

Approval Date: 22/01/2026	<b>Globus Code of Ethics for Social Responsibility</b>			Department: Quality
Page 1 Of 5	Procedure approver: Dudu Shmuelov	Procedure editor: Galit Abargel	Version: A	GL 05-015e

This document is the official English translation of the Hebrew Code of Ethics GL-05-015e

## 1. General

Globus International Packaging and Shipping Ltd. is committed to protecting its employees, the environment, and the community through responsible human rights, environmental, and governance practices. Over the years, Globus has strengthened all aspects of sustainability and social responsibility within its business culture and is committed to continuing its progress in this field.

This Code of Ethics for Social Responsibility sets forth the standards that enable Globus to fulfill its commitment to social responsibility and sustainability.

## 2. Purpose

To define the social responsibility values of Globus and the guiding principles that form the basis of this Code of Ethics.

## 3. Code Framework

### 3.1. Overview of the Code of Ethics for Social Responsibility

3.1.1. Globus maintains an ongoing commitment to social responsibility and sustainability across all areas of operation and throughout its many sites.

3.1.2. Globus is committed to upholding human rights and international ethical frameworks, including the Universal Declaration of Human Rights of the United Nations and the Fundamental Principles and Rights at Work of the International Labour Organization (ILO).

3.1.3. The management of Globus, led by the CEO, bears clear responsibility to ensure that this Code of Ethics for Social Responsibility aligns with Globus's commitments and its legal and ethical obligations across all activities.

### 3.1.4. Relationship to Internal Business Conduct Procedures

3.1.4.1. This Code of Ethics for Social Responsibility establishes the overarching ethical, social, and governance principles of Globus Packing & International Shipping Ltd.

3.1.4.2. The practical implementation of these principles is supported and enforced through internal company procedures and policies, including the Globus Business Culture and Business Conduct Code (GL-05-012), which provides detailed operational guidance on ethical business conduct, fair competition, prevention of conflicts of interest, gifts and benefits, engagement with customers, suppliers, and public entities, and employee conduct.

3.1.4.3. All employees are required to comply with both this Code and the applicable internal procedures, each within its respective scope.

### 3.2. Human Rights, Modern Slavery, and Fair Labor

#### 3.2.1. Modern Slavery

Globus applies a zero-tolerance approach to all forms of modern slavery, including:

- Slavery
- Forced labor
- Deceptive recruitment
- Forced marriage

Approval Date: 22/01/2026	<b>Globus Code of Ethics for Social Responsibility</b>			Department: Quality
Page 2 Of 5	Procedure approver: Dudu Shmuelov	Procedure editor: Galit Abargel	Version: A	GL 05-015e

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- Debt bondage
- Human trafficking
- Child labor

### 3.2.2. Child Labor

Globus shall not use or permit the use of child labor, except for lawful employment of youth, including employees' children, strictly in accordance with applicable law.

The term "child" refers to any person under the age of 18, or under a higher minimum age if required by local law, in accordance with the stricter regulation.

### 3.2.3. Forced Labor or Debt Bondage

Globus shall not use or permit forced labor and shall not restrict any employee's liberty.

Physical or mental punishment and coercion are strictly prohibited. Disciplinary policies must be clearly defined and communicated to all employees.

Employees shall not be required to surrender government-issued identification documents such as passports or work permits. Employees must retain control of their personal identification at all times.

Globus shall ensure that employees do not pay recruitment fees or any employment-related charges during recruitment or employment.

All employees shall receive an employment contract detailing their rights, along with key documents, in a language they understand, preferably their native language.

Globus shall not restrict employees' freedom of movement, including during breaks and rest periods.

### 3.2.4. Human Trafficking

Globus shall not engage in, facilitate, or permit the transfer of any person for the purpose of exploitation.

### Harassment and Abuse

Globus shall treat all employees with dignity and respect, without physical punishment, threats of violence, or any form of physical, sexual, psychological, or verbal harassment or abuse.

### 3.2.5. Non-Discrimination

Globus promotes an inclusive workplace that values diversity.

The company shall not discriminate in employment practices, including wages, benefits, promotion, discipline, termination, or retirement, based on race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, political opinion, or disability.

### 3.2.6. Working Hours and Wages

Globus complies with all applicable labor laws and regulations regarding minimum wages, overtime, maximum working hours, and rest days.

Employees shall be paid on time and receive clear information regarding wage calculation. Statutory benefits shall be provided, and no wage deductions shall be made without written consent or for items the employer is required to provide.

Overtime shall be compensated at legally required rates. Wage deductions as a disciplinary measure are prohibited.

Approval Date:  
22/01/2026

## Globus Code of Ethics for Social Responsibility

Department: Quality

Page 3 Of 5

Procedure approver: Dudu  
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### 3.2.7. Freedom of Association

Employees are free to join or not join labor unions or worker organizations of their choice without threat or intimidation.

Subject to local laws, if employees are lawfully represented by third parties, the company shall not retaliate against employees for lawful participation in union activities.

### 3.3. Health and Safety

3.3.1. As a company with advanced environmental, quality, and safety standards, Globus implements and requires its suppliers to implement health and safety management practices, including regular risk assessments, appropriate controls, and proper chemical storage and disposal.

3.3.2. Employees receive appropriate health and safety training and personal protective equipment.

3.3.3. Globus shall provide a safe and healthy workplace in accordance with all applicable laws, including access to potable water, sanitary facilities, fire safety systems, adequate lighting, and ventilation.

3.3.4. Each facility shall maintain emergency preparedness plans, including detection, evacuation, response arrangements, alarms, lighting, exits, and firefighting equipment.

### 3.4. Environmental Protection

3.4.1. The company commits to complying with all environmental laws, regulations, and standards and to implementing effective systems to identify and mitigate environmental risks.

3.4.2. Globus supports national climate protection goals through its products, services, and operations by setting objectives and striving to achieve them.

### 3.5. Bribery and Corruption

3.5.1. Globus applies a zero-tolerance policy toward bribery and corruption.

3.5.2. The company complies with all applicable anti-bribery and anti-corruption laws. No bribes, improper payments, or inducements shall be offered, paid, received, or accepted.

3.5.3. For the purpose of this Code, "bribe" includes anything of value—such as money, gifts, loans, or favors—that may improperly influence business decisions.

3.5.4. Facilitation payments are strictly prohibited. Globus makes no distinction between facilitation payments and other forms of bribery.

### 3.6. Data Protection and Confidentiality

3.6.1. Globus complies with data protection and information security laws, particularly regarding personal data of employees, customers, and third parties.

3.6.2. Confidential information shall be used solely for legitimate purposes and safeguarded to prevent unauthorized disclosure.

### 3.7. Whistleblowing and Non-Retaliation

3.7.1. Globus provides an accessible, anonymous reporting platform encouraging employees to report non-compliance without fear of retaliation.

3.7.2. All reports shall be investigated and corrective actions taken as necessary.

Approval Date: 22/01/2026	<b>Globus Code of Ethics for Social Responsibility</b>			Department: Quality
Page 4 Of 5	Procedure approver: Dudu Shmuelov	Procedure editor: Galit Abargel	Version: A	GL 05-015e

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### **3.8. Handling Employee Complaints**

3.8.1. Good-faith complaints and concerns are protected. Employees are encouraged to report illegal or unethical conduct or deficiencies in business management.

3.8.2. The company shall not retaliate against employees who report concerns in good faith and shall not dismiss, discriminate against, threaten, or harass employees for lawful reporting or cooperation with investigations.

3.8.3. Reports may be submitted to the Vice President of Human Resources or via the designated complaints box. Confidentiality shall be maintained to the extent permitted by law. Complaints may be submitted anonymously and will be handled with full discretion.

### **3.9. Additional Legal Compliance**

3.9.1. Globus complies with laws relating to anti-money laundering and maintains financial records in accordance with international standards.

3.9.2. The company complies with trade, import, sanctions, embargo, competition, and antitrust laws.

3.9.3. All references to applicable laws include local, national, and voluntarily adopted industry standards and conventions.

## **4. Implementation of Business Conduct Principles and Control Mechanisms**

### **4.1. Management and Oversight**

Implementation of the Code of Ethics for Social Responsibility falls under the responsibility of the Vice President in charge of Human Resources at Globus.

The Vice President of Human Resources, or a representative appointed on her behalf, shall be responsible for this subject (the "Social Responsibility Officer") and shall be entrusted with the following duties:

Operating a structured training program for the initial implementation of the Code and for maintaining ongoing familiarity with its provisions.

Maintaining the Code's relevance and recommending necessary updates.

Providing guidance and consultation to employees regarding any matter or specific instruction set forth in the Code.

Handling violations of the Code of Ethics, including the following actions:

- a. Encouraging employees to report violations of the Code.
- b. Maintaining an accessible and confidential complaint procedure.
- c. Protecting reporting employees from actual or potential retaliation.
- d. Monitoring the handling of complaints.
- e. Informing the reporting employee of the handling of the complaint and its outcome.

### **4.2. Obligation to Comply**

The obligation to implement and comply with the Code of Ethics for Social Responsibility applies to all Globus employees at all levels, each within the scope of their responsibility. As part of this obligation, employees shall act in accordance with the following principles:

Become familiar with and internalize the values of social responsibility set forth in the Code.

Adopt the provisions of the Code and conduct themselves accordingly.

Approval Date: 22/01/2026	<b>Globus Code of Ethics for Social Responsibility</b>			Department: Quality
Page 5 Of 5	Procedure approver: Dudu Shmuelov	Procedure editor: Galit Abargel	Version: A	GL 05-015e

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Remain vigilant for situations in which the Code is not being observed.

### 4.3. Training Program

The principles and rules of the “Social Responsibility Values” set forth in the Code of Ethics shall be integrated into the company’s general training activities.

Messages shall be communicated from managers to their employees through a top-down process, whereby senior management instructs senior managers, who in turn train their teams, continuing down the organizational hierarchy to all employees.

The Code shall be distributed to employees and shall be permanently available on the Globus company website.

As part of orientation programs, the Vice President of Human Resources shall introduce the principles and essence of the Code to all new employees, enabling them to become familiar with the ethical climate on which Globus’s activities are based.

### 4.4. Updates

This Code shall be reviewed periodically and updated as necessary.


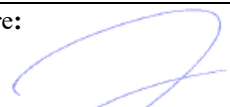
## 5. Responsibility

- 5.1. Implementation: All Globus employees
- 5.2. Updates: VP Human Resources with Quality Management
- 5.3. Supplier compliance: VP Supply Chain

## 6. Appendices

- 6.1. Supplier Code of Conduct F-12-006
- 6.2. Supplier Code of Conduct (English) F-12-007

## 7. Approvals and Signatures

<b>Vice President of Human Resources:</b>  Ronit Amar Borochoy	Signature: 	Date: 22/01/2026
<b>Chief Executive Officer (CEO):</b>  Dudu Shmuelov	Signature: 	Date: 22/01/2026