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## IPACKCHEM Business Ethics Program

This is the abridged version.  
The complete program can be accessed online  
at [www.ipackchem.com](http://www.ipackchem.com)

### A MESSAGE FROM THE CEO

IPACKCHEM's influence is far reaching, as is our responsibility to uphold the highest standards of care, quality and consideration of the global community. The Ipackchem Business Ethics Program reflects our values. We deeply believe that balancing between economic growth, respect for people and environmental protection are essential for the long-term prosperity of our company.

The Business Ethics Program serves as a guiding document for all our managers and employees worldwide, as well as for our various stakeholders, including customers, suppliers, contractors, host countries, local communities, business partners, and shareholders.

Since 2016, IPACKCHEM has actively implemented the Business Ethics Program to ensure that all our facilities and employees act in an appropriate and ethical way. We must understand the choices we make and the consequences they could have on each of us and for the company: regular revisions keep the program aligned with international laws and regulations.

The Business Ethics Program is distributed and administered to all employees through an online training module. The document is accessible on the Ipackchem Group website. We at IPACKCHEM must keep the culture of ethics and social commitments at the center of our operational decision making. We expect suppliers, contractors, and business partners to uphold the same ethical standards.

Best regards,

A handwritten signature in black ink, appearing to read 'Jean-Philippe MORVAN'.

Jean-Philippe MORVAN  
CEO IPACKCHEM Group





## COMPLIANCE AND GOVERNANCE

- IPACKCHEM complies with all relevant laws, both national and international, as well as codes and conventions.
- We adhere to industry codes of conduct applicable to our operations.

## ETHICS AND ANTI-CORRUPTION

### ANTICORRUPTION

- Corruption involves offering or receiving something to gain an unfair advantage. It also encompasses seeking, accepting, or receiving something to secure an unfair advantage.
- Business gifts on behalf of IPACKCHEM are allowable only in accordance with company policies and relevant laws and regulations.
- Gifts must not be given with the intent to influence improper behavior regarding business decisions.
- No monetary gifts are permitted.

### DATA MANAGEMENT

- No alteration or falsification of accounting records to conceal corruption or influence peddling is tolerated, regardless of the country or activity involved.

### CONFIDENTIALITY

- IPACKCHEM employees are prohibited from the unauthorized use or disclosure of the company's confidential business information, even after their employment with IPACKCHEM ends.

### COMPANY PROPERTY

- IPACKCHEM prohibits the acquisition of competitive or proprietary information through illicit means.
- Employees are expected to safeguard the value of IPACKCHEM's intellectual property, including inventions, designs, business processes, methods, and knowledge.

### IT GUIDELINES

- All IPACKCHEM employees utilizing information technology must be familiar with and adhere to company and business unit policies.
- If an employee has a grievance against IPACKCHEM or a colleague, proper internal procedures, not social media, should be utilized.

## BUSINESS CONDUCT THROUGHOUT THE VALUE CHAIN

- IPACKCHEM anticipates that its suppliers and subcontractors will uphold the Business Ethics Program standards throughout the supply chain.
- IPACKCHEM engages in business relationships with customers and selects suppliers based on merit, objective criteria, and adherence to environmental, social, and corporate governance standards.



## ENVIRONMENTAL MANAGEMENT

### RESOURCE EFFICIENCY

- IPACKCHEM is committed to reducing its manufacturing impact by enhancing resource efficiency.
- Pollution prevention and effective control measures are employed to minimize impacts on both human health and the environment, while remaining technically and financially viable.

### WATER STEWARDSHIP

- ISO 14001 certification drives continuous improvement in water management at each site, aiming to reduce and optimize water consumption.
- IPACKCHEM conducts water stress assessments in high-risk areas and focuses on improving water use efficiency, reducing consumption, and implementing recycling processes.

### WASTE MANAGEMENT

- IPACKCHEM is dedicated to minimizing landfill waste and promoting waste recovery from industrial sites.
- Sites prioritize product lifecycle management by encouraging material reuse.

### POLLUTION PREVENTION

- IPACKCHEM is committed to preventing soil, air, odor, and noise pollution by implementing measures to record, control, and minimize impacts at its sites.

### BIODIVERSITY

- IPACKCHEM aims to develop products and methods that safeguard and enhance the natural environment.

### ENERGY & CLIMATE

- IPACKCHEM pledges to combat climate change by reducing and optimizing energy consumption.
- Annual GHG emissions inventories are performed at site level and cover direct, energy, and raw material related emissions.
- IPACKCHEM adapts industrial processes to mitigate climate events and establishes emergency procedures.

## INNOVATION, SOURCING AND PRODUCT STEWARDSHIP

### SUSTAINABLE INNOVATION

- IPACKCHEM commits to employing technological solutions for sustainable innovation while adhering to regulatory requirements for transporting hazardous goods.

### SUSTAINABLE SOURCING

- We are actively implementing circular solutions across our value chain by collaborating with partners to redesign circular processes and utilizing PCR (Post Consumer Recycling).
- Whenever feasible, we integrate upcycled, traceable, renewable, bio-based, or biodegradable ingredients with optimized industrial processes.

### PRODUCT SAFETY, QUALITY AND STEWARDSHIP

- All operations and facilities must establish appropriate HSE procedures to mitigate risks.
- IPACKCHEM will identify hazards and assess risks associated with its products, ensuring clear end-user instructions



## HUMAN RIGHTS AND LABOR STANDARDS

### ANTI-SLAVERY AND HUMAN TRAFFICKING

- IPACKCHEM does not engage in forced labor and expects the same standard from its suppliers, contractors, and partners.

### CHILD LABOR

- IPACKCHEM does not employ individuals under the age of 16 or 18, in accordance with national laws.

### FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

- IPACKCHEM values open dialogue with employees and workers' representatives, without disadvantaging employees who act as representatives.

### EQUAL OPPORTUNITY / NON-DISCRIMINATION

- IPACKCHEM values each employee's individuality and promotes an environment of equal respect and dignity.

### HARASSMENT

- IPACKCHEM fosters a harassment-free workplace, addressing all forms of harassment through disciplinary procedures.

### LABOUR CONVENTIONS

- The company adheres to applicable wage and hour laws and ensures employees can invoke their rights under those laws without retaliation.

### LABOR RELATIONS

- Recruitment respects local legislation regarding age, gender, and family status, with new vacant positions posted internally.

### COMPENSATION & BENEFITS

- IPACKCHEM complies with local legislation regarding compensation and benefits.
- IPACKCHEM is committed to pay living wages, and is undertaking analysis to progressively cover all geographies.

### OCCUPATIONAL HEALTH & SAFETY

- IPACKCHEM is committed to providing employees with a healthy and safe work environment.

### ALCOHOL AND DRUG USE

- IPACKCHEM maintains alcohol and drug-free workplaces and expects employees to refrain from misusing legal substances while on company premises or business.

### TRAINING AND DEVELOPMENT

- Annual appraisals are used to identify training needs and enhance employee competence.

### DISCIPLINARY ACTIONS

- Our progressive discipline policy aims to address and prevent undesirable employee behavior or performance issues.

## OUR CONTRIBUTION TO SOCIETY

- IPACKCHEM actively seeks to positively impact the communities in which it operates.
- The company engages in open and proactive dialogues with key stakeholders.

- Effective local grievance mechanisms and remediation processes are established for vulnerable groups.

## IN SUMMARY: WHAT IS EXPECTED OF EVERYONE

DO	DON'T
1. Respect and comply with laws and industry codes.	15. Accept or offer gifts that influence decisions.
2. Report violations of the Business Ethics Program or laws.	16. Engage in bribery or corruption.
3. Safeguard and manage company records.	17. Misuse confidential information.
4. Use electronic information technology responsibly.	18. Use social media without authorization.
5. Promote IPACKCHEM's Supplier Code of Conduct.	19. Collect competition information unlawfully.
6. Promote diversity and inclusivity.	20. Send waste to landfill without considering recovery.
7. Promote waste reduction and recycling.	21. Allow pollution at IPACKCHEM facilities.
8. Use lifecycle analysis for eco-friendly products.	22. Neglect energy consumption control.
9. Apply HSE procedures to prevent risks.	23. Engage with partners violating ethics.
10. Respect universal human rights principles.	24. Utilize forced labor or employ children under 16.
11. Engage in dialogue with workers' representatives.	25. Retaliate against those invoking rights.
12. Maintain a healthy and safe work environment.	26. Discriminate or harass others.
13. Protect privacy and personal information.	27. Misuse unauthorized substances at work.
14. Ensure workplaces are free of alcohol and drugs.	28. Overconsume alcohol at work-related events.

## PROCEDURES

- Employees must report violations or suspicions of violations.
- Questions about the Business Ethics Program can be directed to managers or the Country General Manager.
- For anonymity, employees can contact [compliance@ipackchem.com](mailto:compliance@ipackchem.com).

At Ipackchem, employees have the responsibility to adhere and act in accordance with the BEP. Any concern should trigger a “whistleblowing” where an employee or an external party inform Ipackchem of a suspected wrongdoing.

The scope of whistleblowing includes any potential unlawful action, environmental or financial malpractice, violations of the Business Ethics Program, or any non-ethical behavior. Should anyone have a concern, they should promptly contact an Ipackchem manager, the local CEO, or use [compliance@ipackchem.com](mailto:compliance@ipackchem.com).

Raising a concern in good faith will not expose to any retaliation. Anonymity will be preserved to the best possible extent. All concerns will be impartially examined and investigated internally as necessary.

