



# Data Ethics Policy

Hartmann Packaging A/S

March 2026

## 1. Introduction

Data is a vital asset for our business. We process personal data about our current, potential and former employees and business contacts, and this policy reflects our commitment to manage data responsibly based on principles of honesty, transparency and accountability.

In this policy, we provide information on how the Group manages and controls data and data systems to build credibility and confidence with the Group's customers, partners, employees, vendors and other stakeholders.

Thank you for contributing to Hartmann, and thank you for being committed to the protection of privacy and to transparent, secure and ethical data processing.

Sincerely,

Torben Rosenkrantz-Theil, CEO

## 2. Your responsibilities as an employee in Hartmann

This policy applies to all employees in Hartmann and contracted employees that act on behalf of Hartmann. The policy is supplemented by our Privacy Policy and Cookie Policy as well as our internal HR Data Protection Policy and IT Security Policy.

All business partners including third parties can have direct impact on our reputation through their behavior. For this reason, it is important that they are committed to the protection of privacy and to transparent, secure and ethical data processing in accordance with the responsibilities mentioned below.

All *employees* are expected to:

- Read, understand and comply with this policy.
- Ask for help, if you are not sure if a decision or action, you are considering, is compliant or lawful.
- Understand that you have an obligation to promptly report any activity that in your judgement would violate this policy.

All *managers* are expected to:

- Lead by example, in both words and action, towards employees and third parties representing Hartmann.
- Promote open and honest two-way communication with your team, encouraging them to raise their questions and concerns and letting them know, when an issue has been resolved.
- Acknowledge and support any employee and third parties representing Hartmann, who comes forward to discuss an issue or report a potential violation and ensure that there is no retaliation for doing so.
- Discuss this policy and the company values with your team and make sure that the employees are trained and informed about the policies, procedures and compliance risks that apply to their position.

All *associated companies* are expected to:

- Comply with this policy.

All *third parties* representing Hartmann are expected to:

- Read, understand and act in a manner consistent with this policy.

## 3. Report your concerns

Hartmann encourages employees to report concerns through the channel, which they are most comfortable with. It could be your manager, another member of management, or a relevant supporting function such as Legal ([legal@hartmann-packaging.com](mailto:legal@hartmann-packaging.com)) or HR ([hr@hartmann-packaging.com](mailto:hr@hartmann-packaging.com)). You can also report your concern through the whistleblower system.

Suppliers, customers and other parties involved with Hartmann may also report suspected violations of laws or this policy to the whistleblower system.

Hartmann does not tolerate retaliation against persons or companies making reports in good faith.

#### 4. Consequences in case of misconduct

If employees do not comply with this data ethics policy, it will result in appropriate disciplinary action including potential termination of employment and/or civil and criminal liability. This will be determined in proportion to the offense.

Associated companies or third parties, who does not comply with the policy, may risk a termination of the engagement with Hartmann and/or civil and criminal liability.

#### 5. Hartmann as data controller

When Hartmann collects data, it is primarily collected directly from the data subject. The company can also collect data from other sources such as public databases and from other third parties. Personal data is processed and handled in accordance with applicable rules and regulations, including GDPR.

Hartmann also process large amounts of data that is not personally identifiable - e.g. aggregated data, technical data, statistical data, enterprise IoT device data, industrial IoT device data or similar. The digital solutions and the collected data are used to improve our performance and reliability of our products, and also to increase productivity in our business. Data is only shared with third parties in a form, where the customer or installation is fully anonymous, unless otherwise agreed with the customer.

When using machine learning, artificial intelligence or algorithms, e.g., in connection with IoT device data collection, we strive to ensure that the results are not discriminatory or biased in any way. Furthermore, the short and long term consequences of data processing activities, especially where new technology is applied, are considered and the impact on the data subjects are taken into account.

#### 6. Security

In Hartmann, we are dedicated to data security, and our IT systems are protected against access and unauthorized or unlawful processing by technical and organizational security measures. We also have procedures in place to protect data against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction or damage.

## 7. Principles and Methods

Hartmann adheres to the 10 fundamental ethical values and principles recommended by the Danish Data Ethics Council. These values provide the foundation for our collection, processing and data usage and will be considered when developing or applying new technology:

- Processing of data must always happen in respect of social conditions, the surrounding society and democracy.
- A person's dignity must be a priority over commercial interests.
- Individuals must maintain as much control as possible over their data to secure their privacy.
- Technology must not discriminate and should support equality and justice for all people.
- The societal advances in the use of data can be achieved using data ethical solutions.
- The processing of data needs to happen in respect of fundamental human rights in a democratic society.
- In the development of new technological solutions, diversity should be taken into consideration regarding gender, age, ethnicity, etc. in the development phase.
- The data security needs to be profound to safeguard the company's integrity and liability.
- If data is processed in a way that is not compliant with this policy, it needs to be clear, who is responsible for the non-compliant data processing.
- Data processing needs to be transparent for people to feel confident about letting Hartmann process their data, and the company has to make sure that the individual has fully understood the purpose of the data processing.

## 8. Policy review and training

This policy was approved by the Board of Directors in Hartmann in March 2026 and is updated annually.

All employees will be assigned annual training in this Data Ethics Policy in Hartmann Academy and will receive a diploma after having completed the training.