



Supplier Code of Conduct

November 2025





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Introduction

At Elopak, we are committed to responsible and sustainable business practices that respect people, society, and the environment. To achieve this, we require strong collaboration with suppliers who share our values and uphold the principles outlined in this Supplier Code of Conduct (the Code). The Code outlines our core principles and minimum requirements regarding business ethics, human and labor rights, health and safety and are based on internationally recognized standards and principles.

Elopak respects and supports internationally recognized human rights and labor standards, including those outlined in the International Bill of Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work (Core Labor Standards). We also support and actively work to implement the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. We expect our suppliers to meet these standards, act with integrity, and help protect our stakeholders, the environment and the communities throughout the value chain. Where national laws and regulations address the same subjects as this SCoC, the most stringent shall apply.

“Supplier” in this Code means any individual or legal entity that provides goods and/or services to Elopak, and their sub-suppliers, agents and employees relevant to the provision of goods and/or services to Elopak.





Supporting management systems

The Supplier must conduct human rights and environmental due diligence assessments to effectively identify, prevent, and address potential adverse impacts on people and the environment across their operations and throughout their supply chains. This process should be risk-based and proportionate to the size of the business and in line with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Suppliers are required to systematically implement the requirements and principles of this Code throughout their operations and supply chains, proactively communicate the principles and requirements (not necessarily this Code itself) to its own suppliers and sub-suppliers and work to ensure their compliance.

Compliance

At the request of Elopak, the Supplier must be able to demonstrate and document its commitment and compliance to this Code through internal and external assessment. This includes sharing site-relevant information, documentation and complete self-assessment questionnaires regarding its sustainability performance. Elopak reserves the right to verify compliance by conducting physical inspections and audits, either directly or through third parties, as well as requesting workers' surveys and mapping of conditions in the supply chains.

Supplier must ensure transparency regarding raw materials and ingredients, including country of origin and full traceability to support food safety and sustainability.

Supplier shall promptly notify Elopak of any actual or suspected non-compliance with this Code, either caused by Supplier or its sub-suppliers. Where non-compliances or issues are identified, both parties will engage in dialogue and agree on remediate actions including reasonable timeline. If the breach is material, or if the Supplier repeatedly fails to show willingness or ability to improve or comply with this Code, Elopak may terminate the contract.

Elopak value Suppliers who strive for positive impact and encourage its Suppliers to continuously work to improve their practices in order to comply with international standards and best practices.

Sustainability principles

Business ethics and legal compliance

Compliance with applicable law

Supplier shall comply with all applicable laws and regulations and obtain and maintain all necessary permits.

Anti-bribery and corruption

Supplier shall not engage in corruption in any form, including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials. Supplier shall comply with international legislation on bribery and corruption, including the US Foreign Corrupt Practices Act and UK Bribery Act.

Conflict of interest

Supplier's business transactions relevant to Elopak must be conducted without any conflict of interest. The Supplier shall promptly disclose in writing any situation where personal, financial, or other interests may conflict with their obligations towards Elopak.

Fair competition

Supplier shall not enter into, seek to enter into or otherwise engage in any form of discussions, agreements or activity that would be a breach of applicable competition laws and regulations.

Anti-money laundering

Supplier shall not engage in money laundering and shall take steps to prevent its financial transactions from being used by others to launder money.

Sanctions and export controls

Supplier shall comply with applicable international sanctions and applicable export and import controls and shall inform Elopak immediately should they become subject to sanctions.

Safeguarding information

Supplier shall protect Elopak's confidential information and trade secrets, and suitable measures should be put in place to prevent unauthorized access.

Privacy and data protection

Supplier shall comply with applicable data protection legislation, including regulations on processing and storage of personal information. This includes the General Data Protection Regulation (GDPR) that applies in the European Union (EU).

Cybersecurity

Suppliers are required to prioritize the protection of confidentiality, integrity, and availability of information. The security measures and controls implemented by suppliers should be proportional to the sensitivity, value, and criticality of the information being processed throughout its lifecycle.

Conflict minerals

To the extent relevant to the Supplier's operations, the Supplier shall have a written policy and procedure in place to prevent the use of conflict minerals or unsustainably mined minerals and take steps to identify and manage related risks in line with OECD Due Diligence Guidance.

Food safety compliance

Suppliers providing materials intended for food contact must comply with applicable food contact regulations and are required to follow the principles of international quality and hygiene standards as ISO 9001 and GFSI (Global food safety initiative) recognized standard. Elopak should be informed of any legal changes affecting the supplied materials.

Human and labor rights

Forced and compulsory labor

Forced, bonded, or involuntary labor, including slavery and trafficking, is strictly prohibited. All work must be voluntary without threats or penalties. Workers' freedom of movement and personal documents must not be restricted and workers may leave employment with reasonable notice.

Child labor

The use of child labor is strictly prohibited. The minimum age for workers shall not be less than 15 and comply with the national minimum age for employment, or; the age of completion of compulsory education, whichever of these is higher (in line with the ILO Convention 138 on child labor). No person under the age of 18 shall be engaged in labor that is hazardous to their health, safety or morals, including night work.

Freedom of association and the right to collective bargaining

Workers' rights to join and form association and trade unions and to bargain collectively shall be respected. Workers' representatives shall not be discriminated against and shall have access to carry out their representative functions in the workplace. Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

Non-discrimination and equal opportunities

Employees and hired labor shall be treated equally and fairly. There shall be no discrimination or harassment at the workplace in hiring, compensation, access to training, promotion, termination or retirement based on ethnic background, caste, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation. Supplier shall promote equal opportunity and fair treatment in employment and occupation for all employees and hired labor, including migrant workers. Measures shall be established to protect workers from sexually intrusive, threatening, insulting or exploitative behavior, and from discrimination or termination of employment on unjustifiable grounds.

Working hours, wages and benefits

Supplier shall adhere to applicable laws, regulations, and national industry standards on working time, including overtime hours, breaks, rest periods, paid vacation and parental leave. Wages and benefits paid for a standard working week shall as minimum meet national legal standards or industry benchmark standards, whichever is higher. Wages shall always be enough to meet basic needs, including some discretionary income. Mandatory benefits, insurance, and social security must be provided. Wage deductions for disciplinary reasons are prohibited.

Regular employment

The use of short-term contracting, sub-contractors, apprenticeship programs or other labor relationships shall not be used in order to avoid obligations to employees under international conventions and national laws and regulations

concerning regular employment. All workers, including hired labor, are entitled to a written contract of employment setting out employment conditions in a language they understand before entering employment.

Marginalized populations

Production and use of raw materials shall not contribute to the destruction and/or degradation of the resources and income base for marginalized populations, such as in claiming large land areas or other natural resources on which these populations are dependent.

Health safety and well-being

The Supplier shall provide a safe and healthy workplace for all individuals and follow prevailing regulatory standards and industry norms to minimize health and safety risks. The Supplier must have a system in place that carefully manages and controls hazardous chemicals and other relevant substances. Adequate steps must be taken to prevent accidents and work-related injury. As a minimum, the Supplier shall provide access to clean toilet facilities, potable water as well as fire exits, free personal protective equipment (PPE), emergency kits, access to emergency assistance, and if appropriate, sanitary facilities for food storage. Accommodation, where provided, must be clean, safe, adequately ventilated, and offer access to toilet facilities and potable water.

Workers must receive regular and documented health and safety training. In cases of work-related injuries or illness, medical treatment and support for full recovery and return to work must be ensured.

Environment and climate

Environmental management

Supplier must implement effective environmental management systems and measures to identify, assess and mitigate actual and potential environmental impact of their business operations related to air, water, pollution, waste and hazardous materials and ensure sustainable extraction and use of resources. Waste and hazardous materials must be safely stored, handled, transported, and disposed of, with clear labeling and management for safe use, recycling and disposal. As a minimum, Supplier must respect and abide to all applicable laws related to environmental protection and obtain relevant permits. Environmental violations and complaints should be addressed proactively, with appropriate stakeholder communication. Environmental performance is regularly monitored against set targets and improvement strategies. Upon request, Supplier shall share relevant data and information on its environmental impact and performance with Elopak.

Climate

For Suppliers classified as small or medium-sized enterprises (SMEs) under local or regional standards, measuring and monitoring greenhouse gas (GHG) emissions is encouraged to help identify opportunities for emissions reductions.

Larger Suppliers are expected to set reduction targets across Scope 1,2 and 3 emissions, following the Science Based Target Initiative (<https://sciencebasedtargets.org/>). The targets should

include near-term targets outlining how the Supplier will reduce their emissions over the next 5 to 10 years, and long-term to achieve net-zero according to the SBTi's Corporate Net-Zero Standard criteria. The Supplier commits to implementing a robust and transparent decarbonization roadmap.

Biodiversity and ecosystems

Business must be conducted in a manner that preserves biodiversity in Suppliers operations and supply chain. Where biodiversity is at risk, the Supplier must conduct impact assessments and implement preservation plans for high-value areas. Actual and potential impacts related to biodiversity and ecosystems must be systematically assessed and addressed to prevent, manage, or minimize adverse effects.

Water

Suppliers must use water efficiently, prevent contamination, and, where water use is significant, particularly in high-stress areas, implement effective water management strategies and ensure their activities do not compromise community access to safe drinking water as part of their overall commitment to environmental responsibility.

Circularity

Supplier shall implement principles of resource efficiency, waste prevention, reuse, and recycling, and shall avoid practices resulting in incineration or landfill unless no viable alternatives exist.





Reporting and raising concerns

Supplier must establish accessible and effective routines that enable workers, local communities, suppliers, and their employees to have the possibility to raise concerns and report suspected or potential breaches of the principles in the Code or applicable laws and regulations. All concerns must be investigated fairly, handled professionally, and be followed by appropriate remediation of confirmed violations.

Elopak values transparency and encourage its Suppliers, business partners and their employees to raise concerns and report suspected or potential breaches to Elopak. Read more about Elopak Whistleblower helpline on Elopak's Homepage. The helpline accommodates for anonymous reporting.

Relevant links

[Elopak homepage](#)

[Elopak Code of Conduct](#)

[Elopak Whistleblower helpline](#)

The Elopak Supplier Code of Conduct is founded on internationally recognized principles, standards, and guidelines, which provides further guidance and context for the requirements herein.

[UN Guiding Principles on Business and Human Rights](#)

[International Bill of Human Rights](#)

[International Labor Organization's Declaration on Fundamental Principles and Rights at Work](#)

[OECD Guidelines for Multinational Enterprises on Responsible Business Conduct](#)

[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#)