

CANPACK GROUP
CODE OF CONDUCT

Our Mission

We shall contribute to the success of our customers, the prosperity of employees and communities, and the sustainability, growth and profitability of our operations by reliably supplying high quality packaging products.





Our Values

We seek to provide our customers and the consumers of their products with high quality products and services. We believe in continuous improvement and seek best practices to eliminate non-conformities. 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.

We, the employees, produce and supply the products customers require. We manage the business and all its processes. Quality, innovation, efficiency, and proactive attitudes are our responsibility. We strive to invest in employee development, provide a safe and comfortable work environment, support the health of employees and their families, and provide opportunities. We treat each other with respect and encourage transparency and communication.

We must comply with all applicable regulations – this is the starting point of our responsibility to society. We must not accept any forms of corruption or other illegal activity. We strive to create value for the countries and communities where we are present by paying taxes, creating jobs and protecting the environment.

If we can deliver these values, then financial success will follow. We are focused on the long term success and sustainability of our business, and want to invest our profits wisely. We will continue to invest in new markets, technologies, best practices and employee development so that we will continue to meet the expectations of our stakeholders in the future.

The Purpose of the Code of Conduct is to give clarity about how we conduct our business globally to ensure that the excellent reputation of the Company and its employees are maintained in order for the company to continue its global growth strategy.

Our Rules of Behaviour

BUSINESS ETHICS

Compliance with the law and basic principles of fairness

We are subject to many different laws and regulations and must all take great care to understand and comply. In addition, we must follow basic principles of fairness in all we do; fairness towards each other, our business partners, our neighbours, our competitors, and towards society as a whole. We also expect fair treatment and ethical behaviour from our business partners in return. We place specific demands on suppliers as outlined in our Supplier Guidelines.

Trade and Competition

Different countries enact legislation affecting how, where and with whom we can do business. Laws of different countries sometimes conflict with each other, and changes frequently occur. Specific areas of trade legislation include:

- Fair competition
- Unfair business practices
- Import and export restrictions

The CANPACK legal department from time to time issues specific guidance to sales, marketing or procurement managers regarding these laws. In any given specific situation, it may be difficult to know how to best comply. When in doubt in specific situations, responsible employees should consult with the CANPACK internal legal counsel.

Corruption

In addition to national legislation in place in most countries, CANPACK is subject to American and European anti-corruption rules. In order to comply, CANPACK must not pay bribes to obtain business, and must not pay bribes to government officials, private persons, politicians, political parties or their advisors to obtain favourable treatment.

Payments in cash to government officials, private persons, politicians, political parties or their advisors to obtain business is never acceptable. However there are many other types of non-cash rewards that would also be considered corrupt and which must be avoided including but not limited to the following examples: vouchers,

tickets, accommodations, entertainment, products or services. CANPACK's internal legal counsel is available to provide advice in specific situations.

If public officials such as inspectors, customs officials, persons issuing work permits or visas, or local municipal officials create artificial problems or delays in order to extort facilitation payments, we should make every effort to avoid payment. Specific tactics will vary from country to country, but may include escalation to superiors, publicly exposing the persons requesting bribes, and wasting the official's time without paying them. Each CANPACK location should develop its own local strategy for dealing with external attempts at corruption.

CANPACK employees must also beware of suppliers or other external parties seeking unfair advantage through corrupt means! Employees never may request or accept cash or valuable favours from CANPACK business partners, for themselves or for family members.

Gifts and entertainment

It is customary practice in some countries to offer gifts or entertainment to customers, suppliers, or other business acquaintances. CANPACK employees must never solicit gifts, and may only accept gifts of minor value, which we define in the CANPACK Group's internal regulations and employment contracts. In cases where entertainment is offered by customers, suppliers or other business acquaintances for building general business relationships, approval is required first by the appropriate internal authorities. Similarly, CANPACK employees should not offer expensive gifts or unreasonable entertainment to representatives of customers, suppliers, or other business acquaintances without appropriate internal approval.

The management of each CANPACK company may establish specific guidelines for its employees after prior approval by the CANPACK Group Management Board. The general principle is that gifts should be limited to promotional items of low value, and entertainment restricted to normal hospitality in conjunction with business meetings or training exercises.

Conflict of interest

As employees, we are trusted to take actions and make decisions that are in the best interest of CANPACK; to do our jobs! At the same time, employees may have their own private interests outside of the company. A conflict of interest occurs



when an employee's private interests come into conflict with CANPACK interests. For example, an employee who negotiates or approves transactions with a company owned by a relative would be in a conflict of interest situation.

Employees of CANPACK should do their best to avoid these situations. If, however, a potential conflict of interest situation should arise, the employee **MUST** report the situation to their supervisor or direct manager in writing. It is then up to the manager to take steps that ensure that the best interests of CANPACK and the integrity of the individual employee are protected. The manager must also report the potential conflict and the steps taken to Human Resources, who will ensure that the situation can be monitored in the longer term.

Financial Reporting, Non-Financial Reporting and Audit

CANPACK companies are required to submit truthful and complete financial statements and declarations in accordance with generally accepted accounting principles and legislation. These statements and declarations must accurately reflect the true financial situation of the group. CANPACK employees involved in creating and safeguarding both financial and non-financial records, or in bookkeeping, accounting and financial report preparation are responsible to ensure the validity and correctness of data and reports throughout the process. When initiating or approving transactions, employees must follow the requirements of authorisation procedures established at each CANPACK company. Where estimates are used, these must be objectively prepared, consistent from year to year and with CANPACK accounting principles. Senior managers must ensure that competent personnel are engaged to perform accounting and reporting procedures, but they must not use their authority to influence accounting results.

We create many kinds of records, financial and non-financial, in both in electronic and paper format. Records include bookkeeping records, contracts, tender offers received, time reports and many other categories. Employees must take care to ensure the integrity of records within their responsibility.

Independent auditors review financial reports and audit the accounting systems, procedures and controls used in their preparation. Their work helps us identify and correct errors and to ensure the overall accuracy of our financial reporting. All employees and managers must cooperate fully and truthfully with the auditors.



PERSONAL BEHAVIOR, LABOUR LAW, AND HUMAN RIGHTS

Responsibility of all employees

As employees of CANPACK, we must accept and follow the Code of Conduct. All employees, regardless of the nature of their work or the place in which it is carried out, shall be aware of the contents of the code of conduct and of the legal regulations which affect their work. Managers must ensure that all employees within their areas of responsibility receive necessary instruction, and must provide appropriate guidance to employees in applying the code to specific situations.

Every employee should strive to ensure that their actions will be seen as a positive example and motivation for other employees to follow.

Respect for the rights and dignity of the individual

While at work we must conduct ourselves professionally and with respect for all people. From the most senior manager to the newest recruit, everyone contributes to the success of CANPACK by:

- respecting the rights, dignity and individualism of every individual
- speaking politely and with professional respect for others
- avoiding all forms of intimidation and harassment
- being personally accountable for our activities

As an employer, we must ensure that our activities fulfil the rights and needs of our employees, and are in compliance with laws governing labour relations, working hours, working conditions and remuneration. As CANPACK employees, we should ensure that our actions are compatible with CANPACK values. We should avoid any act or behaviour that could damage CANPACK's reputation.

Unfair Discrimination

We must avoid 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. We respect cultural diversity and the variety of customs that it entails.

Employment decisions shall be based on business requirements and the individual qualifications of applicants. Recruitment decisions shall respect the principle of equal opportunity of those applying for work. However managers and the CANPACK Human Resources function shall analyze recruitment needs against current resources and provide opportunities for advancement to current employees where possible, before recruiting externally.

Forced labour

We must not use and do not accept the use of forced labour, slave labour, unpaid labour, or human trafficking at any point along the supply chain. Our employees at any time may terminate their employment contracts, and retain the use of their own identification documents. CANPACK will avoid working with suppliers that are known for making use of forced labour in their operations.

Employment of minors

We must not employ any person who has not reached the legal age for employment for the country where they are living. No CANPACK company in any country may employ any person who is not at least fifteen years old. For any employees below the age of 18, we must ensure that the type of work or number of hours worked does not interfere with their ability to receive an education.

Freedom of assembly

The management of every CANPACK company should strive for transparency and consultation with employees in issues which concern them. All employees have the right to represent their own interests with regards to employers to the full extent guaranteed by law, including the ability to form or join trade unions. The executive management of the CANPACK group shall also strive for transparency and to provide information to employees about the activities of the group.



OCCUPATIONAL HEALTH AND SAFETY

Every country establishes regulations designed to protect the health and safety of employees and visitors. But even if there were no laws at all, to achieve our values we must ensure a safe and healthy workplace. Strict laws and external inspections are not a burden, but an opportunity for us to identify risks and improve safety procedures. Therefore we shall strive to achieve group health and safety standards in every country, even if not required by law. It is the responsibility of management at each CANPACK location to implement health and safety procedures.

In addition, management at every CANPACK factory must ensure that a health and safety officer has been appointed and empowered to monitor procedures, systems and controls. CANPACK health and safety officers in every country have a functional reporting line to CANPACK group headquarters, and are authorized to communicate directly with group headquarters on health and safety issues.

Management, with the support of their health and safety officers, are responsible for ensuring that all employees and visitors to CANPACK factories are adequately trained in safety procedures.

All employees are required to learn and apply the health and safety procedures designed to protect them and those around them.



As employees, we are responsible for:

- Understanding the risks associated with our work
- Understanding health and safety procedures in force where we work
- Applying required group and individual safety measures in the workplace
- Regularly taking part in training sessions to raise awareness and knowledge of dangers and appropriate countermeasures in the workplace
- Preventing accidents and near-accidents in the course of our work
- Reporting all potentially unsafe situations observed to management or health and safety officers
- Assisting and cooperating with persons carrying out inspections and during accident investigations

Accidents, threats, and Occupational Health and Safety

It is our ambition to avoid accidents. If, however, a serious accident or near accident does occur, the immediate priorities are to safeguard individuals and neutralize any danger. Once these priorities are achieved, data related to the incident shall be safeguarded for analysis, so that the root causes of the problem will be identified and addressed.

In an accident investigation the objective it is not to determine WHO made an error or is responsible, but rather WHY the error could occur.

Management, with the support of health and safety officers, is responsible for ensuring an efficient and smoothly functioning system for reporting and investigating all accidents, injuries, and potential accidents in the workplace, and for addressing the causes of accidents to prevent reoccurrence.

Management is responsible for ensuring that that procedures are maintained, improved where needed, and that employees are aware of and trained in the application of these procedures.



Drugs

The possession, distribution, and use of illicit drugs, narcotics, and alcohol on the premises of the CANPACK Group and companies working with the Group is prohibited. Employees are prohibited from operating machinery while under the influence of drugs or alcohol.

NATURAL ENVIRONMENT AND SOCIAL RESPONSIBILITY

Environmental management

In every country where CANPACK is active, we are subject to environmental legislation and regulations. However even in countries where legislation is weak or not enforced, we must recognise our responsibility to protect human health, the natural environment and natural resources, and encourage our business partners to do the same. Manufacturing operations can potentially affect the environment in many ways, including noise emissions and air, soil, and water pollution. It is CANPACK's strategy to conduct our business activities with the use of modern technologies so as to minimise the impact of our activities on the natural environment. We must continue to search for innovative solutions to minimise our use of natural resources and limit and recycle waste materials which are produced in the course of our activities.

The management of every CANPACK factory must ensure that an environmental protection officer has been appointed to monitor systems and controls designed to meet the local requirements, and actively engage in raising environmental awareness among employees and the community. CANPACK environmental protection officers in every country have a functional reporting line to CANPACK group headquarters, and are authorized to communicate directly with group headquarters on environmental issues.



All employees must also do their part to ensure the systems and controls are working, follow agreed procedures and promptly report any potential problems.

Usage of energy and resources

CANPACK activities require energy and other scarce resources. It is part of CANPACK strategy to implement programs aimed at reducing our usage of energy and resources, both to reduce costs and to protect the environment. An example of this are programs to recover and re-use heat energy.

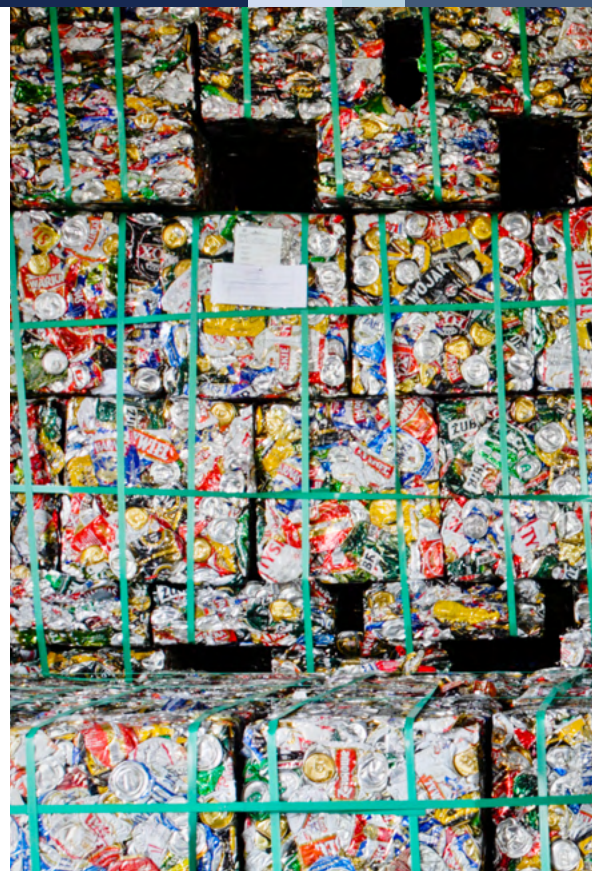
All employees are encouraged to make suggestions or take initiatives to reduce energy inefficiency. Every contribution helps, including factory efficiency, ensuring lights are turned off when not needed or avoiding unnecessary travel!

Waste management

CANPACK as a group must follow legislation for labelling, monitoring, treatment and disposal of unsafe waste products and other substances. But even in jurisdictions where legislation and enforcement are weak, we must implement best practices to ensure that our manufacturing processes do not have a negative impact on those around us.

The management of every CANPACK factory has primary responsibility to organize and monitor waste management procedures, and to spread awareness of potential problems and solutions to all employees and business partners.

All CANPACK employees should contribute to waste management efforts within their daily work by learning and following waste management procedures and watching out for and reporting potential problems.



Use of chemical substances

Chemical substances used in manufacturing can create various kinds risks to the health and safety of employees and others. It is the responsibility of factory management to design and implement procedures to address these risks during purchase, storage, transfer and use of the substances. The procedures must include ensuring that affected employees received appropriate training.

Factory management must also ensure that suppliers, transporters, recyclers and any other business partners dealing with the substances also follow appropriate safety procedures.

All CANPACK employees are responsible for following authorized handling procedures and to be vigilant for detecting and reporting potential problems.

Pro-ecological activities

Our commitment to sustainability extends beyond our manufacturing processes. Recycling of used beverage cans and bottles is part of our business strategy and one way that we can make a positive impact on the ecology and society.

The CANPACK group will continue to explore pro-ecological activities, and we encourage all employees to contribute by supporting existing programs and suggesting new ones.



CONFIDENTIALITY AND DATA PROTECTION

Confidentiality

CANPACK is required by law and by contract to maintain the confidentiality of information entrusted to us by employees, customers, suppliers and other business partners. In addition, in the conduct of our business Can-Pack must also protect its own confidential information from unauthorised parties. Confidential information can include prices, sales volumes, rebates, payment dates, business plans, supplier pricing, marketing programs and goals, client lists, supplier lists, plans for mergers, acquisitions and divisions, changes in management, logins and passwords for IT systems, technological data including production data, know-how, IT data, the configuration and addressing of networks and servers, security and authorisation methods applied, information regarding ongoing disputes including arbitration, court and administrative cases, legal decisions, and data concerning co-workers such as personal details or remuneration.

Through contractual agreement, CANPACK requires business partners to keep secret all confidential information passed on to them by the group, just as we protect their information.

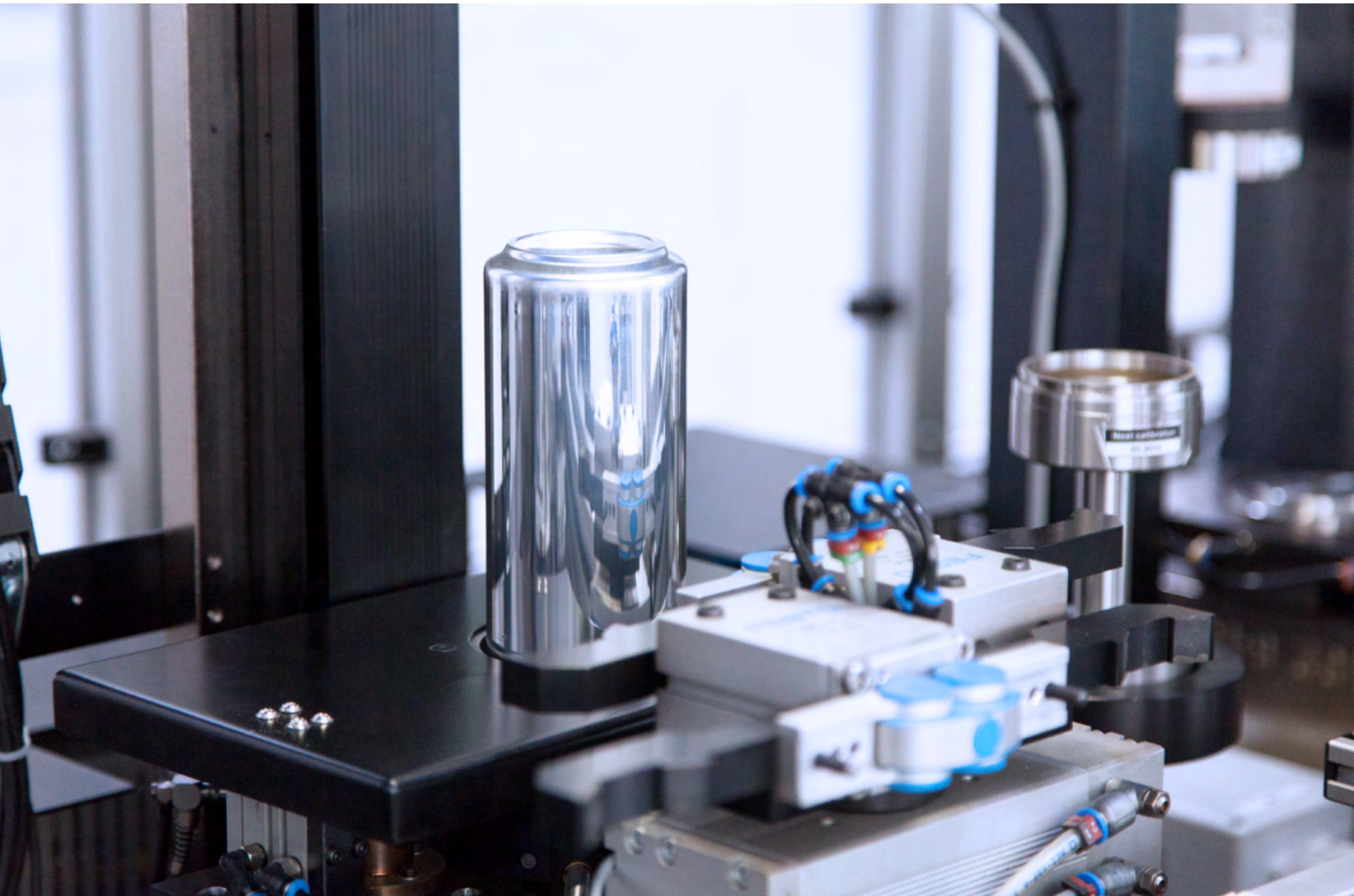
Similarly, CANPACK employment contracts require employees to maintain the confidentiality of internal company information which they have access to in the course of their work. In case a CANPACK employee shall leave the company, they must return any CANPACK documents or files, including electronic files, which may be in their possession. Once they have returned all documents and files, the leaving employee must then permanently delete any electronic copies of CANPACK documents they may possess.





Equipment and systems

CANPACK provides employees with access to computers, printers, telephones, cell phones, tools and other equipment as needed for fulfilment of their work related responsibilities. Systems and equipment are provided for work purposes and are not intended for purposes unrelated to employment obligations. Any information stored by employees on CANPACK systems is the property of CANPACK and may be reviewed by authorized CANPACK personnel.



Protection of personal data

CANPACK is required by legislation in many countries to protect personal data of individuals in the possession of the company. Employees who are entrusted with the collection and maintenance of personal data must familiarize themselves with the applicable legal requirements and take steps to ensure compliance.

External communication

One of the most valuable assets of CANPACK is its reputation. When we employees together strive to achieve our company objectives and fulfil our values, we build and strengthen the reputation of the group.

While we must protect confidential information, we must also ensure that public information about CANPACK is effectively and accurately communicated, so that potential new customers, suppliers, employees, the general public and others with a legitimate interest in our activities can see us clearly.

Employees who have been specifically authorized by management to speak or publish information on behalf of the company must fulfil this responsibility with integrity. We love to publish good news, but when the news is not good we must not hide or misrepresent inconvenient facts.

Other employees who are not authorized to speak or publish information on behalf of CANPACK should refer any requests for information to management.

Archiving of documents

CANPACK is legally required to archive and protect its records, sometimes for many years. CANPACK also needs to protect many kinds of information, including contractual records and technical data, from accidental loss. Most (but not all) of our records are stored in electronic form on our IT systems.

The management of each CANPACK company shall establish specific rules for storage, back-up and archiving of company documentation and records, in accordance with local law and practical requirements.

Employees involved in this important work must perform such tasks diligently and proactively identify and address risks which could lead to loss of information.

SPEAK-UP!

The purpose of this Code is to provide an ethical framework for our activity. It is a description of how we do things, the company culture; not as it is today exactly, but as we would like it to be. Hundreds of CANPACK employees around the world contributed ideas that were used to make this document.

What do we, the employees of CANPACK, want? We want CANPACK to be the best, most technologically advanced and innovative supplier in the market. We want long-term economic security and unlimited opportunity for employees. We want our company to be famous for its positive contribution to society. We want a friendly and safe working environment.

This document is not perfect and our organization is not perfect, but we will make it better by identifying the things that are wrong, and then fixing them. Do you see something in our activity, in the way we do things, that is inconsistent with this Code or needs fixing? Can you describe it? Can you suggest a solution? Here are some alternative ways to report concerns.

First alternative: for most questions, the natural thing is to discuss the matter with your direct manager or supervisor. **All managers and supervisors are required to listen to employee concerns, and look for the best solution according to the Code!**

Second alternative: There are times when an employee may feel uncomfortable in discussing the matter with his or her supervisor. Depending on the issue, you are always welcome to consult with human resources, with health and safety officers, or with other key persons with relevant expertise.

Third alternative: You may always approach senior managers in their company with Code of Conduct concerns. **All senior managers in CANPACK have been instructed to take employee concerns seriously and help find solutions. Employees shall not be punished for raising Code of Conduct questions.**

Fourth alternative: Employees may raise concerns directly with the CANPACK Ethics Officer. The ethics officer may be approached in person or by telephone **(+48) 695 271 885**. All conversations will be treated confidentially.

Fifth alternative: Anyone may contact SYNTRIO, CANPACK's external "Speak-up" service by telephone. When calling from most countries, the caller will provide the CANPACK access code, and will then be able to select their preferred language. Employees may also contact SYNTRIO in writing, either by sending an email to **reports@lighthouse-services.com**, or through their web-site located at **www.lighthouse-services.com/canpack**.

In some countries, there is specific legislation concerning submissions and handling of information. For each country, appropriate instructions have been prepared. The calling number and instructions will be posted at every CANPACK Group location.





www.canpack.eu