

## ETHICS OF BUSINESS GLOBAL STANDARDS FOR SUPPLIERS

PACCOR believes in doing business with suppliers, manufacturers, contractors, partners, agents, distributors and consultants (referred to in these guidelines as « Suppliers ») who respect high standards of ethical business behaviour.

The present Ethics of Business have been established to define PACCOR minimum requirements of its Suppliers.

Failure to observe these Ethics of Business will result in PACCOR ceasing to do business with such Supplier.

### Product Quality and Safety

As a major supplier of food and non-food packaging solutions, PACCOR has a fundamental responsibility to ensure that its products respect the highest standards in terms of safety and quality.

Suppliers undertake to provide services/products that meet or exceed all legal and all agreed upon quality and safety standards. Any threats to product safety must be immediately reported to PACCOR.

### Employment Practices

Treating employees with dignity and respect is a strong commitment of PACCOR. We believe in doing business with Suppliers who share this commitment and we require Suppliers to comply with all applicable employment laws and to support fundamental human rights for all.

#### *Health and safety*

Suppliers will operate a safe and healthy work environment for their employees. Where applicable, this also applies to housing and eating facilities.

#### *Child labour*

Suppliers will not employ individuals in violation of the local mandatory school age, or under the legal employment age in each country where they operate. Moreover, in no case Suppliers will employ workers under the age of 15.

#### *Compensation*

Suppliers will, at minimum, comply with applicable wage and hours laws and regulations, including those relating to minimum wages.

#### *Discrimination*

Suppliers will not discriminate based on personal characteristics or beliefs and are expected to provide equal opportunities to all.

*Forced labour*

Suppliers will not use forced or involuntary labour, whether bonded or indentured.

*Freedom of association and collective bargaining*

Suppliers will respect the right of employees to exercise their lawful rights of free association. Similarly, Suppliers will recognize the lawful rights of their employees to choose or not to choose collective bargaining representation.

*Workplace harassment or abuse*

Suppliers will not subject employees to physical, verbal, sexual, or psychological harassment, nor use corporal or physical punishment to discipline employees.

*Working hours*

Suppliers will comply with all applicable laws and regulations regarding working hours.

Environment

Protecting the quality of the environment around the world and developing sound environmental management practices is key for PACCOR.

Suppliers are expected to comply with all applicable environmental laws and regulations. Any non-compliant practice must be promptly corrected.

PACCOR will favour Suppliers actively seeking to reduce waste and minimize the environmental impact of their operations.

Conflicts of Interest

PACCOR expects business decisions to be made in the best interest of the company. Any situation that creates or may create a conflict between personal and PACCOR interests must be avoided. Suppliers are expected to disclose actual or potential conflicts of interest to PACCOR.

Anti-corruption

PACCOR strictly abide by all local laws and applicable European Union laws and requires Suppliers to act in a similar way.

Suppliers may not pay bribes or engage in corrupt practices in order to advance PACCOR's business interests. This include, directly or indirectly, offering, promising to pay or authorizing the payment of money or anything of value to any third party for the purpose of influencing the acts or decisions of local officials.

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### Gifts, Favours and Entertainment

Gifts, favours and entertainment are not needed to do business with PACCOR, and may lead, or appear to lead, to a conflict of interest.

No gift, favours or preferred treatment should be provided or accepted if it will obligate or appear to obligate the recipients

Gifts or entertainment may be provided if they are reasonable complements to business relationships, of modest value, and in any event not against the law of PACCOR's present policy.

The following situations are strictly prohibited :

- PACCOR employees requesting or soliciting personal gifts, favours, entertainment or services
- PACCOR employees exploiting their position to solicit preferential treatment in pricing, terms or loans from PACCOR' Suppliers.
- Bribes or kickbacks
- Cash or cash equivalents
- Lavish or excessive gifts and entertainments
- Entertainment at clubs or organisations that discriminate on the basis of race, colour, gender, national origin, religion, or sexual orientation
- Entertainment at sexually oriented establishments
- Entertainment that places the PACCOR employee at a risk of physical harm.

### Confidential Information

Suppliers will safeguard PACCOR's confidential information by keeping it secure, limiting access to those who have a need to know in order to do their job, and avoiding discussion of confidential information in public areas (planes, trains, elevators, restaurants etc.), either directly or on mobile phones.

Confidential information includes facts, data and knowledge that are not generally disclosed such as trade secrets, financial figures, new products and marketing plans, research and development ideas, manufacturing processes, personnel information and information about potential investment, divestures and acquisitions.

The obligation to preserve PACCOR's confidential information is ongoing, even after the business relationship ends.

PACCOR will safeguard Suppliers' confidential information.

### Fair Competition and Anti-trust

PACCOR believes in free and open competition, and fully complies with the European Union competition laws. Suppliers are requested to comply with all applicable local and international regulations regarding fair competition and antitrust.

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### Personal Data Privacy

Supplier warrants that it has legal authority in the country which it is established for the purpose of processing personal data (as defined in the General Data Protection Regulation EU 2016/679 (“GDPR”) on the protection of individuals with regard to the processing of individual data and the free movement of such data) and will not process and/or transfer the personal data of PACCOR’s employees, staff, subcontractors or any third party working for or on behalf of PACCOR to which Supplier may be granted access, or which have otherwise been made available to Supplier or Supplier representatives, except in accordance with the national law implementing the Data Privacy Directive or the GDPR.

### Accuracy of Business Records

Suppliers must record and report information accurately, honestly, on a timely manner and must not hide, fail to record or make false entries into financial books.

### General Legal requirements

Suppliers will comply with all applicable laws and regulations to which they are subject.

### Communication

Suppliers will take appropriate steps to ensure that these Standards are communicated to their employees and their own supply chain. Suppliers will use their best efforts to ensure their own suppliers adhere to these Standards as well.

### Monitoring and Compliance

Suppliers will notify PACCOR immediately if they become aware of any non-compliance of their company or of any of their suppliers with these Standards, and will take immediate actions that are necessary to remedy any non-compliance. PACCOR reserves the right to engage in various monitoring activities to confirm compliance with these Standards.

To report any matters of concern:  
PACCOR Group  
For the attention of the Legal Director  
Email : [legal@paccor.com](mailto:legal@paccor.com)