

Sustainable Supply Chain Policy Envases Öhringen GmbH

Foreword

This Sustainable Supply Chain Policy sets out the fundamental values and behavioral principles of our company regarding sustainable procurement - because we are all responsible for shaping and maintaining our environment.

Sustainable procurement is about much more than meeting legal requirements. It is about looking critically at the entire supply chain and ensuring that the products and services we buy are produced under fair and environmentally sound conditions. This includes minimizing the use of resources, reducing waste and emissions, and promoting fair working conditions and social standards.

This policy is aimed at everyone involved in the procurement process - from decision-makers to purchasers and suppliers. It is intended to help raise awareness of the importance of sustainable procurement and to identify concrete actions to effectively integrate sustainability criteria into the procurement process.

We recognize that the road to sustainable procurement is a challenging one. However, we are convinced that it is the right and necessary way forward. Only by acting together and consistently implementing sustainable principles can we ensure a future worth living for all.

Formal review mechanism:

This Policy is reviewed annually and amended if necessary. If changes are made during this period, they will be made independently of the regular review cycle.

Person responsible:

Ulrich Lump, Head of Procurement Envases Öhringen GmbH

Scope:

This policy applies to Envases Öhringen GmbH, including its two plants in Öhringen, Germany.

- Plant 1: 74613 Öhringen, Otto-Meister-Straße 2, Germany
- Plant 2: 74613 Öhringen, Liebigstraße 1, Germany

The contents and values of this policy are binding for all stakeholders. They undertake to "live", observe and implement the indispensable values and contents enshrined herein.

1. Supplier Social Practices

The social practices of our suppliers are a key component of our sustainable sourcing strategy. We expect all our suppliers to adhere to high social standards, including the protection of human rights, fair working conditions, the exclusion of child and forced labour, and health and safety at work. We conduct regular supplier self-assessments and audits to ensure compliance with these standards. Our Supplier Code of Conduct is based on the ten general principles of the UN Global Compact and has to be signed or to be confirmed by our suppliers. We also promote continuous improvement of social practices throughout our supply chain through the training of our buyers. By supporting socially responsible business practices, we help create fair and equitable working conditions around the world.

2. Supplier Environmental Practices

We expect our suppliers to be environmentally responsible and to manage their business processes to minimize negative environmental impacts. This includes reducing greenhouse gas emissions, minimizing waste and using natural resources responsibly. Our suppliers must comply with recognized environmental standards and strive to continuously improve their environmental performance. This includes measures such as implementing ISO 14001 environmental management systems, using renewable energy and promoting recycling and reuse. We incorporate social and environmental clauses into our supply contracts, requiring suppliers to comply with specific sustainability criteria. In this way we support environmental protection and the sustainable use of resources.

3. Conflict Minerals

Conflict minerals refer to tungsten, tantalum, tin and gold, also known as 3TG minerals, originating from the Democratic Republic of Congo or adjoining countries. The extraction and trade of these minerals can fund and exacerbate armed conflict, human rights abuses and environmental degradation.

Envases Öhringen is therefore committed to taking strict measures to avoid the use of conflict minerals in our supply chain. Selected suppliers are required to complete the Conflict Minerals Reporting Template (CMRT) or an equivalent questionnaire on conflict minerals. This reporting ensures that we gather essential information on the origin and traceability of minerals used in our products, promoting responsible sourcing practices. We have established a grievance mechanism that allows all affected parties, including suppliers, employees, and other stakeholders, to voice their concerns regarding the sourcing of conflict minerals.

Our suppliers must comply with the conflict minerals rules as defined by EU Conflict Minerals Regulation 2017/821 laid out in OECD Guidance for due diligence. Corresponding regulation as The U.S. Dodd-Frank Act Section 1502. Suppliers must be able to show transparency and make all necessary declarations upon request.

4. Reporting of violations and sanctions

If stakeholders observe or become aware of a violation of this Policy or applicable laws and regulations, they are required to report it immediately to management. These reports will be treated confidentially and anonymously and will be investigated seriously. There will be no retaliation against stakeholders who report violations, as long as the report is made in good faith and no false accusations are made. Every stakeholder has the right and responsibility to raise concerns about ethical behaviour or violations of the law in order to protect the integrity and reputation of our company.

Whistleblowing Website:

If you as a supplier have concerns about unlawful conduct or misconduct, you can make a report at the following Envases Europe Whistleblower system link:

<https://envases.integrityline.com/frontpage>

And a dedicated reporting channel:

compliance@envases.de

Sanctions: We take violations of this Policy seriously and will take appropriate disciplinary action if an employee violates its provisions. These actions may range from a warning or training to sanctions such as reprimands or transfers, to termination of employment. The nature and severity of the action will depend on the seriousness of the offence and the circumstances of the individual case.

Appendix: Sustainable Procurement targets of Envases Öhringen GmbH

Topic	Target 2024	Progress	Baseline value 2022	Performance 2024
Sustainable Procurement				
Social and environmental practices	Mandatory recognition of the Supplier Code of Conduct by all strategic suppliers (100%) by 2026	On track	15%	70%
Social and environmental practices	Increase the proportion of certified suppliers (ISO 14001, ISO 45001, EMAS) to 50% by 2026	On track	15 %	25 %
Social and environmental practices	Increase the number of trained category managers on prevention on human exploitation to 100%	On track	5%	50 %
Social and environmental practices	Reach EcoVadis Silver in 2025	On track	50%	85%

Öhringen, March 2024



(Jochen Massa, CEO)



(opa. Ulrich Lumpp,
Head of Procurement)