


Vetropack Group Management System	vetropack 	
CODE OF CONDUCT	VGT-0101-01-WIS-055-EN	1/5
	2024-04-18 / REJ/TRS	Version 05

Vetropack is a listed Swiss family business, which has fostered integrity, reliability and transparency since its founding year. Vetropack is committed to ensure accountability, safety, leadership in quality and anticipation of change, its aim is to generate trust and confidence and to exercise environmental responsibility. The Vetropack Code of Conduct is based on these values.

This Code of Conduct applies to all Vetropack companies and its directors, officers and employees. Third parties cannot derive any rights from this Code of Conduct.

A. Integrity, generating trust and confidence

Our actions are characterized by integrity and reliability. Trust is the principle of our relations.

1. We respect all applicable laws and regulations. (Business Ethics Policy)

Vetropack companies and their employees are obliged to respect and comply with all applicable laws and regulations in force.

2. We respect our employees. (HR Policy, Management Policy)

Human Rights

We recognize our responsibility under the Universal Declaration of Human Rights and the International Labour Organization Core Conventions.

No discrimination or harassment

Vetropack companies and their employees are committed to evaluate, employ and promote employees solely based on their qualifications and abilities required for the envisaged position. Vetropack welcomes diversity and therefore no consideration is given to race, gender, age or religion. Furthermore, Vetropack is committed to a work environment that is free from harassment, be this verbal or non-verbal.

Safe working conditions

Safety is essential for Vetropack companies and their employees.

No forced labour

Vetropack companies and their employees are against the use of forced labour.

No child labour


Vetropack companies and their employees are against the use of child labour.

Freedom of association and collective bargaining

Vetropack companies respect their employees' right to freedom of association and collective bargaining.

Working hours and remuneration

Vetropack companies treat their employees fairly in compliance with all applicable laws and mandatory industry standards in respect to reasonable working hours, periodic leave and remuneration.

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3. We respect our **business partners. (Business Ethics Policy; Anti-Trust Policy; Group Policy, Gifts, Hospitality, Entertainment)**

Fair competition

Vetropack companies and their employees are obliged to respect and comply with all applicable competition and antitrust laws.

No improper advantages

It is unacceptable for Vetropack companies and their employees to offer or accept any improper advantages (i.e. lavish business gifts, not modest hospitality or invitations, etc.).

No bribery / corruption

Vetropack companies and their employees are obliged to prevent and report all instances of bribery / corruption.

4. We protect the **assets** of Vetropack companies. **(Vetropack Internal Control System)**

Prevention of fraud

All Vetropack companies and their employees are obliged to protect the assets of Vetropack, in particular from fraud, and to ensure that these assets are used efficiently. The assets of Vetropack should only be used for Vetropack's business.

B. Reliability and Quality

5. We are reliable with regard to **consumers (Quality Policy) and environmentally responsible (see E. 11 below).**

6. We provide **reliable information** about our activities, financial situation and performance. **(Finance Policy)**

Vetropack companies and their employees are committed to provide accurate and timely information about their activities, financial situation and performance.

C. Transparency

7. **Avoidance of conflicts of interest (Business Ethics Policy)**


All Vetropack companies and employees are obliged to avoid and disclose conflicts of interest or potential conflicts of interest.

8. **Compliance and Reporting**

Non-compliance with this Code will result in management taking action, including disciplinary actions.

Vetropack employees shall consult with local management in cases where they are not certain if their actions comply with the provisions of the Code.

In accordance with the principles of proportionality, each Vetropack company and its employees are required **to immediately report** all known or suspected violations of laws, regulations as well as this Code of Conduct to the respective **General Manager, HR Department, Compliance and Legal Department of VPH** or the **CEO of VPH**. Employees will not suffer negative consequences for acting in good faith when bringing a breach or a suspected breach of this Code to the attention of senior management. Such information will be confidentially investigated to protect the employee's personality rights and to avoid any discrimination. Vetropack also offers the possibility to report observations of serious misconduct via the following SpeakUp contacts operating 24/7:

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Country	Phone Instruction	Webservice URL (general URL: www.speakupfeedback.eu/web/vetropack)	Access code	Language Option 1	Language Option 2	Language Option 3	Language Option 4
Austria	0800-295175	www.speakupfeedback.eu/web/vetropack/at	39203	German	English		
Croatia	0800-223069	www.speakupfeedback.eu/web/vetropack/hr	39203	Croatian	English		
Czech Republic	0800-900 538	www.speakupfeedback.eu/web/vetropack/cz	39203	Czech	English		
Italy	0800-787639	www.speakupfeedback.eu/web/vetropack/it	39203	Italian	English		
Moldova	0800-61433	www.speakupfeedback.eu/web/vetropack/md	39203	Romanian	Russian	English	
Romania	0800-894540	www.speakupfeedback.eu/web/vetropack/ro	39203	Romanian	Russian	English	
Slovakia	0800-004529	www.speakupfeedback.eu/web/vetropack/sk	39203	Slovak	English		
Switzerland	0800-561422	www.speakupfeedback.eu/web/vetropack/ch	39203	Swiss German	French	Italian	English
Ukraine	0800-502 206	www.speakupfeedback.eu/web/vetropack/ua	39203	Ukrainian	Russian	English	

Unless the reporting employees leaves contact details the call or message is anonymous. Voice messages will be transcribed automatically.

When leaving a message via the phone, the reporting employee has to enter the access code subject to the table above and leave the message. After one week the reporting employee can call again to listen to Vetropack's response and to leave a new message if desired.

The reporting employee can also leave a message via the SpeakUp Web Service page through a hyperlink or by entering the URL (both as per the table above), choosing the country and entering the access code as per the table above to leave the message. It is possible to attach electronic documents (such as word or pdf files). Responses can also be viewed and replied to after one week.


The conversation cycles described herein can be repeated. A case number will be allocated to the call or message. Please make sure you keep this case number. If it is lost, a new message will have to be left under a new case number, you will have to refer to the content of the original message so it can be linked with the new message.

Vetropack Compliance will handle the cases. The Group Compliance Officer/or the deputy will receive the initial messages regarding all countries apart from the Czech Republic, Croatia and Italy where the Local Compliance Officer/or the deputy, in case of Italy the Supervisory and Control Body, will be the first point of contact due to requirements of local law. Vetropack Compliance and its representatives in all countries grant full confidentiality.

D. Safety (Safety & Environment Policy)

9. Everyone's safety is our main concern; we therefore ensure **safe working conditions** as mentioned under A 2 above.
10. We are commitment to produce **products and services, which are safe for their intended use (Quality Policy)**

We see safety from a holistic point of view and support our customers in optimizing their value chain and hence ensuring the safety of end-consumers.

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E. Exercising environmental responsibility


11. We are environmentally responsible. **(Safety & Environment Policy)**

Caring about the environments is key to Vetropack. We are continuously committed to minimize our ecological footprint.

F. Anticipation of change

12. We are curious and open for new things and we constantly foster new solutions. In this connection, we also keep up with all latest legal and regulatory developments.

Therefor this Code of Conduct will be periodically reviewed as part of the company's efforts to achieve excellence with regard to adhering to the principles and values set forth herein.

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Acknowledgment

I have carefully read this Code of Conduct.

I understand and agree to comply with its objectives and provisions.

Name

Signature

Date

Name of Vetropack Company