

# **CANPACK GROUP**

## **SUPPLIER CODE OF CONDUCT**





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At CANPACK Group, we seek to provide the customers and the consumers with the highest quality products and services. We believe in continuous improvement and seek best practices to eliminate non-conformities. We strive to create value for the countries and communities where we are present by paying taxes, creating jobs and protecting the environment. We know that our customers value innovation and flexibility and our open and proactive attitude. We strive to support the success of our customers and to treat the suppliers and business partners on whom we depend with fairness and transparency.

In order to give clarity about how we conduct our business globally to ensure that the excellent reputation of the Company and its employees are maintained for the company to continue its global growth strategy, CANPACK Group Code of Conduct ("Code of Conduct") has been implemented in CANPACK Group.

All entities belonging to CANPACK Group ("**CANPACK Group Members**") must comply with the Code of Conduct as well as with all applicable regulations and must not accept any forms of corruption or other illegal activity.

The abovementioned principles of CANPACK Group Code of Conduct form a basis for this CANPACK Group Supplier Code which is deemed to clarify our expectations towards our Suppliers in the areas of business ethics, labour law and human rights, occupational health and safety, natural environment and social responsibility, confidentiality and data protection.

This Supplier Code applies to all suppliers, vendors, contractors and consultants from whom CANPACK Group purchases goods or services ("**Suppliers**") and outlines those key elements that we deem to be the most relevant for Suppliers. We expect Suppliers to comply with the following rules which should be treated as minimum requirements for them:

## Business Ethics, Business Integrity, Gifts, Hospitality and Bribes

- Suppliers shall conduct their business with integrity and shall compete fairly, that is:
  - Suppliers shall comply with all relevant applicable laws and regulations of the countries of their operations;
  - Suppliers shall be fair in all aspects of their operations, that is towards their business partners, neighbours, competitors, and towards society as a whole.
- Suppliers shall not give or propose bribes or anything which has value to government officials, private persons, politicians, political parties or their advisors in order to obtain business or favourable treatment. Such kind of actions are not acceptable and are strictly prohibited.
- Suppliers shall not give or propose gifts and/or entertainment in order to influence business decisions.
- Suppliers are not allowed to offer any hospitality or transfer any gift of value to CANPACK Group employees that exceeds usual business conduct in their country of operation.
- Suppliers shall have a zero tolerance policy prohibiting any and all forms of bribery, corruption, extortion and embezzlement (covering promising, offering, giving or accepting any bribes).
- Suppliers are expected to ensure that the sourcing of the products or services supplied do not finance or benefit armed groups.
- Any kind of conflict of interest which affects the operation of the business between the CANPACK Group Member and the Supplier shall be reported to the CANPACK Group Member and a Supplier shall eliminate such conflicts of interests.



## Integrity in financial reporting

The relevant accounting records and supporting documents of every Supplier must accurately describe and reflect the nature of the underlying transactions, both expenses and payments must comply with all applicable legal and regulatory requirements and accepted accounting practices. No false, artificial or misleading entries may be made in the Supplier's relevant books or records.

## Personal Behaviour, Labour Law and Human Rights

- Suppliers shall respect the rights and dignity of each individual involved in their business.
- Any discrimination in human resources or everyday work practices on the basis of race, skin colour, sex, religious affiliation, sexual orientation, political beliefs, age, state of health, or disability must be avoided by Supplier and the Supplier shall introduce procedures in order to eliminate such events.
- Forced labour and employment of minors are not acceptable in the Supplier's organization
- Suppliers shall respect employees' right to freedom of assembly consistent with local laws
- Suppliers shall respect the UN Universal Declaration of Human Rights and the eight fundamental Conventions of the International Labour Organisation (ILO). In particular, Suppliers shall ensure that in their respective organisations and supply chain:
  - the minimum employment age limit defined by national law, applicable regulation and the relevant fundamental Convention of the ILO is adhered by
  - forced, slave or unpaid labour is prohibited;
  - wages and working hours meet or exceed the national legal standards;
  - discrimination and harassment of any kind will not be tolerated; and
  - there is freedom of association.

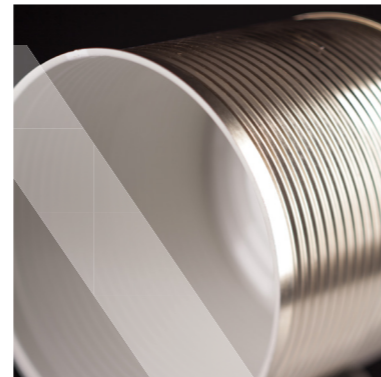
## Occupational Health and Safety

- CANPACK Group expects Suppliers to insist on "safety first" within the work environment.
- Working conditions in Suppliers' organizations should allow for safe working practices and support the occupational health of employees.



## Natural Environment and Social Responsibility

1. Suppliers are committed to protect the environment in compliance with international standards relevant for their business as well as the applicable laws and regulations.
2. Every Supplier strives to continuously minimize the adverse environmental impacts of its activities, products and services through a responsible management of environmental aspects, including, but not limited to:
  - (i) use of scarce natural resources, energy and water,
  - (ii) emissions to air and discharge to water,
  - (iii) fertilization management,
  - (iv) odour, noise and dust emissions,
  - (v) potential and actual soil erosion and contamination,
  - (vi) reduction and recycling of (non-)hazardous waste,
  - (vii) biodiversity, and
  - (viii) product issues (design, packaging, transport, use and recycling / disposal).
3. Suppliers will meet generally recognized and contractually agreed quality requirements in order to provide goods and services that meet CANPACK Group's quality standards and are safe for their intended use. CANPACK Group highly encourages innovation and the use of natural products and Suppliers shall constantly work on improving the sustainability of the goods and services that they deliver to CANPACK Group.
4. CANPACK Group expects that the organisations and supply chains of its Suppliers provide for healthy and incident free working environments for their employees and neighbours. Suppliers must implement appropriate controls and working procedures preventing and controlling hazards and risks related to their specific industry. As a minimum, Suppliers shall provide drinking water, adequate restrooms, appropriate emergency procedures and first aid assistance.



## Confidentiality and Data protection

Commercially sensitive information about CANPACK Group and its partners should not be disclosed to third parties. All business information relating to CANPACK Group's businesses, properties, shareholders, business plans, organisation, financial affairs and all other affairs of CANPACK Group is CANPACK Group members' proprietary information. Suppliers shall ensure that confidential information is kept confidential and shall safeguard all CANPACK Group employees' and business partners' privacy and valid intellectual property rights. Any of such information shall not be disclosed to third parties, unless CANPACK Group has authorised the Supplier to such disclosure in writing.

CANPACK Group expects Suppliers to assist in fulfilling the aforementioned key elements by:

- incorporating them in their own business practice;
- taking all necessary steps to ensure that the key elements of the Supplier Code are communicated to Suppliers' employees;

CANPACK Group expects Suppliers to embed the Supplier Code into their organizations and their supply chain by developing and implementing appropriate internal business processes.

Each Supplier must be able to demonstrate compliance with the Supplier's Code upon request by the CANPACK Group Member. CANPACK Group will monitor the performance of its Suppliers in this respect. Any violations to this Code must be reported directly to the compliance officer of CANPACK Group. All such reports are treated as confidential to the extent permitted by applicable law. The compliance officer of CANPACK Group can be reached by e-mail at: [suppliers.compliance@canpack.eu](mailto:suppliers.compliance@canpack.eu)

If cases of non-compliance are found, CANPACK Group and its Suppliers will work on elimination of those cases, provided CANPACK Group obtains the commitment from the Supplier to eliminate the non-compliance within reasonable time frame. If there is no commitment or lack of corrective measures, such may result in the CANPACK Group Member terminating the contract.





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