

Supplier Code of Conduct

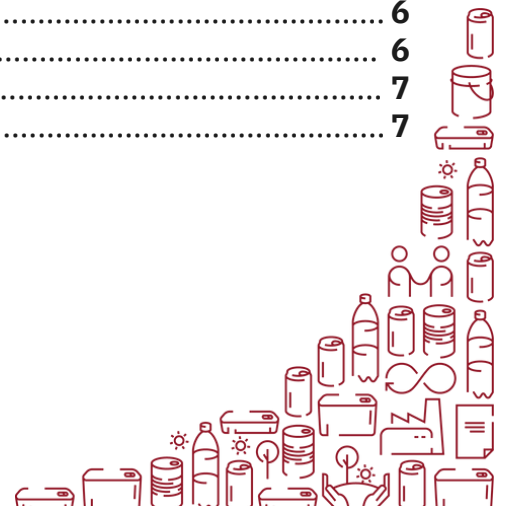
Envases Europe Group

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This policy is reviewed annually and amended if necessary. Additional modifications may be implemented outside of the standard review process.



Supplier code of Conduct – Envases Europe Group

The Envases Europe Group believes that building long-term relationships with suppliers is crucial for our business. That includes mutual expectation of high standards when it comes to the environment, health & safety, labor practice, business ethics and compliance.

We expect all our suppliers, subcontractors and vendors to provide their services to the Envases Europe Group in a manner that respects the environment and the rights of employees in accordance with each country's culture. Furthermore, we strive to continuously optimize our business activities and our products and services in terms of sustainability. We expect our suppliers to contribute to this in the sense of a holistic approach in order to advance the observance of human and labor rights, environmental protection and anti-corruption measures. This is referred to as the “scope” of the Code of Conduct.

For future cooperation, the contractual partners agree on the validity of the following regulations for a joint Code of Conduct. This agreement is to apply as the basis for all future deliveries and services. The contractual partners undertake to comply with the principles and requirements of the Code of Conduct and to endeavor to contractually oblige their subcontractors to comply with the standards and regulations set out in this document. A breach of this Code of Conduct may ultimately be grounds and cause for the company to terminate the business relationship, including any related supply contracts.

The Code of Conduct is based on the ten general principles of the UN Global Compact. The required management of potential and actual adverse impacts on the scope is aligned with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. In the following, the term “supplier” also always refers to their suppliers/subcontractors who provide services for Envases.

1. Business Ethics

1.1 Compliance with laws and rules

All suppliers must comply with the principles of corporate responsibility in respect of the company. All suppliers must comply with economic and trade sanctions established by the UN, EU and US (OFAC).

As a precondition, suppliers are expected to comply with the national laws of the various countries in which the Envases Europe Group conducts business.

Compliance with the law has the highest priority under all circumstances and at all times. Breaches of legal provisions can result in obligations to pay compensation and consequences under criminal law.

1.2 Conflict minerals

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. Conflict minerals refers to tungsten, tantalum, tin and gold, also known as 3TG minerals, originating from the Democratic Republic of Congo or adjoining countries.

1.3 Anti-corruption

The Envases Europe Group does not tolerate any form of corruption, bribery, fraud, acceptance of bribes, extortion, embezzlement, money laundering, or any other illegal preferential treatment. It is prohibited to assure illegal advantages or to pay or approve bribes. All suppliers are obliged to abide by legal regulations relating to cartel law and insider trading.

Employees of the Envases Europe Group must not offer or accept presents or favors from or to suppliers, customers or other business partners. Exceptions are small gifts (presents, hospitality invitations) that are unsolicited and are not offered frequently. Accepting or offering gifts must not have any effect on decisions made on behalf of the Envases Group.

2. Socially responsible working conditions

The supplier ensures good and safe working conditions and therefore follows the following work principles at all the locations of its company.

2.1 Respect for human dignity

The supplier respects the human dignity of its employees and all internal and external stakeholders and ensures good and safe working conditions at all the locations of its company.

2.2 Prohibition of discrimination

The prohibition of discrimination forbids treating people differently if this leads to discrimination, i.e. a disadvantage or disparagement of individuals without any objective justification for this. In particular, neither sex, race, skin color, language, religion, political or other opinions, national or social origins, membership of a national minority, wealth, pregnancy, birth, sexual orientation nor any other status may be drawn on as differentiating features. Sexual harassment, bullying and discrimination violate the rights and dignity of a person. Therefore, no sexual harassment, bullying or discrimination will be tolerated.

2.3 Fair pay and prohibition of forced labor

The supplier rejects every form of forced labor. No employees may be forced into employment. Any type of physically abusive disciplinary measure is prohibited. Working time must not exceed the maximum permissible working hours under national legislation. The Envases Group expects from its business partners, and also from itself, that employees are paid appropriate remuneration. In particular, it is important that national legal provisions concerning minimum wages are complied with.

2.4 Child labor and young workers

Child labor is prohibited by Envases and its suppliers. Suppliers are required to comply with the ILO conventions on the minimum age for the employment of children. The term “child” refers to anyone under the age of 15 or of school age. This does not include school trainees. Workers under the age of 18 are not allowed to carry out work that could endanger health, safety or morality.

2.5 Freedom of association

The supplier respects the right of workers to freedom of association, to join trade unions, to appoint workers' representation and to bargain collectively. Workers representatives must be protected against discrimination. Workers must not be discriminated against on the basis of forming, joining or being a member of such an organization.

2.6 Complaint mechanisms / Whistleblower protection system

The supplier must pass on advice received from Envases Europe on the accessibility, responsibility and implementation of a Complaints Procedure to its employees in an appropriate manner. The Complaints Procedure must be accessible to employees while maintaining confidentiality of identity and effective protection against discrimination. In the absence of a notice, the supplier itself is responsible at the facility level for establishing an effective grievance mechanism for individuals and communities who may be affected by adverse impacts.

A whistleblower protection system is in place at our suppliers, in accordance with applicable national laws and regulations.

3. Health and Safety

3.1 Employees

Healthy and safe workplaces are particularly important to the Envases Group. The supplier is obliged to provide a safe and healthy working environment for its employees and business partners. In the case of regulations concerning, among other things, holidays, rest periods and illness, as well as persons in need of special protection, at the very minimum the national laws and regulations must be complied with. Food and accommodation for employees must be provided in a manner that is hygienic, adequate, and separate from the workplace/location. Sanitary facilities must be available on a gender-specific basis.

3.2 Product safety

For Envases it is of great importance that products are safe throughout the entire lifecycle for customers and for their operating and maintenance staff. The Envases Group and its business partners will work closely together in order to achieve continuous improvements in performance in this area.

3.3 Occupational health and safety

Our suppliers have a comprehensive health and safety management system in place to achieve continuous performance improvements in this area. Necessary precautions must be taken to prevent accidents and damage to health that may arise in connection with the business activity by setting up and applying appropriate occupational safety systems. Excessive physical or mental fatigue must be prevented by means of appropriate measures. In addition, employees must receive regular information and training on applicable health and safety standards and measures to increase safety awareness at all levels of the organization.

Suppliers must continuously evaluate their processes to anticipate and eliminate risks before they occur.

Suppliers must comply with all national legal obligations and other requirements to meet binding health and safety commitments. In addition, suppliers must ensure that safety information regarding hazardous substances, electricity, fire (including evacuation) and other emergencies is provided and adhered to.

4. Environmental Protection

Environmental protection is a matter of safeguarding the future and is therefore a high priority. Protecting the environment involves using raw materials and energy ever more efficiently, avoiding waste, and constantly improving the recovery of the materials used – in short: using, reducing or avoiding all resources in a responsible and environmentally compatible manner. We face this challenge as an industry and as a responsible company.

In order to achieve our internal environmental objectives, Envases works closely with suppliers and customers and provides them with advice and support. Together with them, Envases ensures that its own products have as negligible impact as possible on the environment throughout their life cycle.

Suppliers must continuously review their operations and improve their environmental protection measures to prevent damage to the environment.

5. Data protection, social media and secrecy

Numerous data protection regulations (e.g. the GDPR) as well as national and international data protection laws apply to Envases and its suppliers. These regulate not only how to handle confidential or private information (personal data), but also its collection, storage, amendment, transfer, blocking, erasure, surrender and use. Envases and all suppliers must follow the corresponding regulations and laws of all countries in which we are active.

No confidential information from Envases may be published unless there is explicit approval to do so. The requirement for secrecy also applies to internal confidential or protected information. Envases respects the right to the intellectual property of its business partners. Business secrets must be protected and treated in strict confidence. In the event of any ambiguity when handling personal data, the respective Envases Data Protection Officer is available for questions.

6. Competition and cartel law requirements

All competition laws and cartel laws of all countries in which Envases is active must be complied with.

The Envases Europe Group suppliers must not engage in any business, activity or agreement that violates international or country-specific antitrust laws, regulations and/or competition laws and that impedes and affects fair trade and competition.

Anti-competitive discussions, agreements, including illegal price fixing, market sharing, customer allocation or other restrictive practices at any level of the production, supply or distribution chain are prohibited. On the contrary, the supplier is committed to free undistorted competition. This prohibition covers not only written but also oral or other agreements between employees of at least two companies.

Suppliers to the Envases Europe Group must avoid all conflicts of interest that arise in the business environment due to private interests or other motives. Should a supplier be affected by a potential or actual conflict of interest in its activities with the Envases Europe Group, it is obliged to disclose these conflicts immediately, fully and transparently to the Envases Europe Group.

7. Import and export provisions

Envases expects, from both its business partners and from itself, strict compliance with applicable import and export control laws when transporting and shipping merchandise.

8. Implementation of requirements

We expect our suppliers to identify risks within their supply chains and to take appropriate action. In the event of suspected non-compliance, and in order to safeguard supply chains with increased risks, the supplier will provide Envases with timely and, if necessary, regular information on the identified non-compliance and risks as well as the measures taken. Envases will monitor compliance with the standards and regulations set out in this document using a self-assessment questionnaire and, where appropriate, risk-based audits at supplier production sites. The Envases Europe Group therefore reserves the right to conduct a risk-based audit of suppliers during normal business hours and with reasonable notice by an appointed person to ensure compliance with the Code of Conduct.

Suppliers are responsible for retaining all necessary documentation relating to compliance with the Envases Europe Group Code of Conduct.

The supplier can object to individual audit measures if these would violate mandatory data protection regulations. Should a breach of the regulations of this Code of Conduct be identified, the supplier will be informed of this in writing without delay within one month and given a reasonable period of grace to bring its behavior into line with these regulations. If it is not possible to remedy the situation in the near future, the supplier must notify Envases immediately and, together with Envases, draw up a plan with a timetable for ending or minimizing the breach. If such a breach has been culpable, if the period of grace expires fruitlessly, or if the implementation of the measures contained in the concept does not bring about a remedy after the expiry of the timetable, and if a continuation of the contract until its proper termination is unreasonable for the Purchaser, if no milder remedy is available, Envases may terminate the contract and the business relationship with the Supplier and terminate all contracts after the fruitless expiry of the period of grace set, if it has threatened to do so when setting the period of grace. A statutory right to extraordinary termination without setting a period of grace, in particular in the case of breaches which are assessed to be very serious, remains unaffected, as does the right to compensation for damages.

The review and assessment can also be carried out with the support of a third-party provider.

9. Deviations from the Code of Conduct

If you as 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>

10. Acknowledgement and consent of the supplier

The supplier undertakes to act responsibly and to comply with the principles and requirements listed. The supplier undertakes to communicate the contents of this code to employees, agents and subcontractors in a manner that is comprehensible to them and to take all necessary precautions for the implementation of the requirements.