



# Keter Group Code of Conduct





# Table of Content

## A WORD FROM THE CEO

## SCOPE

## OUR PURPOSE

## OUR PRINCIPLES

## KETER DNA

## GUIDING FRAMEWORK

## THE WAY WE DO BUSINESS AT KETER

We do business ethically

We treat People with Respect

We respect Human Rights

We provide a Healthy and Safe Workplace

We avoid Conflict of Interests

We maintain accurate records

We compete fairly

We build good relationships with our Suppliers

We are a Sustainable business

We take pride in the Quality of our Work and Products

We act responsibly while representing the Company

We lead by Example

## MAKING THE CODE WORK

Making the Right Decision

Speaking up and Raising Concerns

Certificate of Acknowledgement

Helpful Resources

Glossary

# A word from our CEO



**Alejandro Pena,**  
**Chief Executive Officer,**  
**Keter Group**

## To Keter Global team,

At Keter we believe that anyone can dream and as a company we dream — but then we make. We think up the impossible and turn it possible. When we're told something can't be done, we dare to do.

More importantly, we are committed to doing the right thing and doing it right. We will always act ethically, honestly and with respect to our colleagues, customers, consumers, vendors, suppliers, communities, and business partners. Our Code of Conduct clearly articulates the foundation for working the right way and meeting ethical standards at every level of the organization. Acting with integrity and using good judgment are imperative to our long-term success.

As I always say, actions speak louder than words. We will be judged by what

we do and how we do it so following the principles in our Code of Conduct is imperative and will further cement our leadership in the industry. I encourage all of you to read this Code of Conduct carefully and to think deeply about how your everyday actions impact our stakeholders.

The Code of Conduct is for everyone in the company, every role, every country, and reflects our ONE Keter mindset. Any one of our associates may face ethical decisions in their day-to-day work, and I urge you to raise any concerns through the channels that we have made available for Employees to speak up.

Our Company's reputation depends on your commitment to honest and ethical behavior.



# Scope

The Code of Conduct ("Code") is a key part of Keter compliance and integrity program.

It includes all the principles that guide Employees to do business legally, ethically and consistently with our DNA and values.

The Code outlines the expectations Keter has of all staff and their individual responsibilities in acting in the right way and in the best interests of the Company.

The Code is available in 10 languages.

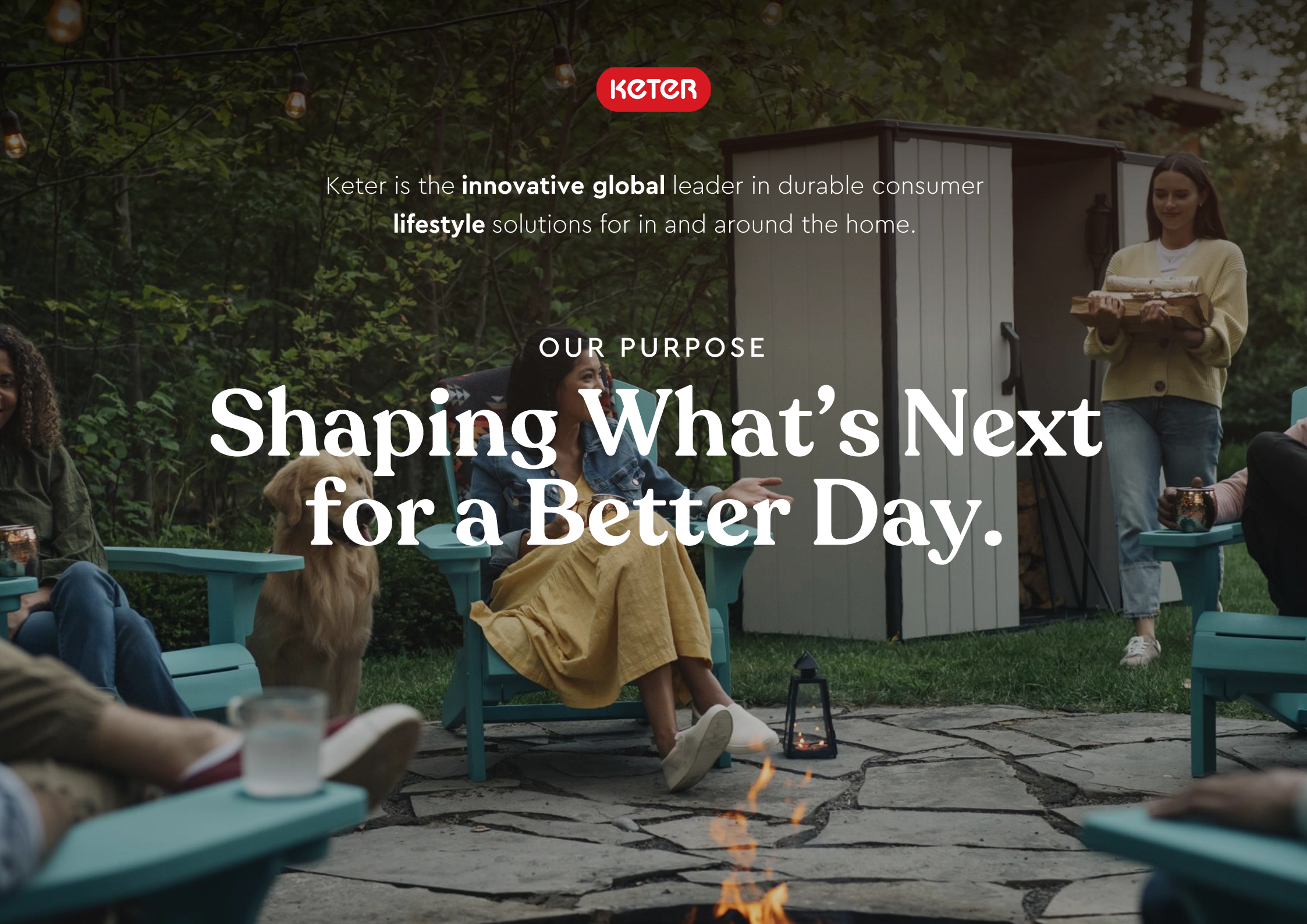
- This Code is applicable to all staff of the Keter Group entities, regardless of their location, role or seniority. This extends to consultants, agents, contractors, agency staff, temporary workers, trainees and anyone else we engage to work for us and/or who acts on the behalf of Keter (referred to as "Employee(s)" for convenience in this Code).
- If you have any questions about this Code, please discuss with a member of management or Human Resources.

The Keter logo is a red rounded rectangle with the word "KETER" in white, uppercase, sans-serif font.

Keter is the **innovative global** leader in durable consumer **lifestyle** solutions for in and around the home.

OUR PURPOSE

Shaping What's Next  
for a Better Day.





KETER

# Our Principles

## WE INVENT

We invent extraordinary, lifestyle solutions that answer unmet needs in and around the home.

## WE CREATE

Our global scale empowers us to positively impact consumers every day, everywhere around the world.

## WE DESIGN

We keep people - customers, consumers, users, shoppers - at the heart of what we do to design products that make day-to-day living better.

## WE BUILD

We use innovative materials and leading technologies to build planet-friendly products that last a lifetime.

# Our DNA

## Innovation

We continuously innovate products and processes to meet the needs of our customer and consumer.

## Agility

We respond positively to change.

## Entrepreneurship

We are passionate, optimistic and never give up.

## Accountability

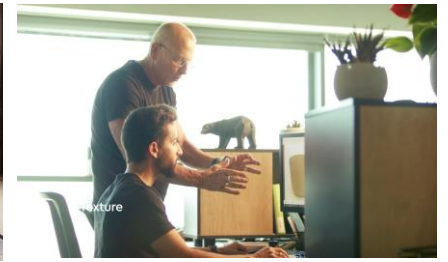
We deliver what we promise.

## One Team

We are one Keter.

## Respect

We believe in diversity and ensure that everyone feels welcome, valued and safe in the workplace.



# Guiding Framework

## Our Values

Innovation, Agility, Entrepreneurship, Accountability, One Team and Respect

They model our behaviour. All Keter Employees are expected to behave in a way that demonstrates our company's values in all business interactions.

## Our Code of Conduct

contains general standards of conduct. It is a guide to our daily business practices, whenever and wherever we are conducting Keter business. Our reputation depends on the moral, ethical and legal behaviour of all Employees.

## Our Policy Documents

supplement the Code. They establish rules of conduct, explain Keter's position on specific topics and outline the responsibility of the Company and of our Employees.

All Global, Regional and Local Policy Documents are available on the Global Keter Portal.





# The Way we do Business at Keter



# We do business ethically

The Company and its management are committed to doing business ethically and to always engage in a lawful, honest and fair dealings with our Customers, Suppliers, Employees and other Stakeholders.

Keter conducts business in an ethical, socially responsible, and environmentally sustainable manner.

## We do not tolerate Bribery and Corruption

All Keter Employees have a responsibility to act with integrity, to know and comply with Anti-Bribery and Anti-Corruption laws and to report any suspicions.

## Gratuities, Gifts and Entertainment

Keter Employees are not authorised to offer or accept anything of value to or from a customer, vendor, supplier or service agencies with whom Keter currently does business or is considering for future business. This includes gifts, money, loans, meals, lodging, trips and special favours.

[Global Anti-Corruption Policy](#), [Global Speaking up Policy](#),  
[Global Travel and Expense Policy](#)



## I have received an expensive watch from a supplier, what should I do now?

You need to refuse this gift and share our Company's rules with the giver.

For guidance, you can also contact:

- Your Line Manager or any Member of your Management Team
- Human Resources
- Legal or Internal Control Team
- [EthicsPoint Hotline](#)

If you are given a "token gift" (fruit basket, promotional items...) or you are given a gift in public, please hand it to your Human Resources representative who will either donate it or raffle it for other Employees.

# We treat People with Respect

All Keter employees are expected to treat one another professionally and with dignity and respect. Keter is committed to equal employment opportunity, to a diverse, inclusive workforce and to create a fair and safe workplace for all.

We believe diversity is what makes our Company great and is an imperative to our success. Everyone at Keter deserves an equal chance to succeed based on their hard work, talent and commitment to Keter.

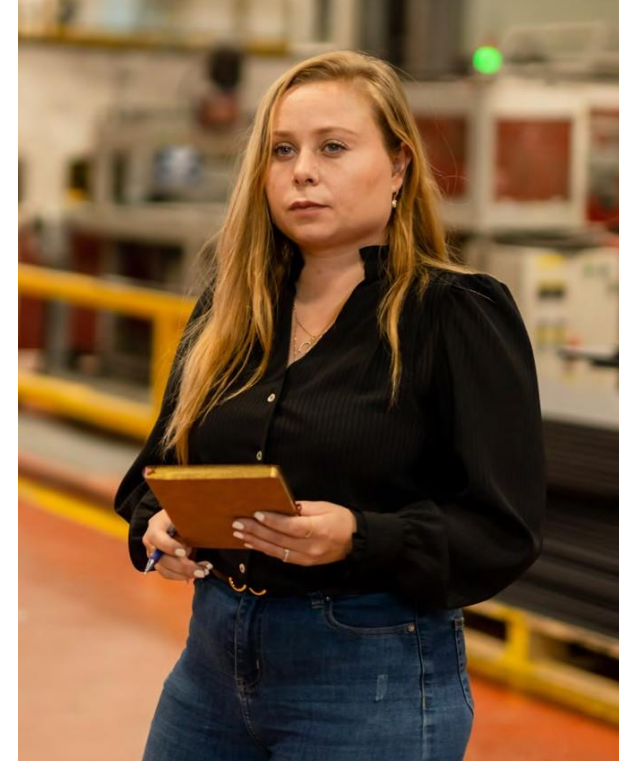
All Employees are entitled to receiving fair feedback and performance reviews.

Keter does not discriminate against any Employee or applicant for employment because of race, color, religion, sex, disability, sexual orientation, gender identity, genetic information, marital status, national origin, age, ancestry, pregnancy, veteran or military status, or any other protected category with respect to any terms of employment.

The Company does not tolerate harassment of any kind. Harassment can reasonably interfere with an individual's work performance or create an intimidating or offensive work environment. Harassment has the potential to impact an Employee's overall health and wellbeing and will not be permitted.



[Global Anti-Discrimination, Anti-Harassment and Anti-Bullying Policy](#), [Global Speaking up Policy](#), [Global Anti-Retaliation Policy](#)



## **I've witnessed an incident, what should I do now?**

If you see, experience or suspect harassment or discrimination in the workplace, you have a duty to speak up. You can contact:

- Your Line Manager or any Member of your Management Team
- Human Resources
- Legal or Internal Control Team
- [EthicsPoint Hotline](#)

### No Retaliation

Keter will not tolerate retaliation of any kind towards Employees that report violations of this Code, Keter Policies or the Law in good faith.

There are no circumstances where retaliation is appropriate, acceptable or tolerated.

# We respect Human Rights

Keter conducts our business activities in a manner that respects and promotes Human Rights:

- We ensure all our Employees (permanent or temporary) across the world work out of their own free will – we do not use any form of slavery, modern slavery, forced labour, prison labour or any form of human trafficking
- We do not use or permit the use of child labour
- We are committed to engaging with our Communities, to valuing Diversity, to maintaining safe, secure, healthy and free from violence, free from discrimination and harassment workplaces, to compensating Employees in full compliance with applicable wage, work hours, overtime and benefits laws

We recognise that Human Rights risks can appear in any country and in any context, so we collectively need to remain alert to emerging risks.

We are committed to identify, prevent and mitigate adverse Human Rights impacts that may result from or be caused by our business activities.

[Global Human Rights Policy](#), [Global Speaking up Policy](#)



**If you become aware of a possible human rights infringement, report it immediately.**

You can contact:

- Your Line Manager or any Member of your Management Team
- Human Resources
- Legal or Internal Control Team
- [EthicsPoint Hotline](#)

We will investigate, address and respond to any concerns raised by Employees without risks of retaliation. We will take all appropriate corrective actions in response to any violation.

# We provide a Healthy and Safe Workplace

The health and safety of all our Employees is of utmost importance to Keter. The Company complies with applicable health and safety laws, regulations and internal / site-specific requirements. Keter is committed to:

- Maintain a productive workplace by minimizing the risk of accidents and injuries
- Raise awareness by training Employees and communicating on Health and Safety matters regularly
- Engage our Teams to continuously improve our workplaces, identify hazards and risks and report concerns

Regional and Local Health and Safety Policies applicable to your location

## Duties of all our Employees

Employees have duties to:

- take reasonable care for their own and other people's health and safety
- work safely, following any information and training provided by Keter
- fully co-operate with Keter in all health and safety requirements
- promptly report any risks, near miss, accident, health issue

## Mental Health and Wellbeing

Mental health is just as important as physical health. We encourage all our Employees to speak up and seek help. If you are experiencing mental health issues or want to support one of your colleagues who is, you can:

- Raise a concern to your Line Manager, HR or using the EthicsPoint hotline if you are witness to a situation causing mental health issues
- Contact your country/region Employee Assistance Programmes (EAP) to seek support

# We avoid Conflict of Interests

All Keter Employees are expected to conduct business in a professional manner. Business dealings or business relationships that create or appear to create a conflict between the legitimate business interests of Keter and an Employee are unacceptable.

Examples may involve:

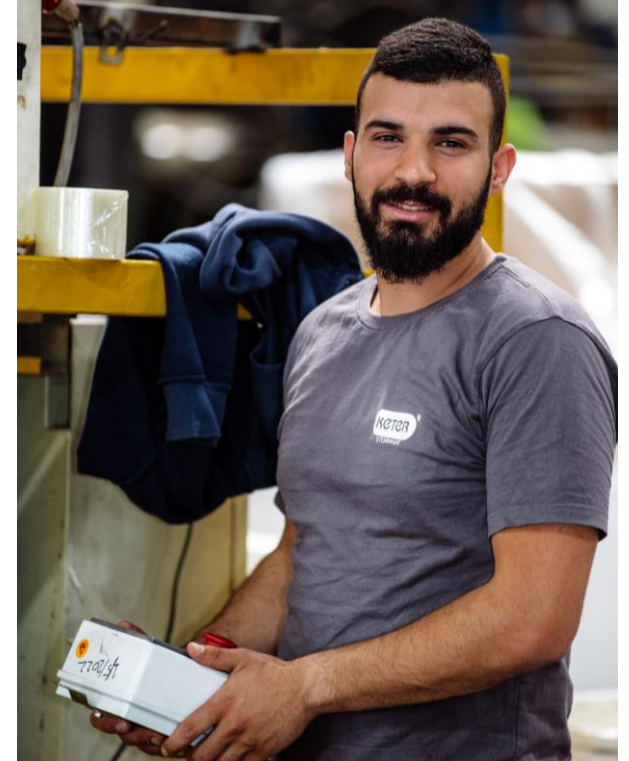
- Hiring a Company owned by a close relative to do business with Keter
- Outside employment that could interfere with Keter business
- Having financial interest in one of our suppliers, customers, or competitors
- Etc....

If an Employee has a potential or actual conflict of interest, they must report it following the Policies in place.

## Personal Relationships

In order to provide and ensure normal and dignified work conditions for all Keter's Employees, the Company requests that personal relationships are disclosed when the two Employees involved do not have the same hierarchical position.

[Global Conflict of Interest and Outside Employment Policy](#),  
[Global Speaking up Policy](#)



## Do my personal interests conflict with Keter's interests?

You can ask yourself:

- Could it affect my work and influence my decisions?
- Could it appear to others to affect my work and influence my decisions?
- Could it damage Keter's reputation?
- Could I or a relative benefit personally from my decisions?

If the answer to any of these questions is "yes" or "maybe", then stop and get advice.

# We protect Personal Information, Company Records and Proprietary Information

All Keter Employees have access to confidential information in their daily work – it can be Technical information, Product information, Employee data, Financial data, etc. – and they all have a responsibility to safeguard this confidential information.

[Global Cyber Security Policy](#), [Global Privacy Policy](#) and [Global Data Protection Policy](#)

## Company Records

As a principle, they shall only use Keter confidential information for authorized Company business and only as authorized by Company management. Company confidential information should only be shared with Keter Employees on a need-to-know basis. Employees acknowledge that the Company has the right to take legal measures, if necessary, to protect confidential, proprietary or private information belonging to the Company if any Employee fails to maintain confidences even after their employment is discontinued.

## Cyber Security

We rely on technology to collect, store and manage information and as a consequence, we become vulnerable to severe security breaches. Human errors, hacker attacks and system malfunctions could cause great financial damage and may jeopardize our company's reputation and business. All Employees have a responsibility to avoid security breaches and to report any potential or suspected security breaches.

## Personal Information

Keter respects the privacy of its customers, Employees and candidates, and is committed to protecting the personal information they share with us. We also protect the privacy of our website visitors, site visitors, followers, vendors, service providers, partners and others who come in contact with Keter. Employees at Keter must carefully read and understand our Policies and Practices regarding your personal data and how we will treat and process them.

# We protect our Company Assets

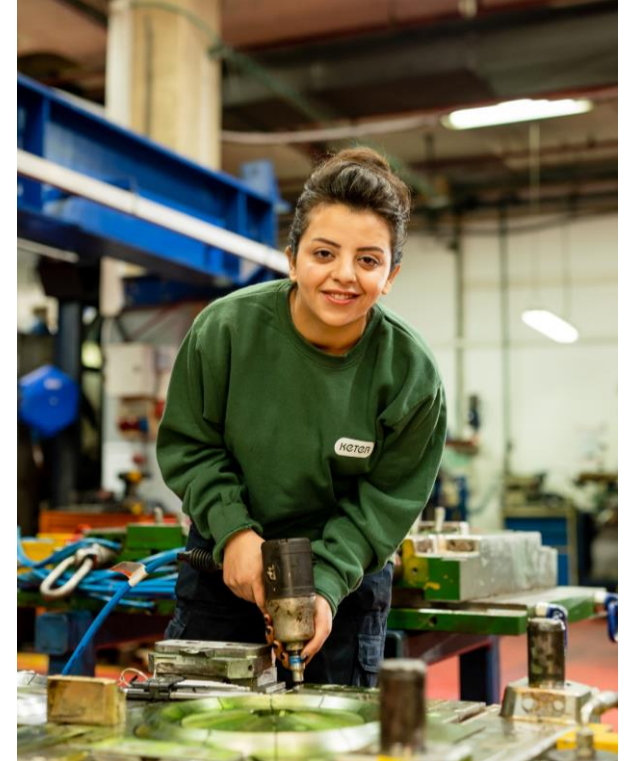
All Employees must be good steward to our Company Assets and must safeguard them.

Employees use them to carry out Company business, they must be used in their intended purpose, and they must be protected from loss, damage, abuse, theft, waste, fraud, and misuse. Each Employee has a responsibility to ensure they are preserved, protected and managed properly.

Acceptable use is clearly stated in the applicable policies and procedures. Do not use Company Assets:

- For personal gain
- For outside business
- For anything illegal or unethical

[Global Cyber Security Policy](#), [Global Privacy Policy](#)  
and [Global Data Protection Policy](#)



## Company assets can be:

Electronic: computers, telephone, emails, information technology, software, etc....

Physical: Equipment, injection machines, tools, material, office supplies, facilities, etc....

Intellectual property: our brands, patents, copyrights, etc....

Information: personal data, customer data, new product designs, customer lists, spreadsheets, costs...

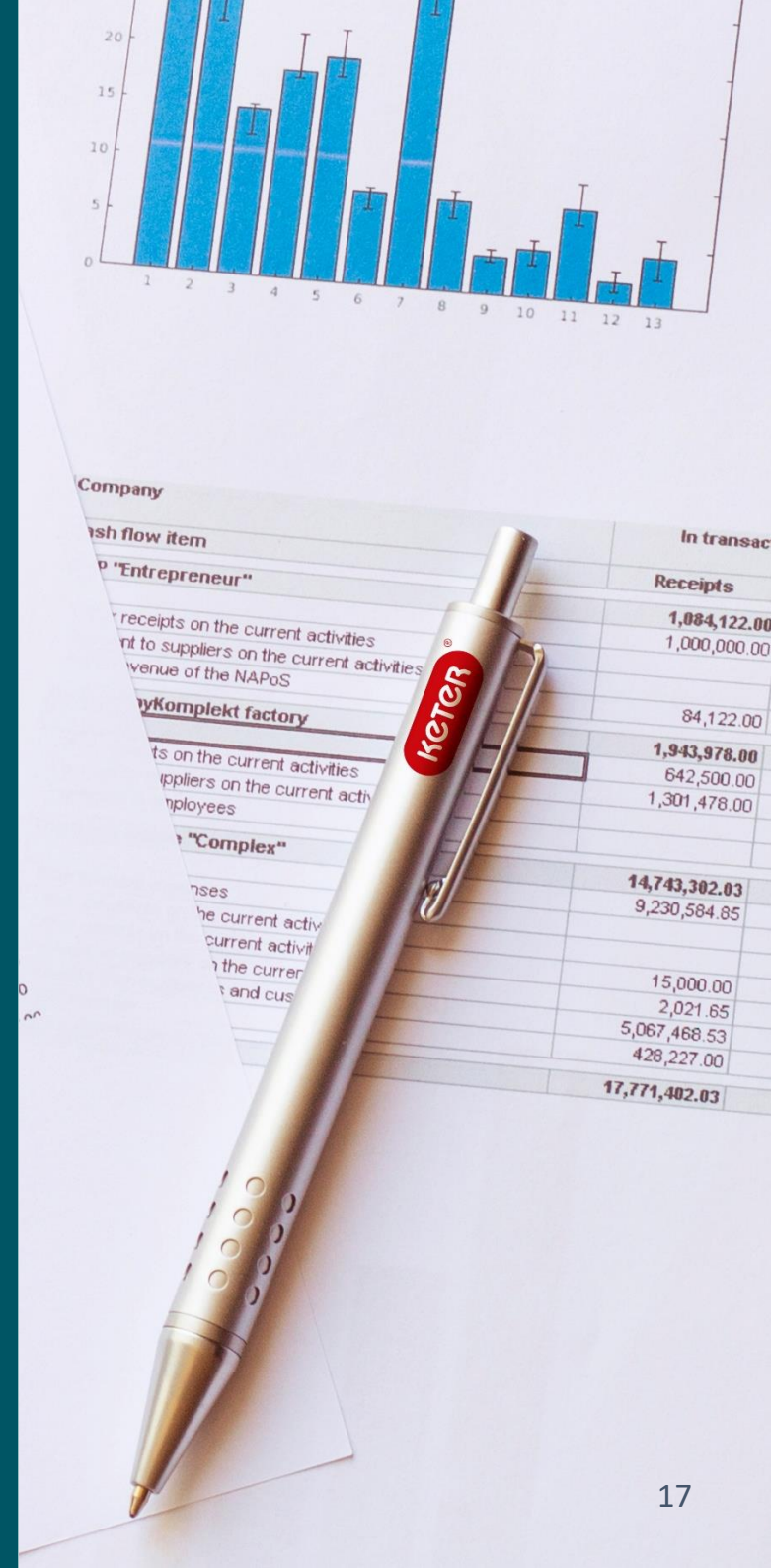


# We maintain accurate Company records

All Employees are responsible to:

- Protect the integrity of our records
- Produce accurate records – whether it is a timesheet, an expense report, a financial forecast, etc....
- Report and correct errors immediately
- Maintain, store and dispose of records according to applicable laws
- Ensure that our books and financial statements reflect an accurate picture of our business, that they comply with applicable laws, accounting principles and internal Financial procedures
- Provide complete and accurate information in response to any inquiry from the Company's management, internal auditors or independent auditor

Keter also relies on the integrity of data and accuracy of records to make business decision. They must not be misleading as they are critical to our future success and to maintaining the trust of business partners.



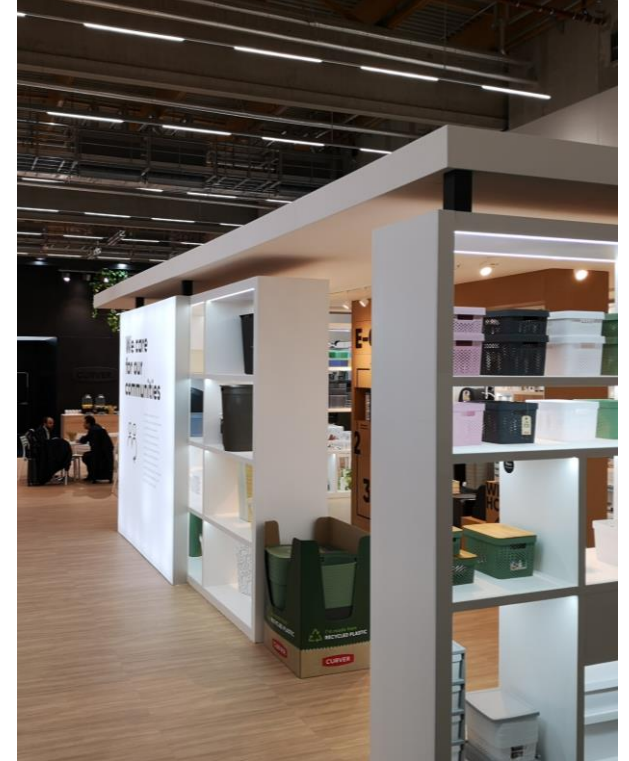
# We compete fairly

We believe in free and open competition. We compete vigorously but always fairly, lawfully and with integrity. We gain our competitive advantage on the quality of our products rather than through unethical or illegal business practices.

This means that Keter Employees will not:

- exchange information with our customers and competitors to limit or restrict competition
- gather competitive intelligence using illegal means
- formally or informally agree with competitors on price, promotion, terms and conditions, etc.

All Employees at Keter involved with our Customers need to be aware and understand the requirements and provisions of the law around Fair Competition.



**At a Trade Show, I was approached by one Sales Manager of our Competitors who wanted to discuss prices. What should I do?**

If you are ever in a situation where the conversation could turn to a competitively sensitive topic, you should stop the conversation immediately and make it clear to the other party that the discussion is inappropriate. Then, you should report the incident to your Line Manager immediately.

# We build good relationships with our Suppliers

At Keter, we build and foster long-term, reliable and sustainable relationships with our Suppliers, Vendors, and Third-Party providers. We value our Suppliers and prospective suppliers and treat them the way we expect to be treated.

[Global Supplier Code of Conduct](#)

We ask our Suppliers to uphold our ethical principles and positive environmental practices in all their dealings with Keter, specifically our Suppliers shall:

- comply with all applicable laws and regulations within the countries that the Supplier operates;
- not disclose Keter's confidential information to any other person without our advance written consent;
- share Keter's commitments to human rights (prohibit any form of child labour and/or forced or bonded labour, respect the rights of Employees to freedom of association and collective bargaining);
- create a work environment in which Employees and business partners feel valued and respected for their contributions and where discrimination of any kind is not tolerated;
- comply with all applicable environmental laws and support Keter's commitments through continuous improvement and performance measurements of environmental and social indicators.

We also include in certain procurement contracts a clause that stipulates our requirements for suppliers to adhere to ethical labour and Human Rights practices, including Health and Safety. We plan to extend this to all key procurement contracts globally and will consider expanding the scope to include environmental practices, as part of a program to engage more extensively with suppliers on sustainability in the future and encourage improved impacts throughout our supply chain.

Violations of policy or standards of our Global Supplier Code of Conduct may be reported by phone or online using the EthicsPoint website.

# We are a Sustainable business



At Keter, we are leaders in creating products that transform the places where people live, work and socialize. We aim to deliver affordable lifestyle solutions and functionality that make life easier.

We create better products for better places by advancing a circular economy through the use of recycled content and design for recyclability. Our focus on innovation at every stage of our design and supply chain processes deliver significant benefits for customers and for the health of our planet.

[Keter's Sustainability Reports](#)

## The Keter Everyday Sustainability 2025 Pledge

- **55% of recycled content** in total production
- Continued **zero production of single-use** plastic consumer products
- **25% reduction in greenhouse gas emissions** from production
- **Zero waste to landfill** from production
- Product **end-of-life programs** implemented in all regions

# We take pride in the Quality of our Work and Products

We take pride in the quality of our work and promote quality at every stage of our Operations and in every department, from development to distribution.

Our products are developed to the highest quality standards and designed for safe use throughout their lifecycle. We monitor and test for quality and safety during production according to our Quality Management System, quality standards and protocols. We maintain a comprehensive set of quality KPIs such as quality compliance and defects and external measures including customer feedback.

We follow (and often exceed) national guidelines for safety, stress testing and weight bearing and meet all applicable regulations for products as required in all our markets. Similarly, we strive to comply with product labelling and use instructions on all products.

Everyone has a role in ensuring the Quality of our products and has a duty to raise their hands and express any concerns on quality issues. All Employees are expected to complete Quality training.



# We act responsibly while representing the Company

When Employees speak or take action on behalf of the Company, they must do so with consideration of the generally accepted practices of the Company and upon approval of their Managing Director or the Chief Executive Officer. We expect all Employees representing the Company to protect our company's image and reputation and to always:

- Be respectful, polite and patient.
- Avoid speaking on matters outside your field of expertise when possible.
- Follow Keter's confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism and fair use.

## While doing business / travelling

All our Employees should hold themselves to the highest ethical standards and to interact in an open, honest positive manner and be guided by what is right.

## In the Media

If Employees are contacted by the media for an interview on any subjects (products, competition, labour disputes, etc.), they should contact Keter's Marketing department before responding to or interacting with the media. Likewise, Employees should not approach any media representative directly without prior authorisations.

## On Social Media

Employees handling our Keter social media accounts or speaking on our company's behalf on social media are expected to always:

- Refer to the Global Social Media policy.
- Coordinate with Keter's Marketing department when they are about to share any major-impact content.
- Avoid deleting or ignoring comments for no reason.

- Correct or remove any misleading or false content as quickly as possible.

## Participating in public events

Before representing Keter in public events (e.g. university lecture, professional bodies...), Employees need to inform and get approval from their Line Manager.

## Work Related Social Events

The Company may offer Employees the opportunity to attend social events from time to time. Even though such events will usually occur outside normal working hours and away from the usual workplace, the provision of the Code of Conduct will apply for the protection and comfort of all.

[Global Social Media Policy](#), [Global Communications Policy](#) and [Global Conflict of Interest and Outside Employment Policy](#)



# We lead by Example

Leaders, Managers and Supervisors have added responsibilities under the Code. They:

- must ensure that their Teams understand this Code and what applies to them.
- set the tone for an ethical and compliant workplace and provide their Teams with the right guidance, tools, training, and environment to ensure integrity.
- treat Employees fairly and consistently, with dignity and respect; understand and manage their unconscious bias; encourage diversity and inclusion; and foster cooperative working relationships among those they manage or supervise. Value the skills, abilities, backgrounds, and experience of every individual on their team.
- know the Code, communicate about the Code with their Teams; They create an environment where Employees are comfortable asking questions and sharing concerns
- intervene and stop any situation that is unethical, may violate this Code, Policies, or the law, or could damage Keter's reputation and report any suspected violations.
- never retaliate – and never permit retaliation by others – against anyone who raises a concern.





# Making this Code work





# Making the Right Decision

All staff are expected to exercise their best judgment and behave according to the highest ethical standards. But if doing the right thing is not clear? You can ask yourself:

- Is it **consistent** with this Code and Keter policies?
- Is it **legal**?
- Am I acting in the **Company's best interests**?
- Does it reflect our **Core Values, DNA and culture**?
- Would I be **comfortable** if my actions were made public?
- Will it protect **Keter's reputation** as a fair and ethical Company?

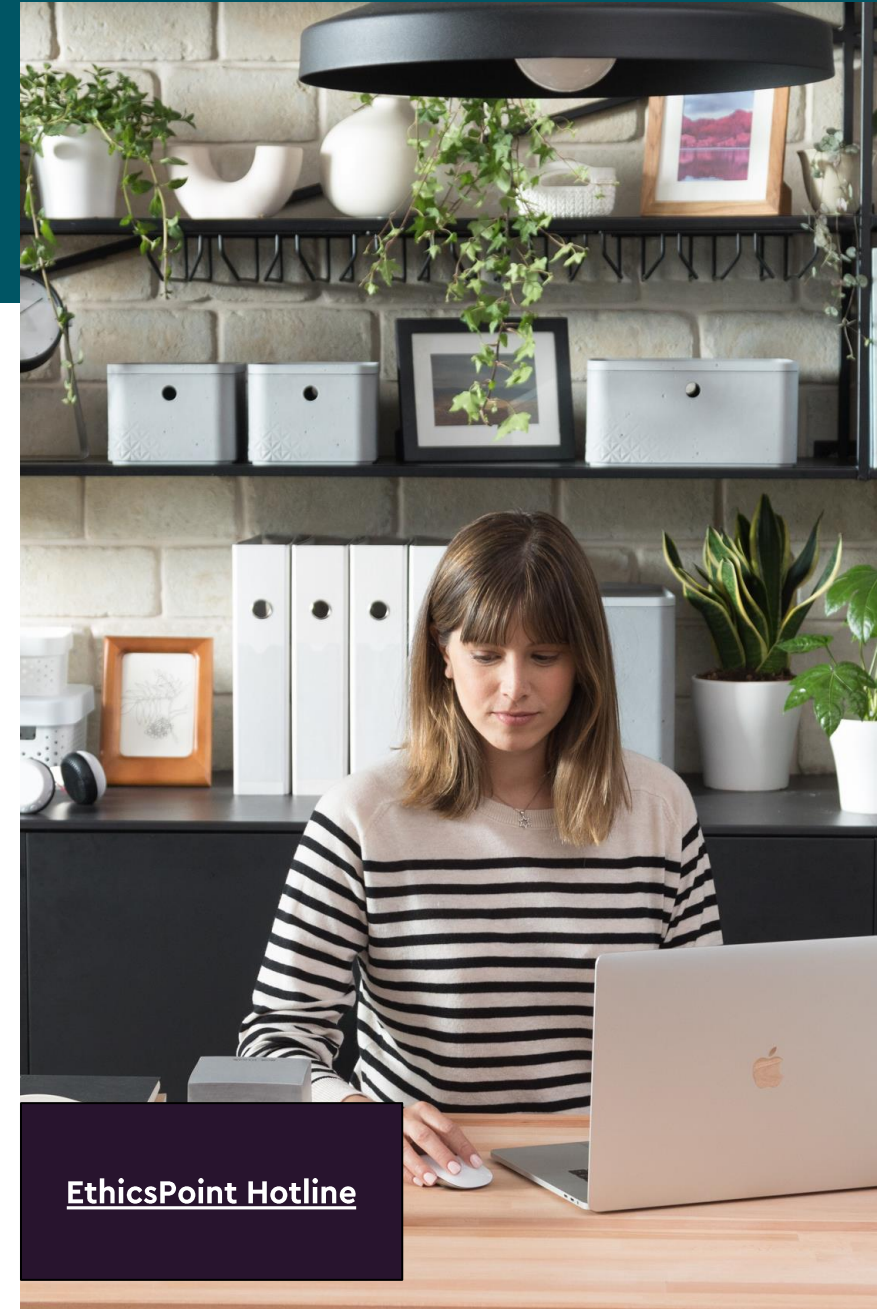
If the answer to any of these questions is "no" or "maybe", then stop and get advice. You can contact:

Your Line Manager or  
any Member of  
Management

Human Resources

Legal or Internal  
Control Team

EthicsPoint Hotline



# Speaking up and Raising Concerns

We encourage people to speak up when they see any activity or behaviour that they feel is wrong or does not match our values or simply when they want to have questions or want to share ideas.

## Ask Questions

Talk to your Line Manager or your Human Resources representative.

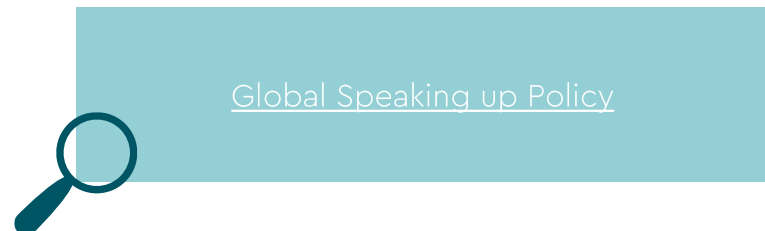
## Share Concerns

Any suspected violations of this Code can be reported to your Manager, Human Resources or any member of Management. Additionally, if you prefer to place an anonymous report in confidence, you can use our hotline, hosted by a third-party provider, EthicsPoint. The information you provide will be sent to us by EthicsPoint on a totally confidential and on an anonymous basis if you choose so. Violations can be reported by phone and on-line ([EthicsPoint - Keter Group](#)). Every effort will be made to investigate all reported violations promptly and confidentially. While anonymous complaints are welcome, enough details need to be provided so that a proper investigation can be conducted. It is the goal of any investigation to uncover the facts and resolve issues. Keter

will not tolerate retaliation of any kind towards Employees that report violations of the code in good faith. Knowingly making a false or untrue accusation of another Employee is also a violation of the Code of Conduct. Employees that are found to have violated this Code will be subject to disciplinary action up to and including termination of employment.

## No Retaliation

We want all our Employees to feel comfortable in raising a concern and coming forward. Keter will not tolerate retaliation of any kind towards Employees that report violations of this Code, Keter Policies or the Law in good faith. There are no circumstances where retaliation is appropriate, acceptable or tolerated.



# Certificate of Acknowledgement

## New Employees

All new Employees at Keter are required to sign a Certificate of Acknowledgement which states that they have received, read and understood the Keter Code of Conduct and that they have an obligation to comply with it.

They will need to make sure they understand all sections of the Code before signing or seek clarification by asking their Line Manager or Human Resources Representative.

## Employee Recertification

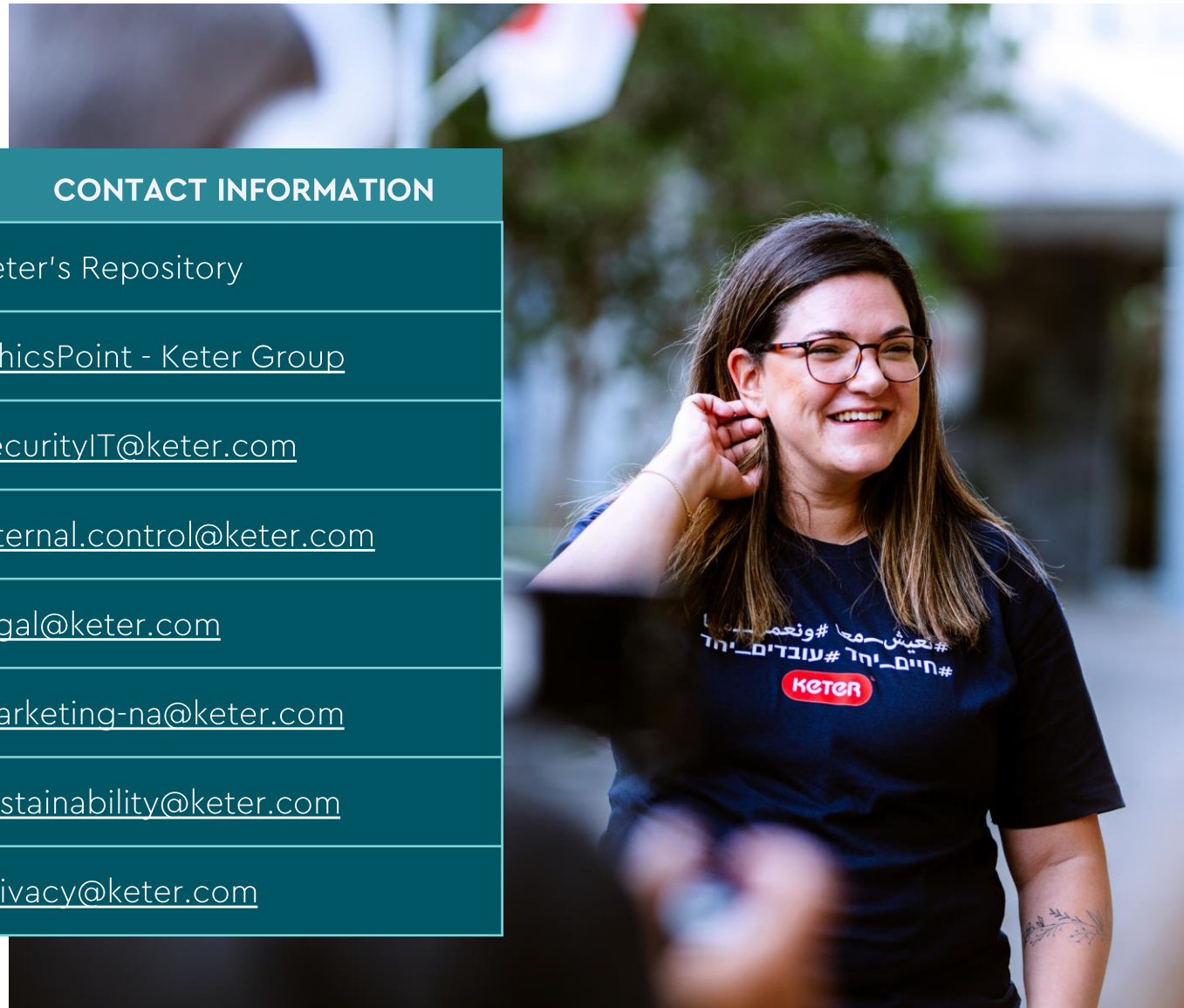
Keter reserves the right to amend and update this Code of Conduct at any time. All current Employees will be required to attest or sign a Certificate of Acknowledgement when asked to do so. Failure to do so may result into disciplinary action.

## Violation of this Code

Any suspected Violations of the Keter Code of Conduct will be investigated thoroughly. An established violation will have consequences and may result in disciplinary action, up to and including dismissal and, in some cases, fines and legal action. Any (disciplinary) action will be taken consistent with applicable Policies, Practices, and Local law.

# Helpful Resources

GLOBAL CONTACT	CONTACT INFORMATION
Keter Set of Policy Documents	Keter's Repository
Ethics Hotline	<a href="#">EthicsPoint - Keter Group</a>
Cyber Security	<a href="mailto:SecurityIT@keter.com">SecurityIT@keter.com</a>
Internal Control	<a href="mailto:internal.control@keter.com">internal.control@keter.com</a>
Legal	<a href="mailto:legal@keter.com">legal@keter.com</a>
Global Branding and Comms Team	<a href="mailto:marketing-na@keter.com">marketing-na@keter.com</a>
Sustainability Team	<a href="mailto:sustainability@keter.com">sustainability@keter.com</a>
Data Protection Officer	<a href="mailto:privacy@keter.com">privacy@keter.com</a>



# Glossary

**Anything of Value** – can refer to cash, gifts, meals, hospitality, business opportunities, job offer, goods, etc. There is no minimum or maximum value attached to this concept.

**Bribe** – anything of value received or given in exchange for a decision or an action.

**Competitive intelligence** – information about a competitor of Keter.

**Competitor** – any business, large or small, operating, manufacturing and selling within one or several of the Categories Keter operates.

**Customer** – any business to which Keter sells or intends to sell products.

**Company Record** – All information the Company produces is considered Company record. Examples include, but are not limited to, financial, accounting, technical, sales, production information, personnel information, safety data, contracts, and manufacturing processes, marketing information and business plans. Employees must ensure that all company records are accurate and clearly describe relevant facts.

**Confidential Information** – any information which is required to be kept confidential pursuant to applicable privacy laws and any information regarding the business and affairs of Keter that has not been widely disclosed to the public and which is commercially sensitive or if disclosed to the public or a specific person, would be unduly detrimental to the Company's interests. Without limiting the generality of the foregoing, information would be considered "Confidential Information" if disclosure of such information would interfere with the Company's pursuit of a strategic objective or otherwise impair the Company's ability to negotiate with a third party or complete a proposed transaction.

**Discrimination** – treating someone with a protected characteristic (such as race, colour, religion, national origin, sex, physical or mental disability, age, etc...) differently and/or less favourably than others.

**Diversity** – a diverse workplace refers to an organization that employs a workforce comprised of individuals with a range of characteristics, such as gender, religion, race, age, ethnicity, sexual orientation, education, and other attributes.

**Equal Opportunity Employer** – an employer who agrees not to discriminate against any employee or job applicant because of race, colour, religion, national origin, sex, physical or mental disability, age, etc.

**Ethics** – doing business ethically means doing business while conforming to a standard of what is good and right.

**EthicsPoint** – our Ethics and Compliance reporting service, administered by a third party, through which Keter Employees can ask questions or raise concerns confidentially.

**Good faith** – "raising a concern in good faith" means with an honest belief that there is a violation of Keter's Code of Conduct, Policies and/or the law.

**Harassment** – serious, severe or pervasive conduct, based on a characteristic protected by applicable law, that is unwanted or offensive that has the purpose or effect of violating a person's dignity or creating an intimidating, humiliating, hostile or offensive environment. Harassment is considered objectionable and causes distress or other detrimental effect. It can be physical contact, verbal or non-verbal.

**Human Trafficking** – refers to the trade of humans for the purpose of forced labour, sexual slavery, or commercial sexual exploitation for the trafficker or others.

**Inclusion** – an inclusive workplace is a workplace where you feel you are listened to, respected and valued for who you are.

**Infringement (Human Rights infringement)** – an action or situation that interferes with individuals' Human Rights and the freedom they are entitled to.

**Integrity** – firm and non-negotiable adherence to a code of ethical values, that cannot be corrupted or bribed.

**Lawful** – In accordance with the applicable law.

**Line Manager** – an Employee with direct managerial responsibility for a particular employee or a group of Employees.

**Personal Information or Personal Data** – Any information that relates to a person, such as an address, phone number, photo, birth date, location data, performance review, educational background, driver's license number, banking or payroll information, identification number, medical condition or history, or to one or more factors relating to the physical, psychological, genetic, mental, economic, cultural, or social identity of a person.

**Relative** – includes a spouse, partner, sibling, grandparent, child, grandchild, in-law and any other close family member that could financially benefit from an action.

**Retaliation** – any kind of negative action against a current or former employee, either directly or indirectly, that takes the form of punishment, and creates a hostile, threatening or uncomfortable environment because they reported a complaint or participated in an investigation.

**Social Media activities** – include but are not limited to publishing content, liking content, sharing content, re-sharing content, writing comments, providing online ratings, giving reviews, chatting, sending instant messages, participating in an online discussion, etc... on platform such as Facebook, LinkedIn, TikTok, WhatsApp, etc.

**Supplier** – Any vendor of parts, products or services to Keter, including consultants, contractors and agents and including prospective vendors.

**Token Gift** – an item of value with no appreciable economic value (trophies, certificates, free promotional items such as advertisers' calendars, pens, notepads, etc.).



**KETER**