

Code of Conduct for VPK Suppliers

Improving sustainability and valuing ESG objectives are key elements of VPK's strategy. VPK adheres to The Ten Principles of the UN Global Compact.

VPK believes that sustainability is the essential and only way to remain relevant as a company and to build a future-proof, resilient business.

VPK attaches great importance to close collaboration, both with each other and with our external partners. Together we are committed to develop circular packaging solutions and to ensure optimal product protection in a sustainable flow of goods.

We believe in building sustainable partnerships and select our suppliers not only on basis of economic criteria, but also upon the criterium of being a corporate responsible business. We expect our suppliers to comply with applicable laws, to adhere to internationally recognised environmental, social and corporate governance standards and to impose the same on their employees and business partners.

This is what this code of conduct for suppliers of VPK (hereinafter referred to as 'Code') is about. The Code reflects the minimum standards a supplier of VPK should meet.

The Code applies to all suppliers of VPK by being a supplier of VPK and is considered part of the agreement between VPK and the supplier. In case of contradiction or difference between applicable regulations and a provision in this Code, the supplier has to respect whatever is stricter. The most recent version of the Code can be consulted on our **website**.

- Consult the Code, comply with its provisions and seek guidance where needed.
- Implement the principles and obligations of this Code back-to-back on:
 - o the supplier's own employees and representatives
 - o the supplier's own supply chain, including subcontractors and other suppliers - keep records of the business transactions with its own suppliers
- Ensure compliance with this Code and provide for adequate risk management, including monitoring, establishing a complaints procedure case of deviation and take appropriate action in case of irregularities or breach.
- Allow VPK or a third party appointed by VPK to monitor compliance with the Code and if necessary to conduct an audit at supplier's operations and premises (in conformity with the law and the contract between VPK and the supplier).
- Report illegal or non-compliant conduct. As per EU Whistleblowing Directive 2019/1937 and all transpositions into national law by the EU Member States, suppliers are invited to report any (suspected) practices, actions or misconduct believed to be non-compliant with ethical business practices, considered as illegal or in breach with



this Code to VPK's internal reporting channel (compliance@vpkgroup.com; +32 52 30 79 57). Reports can be made in English, Dutch or French. Anonymous reports are allowed. In case the report is made by email, the whistleblower will receive an acknowledgement of receipt within 7 days. Following the report, an independent and impartial investigation shall be conducted, taking into account all factual and legal aspects of the report. Within a period of 3 months following the receipt of the report, the whistleblower will receive feedback regarding his/her report and the outcome of the investigation. Depending on the complexity of the issue raised, this period can amount to up to 6 months. All personal data, both of the whistleblower and of the persons referred to in the report, shall be handled in full compliance with the EU General Data Protection Regulation 2016/679 ("GDPR").

If it is appropriate, in view of the nature of the reported matter, reports addressed to VPK Internal Audit may be escalated internally if necessary for an appropriate complaint handling. All complaints shall be properly investigated and are treated confidentially.

Being a supplier of VPK implies to respect the following:

SOCIAL

1. Health and Safety

A safe, healthy and motivating working environment is key to personal wellbeing, efficiency and durable profitability and growth. Every co-worker, in every location, at every level of our organisation, has a responsibility in the pursuit of our safety goals. We expect our suppliers to be dedicated to safe operations.

- Provide safe and healthy working conditions at all of its operations. Take all reasonable and practicable actions to safeguard the health and safety to the supplier's employees while at work and to protect other persons from hazards to health and safety arising out of the supplier's activities, also when present at VPK's sites.
- Ensure the implementation of the requirements of health and safety legislation that are considered as the minimum standards and which are completed by the VPK Safety & Health Guidelines and recommendations as applicable for the relevant site, including the following minimum obligations for external parties accessing a VPK site:
 - wear PPE in conformity with local requirements
 - register at entrance and at departure of any VPK location
 - be sufficiently licensed for working at height and hot work interventions
 - for truck drivers, always stay in the truck cabin or specifically provided waiting areas during loading and unloading activity



- If supplier provides accommodation for its employees, comply with applicable safety and other regulations and provide access to adequate sanitation, clean water, food and emergency medical care at its factory in the event of accidents or incidents.

2. Forced, compulsory and child labour internally and in our entire value chain

We uphold the elimination of all forms of forced, compulsory and child labour internally and in our entire value chain. We support and respect the protection of internationally proclaimed human rights and ensure we are not complicit in human rights abuses.

- Observe the principles set forth in the Universal Declaration of Human Rights.
- Do not appeal to and do not allow forced labour, slavery or other practices that exploit adults and/or children or expose them to harmful or hazardous conditions. Child labour as defined by the International Labour Organization (ILO) refers to unacceptable forms of child labour, which is work that is mentally, physically, socially or morally dangerous and harmful to children. Adhere to laws regarding minimum age (in accordance with ILO Conventions or, if higher, the age specified by local legislation) and other terms of employment in its operations, being in its own factories and offices around the world, with its own suppliers or on VPK sites.
- Meet or exceed all legal requirements for compensation and working conditions: pay each employee at least the minimum wage or an industry-wide wage deemed reasonable (whichever is more preferable) and provide each employee with all facilities required by law.
- Comply with applicable social laws and the laws governing working time and labor rights in the countries in which it conducts business.

3. Discrimination and harassment

We embrace diversity and respect the personal dignity of our fellow employees.

- Respect the personal dignity, privacy and personal rights of its employees and of the persons dealing with in its interaction with VPK.
- Maintain a workplace free from discrimination and harassment. Do not discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation. Do not engage in or permit verbal or physical harassment based on any of the above or any other reason.



4. Freedom of association and the right to collective bargaining

We uphold the freedom of association and the effective recognition of the right to collective bargaining.

- Respect the legal rights of employees, as applicable, to join or to refrain from joining worker organizations of their choice, including trade unions, and to bargain collectively.

ENVIRONMENT

5. Environmental challenges

We support a precautionary approach to the environment, undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies.

- Conduct the business in accordance with applicable environmental laws and regulations.
- Do business in an environmentally conscious manner.
- Use natural resources sustainably, use renewable resources as far as possible and minimize the generation of waste.
- Minimize the negative impacts on the environment, particularly on climate and biodiversity, implement measures to protect soil and water bodies; Implement relevant measures and actively apply better production processes and technologies in order to reduce the environmental impact.
- Implement measures to reduce the environmental impact throughout the entire supply chain.

GOVERNANCE

6. Compliance with laws, rules and regulations

We respect the law at all times.

Compliance with all applicable laws and regulations must never be compromised and is expected from VPK suppliers, including:



- Be a legal entity duly organised and legitimately existing under applicable laws.
- Have the right to conduct its business and maintain the necessary licenses and authorisations needed for its operations for VPK.
- Have the right to contract with VPK and to perform its obligations under its agreement with VPK accordingly and in compliance with applicable legislations.
- Comply with all applicable laws, including but not limited to social laws, environmental laws, privacy regulations and tax laws (including payment of all taxes and contributions set by the authorities).

7. Antitrust and fair dealing

We believe in the importance of free competition. VPK is prepared to compete successfully in today's business environment and will always do so in full compliance with all applicable antitrust, competition and fair dealing laws. The same is expected from our suppliers:

- Comply with applicable antitrust, competition and fair dealing laws. Do not or do not fail to do anything, directly or indirectly, whether alone or together with any other person or entity, which is contrary to any applicable laws, regulations and/or rules relating to competition and/or antitrust.

8. Bribery and corruption

We condemn strongly any form of bribery and corruption and strive for total absence of such practices within VPK.

- Comply with applicable anti-corruption laws. Do not or do not fail to do anything, directly or indirectly, whether alone or together with any other person or entity, which is contrary to any applicable laws, regulations and/or rules relating to bribery and corruption.
- Make, directly or indirectly, no payment, offer or promise or transfer anything of value to a government official, political party or candidate for political office with the intention of influencing decisions favorable to the supplier's company or business in contravention of applicable laws.

We compete and do business based only on quality and competence.

- Do not offer VPK employee(s) or representatives gifts taking the form of any of the following, whatever the value involved: money, loans, kickbacks and/or similar monetary advantages.



- Do not influence VPK employees or representatives by offering favours and do not offer gifts, meals or entertainment if this could create the impression of improperly influencing the respective business relationship.

When assessing the situation in light of the above, apply the most restrictive local rule in order to avoid even the appearance of improper dealings

9. VPK's confidential information, property and reputation

We value and protect our confidential information and we respect the confidential information of others.

In respect of VPK confidential information (information in relation to VPK which is not or not yet public and which includes trade secrets, business, marketing and service plans, consumer insights, engineering and manufacturing ideas, product recipes, intellectual property, designs, databases, records, and any non-published financial or other data relating to the VPK group (including its employees, its customers and other business partners), VPK expects the supplier to:

- Sufficiently protect VPK confidential information against unauthorised use and disclosure.
- Only use VPK confidential information for the purpose for which it was received.
- Do not disclose VPK confidential information or allow such disclosure, unless to the persons who strictly need to know within the supplier's organisation for the purpose of the execution of the supplier contract with VPK (and who are bound by the same obligations), or unless imposed by law.

We insist on honesty and respect for assets and property of VPK, for its employees and third parties.

The supplier shall further on:

- Safeguard property of VPK while under its control and treat it respectfully when being at a VPK site.
- Handle and process personal data in accordance with applicable laws (including GDPR).
- Do not publish any announcements, press releases or other public disclosures concerning VPK without its approval.
- Avoid situations that may adversely affect VPK's business interests and reputation.
- Respect the intellectual property rights of VPK and its business partners.





10. Conflicts of Interest

We will always act in the best interests of VPK.

A conflict of interest occurs when personal interests of an employee, director or manager (hereafter referred to as “employee”) compete with the interests of the company it is working for. VPK expects its suppliers to have a policy on this, implying the following:

- Avoid any conflict of interest relating to financial interests or other personal arrangements with VPK employees that may be considered inappropriate.
- Instruct the supplier’s own employees to avoid such conflicts of interest with VPK.

If a conflict of interest situation with impact on the relation between VPK and the supplier occurs or if the supplier faces a situation that may involve or lead to a conflict of interest, the supplier shall disclose, or if this legally cannot be imposed, is encouraged to disclose this as described above.

Approved by the executive committee of VPK Group NV on 1st of May 2021.

Company name:

Name:

Function:

Date:

Signature:

