SUPPLIER CODE OF CONDUCT





Introduction

At Schoeller Allibert we are committed to being the first-choice partner for our customers. To maintain our reputation for producing safe, high-quality products, we are committed to going beyond mere compliance with the law and strive to uphold high ethical standards in everything we do. We expect all our Suppliers and (Supplier) Subcontractors to adhere to all applicable laws and regulations where they operate as well as to share the principles that are expressed in this Supplier Code of Conduct that comprise an important component of Supplier selection and evaluation. Moreover, we expect you to replicate these standards further down the supply chain. The Code of Conduct for Suppliers specifies the minimum standards expected of all of Schoeller Allibert's Suppliers.

This Supplier Code of Conduct is therefore made available to our Suppliers with the goal of strengthening our mutual understanding of how good practices, and sustainability should be incorporated in day-to-day business. To meet social responsibilities, suppliers are expected to conduct their business in an ethical manner and to act with integrity.

Schoeller Allibert is a company that produces materials with precisely defined functional characteristics. In this context we enter into relations with other parties in our vicinity as supplier, developer, partner, etc. These relations are based not only on trust, in-house technological know-how and skills and the quality of our products, but also on our method of operation, the way we treat the environment and our social objectives.

Our purpose:

Accelerating sustainable supply chains, through innovative, reusable solutions, which are efficient by design and circular by nature

Our vision:

A world where reusable, circular solutions are the smartest choice

Our mission:

We will advance the use of reusable packaging systems

Our reusable packaging solutions have a long lifespan, reducing the total cost of ownership and environmental footprint for our customers

We will continue to set new standards for sustainable packaging, storage and logistics products

Our innovative products reduce waste, are fully recyclable and will increasingly be made from recycled materials We will drive smart digital solutions

Our digital technologies enable data-driven decision-making for our customers, enhancing supply chain efficiency and circularity at a global scale

Our Values

Trust!

The only way to meet our ambitions is working together, with all our colleagues and other stakeholders. Therefore, we rely on one another. The level of trust in our working environment is high. And loyalty is key in our teams. We always have respect and show passion and enthusiasm.

Own!

We also have respect for our role in the company and teams. We own our work and responsibilities. And we take initiative. With energy we challenge ourselves (and others). We motivate colleagues by being dedicated: we lead by example.

Deliver!

And there can be no doubt about our approach to customers and other stakeholders; we exceed their expectations and deliver on time and in full.



BUSINESS ETHICS

Business Integrity

Schoeller Allibert does not allow any form of bribery, kickbacks, inappropriate gifts, hospitality or other improper incentives in connection with Schoeller Alliberts business in any place, at any time, with the object of obtaining a business advantage for Schoeller Allibert.

Schoeller Allibert expect Supplier to warrant and undertake to Schoeller Allibert to conduct business fairly and with integrity and Supplier will maintain in place its own policies and procedures to ensure compliance. Suppliers and Suppliers contractors or third parties should ensure that such third parties prior to engaging contractors or third parties comply with the Schoeller Allibert and anticorruption laws including but not limited to the United Kingdom Bribery Act, the United States Foreign Corrupt Practices Act and Canada's Corruption of Publics officials Act.

Schoeller Allibert reserves the right to conduct audits or assessments to ensure Suppliers compliance and will take appropriate steps regarding our relationship with Supplier if there is a reason for concern. Schoeller Allibert encourages its Suppliers, either anonymously or not, to raise any concerns regarding a possible violation hereof by going to Schoeller Allibert's reporting Hotline http://schoellerallibert.ethicspoint.com.

Fair competition

Supplier will conduct its business in line with fair competition and in accordance with all applicable anti-trust laws. Supplier does not enter into agreements or practices that have a restrictive effect on competition, such as price-fixing, market allocation or abuse of dominant position. Nor does Supplier offer products or services to or on behalf of Schoeller Allibert in a misleading way.

Conflict of interest

We require all our Suppliers to make decisions in the best interest of Schoeller Allibert. Supplier should avoid any conflict of interest relating to financial interests or other arrangements with our employees that may be considered as inappropriate this includes avoiding situations in which a conflict could arise between the interest of Schoeller Allibert and a direct or indirect personal interest. Supplier should disclose to Schoeller Allibert any situation in which Supplier perceives a potential conflict of interest so that appropriate action can be taken.

Financial records

We expect Suppliers to perform all business and commercial dealings transparently and record them accurately in their books and records according to local law. Suppliers should keep accurate, complete and up-to-date records on their transactions with Schoeller Allibert and are not to engage in or facilitate any form of money laundering.

All payments to Supplier shall be made, subject to receipt by Schoeller Allibert of appropriate invoices in reasonable detail, by wire transfer to Supplier.

Sanctions and Trade Controls

We expect Suppliers to comply with applicable local and international sanctions laws, export controls regulations and requirements.

Confidential Information

We expect our Suppliers to respect intellectual property rights, including those of Schoeller Allibert. There must be appropriate measures to prevent disclosure or unauthorized use of Schoeller Allibert confidential information made available to them. Supplier will safeguard and make only appropriate use of confidential information and ensure that all employees' and Suppliers' privacy and valid intellectual property rights are protected. Supplier does not use confidential information it possesses regarding Schoeller Allibert to either engage in or support insider dealing.



Grievance

Our Suppliers provide their employees and other stakeholders and interested parties with a mechanism to raise concerns about violation or potential violation of laws and the principles provided in this Code. These concerns will be addressed in a fair and transparent way. Our Suppliers protect confidentiality and prohibit retaliation against those raising the concern.

SUSTAINABILITY

Environment

Schoeller Allibert operates a policy to minimize environmental impact. Suppliers are also expected to commit to minimizing their environmental impact and carbon footprint and to the efficient use of raw materials, energy and other natural resources while minimizing waste, emission and noise. Supplier shall comply with all relevant environmental laws and ensure that the necessary permits are in place.

Reduction of waste

Reduction of waste is at the core of Schoeller Allibert's mission. Equally we expect our Suppliers to explore how to avoid and reduce packaging waste by replacing single-use packaging materials with reusable and more sustainable options.

Prevention of Plastic Pollution

Plastic particles that escape into the environment accumulate in and contaminate freshwater and marine ecosystems, leading to the so called "Plastic Soup". Therefore, Schoeller Allibert asks its suppliers to prevent resin, pellet, flake and powder loss at all facilities and commits to doing the same. For further information, please check Operation Clean Sweep® (opcleansweep.org)

Human rights

Supplier shall recognize the human rights of all people as outlined in the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights. Supplier takes responsibility for avoiding infringement of human rights and for remediating the impact, if any, on human rights resulting from activities performed for Schoeller Allibert and from products made for Schoeller Allibert.

Employment relationships

Our Suppliers are committed to apply principles of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. People are not employed against their will, transported for exploitation, engaged in slavery or servitude, nor deprived of their rights. Legal minimum age requirements as outlined in the relevant ILO conventions and the laws of the countries of operation are adhered to and children under the age of 16 are not employed.

Working hours and remuneration must comply with laws while being fair and just. Overtime is compensated and leave is offered as required.

<u>Freedom of Association</u>

Supplier shall uphold the freedom of association and the right to collective bargaining in accordance with applicable laws. Supplier shall comply with minimum wages and working hours in accordance with local laws, and ensure compensation of a living wage according to local living conditions.



Diversity & Inclusion

We are committed to developing a diverse workforce in which everyone is treated fairly and with respect and has the opportunity to contribute to business success and realize his or her potential. This means harnessing the unique skills and experience that each individual brings. Our Suppliers treat people with dignity and respect and do not harass or discriminate, whether through culture, nationality, race, religion, gender, political preference, disability, association, sexual orientation or age.

Safety in general

Supplier will comply with all applicable quality, health, safety and environmental regulations. All required permits, licenses and registrations will be obtained, maintained and kept up-to-date. Supplier will fulfill its operational and reporting requirements.

Material Safety Data Sheets containing all necessary safety-relevant information will be made available by Supplier for all hazardous substances and will be provided to Schoeller Allibert and other parties in case of a legitimate need. All products and services delivered to Schoeller Allibert shall meet the quality and safety criteria specified and shall be safe for their intended use.

Working Safety

Supplier will protect its employees from any chemical, biological and physical hazards and physically demanding tasks in the workplace as well as from risks associated with any infrastructures used by their employees. Supplier will provide appropriate controls, safe work procedures, preventative maintenance and necessary technical protective measures to mitigate health and safety risks in the workplace. When hazards cannot be adequately controlled by these means, Supplier will provide employees with appropriate personal protective equipment. Safety information relating to hazardous materials – including compounds in intermediate materials – shall be available to educate, train and protect workers from hazards. A safe and healthy working environment also includes as a minimum potable drinking water, adequate lighting, temperature, ventilation and sanitation and, if applicable, safe and healthy company living quarters.

Process Safety

Supplier will have safety programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards. Supplier will address product-related issues and their potential impact during all stages of the production process. For hazardous installations, Supplier will conduct specific risk analyses and implement measures that prevent the occurrence of incidents such as chemical releases and/or explosions.

Emergency Preparedness, Risk Information and Training

Supplier will make available safety information on identified workplace risks, and suppliers' employees will be correspondingly trained to ensure they are adequately protected. Supplier will identify and assess likely and potential emergency situations in the workplace and minimize their impact by implementing emergency plans and response procedures.



We confirm to comply with the core principles provided in this code:
Company Name:
Name:
Date:
Signature: