships and communicate with customers, suppliers, and colleagues. However, misuse of social media can be harmful to you and/or the company.

The following guidelines apply to all employees regarding social media use:

- You are personally responsible for what you post, write or publish online. Please remember that everything that goes on the Internet stays on the Internet. This means everything you publish will be visible to the world for a long time.
- When discussing Sustana or brand-related matters on the Internet, you must identify yourself with your name and, when relevant, your role at Sustana.
- Very few people are authorized to officially speak for the company. If you are not one of them, you must make clear that you are speaking for yourself and not for Sustana. Please always write in the first person and don't use your company email address for private communications. Even anonymous postings can be traced back to the company.

- Treat all confidential information and trade secrets of our company, of our partners and suppliers, as strictly confidential. Do not share this information online.
- No one is allowed to post information from internal company communications without specific written authorization; no exceptions. Messages from our leadership to all employees are not meant to be shared externally. If the company desires the communication to be external our marketing group will manage the external messaging.
- If you see something on social media regarding the company, please let the marketing group know.
- Use common sense. If you are about to post something that you feel could make you or anyone else even the slightest bit uncomfortable, review and reconsider.

### EXTERNAL COMMUNICATIONS

Open communication both internally and externally is positive and necessary, however one piece of information taken out of context or an incomplete, or poorly worded document can be detrimental, especially when dealing with external communications. Therefore, only authorized company representatives, namely the Executive Team, Facility Managers and Human Resources are approved to speak on behalf of the company as part of a fully developed communication plan.

If you are approached either in person or through social media by the press, investors, or market analysts to comment on company business just politely inform the requesting party that you are not authorized to discuss the subject and refer them to a member of your organization who is.

### CHARITABLE ACTIVITIES

Sustana believes in corporate responsibility through its environmental efforts (which is a core component of our overall business model), philanthropy (donating money, products and services) and volunteerism. Given the multitude of ways to give back, and the sheer number of worthwhile organizations to support, the company has identified organizations, causes, and activities that it will support as an organization.

We encourage each and every employee to get involved with organizations and causes that are personally important to them by volunteering, fundraising, donations, etc. While it is acceptable to inform others in the workplace of your activities so that they can decide if they would like to join with you, it is important that it be done without pressuring others or using company assets unless approved in advance.

# Administering our Code

## REPORTING

Sustana is our company so we all need to take the responsibility to personally follow our Code of Conduct and to report any concerns you have, or observations you make that might violate our Code. The key is to report anything concerning, even if you are not sure an actual Code violation has occurred. That way we can investigate so we can properly fix issues that have occurred or prevent something from happening in the future. While we prefer to know who is voicing a concern so we can ask any necessary follow-up questions, you are able to anonymously report them as well. All concerns should be directed to your direct supervisor, next level supervisor or Human Resources. Elevate any concerns to senior leadership if you feel they are not being appropriately addressed. You can also report any incidents of discrimination, harassment, or bias via our whistleblower channels (email to [report@sustanagroup.com](mailto:report@sustanagroup.com) or [hr@sustanagroup.com](mailto:hr@sustanagroup.com)). You can also use the Ethics Reporting Hotline (3<sup>rd</sup> party hosted platform) to make an anonymous or non-anonymous report online or by phone: <https://sustana.ethicspoint.com/>.

Sustana has zero tolerance for any retribution within the company, recognizes the right of whistleblowers to raise concerns, and will work with them to ensure there is no retaliation for having brought forward a concern in good faith.

## INVESTIGATING

We take all reports of suspected Code violations seriously and make investigating them a priority. We will protect the identity of the reporting party to the fullest extent possible and inform employees who have had an accusation reported about them as soon as doing so will not negatively impact the investigation. We encourage the reporting of all good faith concerns, founded or not. We will not, however, tolerate knowingly false reports. It is the responsibility of every employee to cooperate fully and honestly in all investigations and will not tolerate retaliation of any kind against anyone who shares a good faith concern or participates in an Employee Code of Conduct investigation.

### **TAKING ACTION**

We take all Code and legal violations seriously. Sites will have documented rules for employees' reference and written disciplinary procedures will be in place. We will take swift and appropriate action that fits the nature and seriousness of the violation, and records of disciplinary actions will be maintained. These actions could include, for instance, formal documented coaching, or termination of employment, and will be in line with local legal requirements. Additionally, if an act violates a law, it could also result in fines or criminal prosecution.

### **OUR CODE IS NOT A CONTRACT**

Our Employee Code of Conduct is not a contract, does not convey any employment rights or guarantees of employment, and can be modified at any time by Sustana's Executive Team.



Version: 2.1

August 11, 2023