


Vetropack Group Management System	vetropack 	
SUPPLIER CODE OF CONDUCT	VGT-0501-01-WIS-001-EN	1/5
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SUPPLIER CODE OF CONDUCT

Vetropack* is committed to **integrity, reliability** and **transparency**. These values are reflected in our Supplier Code of Conduct (“Code”) which all suppliers are obliged to observe. This Code covers suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do, or seek to do business with Vetropack worldwide (“Supplier or Suppliers”).

The Code can only be implemented successfully if the entire supply chain is engaged, i.e. Suppliers are also required to ensure that all subcontractors and agents throughout the supply chain acknowledge and comply with this Code.

The Code is part of all agreements between Vetropack and its Suppliers, even if this is not expressly stated in these agreements.

Vetropack expects its Suppliers to adhere as a minimum to the following standards:

A. Integrity

a. Respect **all applicable laws and regulations**

- Suppliers are obliged to respect and comply with all applicable laws and regulations in force.

b. **Suppliers’ employees** are treated with respect.

- **Human Rights**

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

- **No discrimination or harassment**

Employees are evaluated, employed and promoted solely based on their qualifications and the abilities required for the envisaged position. Therefore, no consideration is given to race, gender, age or religion. Furthermore, Suppliers are committed to a work environment that is free from harassment, be this verbal or non-verbal.

- **Safe working conditions**

Safety is essential for Vetropack and its employees. Vetropack expects its Suppliers to be committed to respecting all applicable standards and continuously improve the safety of their employees.

- **No forced labour**

Involuntary work is strictly prohibited.

- **No child labour**


Child labour is strictly prohibited.

- **Freedom of association and collective bargaining**

Suppliers respect their employees’ right to freedom of association and collective bargaining.

- **Working hours and remuneration**

Suppliers are obliged to treat 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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c. Respect for business partners

- Fair competition

Respect for and compliance with all applicable competition and antitrust laws

- No improper advantages

It is not permitted to offer or accept any improper advantages (i.e. lavish business gifts, excessive hospitality or invitations, etc.).

- No bribery / corruption

Obligation to prevent and report all instances of bribery / corruption

d. Protect the assets of Vetropack companies

- Prevention of fraud

Suppliers and their employees are obliged to protect Vetropack's assets (tangible and intangible), in particular from fraud. Suppliers are expected to refrain from disclosing any confidential information in connection with Vetropack. Suppliers may be asked to sign a confidentiality agreement.

B. Reliability

a. Commitment to products and services which are safe for their intended use

Suppliers are committed to providing products and services which are safe for their intended use.

b. Environmental responsibility

Suppliers respect all applicable standards and are committed to continuously reducing the negative impacts of their activities on the environment.

c. Provision of reliable information

Suppliers must accurately record and disclose information regarding their activities, financial situation and performance in accordance with applicable laws and regulations.


C. Transparency

a. Avoidance of conflicts of interest

Conflicts of interest or potential conflicts of interest shall be avoided and disclosed.

b. Reporting potential misconduct

Suppliers, who believe that an employee of Vetropack, or anyone acting on behalf of Vetropack or their own employees or any employee of a subcontractor or agent, has or have engaged in illegal or otherwise improper conduct, shall report the matter to Vetropack. Suppliers can contact the Vetropack Holding Legal & Compliance Office at Schützenmattstrasse 48, CH-8180 Bülach, +41 44 863 31 31 or e-mail compliance@vetropack.com. Honest reports of potential misconduct will not jeopardise a Supplier's relationship with Vetropack.

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Vetropack also offers the possibility to report observations of serious misconduct via the following SpeakUp contacts operating 24/7:

Country	Phone Instruction	Webservice URL (general URL: www.speakupfeedback.eu/web/vetropackexternal)	Access code	Language Option 1	Language Option 2	Language Option 3	Language Option 4
Austria	0800-295175	www.speakupfeedback.eu/web/vetropackexternal/at	07234	German	English		
Croatia	0800-223069	www.speakupfeedback.eu/web/vetropackexternal/hr	07234	Croatian	English		
Czech Republic	0800-900 538	www.speakupfeedback.eu/web/vetropackexternal/cz	07234	Czech	English		
Italy	0800-787639	www.speakupfeedback.eu/web/vetropackexternal/it	07234	Italian	English		
Moldova	0800-61433	www.speakupfeedback.eu/web/vetropackexternal/md	07234	Romanian	Russian	English	
Romania	0800-894540	www.speakupfeedback.eu/web/vetropackexternal/ro	07234	Romanian	Russian	English	
Slovakia	0800-004529	www.speakupfeedback.eu/web/vetropackexternal/sk	07234	Slovak	English		
Switzerland	0800-561422	www.speakupfeedback.eu/web/vetropackexternal/ch	07234	Swiss German	French	Italian	English
Ukraine	0800-502 206	www.speakupfeedback.eu/web/vetropackexternal/ua	07234	Ukrainian	Russian	English	

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

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

The reporter 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 granting full confidentiality. In case of Italy the Supervisory and Control Body will be the first point of contact as per requirements of local law.

c. Compliance and monitoring

Vetropack requires that Suppliers implement this Code and participate in Vetropack's Supplier assessment process. Vetropack therefore reserves the right to verify and monitor compliance with this Code. For this reason, Vetropack or an independent third party appointed by Vetropack may visit Supplier sites or request the data regarding compliance with this Code. In the event of misconduct, Vetropack will work together with the Supplier to elaborate corrective measures. If there is no commitment on the part of the Supplier to do this or if corrective measures are not drawn up, Vetropack may cease to do business with the Supplier, terminate the contract or take legal action.


* Use of the term Vetropack in this document refers to all companies directly or indirectly controlled by Vetropack Holding Ltd.

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Contact details:

Vetropack Holding Ltd.
Procurement Department
Schützenmattstrasse 48
CH – 8180 Bülach
Switzerland

Tel: +41 44 863 31 31
E-mail: info@vetropack.com

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Please complete and duly sign by person(s) who is (are) registered in the Company Register and provide if applicable a copy of an extract from the Company Register. Please send the signed documents back to....., Mr....., Schützenmattstrasse 48, CH – 8180 Bülach, Switzerland or e-mail to@.....

ACKNOWLEDGEMENT

We have carefully read this Supplier Code of Conduct and agree to comply with all its objectives and provisions.

Supplier, Address, Stamp

Name, Position

Signatures of Authorized Persons

Date