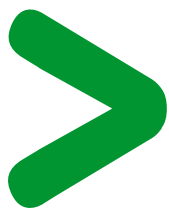


# Suppliers & external providers code of business conduct

Edition : September 2019



# 1



## INTRODUCTION

Dear partners,

Since over 35 years, Eurofoil is established as a global leader in the competitive market of plain aluminum foil for foodstuff.

As an unseparated part of the conduct of its business, Eurofoil is committed to promoting integrity and maintaining the highest standard of ethical conduct in all of its activities in all countries wherever its employees operate.

Today, Eurofoil has made a lot of efforts to get a solid social and environmental responsibility.

At the heart of our strategy, this culture is the foundation of our commitment, to differentiate ourselves and make us attractive to our customers.

Eurofoil undertakes to act diligently throughout its supply chain, by involving its suppliers and external providers in its policy.

As actions of those with whom Eurofoil does business may be linked to Eurofoil and affect its reputation, we expect that our business partners act with the same level of integrity and honesty.

Eurofoil expects its partners to implement these commitments in accordance with this Suppliers & external providers Code of Business conduct, and promote them in long term within their respective spheres of activity and influence. Eurofoil will refuse to approve or do business with those who do not share, in action and in words, the same principles.

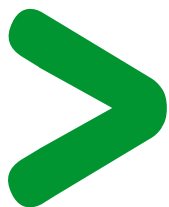
The Eurofoil Supplier & external providers Code of Business Conduct sets out the principles that all suppliers and external providers working with Eurofoil must respect for all its activities, anywhere in the world.

Our Supply Chain Sustainability Policy is fully supporting on the respect and the promotion of the main recognized international standards, as the 10 United Nations Global compacts and the 8 International Labor Organization 's Fundamentals Conventions.

This Code of Business Conduct reflects Eurofoil's expectations for ethical business, social and labor rights, occupational health, safety and the environment.



# 2



## ETHICAL BUSINESS

### COMPLIANCE WITH LAWS AND REGULATIONS

The Supplier or external provider should agree to comply with all laws and regulations applicable to its activity wherever it operates.

### PREVENTION AGAINST CORRUPTION

The Supplier or external provider should not offer, promise or grant any direct or indirect hospitality of any kind whatever for the purpose of getting a contract or deriving any benefit or advantage from it. Employees of Eurofoil are prohibited from accepting anything more than modest gifts, ordinary business meals from suppliers

### PREVENTION OF CONFLICT OF INTEREST

The Supplier or external provider should agree disclosing any personal, financial or other interest that binds it to a Eurofoil employee could interfere in their business relationship or create the obvious appearance of a conflict of interest.

### FREE COMPETITION AND ANTITRUST

The Supplier or external provider should agree conducting its business in accordance with the free competition and antitrust laws and regulations applicable. It refuses any abusive or unlawful behaviour, as well as any unfair practices having the effect of hindering the free competition: agreements on prices, abuse of a dominant position, abusive exploitation of the economic dependency of a customer or supplier.

### TRANSPARENCY

The Supplier or external provider should agree working with transparency and have to communicate information concerning its economic and financial situation, in accordance with laws and regulations applicable.

### CONFIDENTIALITY AND INTELLECTUAL PROPERTY

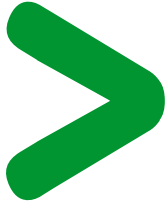
Suppliers or external provider to Eurofoil are expected to protect confidential and proprietary information of Eurofoil. Suppliers or external provider who have been given access to confidential information must not share it with third parties without prior a written consent from Eurofoil. If a supplier or external provider believes it has been given access to any confidential information from Eurofoil in error, it should notify Eurofoil immediately. At the request of Eurofoil, supplier or external provider must sign a non-disclosure agreement containing confidential obligations.

### TRAINING

The Supplier or external provider should undertake the implementation of training programs for its managers and employees to acquire the sufficient level of knowledge for understanding the content of this Supplier and external providers Code of Business Conduct, laws and regulations applicable, as well as recognized universal standards.



# 3



## SOCIAL AND LABOR RIGHTS

Suppliers must meet the applicable legal standards and also undertake the application of the principles of international conventions, including:

- The UN Universal Declaration of Human Rights,
- The ILO's fundamental Conventions.

### PROHIBITION OF FORCED LABOR

➤ ILO Conventions No. 29 and No. 105

The Supplier or external provider should undertake not to use any form of forced and compulsory labor, obtained under the threat of sanctions or any other constraint. All work must be done voluntarily.

### PROHIBITION OF CHILD LABOR

➤ ILO Conventions No. 138 and No. 182

Eurofoil does not tolerate child labor in its supply chain. The Supplier or external provider should agree in any way to don't work with persons whose age is lower than minimum age of the completion of compulsory schooling.

### FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

➤ ILO Conventions No. 87 and No. 98

The Supplier or external provider must provide to its workers the right to be organized freely in trade unions and to be represented by the organizations of their choice in order to carry out collective bargaining (unless otherwise provided by law).

### EQUALITY OF TREATMENT

➤ ILO Conventions No. 100 and No. 111

The Supplier or external provider have to respect equal treatment between its employees by prohibiting any discrimination in terms of employment, professional promotion and training access for reasons of origin, sex, sexual orientation, age, political or religious opinion, trade union membership, in accordance with laws and regulations applicable.

### FIGHT AGAINST MORAL, PHYSICAL OR SEXUAL HARASSMENT

The Supplier or external provider must prohibit any abusive and inhumane behavior towards its employees such as verbal or physical violence, moral or sexual harassment.

### WORKING TIME AND WAGE

The Supplier or external provider undertakes that the working time of its employees will not exceed the maximum working time, as determined by applicable local laws and regulations.

The supplier must adopt a remuneration policy (including overtime), which must comply with local laws and regulations.

In the absence of dedicated legislation, the supplier must provide regular remuneration that meets the basic needs of its employees.

Except as otherwise provided by applicable law, any pecuniary sanction resulting from a disciplinary measure shall be prohibited.

### DECLARATION AND DETACHMENT OF WORKERS

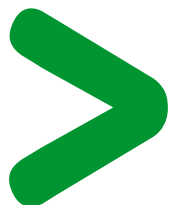
The Supplier or external provider must carry out all administrative declaration for hiring their collaborators.

In addition, the detachment of foreign workers to the Grand Duchy of Luxembourg is regulated.

The Supplier or external provider should agree performing a social badge declaration in accordance with Luxembourgish laws.



# 4



## HEALTH AND SAFETY AT WORK

The Supplier or external provider must ensure that all necessary measures are taken to ensure the safety and health of his employees in accordance with applicable health and safety principles. Eurofoil request its suppliers to develop a Health and Safety culture to prevent accidents at work and occupational diseases.

### COMPLIANCE WITH LAWS AND REGULATIONS

The Supplier or external provider should agree to respect at least all the regulations and laws applicable, in terms of Health and Safety.

The Supplier or external provider is committed to set a safe working conditions and a healthy work environment to prevent accidents at work and occupational diseases.

### ASSESSMENT OF SANITARY AND PROFESSIONAL RISKS

The Supplier or external provider should undertake an identification and assessment of health and safety risks.

Eurofoil requests the application of the general principles of prevention as the implementation of technical action as priority.

If actions in place are qualified as insufficient, the Supplier or external provider shall provide its employees appropriate and well-maintained personal protective equipment and will train them as their uses.

### HYGIENE AT WORK

The Supplier or external provider must provide clean premises, usable sanitary facilities, access for drinking water, lighting, heating or cooling.

### REACH / RoHS / Conflict Minerals

The Supplier or external provider should inform Eurofoil when one of its articles contains a

substance on the candidate list with a concentration greater than 0.1% w/w. The list of substances of very high concern (SVHC) is available at:

<https://echa.europa.eu/fr/candidate-list-table>

In addition to the above-mentioned as an obligation, it is the supplier's responsibility to verify whether a notification to ECHA must be done, when all the articles supplied in a year contain substances on the candidate list and exceed the threshold of 1 tonne.

The safety data sheet (SDS) is the main mode of transmission between chemical industry firms and downstream users. In accordance with Regulation No EC 1907/2006, the Supplier or external provider must transmit electronically for each item purchased by Eurofoil, a SDS in French, at the first delivery, and thereafter each revision.

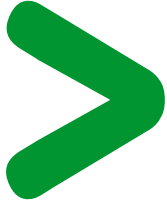
The Supplier or external provider must inform Eurofoil about the conformity or non-compliance (including cases covered by exemptions) of the products supplied, with the European Directive 2011/65/EU, concerning hazardous substances in electric and electronic equipment.

Upon Eurofoil requests, Supplier or external provider must provide a RoHS declaration of conformity of its products.

The Supplier agrees to deliver only products that comply with Conflict Minerals (Dodd-Frank Act, Section 1502) for the supply of tantalum, tin, tungsten, and gold from Democratic Republic of Congo and adjoining countries.



# 5



## ENVIRONMENT

The Supplier or external provider must ensure that all necessary actions are taken to act responsibly in the design, manufacture, use and disposal of the products.

Eurofoil requests its suppliers to share commitments for the environmental protection, the preservation of natural resources and in the fight against climate change both in the activities carried out on behalf of Eurofoil and in the rest of their activities.

### COMPLIANCE WITH LAWS AND REGULATIONS

The Supplier or external provider should respect at least all environmental laws and regulations applicable.

The Supplier or external provider must limit the impact of its activities on the environment, and promote a process of continuous improvement of its environmental performance on:

- Optimization of energy consumption and natural resources needed to conduct activities,
- Decrease of waste production,
- Control of all emissions and nuisances.

### NATURAL RESOURCES

The Supplier or external provider must use the necessary resources sparingly.

Eurofoil recommends to its suppliers the implementation of a policy to control and reduce energies and raw materials consumptions to preserve the natural resources.

### WASTES

The Supplier or external provider should collect, sort the hazardous wastes, store them under appropriate conditions and ensure that are disposed in accordance with applicable local regulations.

### WATER AND POLLUTING EMISSIONS

The Supplier or external provider should treat the wastewater, purify the hazardous air

emissions before either discharging it into the natural environment or to dump it in appropriate reprocessing plants.

Eurofoil recommends to its suppliers or external provider the implementation of a policy of control to control and reduce greenhouse gases, dust volatile organic compounds and long term damage to ecosystems.

### LIFE CYCLE ASSESSMENT

The Supplier or external provider must provide to Eurofoil all necessary data enabling to measure and analyze the carbon footprint of the product or service supplied to Eurofoil.

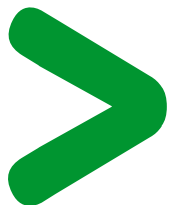
Supplier or external provider must share environmentally friendly products or services that comply with Eurofoil specifications and lower environmental impact as a benefit.

### BIODIVERSITY

The Supplier or external provider must take care about the accidental or intentional introduction of invasive alien species (plants or animals) outside of their natural geographic range into an area where they are not naturally present.



# 6



## APPLICATION

### COMMITMENT

By signing the Eurofoil Suppliers & external providers Code of Business Conduct, the Supplier or external provider fully accepts the terms and undertakes vis-à-vis Eurofoil to comply strictly with the principles.

Once signed, this commitment is given as an integral part of the business relationship between Eurofoil and the Supplier or external provider.

Eurofoil supplier or external provider must meet at least the national and local laws and regulations applicable. If the level of requirements of principles established by Eurofoil are higher than local laws and regulations, this code of business conduct will be applicable, unless otherwise provided by laws.

In the event that these principles are not yet achieved, Eurofoil and its supplier or external provider, in a common process of continuous improvement, will consult each other as far as possible; in order to achieve the criteria set through appropriate accompanying measures.

In addition, the Supplier or external provider must spontaneously inform Eurofoil any event calling into question of the accuracy information provided.

### EVALUATION OF PERFORMANCE - CASE OF NON-RESPECT

Eurofoil reserves the right to evaluate its suppliers or external providers to ensure that they well respect and implement the principles given by this Code of Business Conduct.

Suppliers or external providers must cooperate with Eurofoil in order to:

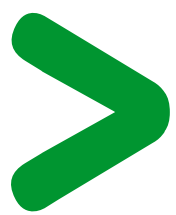
- Providing information with transparency to get a conformity assessment of the principles,
- Auditing, which will be conducted either by a Eurofoil representative or by external auditors selected by Eurofoil.

In case of serious and repeated failures far away one or several obligations of the Eurofoil Suppliers and external providers Code of Business Conduct, or if the Supplier or external provider refuses any improvement required by Eurofoil, Eurofoil reserves the right to stop immediately business relationships with this Supplier or external provider.

The Supplier or external provider is fully responsible of all the consequences of a potential non-compliance by itself or its suppliers and subcontractors; accordingly, it will bear for payment of compensation relating to the consequences of non-compliance.



# 7



## COMMITMENTS

### CORPORATE RESPONSABILITIES

I, the undersigned **(Name and Surname)** .....

Acting as **(Position in the company)** .....

Representing the company **(Company name)** .....

Located **(Full address of the company)**  
 .....  
 .....

Country .....

Hereby declare read and understand all the principles set out in the **Eurofoil Suppliers and External Providers Code of Business Conduct** and undertake to comply with all the provisions thereof.

Signature
Date .....

Company Stamp



**This page must be completed, signed and returned by the Supplier or external provider.**





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