

Global Supplier Code of Conduct



Elopak strives towards responsible business conduct that respects people, society and the environment. Elopak always seeks collaboration in order to achieve responsible business conduct and is therefore reliant on working with suppliers sharing our values and commitments to the principles outlined in this Supplier Code of Conduct (SCoC). We expect our suppliers to work focused and systematically to comply with our SCoC, that covers fundamental requirements on human and labor rights, anti-corruption and business ethics, health and safety and the environment.

Elopak works actively to comply with international guidelines and standards and this SCoC is based on such guidelines including the International Bill of Human Rights, UN Guiding Principles on Business

and Human Rights, the OECD Guidelines for Multinational Enterprises and the ILO declarations on Fundamental Principles and Rights at Work. This SCoC outlines the minimum standards Elopak requires its suppliers to comply with when doing business with Elopak in addition to applicable laws and regulations. Where national laws and regulations address the same subjects as this SCoC, the most stringent shall apply.

Definition:
“Supplier” in this SCoC is any individual or legal entity that provides goods and/or services to Elopak.

Compliance

Supplier shall have a systematic approach in implementing the requirements in this

SCoC, including in its supply chain, as well as conducting effective risk assessments to identify, prevent and mitigate potential negative impact. Supplier is to communicate the principles and requirements herein (not necessarily this SCoC itself) to its own suppliers and sub-suppliers and work proactively to ensure their compliance. Supplier shall promptly report to Elopak any non-compliance or suspected non-compliance to this SCoC, either caused by Supplier or its sub-suppliers.

At the request of Elopak, the Supplier must be able to demonstrate and document its commitment and compliance to this SCoC through internal and external assessment. This may be done through self-assessment, follow-up meetings, physical inspections and audits at supplier's operations and mapping of conditions in the supply chain. The supplier must be able to disclose information of origin (country of origin) associated with the products and services produced for and ordered by Elopak.

This SCoC forms an integral part of all contracts between the Supplier and Elopak. In the event of a breach of this SCoC, corrective actions must be taken within a reasonable period of time. If the breach is material or if Supplier, after several requests does not show willingness or ability to improve or comply with this SCoC, the contract may be cancelled. Elopak encourages its Suppliers to continuously work to improve their practices in order to comply with international standards and best practices.

Responsible Business Conduct principles

Business Practices

Anti-Corruption

Corruption in any form is strictly prohibited including bribery, extortion, kickbacks and improper private or professional benefits to customers, agents, contractors, suppliers or employees of any such party or government officials.

Elopak and its employees will not, in order to obtain business or private benefits, accept illegal or undue advantages. Elopak expects the Supplier to adhere to similar practice and principles for its business.

Supplier shall comply with applicable laws and regulations including international legislation on bribery and corruption, such as the US Foreign Corrupt Practices Act and UK Bribery Act.

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 be firmly opposed to all forms of money laundering and shall take steps to prevent its financial transactions from being used by others to launder money.

Sanctions and trade controls

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

Privacy and data protection

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

Human and Labor Rights

Forced and Compulsory Labor

There shall be no forced, bonded or involuntary prison labor. Workers shall not be required to lodge deposits or identity papers with their employer and shall be free to leave their employer after reasonable notice.

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 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.

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.

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

The 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

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.

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.

Conflict Minerals

To the extent relevant to the Suppliers operations, there shall be a written policy and procedure in place to avoid knowingly acquiring conflict minerals or unsustainable mined minerals produced at high environmental or social costs.

Health and Safety

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, essential safety equipment, emergency kits, access to

emergency assistance, and if appropriate, sanitary facilities for food storage.

Supplier shall ensure that its workers understand the hazards and safe practices for their work and whenever necessary workers are to be provided with, and instructed to use, appropriate personal protective equipment. Workers shall receive regular and documented health and safety training, and such training shall be repeated for new or reassigned workers.

The supplier must adhere to good manufacturing practices and relevant laws and regulations on food safety related to the product.

Accommodation, where provided, shall be clean, safe and adequately ventilated and shall have access to clean toilet facilities and potable water.

Environment and Climate

Negative impact on the environment shall be reduced throughout the value chain. Supplier shall take measures to continuously minimize greenhouse gas emissions and local pollution, the use of harmful chemicals, pesticides, and to ensure sustainable resource extraction and management of water, oceans, forest and land, and the conservation of biodiversity. The local environment at and nearby the suppliers' facilities shall not be exploited or degraded.

To the extent applicable to Suppliers' operations, supplier shall demonstrate an established methodology of identifying and mitigating its material environmental risks. As a minimum, national and international

environmental legislation and regulations shall be respected, and relevant discharge permits obtained. The Supplier shall handle environmental violations and complaints systematically and proactively and inform stakeholders of them. To the extent relevant, the Supplier will upon request provide information about its environmental impact, greenhouse gas emissions and energy sources to Elopak.

Reporting and Whistleblowing routine

Supplier shall ensure routines for workers, local communities, suppliers and their employees to have the possibility to raise concerns regarding suspected or potential breaches of the requirements set out in this SCoC or applicable laws

and regulations. Supplier shall ensure that all reported concerns receive fair investigation and are handled professionally and remediate any confirmed cases.

Elopak values transparency and encourages its suppliers, business partners and their employees to raise concerns and report suspected or potential breaches to this SCoC 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](#)

Commitment

We, the undersigned, hereby confirm that we fulfill the requirements of the Elopak Global Supplier Code of Conduct. We will report to Elopak any case of non-compliance to this SCoC and will take necessary action to comply with the requirements and provisions herein. We agree that Elopak may audit our practices and operations in the aforementioned areas to assess compliance with the requirements. We are aware that where a non-compliance is material or is not improved or remedied, the business relation may be renegotiated or cancelled by Elopak.

Supplier Company Name:

Name and Title:

Date & Place:

Authorized signature:

This document must be signed by an authorized representative of the supplier.