

colep Packaging

CODE OF CONDUCT

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OBJECTIVE

This document defines the ethical standards of conduct that Colep Packaging expects from all its employees, in order to enforce the Ethics & Integrity Framework application. These norms of behaviour derive from the values and principles adopted by Colep Packaging and aim also to comply with our stakeholders' expectations and requirements.

SCOPE

This procedure applies globally to Colep Packaging employees and its subsidiaries. For companies that are owned less than 50% by Colep Packaging, another procedure may apply.

RESPONSIBILITY

The preparation and revision of this procedure is the responsibility of the Head of People & Culture.

SIGNIFICANCE AND INTERPRETATION OF THE CODE

This Code establishes the way we do business, and the conduct we expect from our employees. With this document we intend to achieve greater standards of conduct that are aligned with our values and principles. By doing so, we are reinforcing our commitment to have an honest, upright and ethical culture in our company and in the relationship with all our stakeholders.

We do not intend to ask our employees to know our Code of Conduct by heart, as it is our desire that this document is seen as a tool to be consulted whenever an employee is in doubt about the best behaviour or decision they should take.



GOVERNANCE

The continuous application of our Ethics & Integrity Framework is monitored by a specific body that interprets the ethical orientations and norms of behaviour and provides advice on how to proceed. This body is the Corporate Ethics Committee with the support of the Local Ethics Committees.

The function of the ethics committee is defined in a specific regulation.

Ethics Committees Mission

The Corporate Ethics Committee regulates and monitors the implementation of the Ethics & Integrity Framework. As our operations are decentralised, Local Ethics Committees have been created to ensure proximity to our employees and other stakeholders, focusing on support and follow-up of local situations.

It is the responsibility of both committees to ensure the continued achievement of ethical standards and ethical quality of the company's decisions and actions, as well as the treatment of internal or external ethical and business integrity issues.



Corporate Ethics and Local Ethics Committees' Responsibilities

- Foster the application of ethical values and principles, ensuring an independent and consistent interpretation of the rules set out in the Ethics Charter and the Code of Conduct;
- Provide employees with guidance and advice on ethics and professional conduct whenever requested;
- Analyse and advise on ethical issues received through the available channels sent by stakeholders, whether those are internal or external, ensuring confidentiality and non-retaliation for all involved;
- Manage the Colep Packaging direct line;
- Suggest improvements to the Ethics Charter and the Code of Conduct, as well as changes to policies, procedures and other instruments that contribute to improving our ethical performance, resulting from experience with the implementation and also from the issues raised by stakeholders;
- Monitor the forthcoming procedures that relate to employees or other parties that have reported a situation or non-compliance with the Code of Conduct, to ensure that these people do not suffer any retaliation;
- Produce an annual report related to Colep Packaging ethical performance. The report is issued by the Corporate Ethics Committee.



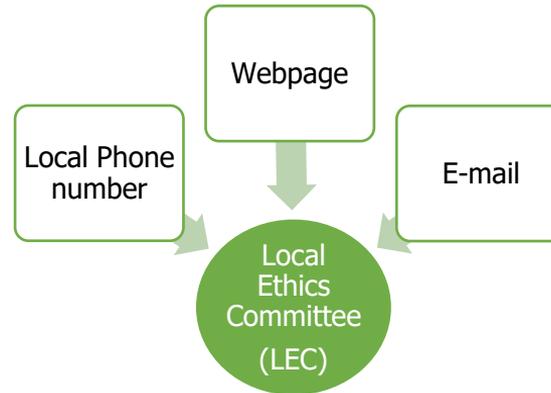
How to report a situation

Employees, customers, suppliers and other stakeholders can contact the Ethics Committee via the Colep Packaging direct line.

The Colep Packaging direct line is a formal channel that employees and other stakeholders can use when they wish to present a concern, a situation, or they feel they are being adversely affected by our business activities and operations.

How can a situation be reported?

The Colep Packaging direct line has various channels to the Ethics Committees: local phone number, webpage and e-mail.





What kinds of situations can be reported?

- Violation of Human rights such as freedom of expression, freedom of association, child labour, forced labour, harassment, discrimination, inappropriate treatment, working conditions, social protection, health and safety at work;
- Situations related to bribery, conflicts of interest, influence peddling, fraud, money laundering or other illegal business practices;
- Situations related to lack of transparency, accuracy or false declarations on financial reports, indicators or general information;
- Irregularities in company procedures or controls;
- Environmental situations like waste management, energy efficiency, use of natural resources;
- Non-compliance with the Ethics Charter or Code of Conduct;
- Non-compliance with confidential issues, contracts, NDA's, etc;
- Requests for advice on any kind of situation concerning your or others' behaviour.

All situations are dealt with by the Ethics Committees. Confidentiality will be respected and the presenter shall not be discriminated in any way.

COMPLYING WITH THE LAW
RESPECTING HUMAN AND SOCIAL RIGHTS
DEALING WITH CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY



COMPLYING WITH THE LAW

We respect the rule of law, complying with the applicable laws in each country where we operate. Company Management at all levels has the primary responsibility to identify the laws and regulations applicable to our business activities in order to ensure full compliance.

RESPECTING HUMAN AND SOCIAL RIGHTS

We are committed to promoting a workplace environment where the rights of our employees are fully respected. We comply with the International Labour Organization (ILO) Declaration of Fundamental Principles and Rights at Work and this commitment is reflected in our ethical framework, as well as in our internal policies and procedures.

Child Labour

Our standard of conduct is based on the ILO Recommendation No. 146 – concerning Minimum Age for Admission to Employment - transposed from International Labour Organization (ILO), where a child is defined as any person below the age of sixteen.

We do not accept child labour in our operations, therefore, we do not hire employees under the age of sixteen, in any operation or country, even if the local legislation authorises it. Exceptions may occur when we accept internships as a transitional measure for professional life or other forms of school programmes.

Young employees

Young employees from the ages of sixteen to eighteen require special treatment as these ages encompass the transition from school-to-work, or from school-based education to vocational training. Young employees do not work under potentially hazardous conditions for their health, safety and welfare, in our operations, as stated in ILO Convention concerning the Night Work of Young Persons Employed in Industry. If such a situation were found in one of our compliance audits, the young employee would be placed in an appropriate type of employment for their age.



Forced Labour

We do not engage in or support any use of forced, bonded or involuntary labour. Physical punishment, threats, violence, or other kind of coercion is also not permitted in any kind of situation.

Freedom of association and collective bargaining

We respect our employees' right to freely associate themselves with trade unions or other kind of organisations, without any kind of reprisal, interference or coercion. We also respect their choice of non-affiliation.

Discrimination

Employees shall not be discriminated against in recruitment, employment and assessment processes or career progression based on their physical characteristics, race, religion, beliefs, gender, ethnicity, marital and maternal status, age, political affiliation, nationality, disability, health, sexual orientation or any other factor.

The "discrimination concept" stated above does not affect the promotion and recognition of employee contributions based on competences and merit.

Also, Colep Packaging does not accept any form of discrimination between colleagues, as stated in the Ethics Charter. Positive relationships between the employees are a determinant factor for a healthy work environment.

Specific applications & compliance

The topics above will be included in internal audits, as these issues have direct influence on legal and regulatory compliance.

Deviations from our ethical framework will be treated under the guidelines of the United Nations "Protect, Respect and Remedy" transposed to the Human Rights Remedy procedure. Colep Packaging developed its own specific procedure to guarantee the adequate treatment of social issues, including child labour and forced labour, harassment or discrimination.



DEALING WITH CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Confidential information is all the information produced and developed within the company, in whatever form, whether written or oral, which has not been made public. Confidential information is a company asset that needs to be protected and preserved. Protecting and preserving such information is a responsibility of all employees.

We highlight three main types of confidential information:

1. Company Information and Intellectual Property: information related to our decisions, activities and business in general, which includes, but is not limited to, policies, procedures, methods and methodologies, work instructions, databases, new markets and products, formulation, specification, internal projects, new developments/inventions, commercial information, marketing information, equipment, know-how, pricing and purchasing;
2. Employee data: which includes, but is not limited to, personal data, medical and financial information;
3. Customer data: which includes, but is not limited to, formulas, specifications, test results, specific suppliers, contracts and negotiation processes.

Colep Packaging employees must at all times comply with their non-disclosure and non-use obligations regarding this information. These obligations typically derive from the respective Employment Agreements, but may also result from specific Non-Disclosure Agreements.

For more detailed information on this topic, please consult the Confidentiality Agreements Procedure.



Company information and intellectual property

Our information and intellectual property must be protected and preserved from all parties, both internally and externally. All policies, procedures, methods and methodologies, work instructions, databases, formulation, specification, internal projects, new developments/inventions, equipment and know-how, developed within the company's activity are considered Colep Packaging intellectual property.

As an employee, you shall:

- only have access to the information that you strictly need or are authorised to;
- only give access to colleagues who strictly need that information or are authorised to have access to it in order to develop their work;
- never give to third parties or permit third parties to have access to the information without first assuring that they are bound by written confidentiality obligations to Colep Packaging.

Data protection & Cybersecurity

Customer data

Our customers trust us with critical data for their business and a significant part of our operations depends on the way we correspond to their expectations.

All customer data must be treated as confidential. Treating information as confidential means using it only for the purposes for which it is intended, giving access only to the Colep Packaging people who need it or are authorised to use it and preserving its integrity by not disclosing it to third parties or permitting third parties to have access to the information without first ensuring that they are bound by written confidentiality obligations to Colep Packaging.



Employee data

Our company records include personal employee data which is needed to articulate our employee-company relationship and for legal purposes. In order to safeguard that information, we have in place safety measures such as reserved access to the employee database and personal physical files, accessed only by authorised personnel and used only for the purposes that the information is needed. Personnel with access to employee data have an increased responsibility in keeping such information safe.

Cybersecurity

Cybersecurity is the practice of defending computers, servers, mobile devices, electronic systems, networks, and data from malicious attacks. It depends on all Colep Packaging employees to safeguard hardware and software from these attacks by following up on the Company IT policies and procedures, not just by acknowledging them but also by adopting them and advocating their application by others.

For further information on this topic, please contact the IT team and read the relevant policies.

[Relating to stakeholders](#)

We hold ourselves to a very high standard of business conduct so that our stakeholders continue to trust our company. Our reputation is one of our most valuable assets and our employees are the face of the company to all of our stakeholders. As is widely known, image can be easily damaged but can take years to rebuild. It is every employee's responsibility to protect and care for our reputation and to preserve our image, both during and after normal business hours.



Internal communication

All information communicated internally shall be based on the principles held in our Communication Policy.

Managers are expected to provide employees with information on a regular basis. The objective is to keep teams informed of all activities and developments in order to maintain high standards of integrity and accuracy of the information. Therefore, employees shall only rely on information that comes from the appropriate and formal channels.

For full information on this topic please consult our Communication Policy.

External communication

Foreseen and planned communication

We encourage our employees to promote the company, ensuring that all communications contribute to protecting our credibility and reputation and bearing in mind we are committed to providing accurate information to the public.

Company representation in conferences, lectures, classes and meetings organised by business associations, educational institutions or government entities is subject to the necessary authorisations granted by the respective management whenever disclosure of information is foreseen.

Information that might be considered sensitive or confidential cannot be disclosed to the public. Make sure that the information you are about to disclose was previously approved by a Manager with responsibility for those matters.

In addition, as far as social media is concerned, it is our employees' responsibility to make a conscientious, lawful and professional use of social media, ensuring the confidentiality of the company's information.



Our marketing practices are fair and accurate since they are critically important to preserving our image and reputation. All advertising and other communication materials to our current and potential customers must be truthful, factual and objective. Caring for our relationship with customers is one of our top priorities and our marketers shall maintain high standards of fairness and honesty.

Crisis communication

There are some situations which require an especially careful and adequate approach to communication. Those situations may be, among others: severe work-related accidents, safety matters, ethical issues, environmental disasters, strikes.

In any of these cases, no employee is allowed to disclose any information about the company. Designated company representative(s) will be appointed to deal with these matters.

For full information on this topic please consult our Communication Policy.

CARING FOR A SAFE AND HEALTHY WORKPLACE
PROTECTING THE ENVIRONMENT
USING COMPANY RESOURCES
BUSINESS ETHICS
FAIR COMPETITION
AVOIDING CONFLICTS OF INTEREST



CARING FOR A SAFE AND HEALTHY WORKPLACE

We care for our employees' health and safety, so we make it a priority, striving to provide a work environment where risk is controlled and eliminated wherever practicable. We believe risk should be reduced at source, so adequate measures are taken in order to move towards such goals. Our goals are simply stated: no accidents and no harm to people. In order to achieve them we have established the following commitments:

- Audit operations, activities and in the near future chosen suppliers to assess compliance with health & safety legislation;
- Risk assessment is performed for all sites and reviewed when operations change;
- Employees are aware of the risks;
- Adequate training is given to employees who operate equipment, carry out potentially hazardous operations or deal with hazardous materials or waste;
- Training also focuses on hygiene, safety and health;
- Employees are equipped with appropriate personal protective equipment and sites are equipped with collective protective equipment;
- Personal protective equipment is renewed when needed and provided free of charge to employees;
- All our sites have safety information available to workers and safety signs on the machines and other operational equipment;
- Procedures and measures are implemented to ensure a safe and healthy workplace.

For further information please read our policy on Health, Safety & Environment.



PROTECTING THE ENVIRONMENT

Colep Packaging continuously identifies and implements environmental improvement opportunities. Our environment programmes include short and long-term reduction targets in order to reduce our impact on the environment and we are fully committed to:

- complying with the applicable laws and local regulations;
- improving the environmental impact of our operations;
- preventing contamination;
- working to achieve zero waste to landfill in the long term;
- protecting natural resources, including ecosystems, water, soil and air by engaging in safe operating practices.

For further information please read our policy on Health, Safety & Environment.

USING COMPANY RESOURCES

Assets like facilities, equipment, materials, information systems, technology, cash and vehicles are a company investment in its business operations. Work time and intellectual property produced by any employee during working hours result from the hard work of employees and are also company assets. These resources are intended to develop the business activity and therefore must be used for the company's own benefit. We count on employees to ensure that company resources are protected and only used for business purposes, unless another level of authorisation applies.

Protection includes defence against theft, misuse, misappropriation and damage. Managers have a decisive role in preventing and avoiding this kind of behaviour.



BUSINESS ETHICS

We will not be an active or passive party in processes that involve or may involve illicit or unethical practices.

Anti-corruption

Our anti-corruption statement clearly states: Bribery and Corruption are unacceptable. This means forbidding corruption of all kinds, including bribery. The company abides by all applicable anti-corruption laws in all the countries in which the company operates.

Violation of anti-corruption laws affects the company, its employees, customers, business partners and other stakeholders and can lead to severe civil and criminal penalties, therefore it is vital that we comply with them in our daily work.

Illicit and unethical practices include corruption, bribery, influence peddling, money laundering, embezzlement or any other activities carried out for the personal benefit of the employee or of others, like offering gifts and providing favours, favourable treatment or services of value.

Corruption is the abuse of entrusted power for private gain. It can be classified as grand, petty and political, depending on the amounts of money lost and the sector where it occurs.

Bribery refers to the offering, promising, giving, accepting or soliciting of an undue advantage of any value (which could be financial or non-financial), directly or indirectly, and irrespective of location, in violation of applicable law, as an inducement or reward for a person acting or refraining from acting in relation to the performance of that person's duties.



Bribery and corruption can take many forms, including the provision or acceptance of:

- cash payments;
- phony jobs or “consulting” relationships;
- kickbacks;
- political contributions;
- charity contributions;
- social benefits;
- gifts, travel expenses, hospitality, and reimbursement of expenses.

If you are faced with a situation where someone offers or tries to offer any kind of financial or other advantage or a reward in exchange for favourable treatment, information or other situation, you must inform the Local Ethics Committee.

Hiring

All hiring processes must be fair, transparent and competence-based. Hiring cannot be used as a mean to repay any kind of favour or advantage. If such a situation occurs, the Local Ethics Committee must be informed.

Charity donations

Colep Packaging supports social causes of community interest. In order to apply our resources efficiently and create impact on our supporting communities, charity donation requests shall be considered by the Local Ethics Committee following corporate & RAR Group guidelines.

Financing political parties

Colep Packaging does not support or finance political parties.



FAIR COMPETITION

We compete fairly with all of our competitors in order to contribute to a market where relations between companies have greater transparency. Competing fairly means complying with the applicable competition laws in the countries where we do business and not engaging in any kind of agreements with competitors that could result in fixing prices, dividing territories, customers or suppliers.

Part of our operation depends on customers who compete among themselves. In those cases we feel even more committed to protecting their interests.

AVOIDING CONFLICTS OF INTEREST

Conflicts of interest or potential conflicts of interest can have a significant impact on Colep Packaging and its employees' reputation and might lead to code of conduct violations. These conflicts can arise from a number of situations and shall be dealt with taking into consideration their context and nature. Guidelines presented below have been defined to address the major situations that can occur and this section aims to provide support on how to deal with them.

A conflict of interest may occur whenever the employee is involved in a situation that undermines his objectivity. Therefore, employees shall disclose all potential situations that can cause a conflict of interest to their management, who should inform or involve in the decision the Local Ethics Committee. In case of disagreement it is the Ethics Committee who has the final word.

Gifts and entertainment

Gifts and entertainment within business relationships are often used as a courtesy or a way to demonstrate appreciation. As Colep Packaging operates in a diverse environment, in some countries gifts are part of local culture and norms of conduct. However, these practices may also infer a conflict of interest when seen as a way to influence or be influenced by others.



In order to prevent any kind of conflict of interest and keep our relations fair and honest, employees are only allowed to accept symbolic gifts with nominal value up to 15 € considering it will not affect business independence. These offers may be marketing materials such as calendars, pens or mugs, as these constitute courtesy offers. When faced with situations that may constitute an exception to this rule, employees must inform the respective manager and hand over the gift to Human Resources, who will decide within the Ethics Committee on a final use.

For meals and entertainment the below principles apply.

Employees are only allowed to offer gifts, meals and entertainments that are considered as a courtesy in normal business relationships. When faced with situations where questions or doubts arise, in the employee's own interests, they must consult or inform their Manager and HR Manager in order to prevent the situation from being considered misbehaviour according to this Code of Conduct.

Other professional activities performed by employees

Performing other professional activities that involve competitors, customers or suppliers may raise a conflict of interest. In order to protect both the company and the employee, employees are invited to inform their line manager, who shall inform in due time the Local HR Manager who should involve the Ethics Committee if necessary.

Personal choices or activities of political, religious or other nature are considered the employee's responsibility as an individual and it should not bind Colep Packaging's name.

If there are questions about whether an activity the employee is performing or intends to perform causes a conflict of interest, the employee is encouraged to consult his manager or the Ethics Committee.

These aspects are reinforced in section 10.3 Relating to stakeholders.



Business with family members

Transparency is part of the way we do business. It increases internal and external confidence of our stakeholders and protects each other's interests. Employees must inform management whenever they are engaged in a business decision that involves family members.

Personal relationships

In order to protect the employee and to agree on the best way to deal with the situation, employees must communicate to their Manager and to the Local Human Resources department whenever they are confronted with a situation of supervision or performance assessment of a family member. Furthermore, employees cannot hire, designate or promote family members or persons with whom they have intimate relationships.

Appendix I – Terms and Definitions



APPENDIX I – TERMS AND DEFINITIONS

For the purposes of this document, the following terms and definitions apply.

Bonded Labour

Bonded labour is the most widespread – yet the least known - form of slavery in the world. A person becomes a bonded labourer when their labour is demanded as a means of repayment for a loan. The person is then tricked or trapped into working for very little or no pay. The value of their work becomes invariably greater than the original sum of money borrowed. Often the debts are passed onto the next generations.

Ethical behaviour

Behaviour that is in accordance with accepted principles of right or good conduct in the context of a particular situation and is consistent with international norms of behaviour.

Forced labour

Forced labour is any work or services which people are forced to do against their will under the threat of some form of punishment. Almost all slavery practices, including human trafficking and bonded labour, contain some element of forced labour.

Gender equality

Equitable treatment for all genders.

NOTE: This includes equal treatment or, in some instances, treatment that is different but considered equivalent in terms of rights, benefits, obligations and opportunities.

Impact

Positive or negative change to society, economy or the environment, wholly or partially resulting from an organisation's past and present decisions and activities.

Organisational governance

System by which an organisation makes and implements decisions in pursuit of its objectives.

Principle

Fundamental basis for decision making or behaviour.



Safety Risks

Safety risks include unsafe conditions that can cause injury, illness and death.

Biological risks: associated with working with animals, people, or infectious plant materials. Uncommon in our activity.

Physical risks: factors within the environment that can harm the body without necessarily touching it. These include: radiation ionizing or non-ionizing (EMF's, microwaves, radio waves, etc.), high exposure to sunlight/ultraviolet rays, temperature extremes (hot and cold) or constant loud noise.

Ergonomic risks: occur when the type of work, body positions and working conditions put strain on your body. They are the hardest to spot since you do not always immediately notice the strain on your body or the harm that these hazards pose. Short-term exposure is not considered hazardous, but long-term exposure can result in serious long-term illnesses.

Chemical risks: present when an employee is exposed to any chemical preparation in the workplace in any form (solid, liquid or gas). Some are safer than others, but to some workers who are more sensitive to chemicals, common solutions can cause illness, skin irritation, or breathing problems.

Psychological risks: stressors that cause stress (short-term effects) and strain (long-term effects). These are the risks associated with workplace issues such as workload, lack of control and/or respect, etc.

Social responsibility

Responsibility of an organisation for the impacts of its decisions and activities on society and the environment, through transparent and ethical behaviour that:

- contributes to sustainable development, including the health and welfare of society;
- takes into account the expectations of stakeholders;
- is in compliance with applicable law and consistent with international norms of behaviour; and
- is integrated throughout the organisation and practised in its relationships.

NOTE 1: Activities include products, services and processes.

NOTE 2: Relationships refer to an organisation's activities within its sphere of influence.

Sphere of influence

Range/extent of political, contractual, economic or other relationships through which an organisation has the ability to affect the decisions or activities of individuals or organisations.

NOTE: The ability to influence does not, in itself, imply a responsibility to exercise influence.

Stakeholder

Individual or group that has an interest in any decision or activity of an organisation.



Sustainable development

Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

NOTE: Sustainable development is about integrating the goals of a high quality of life, health and prosperity with social justice and maintaining the earth's capacity to support life in all its diversity. These social, economic and environmental goals are interdependent and mutually reinforcing. Sustainable development can be treated as a way of expressing the broader expectations of society as a whole.

Sources:

- ISO 26000:2010 Guidance on social responsibility
- www.antislavery.org
- www.ilo.org

Thank you!