



*When  
packaging  
matters*



# **WESTPACK CODE OF CONDUCT**



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# Introduction



**Good business  
is always coupled  
with good behavior**

**The Westpack Code of Conduct is anchored in the values that Westpack was built. The values include reliability, community, and not least responsibility. We seek to stay true to these values in all business conduct which is well reflected in our amfori membership and the principles of BSCI. Westpack is therefore committed to complying with the principles of BSCI and therefore the entirety of the amfori BSCI Code of Conduct shall be considered an integral part of the Westpack Code of Conduct (CoC).**

**The term ‘supplier’ covers all the following: partner factories, suppliers, sub-suppliers and sub-contractors.**

*This 2021 version overrules the Westpack Code of Conduct versions of 2014 and 2020. This CoC is available in both English and Chinese. If there are any discrepancies between the English version and Chinese version, the English version shall prevail.*

### **Compliance with Westpack Code of Conduct**

The Westpack CoC not only serves as a guideline for the business conduct, which is expected of Westpack's suppliers, but it also serves as a means of evaluating our suppliers on a continuous basis.

The supplier shall allow Westpack and/or any third party representing Westpack unhindered access to production facilities, employees and to all relevant data needed to audit the supplier after the principles of BSCI. Audits will generally be conducted as semi-announced (i.e., any day in a 4-week period) in line with the principles of BSCI, but may also be announced or unannounced.

The supplier shall ensure that the content of this CoC is communicated to its employees. A copy of Westpack CoC and related appendices in all relevant languages shall be made available in a place accessible to all employees.

The supplier shall use reasonable endeavors to achieve the goals set out in the Westpack CoC and amfori BSCI Code of Conduct. If a supplier cannot document compliance with this Code in a reliable manner, Westpack is entitled to demand that the supplier implements a corrective action plan to remedy the non-compliance. If Westpack has recommended such a corrective action plan, and it

is not implemented in a reasonable time frame, Westpack is entitled to terminate its business relation as a last resort.



## General Principles and Auditing

Central to this Code is that the supplier shall treat the environment and all its employees with respect and dignity.

As mentioned in the above, Westpack applies the amfori BSCI standard for auditing. The amfori BSCI Code of Conduct refers to international conventions such as the Universal Declaration of Human Rights, the Children's Rights and Business Principles, UN Guiding Principles for Business and Human Rights, OECD Guidelines, UN Global Compact and International Labour Organization (ILO) Conventions and Recommendations relevant to improve working conditions in the supply chain. For the specific standards and requirements please refer to amfori BSCI Code of Conduct annexed to this CoC and the BSCI audit checklist in the amfori System Manual.



The frequency of audits is determined by an overall risk assessment amongst all suppliers to Westpack.

The supplier shall comply with national and all other applicable laws, prevailing industry standards, BSCI principles and in some instances our customers will also have their own specific Code of Conduct that must be complied with. In case a customer specific CoC must be taken into account, this document will also be annexed to this document.

Obeying domestic laws is the first obligation of suppliers. In countries where domestic laws and regulations are in conflict with, or set a different standard of protection than the amfori BSCI Code of Conduct or customer specific CoC, suppliers should seek ways to abide by the principles that provide the highest protection to the workers and environment.

In order to avoid the waste of resources associated with double auditing Westpack may exempt suppliers from further auditing if the supplier in question is already audited by an accredited auditing company applying a recognized auditing standard.

## European Timber Regulation

The European Union Timber Regulation (EUTR) aims to counter illegal logging and associated trade in timber and timber



products in the member states of the European Union, and ultimately contribute to sustainable management of forests and reduced emissions from deforestation and forest degradation beyond EU borders. The regulation requires operators who place timber or timber products on the EU market for the first time to exercise due diligence to make sure that timber and timber products are legal. The due diligence requires a risk assessment and the documentation of legality which includes trade name, type of product, common name of tree species, country of origin, quantity and details concerning the supply chain. For this due diligence process Westpack uses the amfori BEPI platform and we require all Westpack suppliers, producing timber related products intended for EU markets, to comply with the amfori BEPI Timber Due Diligence Programme.

## Anti-Corruption

Corrupt arrangements with suppliers, government officials, or other third parties are strictly prohibited, meaning that Westpack enforces a zero-tolerance policy. "Corruption" generally refers to obtaining, or attempting to obtain, a personal benefit or business advantage through improper or illegal means. Corruption may involve payments or the exchange of anything of value and includes the following activities:

- Bribery (bribery of a government official or commercial bribery)
- Extortion
- Kickbacks

Corrupt activities are not only a policy violation, they can also be a serious violation of criminal and civil anti-bribery and anti-corruption laws in various countries. Should you become aware of any potential or actual corrupt arrangement or agreement, speak up and report it.

## Anti-Bribery

To comply with anti-bribery laws, no employee or supplier should ever offer or receive, directly or indirectly, any form of gift, entertainment or anything of value to any government official or his or her representatives to obtain or retain business, influence business decisions, or secure an unfair advantage. Not all government payments are problematic. For example, payments may be made to a government entity in the normal course of business, such as to pay taxes or when the government entity is a customer or supplier. All payments, both direct and indirect, made to government officials must be accurately recorded.



## Non-disclosure

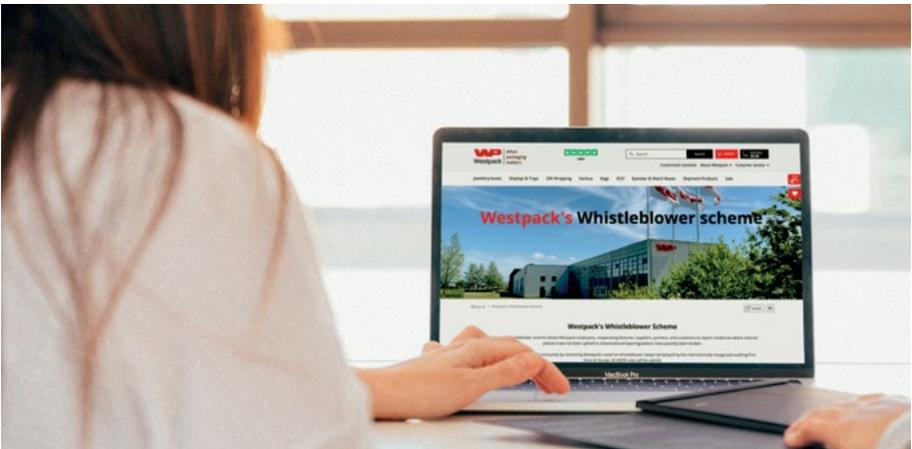
The supplier shall consider all customer related information provided to the supplier by Westpack

A/S, or third party, as strictly confidential. This includes, but is not limited to; design, pricing, strategy, promotions, volume, logistics and trade secrets. Customer related information shall be understood as information relating to customers or potential customers of Westpack A/S shared with the supplier in connection with inquiries for sub-contracted production as well as in connection with the sub-contracted production itself. The supplier shall accept limitations on future marketing and sale to Westpack's current and potential customers as introduced by Westpack.

## Whistle blower program

Westpack makes our expectations and compliance standards for anti-corruption very clear and encourages suppliers to contact the whistle blower hotline if an associate ever asks you to do anything that infringes upon the standards set forth above. The whistle blower program is handled by a third party which insures 100% impartiality. The hotline is always at your disposal for reports on violations of Westpack's policy pertaining to receiving or soliciting gifts, bribes or kickbacks, disclosure of confidential information or a conflict of interest.

In this whistle blower program your anonymity is guaranteed, so there is no risk of reprisals to your business. For more information about Westpack's Whistleblower Scheme, please visit <https://www.westpack.com/whistleblower>.



# CEO CLOSING STATEMENT



At Westpack providing quality solutions to our customers is our bread and butter. Not just the quality of the product itself, but also everything pertaining to our products. We invest a lot of resources both material, financial and human, in all parts of our value chain to meet high quality standards. To this end, our CoC is a very important tool. It guarantees that we and our business partners are constantly kept on guard concerning quality, including Corporate Social Responsibility (CSR). If only a single link in our value chain fails, the whole chain fails. Therefore, this should never happen.

When Westpack refers to quality it shall be understood in a broader sense, as do our customers. Quality in our understanding is not only the physical characteristics of a product. Quality is just as much an assessment of the physical and psychological conditions our products and solutions are produced in. Moreover, it is an assessment of the ethics and morals that set the framework for the cooperation between Westpack and our suppliers. It is a safeguard for compliance with all laws, rules and regulations in connection with the development and production of our products and solutions. In short: CSR.

When our customers choose to do business with Westpack, they take several of the above parameters into account. They do so in confidence that Westpack and our suppliers live up to the above. A breach of the Westpack CoC is a serious violation of trust between not only Westpack and our suppliers, but also between Westpack and our customers. At large, a breach of the Westpack CoC is in effect a violation of trust in relation to our community.

Westpack has been in the packaging business nearly 70 years. We believe in long term relationships with customers, business partners, suppliers and employees.

Therefore, we have the philosophy: "Good business is always coupled with good behavior". And the Westpack CoC is in effect a description and guideline for good behavior.

## **Morten Dalsgaard**

CEO Westpack  
mda@westpack.com

A handwritten signature in black ink, appearing to read 'Morten Dalsgaard', followed by a period.





With this signature the supplier hereby testifies that the supplier understands and complies with the meaning and intent of the Westpack Code of Conduct as set forth in the above.

Date: \_\_\_\_\_

Supplier Company Name: \_\_\_\_\_

Name of Signatory: \_\_\_\_\_



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