



BUSINESS ETHICS PROGRAM

Supply Chain Code of Conduct

Publication: October 2021
Rev1 : Octobre 2023

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MESSAGE FROM THE DIRECTOR GENERAL

IPACKCHEM is committed to promoting the best principles and practices along its value chain, as well as promoting understanding of the importance of economic and social contributions. The company is committed to increasing dialog and transparency with its business partners and other stakeholders, as well as expanding knowledge of packaging product management.

IPACKCHEM expects its suppliers and subcontractors to share its commitment to conduct its business in a responsible and ethical manner, in accordance with the principles set out in this Business Ethics Program. IPACKCHEM expects its suppliers and subcontractors to apply these standards further down the supply chain. The company considers compliance with these standards as a key criterion in selecting new suppliers or maintaining relationships with existing suppliers.

The **Business Ethics Program - SUPPLIER Code** is a common reference document for our partners around the world, suppliers and subcontractors and all business partners.

Suppliers, subcontractors and trading partners must apply standards equivalent to ours, in particular with regard to their employees.

Our hard-won reputation for upholding the highest standards of business conduct should not be taken for granted.

We want to be able to rely on our business partners to meet the standards outlined in the Business Ethics Program and other corporate and corporate policy statements.

Sincerely,
Jean-Philippe MORVAN
CHIEF EXECUTIVE OF THE IPACKCHEM GROUP

THE COMMITMENTS OF THE IPACKCHEM GROUP

- IPACKCHEM complies with all applicable national and international laws, codes and conventions. We adhere to the sectoral codes of good practice applicable to our activities and we expect our partners to comply with our ethical rules.
- IPACKCHEM's commitments to international declarations and conventions are reflected in the principles it has endorsed. The most important of these are:
 - Principles of the UN Universal Declaration on Business and Human Rights;
 - United Nations Guiding Principles on Business and Human Rights;
 - Declaration of Principles of the International Labor Organization (ILO) on Fundamental Principles and Rights at Work;
 - OECD Guidelines for Multinational Enterprises;
 - The Global Compact Principles to which IPACKCHEM adhered in 2017 through its CEO;
 - UN Sustainable Development Goals.
- IPACKCHEM complies with the provisions of the French law n° 2016-1691 on transparency, the fight against corruption and the modernization of economic life - law called "Sapin 2". Sapin 2 applies to all subsidiaries of the Group. IPACKCHEM also incorporates the principle of extra-territoriality in the anti-corruption laws to which the Group is subject.
- IPACKCHEM is also committed to all other applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act 2010 ("UKBA").
- IPACKCHEM shares the principle that aggressive and fair competition is essential for transparent business practices. Our fair competition rules aim to promote and protect fair competition and to punish those who engage in unfair commercial practices in the conduct of business.

EXPECTATIONS OF THE SUPPLY CHAIN

IPACKCHEM expects all its suppliers, subcontractors, and other business partners to adopt the same standards and expects them to request the same from their own suppliers and partners.

As part of its global deployment, IPACKCHEM expects its partners to comply with these provisions.

The following rules apply to all our suppliers, their subcontractors and business partners:

COMPLIANCE AND BUSINESS ETHICS

- Antitrust laws and fair competition rules prohibit conspiracy between competitors to control prices or terms of sale.
- Suppliers and subcontractors shall select their partners exclusively based on merit, taking into account criteria such as price, quality and reliability.
- They shall prohibit any collection of competitive or confidential information by unlawful means, including theft, espionage, or breach by a customer or any other third party of its obligation of confidentiality towards a competitor.

1. CORRUPTION

- Suppliers and subcontractors must not tolerate any form of corruption, whether involving a public official or the private sector, whether direct or indirect.
- Corruption is proposing or granting something in order to obtain an unfair advantage. The unfair advantage may be preferential treatment, the signing of a contract, the disclosure of confidential or inaccessible information, the exemption from the exercise of a right (tax or customs), the exemption from a control (tax, for example) or in general anything that could influence a person in office.
- No act involving the offer or acceptance of bribes will be tolerated by the company.
- Promising, offering, or granting to a public official, directly or indirectly, an undue advantage, to himself or to another person or entity, in order for him to perform or refrain from performing an act in the performance of his official duties, shall be considered an act of corruption of a public official. Any undue

advantage granted to a family member of a public official shall be subject to the same penalty as an advantage conferred on a public official.

- Suppliers and subcontractors shall not promise or grant an unfair advantage in exchange for confidential information during the tender procedure of another private company.

2. TRAFFIC OF INFLUENCE

- Suppliers and subcontractors must not tolerate any form of influence peddling, regardless of the country and activity concerned.
- Influence peddling can be defined as 'the promise, offer or grant to a person, directly or indirectly, an undue advantage so that that person abuses his or her actual or supposed influence in order to obtain an undue advantage from a public administration or authority for the original instigator or any other person'.

3. ILLEGAL SOLICITATION

- Suppliers and subcontractors must prohibit any form of unlawful solicitation, regardless of the country or activity concerned, unless the life or physical security of a person is in danger.
- Some public officials may abuse their status in order to obtain benefits, for example in exchange for the cancelation of penalties during a tax adjustment.

4. MONEY LAUNDERING

- Suppliers and subcontractors must not deal with individuals or entities sanctioned for past or current links to criminal or terrorist activities.
- Money laundering means the introduction of financial assets from criminal sources into the legitimate financial and economic cycle.

5. GIFTS, MEALS AND ENTERTAINMENT

- Suppliers and subcontractors must also be careful about gifts and entertainment offered to third parties. Gifts and entertainment must not be given with the intention of inducing the beneficiary to act improperly in any commercial decision.
- Gifts include cash offers, gift cards or other cash equivalents, business meals, entertainment such as free trips or stays, invitations to events and

meetings, job offers, business opportunities, personal favors, and donations to selected foundations or discounts on products.

- Gifts, business lunches or entertainment are offered or accepted only as a courtesy, following standard business practices that exclude any influence on business decisions.
- In any case, cash gifts are prohibited.
- Gifts should not be given with the intention of inducing our employees to act improperly in any commercial decision.
- In order to avoid giving the impression that suppliers are being selected other than on the basis of merit, suppliers and subcontractors must prohibit their employees from accepting entertainment, gifts or any other type of gratuity offered by persons soliciting a contract or purchase, except for common commercial courtesies of reasonable frequency and value.

6. CONFLICT OF INTEREST

- Suppliers and subcontractors must report any potential conflicting activities related to IPACKCHEM employees and must cease such activities.
- Suppliers and subcontractors shall at all times disclose any potential conflict of interest at the time of its occurrence.

HUMAN RIGHTS AND SOCIAL NORMS

7. RESPECT FOR HUMAN RIGHTS

- The responsibility for human rights rests with all companies regardless of their size, sector, operating context, ownership, and structure. Suppliers and subcontractors must:
 - assume responsibility for human rights.
 - implement a due diligence process to identify, prevent and mitigate human rights impacts;
 - put in place procedures to address any negative impact the company may have on human rights or to which it contributes.

8. FORCE LABOR

- Suppliers and subcontractors must not resort to forced labor. A zero-tolerance approach to modern slavery is mandatory and suppliers and

subcontractors must implement and enforce effective measures to prevent modern slavery and human trafficking in any supply chain in accordance with the provisions of the Modern Slavery Act 2015.

- Modern slavery is a crime that consists in the abject violation of the human rights of vulnerable workers. This violation may take many forms, including slavery, servitude, forced or compulsory labor and trafficking in human beings.

9. CHILD LABOR

- Suppliers and subcontractors shall not employ persons under the age of 16 or 18 years in accordance with national law and shall ensure, to the extent possible, that their suppliers adhere to this standard.

10. SOCIAL DIALOG

- Suppliers and subcontractors must conduct an open and constructive dialog with their employees and representatives.
- According to local laws, will be respected: the right of their employees to associate freely, join trade unions, be represented, join works councils, and participate in collective bargaining.
- They must not penalize employees who hold office as workers' representatives.

11. LABOR CONVENTIONS

- Suppliers and subcontractors must comply with all applicable laws on remuneration and working hours, as well as other legal provisions governing the employer-employee relationship and the working environment.
- They must comply with all applicable regulations to prevent illegal, clandestine, and undeclared work.
- All expatriate employees must hold and retain all required work permits or visas in the country where the company employs them, and otherwise comply with all applicable immigration laws.
- In terms of working hours, suppliers and subcontractors must comply with the applicable local laws and regulations, which may in no case exceed the maximums set by internationally recognized standards such as those of the International Labor Organization. Our suppliers cannot impose excessive overtime.

12. HEALTH AND SAFETY AT WORK

- Suppliers and subcontractors must provide a healthy and safe work environment in accordance with the requirements of applicable occupational health and safety legislation.
- They must be committed to a work environment free from violence, harassment, intimidation and other dangerous or disruptive situations due to internal and external threats.
- They must prohibit the use of illegal or unauthorized alcohol and drugs in the workplace.
- They should advise their employees who are subject to problems of abuse to receive assistance or be encouraged to seek it.

13. EQUAL OPPORTUNITIES AND NON-DISCRIMINATION

- Suppliers and subcontractors must treat their employees equally in terms of respect and dignity. The overall success and promotion of employees depends solely on personal skills and job performance.
- They must strictly prohibit any discrimination based on race, color, religion, creed, sex, nationality of origin, age, marital status, sexual orientation, disability, veteran status, or any other protected category.

14. HARASSMENT

- Suppliers and subcontractors must treat their workers with respect and dignity. They must not accept or practice any form of corporal punishment, physical, sexual, verbal, or psychological harassment, or any other form of abuse. Accordingly, it is strictly prohibited to intimidate or harass any person, including on the basis of race, color, religion, belief, sex, nationality of origin, age, family status, disability, sexual orientation, gender change or any other protected category of the person in question.
- Harassment includes racist remarks, derogatory ethnic jokes, religious insults, unwelcome sexual advances, and any other circumstances that may result in a hostile and threatening work environment.

15. PRIVACY AND PERSONAL DATA

- Suppliers and subcontractors must undertake to take all necessary steps to ensure the confidentiality of professional and other non-public information disclosed in the course of their business relationship with the IPACKCHEM Group.
- They must comply with the legislation in force on insider trading.

ENVIRONMENT AND SOCIETY

16. CLIMATE CHANGE

- Suppliers and subcontractors must work positively to preserve their natural environment with the support of their partners.
- Suppliers and subcontractors must control their energy consumption and use renewable energy sources.
- They must also put in place a risk assessment and business continuity plan related to their climate change impacts.
- They are committed to adopting circular economy principles for the conservation of natural resources and to reducing, sorting, and recovering their waste.

17. PRODUCT SAFETY

- Faced with the potential health and environmental risks associated with products throughout their life cycle, suppliers and subcontractors must provide clear information on the safest and most appropriate way of using their products and the risks associated with their use by providing appropriate instructions and warnings as well as on life cycle traceability.
- All activities and facilities of suppliers and subcontractors shall adopt appropriate HSE procedures and practices to minimize any risk.

18. CONTRIBUTION TO THE COMMUNITIES

- Suppliers and subcontractors must pay particular attention to development opportunities for local communities.

PROCEDURES

- Any partner who reasonably discovers or suspects a breach of the Business Ethics Program or of any applicable law, regulation, or policy in the course of activities on behalf of IPACKCHEM shall report the actual or suspected breach. Failure to report a violation is itself a violation of the Business Ethics Program.
- In most cases, the information should be sent to the person indicated in the CONTACT chapter.
- Anonymous reports will also be investigated to the extent possible. IPACKCHEM suppliers and subcontractors should not fear sanctions or retaliation for reporting in good faith actual or suspected violations. IPACKCHEM strictly prohibits retaliation.
- Reports of incidents, violations or activities that constitute or may constitute violations of the Business Ethics Program or applicable laws, regulations or policies will be fully investigated. These investigations will be conducted as discreetly as possible. If an investigation reveals a violation, appropriate disciplinary or judicial action will be taken against the offender(s).

CONTACT

Any business partner with questions regarding the Business Ethics Program - Supply Chain Code of Conduct, any specific compliance policy or concern should request and receive a response, and should not hesitate to contact:

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If deemed appropriate by a partner,
we encourage him to contact the group compliance officer
to the compliance@ipackchem.com

