

CODE OF CONDUCT



Schoeller Allibert

Name Employee :
Date :
Signature :



Introduction

This code of conduct has been drawn up by Schoeller Allibert and applies to all directors, officers and employees of the Schoeller Allibert group of companies (the “Schoeller Allibert Group”). The code forms the basic principles that underlie all the actions of our operating companies of the Schoeller Allibert Group and related companies.

Schoeller Allibert is a company that produces materials with precisely defined functional characteristics. In this context we enter into relations with other parties in our vicinity as supplier, developer, partner, etc. These relations are based not only on trust, in-house technological know-how and skills and the quality of our products, but also on our method of operation, the way we treat the environment and our social objectives.

For Schoeller Allibert it is essential that our stakeholders have confidence in the company both now and in the future. The object of this code of conduct is to contribute to that confidence and Schoeller Allibert will therefore adhere to this code of conduct and expects the same of all of its directors, officers and employees.

Because Schoeller Allibert operates in a dynamic environment the code will - if required - be modified as a result of new insights, requirements or wishes. The Leadership Meeting will communicate significant amendments to the relevant target groups.

Should any questions or complaints arise that relate to this code, the Corporate HR Director and/or the Group’s General Counsel may be consulted.

Questions and complaints with regard to the financial and economic aspects of the code of conduct may be filed with the Group’s General Counsel. For questions or complaints with regard to the interpersonal aspects of this code, such as discrimination and intimidation, employees may turn to the Corporate HR Director or our reporting hotline, which is managed by an independent third party.

The code of conduct relates to everyone who is employed by Schoeller Allibert or its operating companies. This code forms an integral part of each individual contract of employment.

The Leadership Meeting considers it crucial that employees understand the importance of the code of conduct and comply with it. A significant task thus falls to the supervisory managers in this respect.



Our Vision

We live in exciting and demanding times. The business landscape is evolving fast. The world of supply chain is developing into the next phase. Most remarkable in the returnable transport packaging industry is the growing need for sustainable solutions. These solutions must be innovative, smart and circular.

Our Mission

Schoeller Allibert has the power and the ingenuity to transform supply chain into the future. Together we provide our customers with smart and innovative returnable packaging solutions. Our aim is to lead by setting the standard in our industry: we support and enrich the circular supply chain of our customers.

Through this ambition, we make it easy to waive single use products, which contributes to a more sustainable world. Furthermore we will make a difference by adding smart services.

Our Values

Trust!

The only way to meet our ambitions is working together, with all our colleagues and other stakeholders. Therefore we rely on another. The level of trust in our working environment is high. And loyalty is key in our teams. We always have respect and show passion and enthusiasm.

Own!

We also have respect for our role in the company and teams. We own our work and responsibilities. And we take initiative. With energy we challenge ourselves (and others). We motivate colleagues by being dedicated: we lead by example.

Deliver!

And there can be no doubt about our approach to customers and other stakeholders; we exceed their expectations and deliver on time and in full.



Employees

The company expects of its employees that they will not under-take any actions that are in conflict with our mission and core values.

Protecting the Company's assets and resources

Company property such as machines, equipment, goods of fixtures and fittings should only be used for company purposes. Any other use is not permitted. This applies equally to confidential information, such as sales and profit figures, marketing plans and the like. Employees will handle both the material and the immaterial property of Schoeller Allibert with care. If an employee becomes aware of loss, damage, theft, misuse or waste of the company's assets, this employee should speak to his supervisor.

If an employee uses the company's assets for personal benefit, or is otherwise careless or wasteful with the company's assets, he may be in breach of his duty to the company.

Employees have a responsibility not to abuse company resources for expense reimbursement. Any requests for reimbursement for authorized company expenses must be for legitimate business expenses.

Confidential information

Employees of Schoeller Allibert are obliged to observe the complete secrecy of all confidential information (both information about the company and information about other companies and our customers) in so far as this does not contravene a legal obligation of disclosure. When in doubt the Corporate HR Director and/or the Group's General Counsel is to be consulted. The obligation to maintain secrecy will remain in force even after termination of employment and all confidential information is to be delivered to the company promptly after such termination or at any time upon the company's request.

It is important to use discretion when discussing company business. This includes not discussing company business internally, except with those individuals at the company that have a "need to know" the information. Additionally, be careful not to discuss company business in public places such as elevators, restaurants and public transportation, or when using phone or email outside of the office.

Schoeller Allibert employees should also be careful not to leave confidential information in unattended conference rooms or in public places where others can access it.



Intellectual property belongs to the company

Employees may be involved in the creation, development or invention of intellectual property such as concepts, methods, processes, inventions, confidential information and trade secrets, works of authorship, trademarks, service marks and designs during the course of their employment. All such intellectual property and the rights therein, such as copyrights and patents, will be owned by the company. Employees are responsible for cooperating with the company and providing all necessary assistance to ensure that all intellectual property and related rights become the exclusive property of the company.

Accuracy books and records

All transactions with customers or business partners will be recorded in writing in accordance with the current guidelines. The administration of every order and every project will be transparent, complete and correct. Employees must never conceal information from (i) an external auditor; (ii) internal auditor; or (iii) an audit committee of the company. In addition, it is unlawful for any person to fraudulently influence, coerce, manipulate or mislead an external auditor of the company.

The company's contracts and agreements govern our business relationships. Because the laws governing contracts and agreements are numerous and complicated, employees who enter into contracts or agreements on behalf of the company must have proper authorization and, prior to their execution, these documents must be reviewed by legal counsel.

Ensure that the company provides full, true and plain public disclosure.

All employees who are responsible for the preparation of the company's public disclosures, or who provide information as part of this process, must ensure that public disclosures of information are made honestly and accurately. Employees must be aware of and report any of the following: (a) fraud or deliberate errors in the preparation, maintenance, evaluation, review or audit of any financial statement or financial record; (b) deficiencies in, or noncompliance with, internal accounting controls; (c) misrepresentations or false statements in any public disclosure document, such as annual and quarterly reports, prospectuses, information/proxy circulars and press releases; or (d) deviations from full, true and plain reporting of the company's financial condition.

Company's stakeholders

We are meticulous in meeting our commitments to our stakeholders (shareholders, supervisory board member, management, employees, customers, partners etc.) so that their confidence is not undermined. To preserve Schoeller Allibert's reputation, do not engage in any illegal or unethical conduct when dealing with stakeholders or competitors.



Communications and media

Schoeller Allibert has a Communications and Social Media policy, which can be found on SchoellerNet. Employees should familiarize themselves with the content of the Communications and Social Media policy.

Conflicts of interest

The personal behaviour of Schoeller Allibert employees, both inside and outside work, should reinforce a positive image of such employee, the company and its clients. It is essential to use good judgement in all personal and business dealings. Employees should refrain from engaging in activities that could hurt the company's reputation and that could undermine the relationship of trust between the employee and the company. Employees that have acted inappropriately may be subject to disciplinary action up to and including termination for cause.

The individual ambitions, values and standards of employees should fit within generally accepted values and standards.

Additional functions of Schoeller Allibert employees may not contravene the law. If necessary, employees must indicate that they are speaking in a personal capacity and not make any statements on behalf of Schoeller Allibert. It is not permitted to make statements that will harm the material or immaterial interests of the company. Paid or unpaid additional activities that are contrary to the interests of Schoeller Allibert are not permitted. When in doubt the Corporate HR Director and/or the Group's General Counsel is to be consulted. For any other additional activities an agreement with the relevant member of the Leadership Meeting should be in place.

A conflict of interest occurs when a person's private interest interferes, or even appears to interfere, with the interests of the company. An employee may have a conflict of interest if he/she is involved in any activity that prevents the employee from performing his/her duties to the company properly, or that may create a situation that could affect the employee's ability to act in the best interest of the company. Accordingly, the employee must place the company's interest in any business matter ahead of any personal interest.

Positive work environment

Employees will be judged on their performance. Any form of discrimination on grounds of race, sex, religion, life principles, political preferences, age, handicap, sexual preferences or otherwise are unacceptable within Schoeller Allibert. Physical, verbal, written and sexual intimidation will not be tolerated. In case of complaints employees may call on the Corporate HR Director and/or the Group's General Counsel.



If an employee experiences or becomes aware of discrimination or harassment, such employee has a duty to report it. Reference is made to the company's Whistleblower Policy and the company's reporting hotline.

Schoeller Allibert will ensure a safe and healthy workplace for its employees. Schoeller Allibert expects all its employees, just as its business partners, to act in the spirit of the company's environmental and safety policy.

Schoeller Allibert acknowledges the provisions of the Universal Declaration of Human Rights (UDHR). Schoeller Allibert also respects the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, and the company specifically attaches great importance to the elimination of forced and child labour, freedom of association and compliance with the guidelines on working time and minimum pay.

Schoeller Allibert has a Positive Work Environment policy, which can be found on SchoellerNet. Employees should familiarize themselves with the content of the Positive Work Environment policy

Compliance with laws, rules, regulations and policies

Many of the company's activities are governed by laws, rules, regulations and policies that are subject to change. If you have questions about the applicability or interpretation of certain laws, rules, regulations or policies relevant to your duties at Schoeller Allibert you should consult with the company's internal legal counsel.

Schoeller Allibert and its employees will refrain from behaviour that discourages fair competition. Schoeller Allibert or its employees will acquaint themselves with information about competitors only by legal means.

Schoeller Allibert and its employees will make no use of customers or suppliers to breach or circumvent legislation or regulations. Neither will they act contrary to socially accepted standards.

Schoeller Allibert and its employees will neither give nor receive gifts with the aim of influencing the other party. Small attentions as a token of appreciation are permitted, provided they represent a value of less than € 100 (so-called "hard" gifts). Gifts with a higher equivalent value, such as invitations to sporting and other events of a commercial nature ("soft" gifts) are to be reported to the Group's General Counsel. Gifts in money or gifts that can be converted into money are not permitted. Should an employee be embarrassed by a gift or when in doubt, the Group's General Counsel is to be consulted. The General Counsel will keep record of these reports. In case of doubt he or she will consult the CFO. Please consult Schoeller Allibert's Anti-Bribery Policy for more information.



Payments in cash will not be accepted, unless the payment is made in accordance with generally accepted auditing procedures. When in doubt the Group's General Counsel is to be consulted.

It is the policy of the Company that no Group company will sell any goods or services directly, or indirectly through sales agents, distributors or other third parties, to Cuba, Iran, North Korea, Sudan or Syria ("Sanctioned Countries"), or otherwise to engage in transactions involving Sanctioned Countries or Sanctioned Persons that would be prohibited under US economic sanctions or other applicable economic sanctions. For the list of countries, individuals, entities and organizations check the latest version of the Specially Designated Nationals (SDN list) : <http://www.treasury.gov/sdn>.

Environment

Schoeller Allibert operates a policy to minimize environmental impact. The company and its employees will therefore act vigorously in the spirit of this policy. Business partners are also expected to do their best to minimize environmental impact.

Disciplinary action for code violations

Please note that Schoeller Allibert reserves the right to take disciplinary action for violations of this code of conduct that fits the nature and particular facts of the violation. This could, in the most severe circumstances, include immediate termination for cause and, if warranted, legal proceedings may be brought against you.

Coming into force

This policy came into force in January 2021.