



## VPK Code of Conduct for Suppliers

Version	Owner (dept. or function)	Target audience	Approved by	Approval date	Review frequency	Reviewed topics
1	Legal dept.	Key suppliers	ExCom	2021	At least every 3 years	/
2	Legal dept.	Key suppliers	ExCom	May 2022	At least every 3 years	Reference to whistleblowing included
3	Legal dept.	Key suppliers	ExCom	March 2023	At least every 3 years	Adjustment whistleblowing section
4	Legal dept.	Key suppliers	ExCom	August 2024	At least every 3 years	Addition of version table, compliance section, references to ILO/ETI/SBTi targets/EUDR and overall formatting

### INTRODUCTION

Prioritizing the environment, respecting the social and ethical aspects of doing business and continuously improving corporate governance (“ESG”) are the cornerstones of VPK’s sustainable business strategy. We believe that creating and maintaining a sustainable business model is the essential and only way to remain relevant as a company and to build a future-proof, resilient business.

This is why we attach great importance to transparency and close collaboration, both internally amongst companies of our group and together 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 strongly believe in building sustainable partnerships and select our suppliers not only on the basis of economic criteria, but also upon the criterium of being a responsible business.

Therefore, this code of conduct for suppliers (hereinafter the “Code”) reflects our minimum standards concerning compliance with legislation and international standards with regard to ESG and is part of VPK’s commitment to enhance our corporate accountability towards all stakeholders. We expect all of our suppliers to comply with these minimum standards or with applicable law, whichever is stricter, to continuously and actively engage to do better than the minimum standards and to demand no less from their own business partners. We are fully aware of the important role our suppliers play in successfully reaching our own goal of corporate accountability concerning ESG. Therefore, this Code shall at all times apply to any supplier of VPK and is automatically considered part of the commercial agreement between



VPK and each supplier.

**Compliance with this Code is mandatory in order to sustain a business relationship with VPK. To reinforce this commitment, we perform recurrent risk maps of our supply chain to identify and assess possible risks of non-compliance and actively work together towards better compliance, followed by an evaluation of the effectiveness of measures taken to respond to such risks. We will not knowingly remain passive in case of detected non-compliance. In such case, we expect continuous improvement based on a transparent milestone approach. Failure to do so might result in the cancellation of outstanding orders, the suspension of future orders or even a termination of the commercial relationship. Should the commercial agreement between VPK and the supplier, to which this Code forms an integral part, contain separate termination provisions, it is nevertheless understood that this Code takes precedence, meaning that the failure to make improvements based on a transparent milestone approach in case of non-compliance shall be considered a material breach of the commercial agreement, entitling VPK to terminate such agreement.**

With regard to this Code, we expect all suppliers to adopt the following general principles:

- Consult the Code, comply with its provisions and seek guidance where needed. We welcome an open dialogue with all our suppliers to help them meet our requirements.
- Implement the principles and obligations of this Code back-to-back with regard to:
  - o your own employees and representatives
  - o your own supply chain, including subcontractors and other suppliers
  - o keeping records of the business transactions with your own suppliers
- Provide for adequate risk management, including monitoring, establishing a complaints procedure for non-compliant conduct and taking appropriate action in case of such non-compliant conduct.
- Allow VPK or a third party appointed by VPK to monitor compliance with the Code and if necessary to conduct an audit of your operations and premises (in conformity with the law and the commercial agreement).
- Report illegal or non-compliant conduct. As per EU Whistleblowing Directive 2019/1937 and all transpositions into national law by the EU Member States, reports are welcomed through VPK's whistleblowing channels (see separate Whistleblowing section on the VPK websites, such as [www.vpkgroup.com](http://www.vpkgroup.com)).

The most recent version of this Code is available on our [website](http://www.vpkgroup.com) (www.vpkgroup.com).

## **I. ENVIRONMENT**



## **A. General obligations**

At VPK, we support a protective approach towards the environment, undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies. We expect our suppliers to:

- Conduct their business in accordance with applicable environmental, health and safety laws and regulations
- Do business in an environmentally conscious manner
- Use natural resources sustainably, use renewable resources as much 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, air and water bodies
- Implement relevant measures and actively apply better production processes and technologies in order to reduce the environmental impact
- Take measures to reduce the environmental impact throughout their entire supply chain

## **B. Decarbonization**

VPK is committed to leading the way in decarbonization efforts, aligning with the Science Based Targets initiative (SBTi) and setting ambitious net-zero targets for 2050. We recognize the urgent need to mitigate climate change and reduce our carbon footprint. We commit to transitioning to renewable energy sources and achieving significant reductions in greenhouse gas emissions.

Therefore, we require suppliers to set near-term and net-zero science-based emission reduction targets in line with the goal to limit global warming to 1.5°C and to communicate transparently on the progress upon request.

## **C. EUDR (EU Deforestation Regulation)**

Biodiversity is under significant pressure globally. VPK is committed to contributing to nature conservation and to managing forests responsibly.

Therefore, VPK expects full transparency and compliance to the requirements of the EUDR for suppliers in scope working with VPK.

## **II. SOCIAL**

We require our suppliers to commit to having an approach in line with the following international human rights frameworks:

- The Universal Declaration of Human Rights
- The ten principles of the UN Global Compact and the United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The International Labour Organisation's (ILO) Declaration on the Fundamental Principles and Rights at Work and the Ethical Trade Initiative (ETI) code based



thereon, setting out the following 9 essential labour practices:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed
- The OECD Guidelines for Multinational Enterprises

We acknowledge that respect for human rights on a global scale remains an ongoing challenge, filled with complexities of many natures. VPK wishes to be part of the solution. We strongly believe that the path forward is based on collaboration and engagement.

### **III. GOVERNANCE**

#### **A. Compliance with laws, rules and regulations**

We respect the law at all times and we expect no less from our suppliers.

Compliance with all applicable laws and regulations must never be compromised and is expected from you as a supplier, including the following obligations:

- Being a legal entity duly organized and legitimately existing under applicable laws
- Having the right to conduct your business and maintaining the necessary licenses and authorizations needed for your operations for VPK
- Having the right to contract with VPK and to perform your obligations under the agreement with VPK accordingly and in compliance with applicable legislations
- Complying 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).

#### **B. 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. All suppliers must comply with applicable antitrust, competition and fair dealing laws. Suppliers must refrain from doing 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.

#### **C. Bribery and corruption**

We strongly condemn any form of bribery and corruption and strive for total absence of such



practices within VPK. Make sure that you, as a supplier:

- 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.
- Do not make, directly or indirectly, any 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 your 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 favors 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.

#### **D. 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's 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 VPK (including its employees, its customers and other business partners), VPK expects suppliers to:

- Sufficiently protect such information against unauthorised use and disclosure.
- Only use such information for the purpose for which it was received.
- Do not disclose such information or allow such disclosure, unless to the persons who strictly need to know within your organisation for the purpose of the execution of the commercial agreement 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 VPK employees and third parties.

As a supplier, you shall further on:

- Safeguard property of VPK while under its control and treat it respectfully when



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

### **E. Conflicts of interest**

A conflict of interest occurs when personal interests of an employee, director or manager of a company compete with the interests of the company itself. VPK expects its suppliers to have a policy on conflicts of interest, implying the following:

- Avoid any conflict of interest relating to financial interests or other personal arrangements with VPK employees or representatives that may be considered inappropriate.
- Instruct and train your 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 this conflict to VPK in a transparent way, or if this legally cannot be imposed, is encouraged to disclose as described above.

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The undersigned declares to have taken notice of and agrees to accept the conditions set within this Code.

Supplier name:
Date:
Signature: