

Supplier Code of Conduct

Department Name: Procurement / Sustainability

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Statement

Trivium Packaging's mission is to reliably deliver, high quality, innovative and sustainable packaging that exceeds expectations in protecting and promoting our partners' brands. By exclusively using infinitely recyclable materials and driving out inefficiencies in our processes, Trivium delivers sustainable value to our customers and the planet. Sustainability guides us in all our actions and forms the basis for our Supplier Code of Conduct hereafter referred to as the "Code" (previously referred to as the Responsible Procurement Policy).

'Trivium' is Latin for three roads coming together. At Trivium, our success is grounded in three foundational pillars: Planet, People & Customer. These core values allow us to meet our commitments to our customers, partners, suppliers and stakeholders, and to promote ethical corporate behavior within Trivium and with respect to third parties.

In an ever-changing world, it's not easy to assess situations and evaluate their associated risks. It takes courage and effort to act with integrity beyond mere compliance with law and regulation. This Code is designed to clarify the mandatory requirements in the areas of human rights and labor, environment, health and safety and business integrity which apply to all our direct and indirect (production-related and non-production related) suppliers, contractors, sub-contractors, agents and their subsidiaries hereafter referred to as "Suppliers".

Through dialogue with our Suppliers, and training if required, we aspire to achieve an adequate implementation of our Code. To that effect, our Code is embedded in Trivium's General Terms and Conditions of Purchase. In addition, Suppliers are asked to sign a (digital) certificate of compliance to ensure that they have read and understood our Code and that they will comply with it. Suppliers may also be asked to re-certify on a periodical basis. Please keep in mind that failure to conduct business in compliance with this Code may result in terminating the Supplier relationship. We strongly believe that the journey to continuously strengthen our foundational pillars will benefit both Trivium and our Suppliers.

For specific questions, please refer to your relevant purchasing professional. You can also write to procurement@triviumpackaging.com

This Code will be reviewed periodically to ensure that it continues to meet our targets and moves us closer towards our vision to be the global leader in metal packaging.

Thank you for your dedication.
Regards,

Andrew Vanstone,
Chief Transformation Officer

Jenny Wassenaar,
Chief Sustainability Officer & SVP Global R&D

Overview

Implementation

Our Suppliers must ensure sustainable and ethical business practices through policies, targets, management systems and processes that reflect the impacts and opportunities of the organization. In addition, they must strive for continuous improvement of their sustainability performance. Our Suppliers must comply with applicable laws, rules and regulations (including environmental, social and governance (“ESG”) standards, as in particular laid down in international conventions), as well as the standards described in this Code.

Compliance

Through dialogue with our Suppliers, we aim to continuously improve business conduct and to discover our Suppliers’ unique competences that contribute to Planet, People & Customer. When we conduct our annual supplier risk assessment and send a selected group of Suppliers our ESG questionnaire, we also require them to certify compliance with this Code. We expect Suppliers to use a proactive approach in establishing and maintaining the standards set forth in this Code, including the collection and evaluation of adequate and timely information, the establishment of relevant, measurable objectives and targets, and the regular monitoring and verification of progress. We expect our Suppliers to develop control mechanisms which are in line with the size and complexity of their business. As a minimum standard we expect our Suppliers to:

- Conduct business in a responsible manner covering the requirements set out in this Code;
- Adhere to relevant laws and regulations; and
- Strive for continuous improvement.

Subcontractors

Our Suppliers will ensure that any party that they involve to perform work for Trivium, will be made aware of the standards in this Code and will act in compliance with them.

Non-Adherence

Trivium reserves the right to terminate any agreement with any Supplier that cannot demonstrate compliance with this Code. Additionally, Trivium reserves the right to conduct audits or assessments to ensure Supplier’s compliance and will take appropriate steps regarding our relationship with the Supplier if there is reason for concern.

Whistleblowing procedure

We encourage our Suppliers to provide their stakeholders with access to a mechanism to raise concerns relating to (suspicion of) a breach of this Code, laws, or regulations. Employees who raise concerns in good faith should be protected from retaliation.

Suppliers or Suppliers' employees who wish to raise a concern regarding a (suspicion of a) violation by Trivium or its employees of any laws or regulations or Trivium's Code of Conduct should contact Trivium (legalandcompliance@triviumpackaging.com).

Planet

Environmental management

Our Suppliers must adhere to all relevant environmental laws and regulations. We expect our Suppliers to measure and monitor relevant environmental information, keep their environmental impact at the minimum and work towards achieving their defined targets, for example Science Based Initiative (SBTi) carbon emission reduction plans, and general ESG objectives within a timely manner. Continuous environmental improvements have to be demonstrated by means of clear targets and improvement policies. For example, measurable reductions in raw materials usage, energy consumption, greenhouse gas (GHG) emissions, water usage, discharges, noise, waste, reliance on natural resources and hazardous substances. An ISO14001 certification, or a comparable certification, is deemed sufficient.

Energy consumption

We encourage our Suppliers to move away from non-renewable energy sources where feasible and economically viable. In the interim, we expect our Suppliers to identify and implement energy saving initiatives where applicable. We expect our Suppliers to develop short, mid and long-term reduction plans on GHG emissions, to have these published and preferably validated by external bodies like the SBTi.

Water use

We encourage Suppliers to use water efficiently in the communities where they operate, adopt sustainable water practices and implement water reduction initiatives where applicable.

Biodiversity

We encourage Suppliers to increase biodiversity protection awareness and take actions to better understand, assess and respond to their biodiversity risks to enhance resilience where applicable.

Recycling & waste management

The collection and disposal of all waste must be managed through authorized service providers. Suppliers have in place or shall establish a procedure for the safe handling, storage, transportation, utilization and disposal of waste in accordance with applicable legislation.

Environmental information

Suppliers provide customers and the general public with clear information about the environmental and safety aspects of their products and production processes.

Continuous improvement

Suppliers continuously evaluate and improve their products, working methods, production and services. Suppliers ensure that these changes are executed in a controlled way and are acceptable to their customers and stakeholders.

Product stewardship

In accordance with the principles of product stewardship, Suppliers identify the risks and environmental impact related to their products during the production, distribution and transportation process as well as their entire lifecycle and look for opportunities to reduce these. In this context, Suppliers share relevant knowledge, expertise and experience with their own Suppliers, customers, and other parties.

Social responsibility in the value chain

We require our Suppliers to manage their supply chain responsibly, taking care to identify and mitigate potential social, ethical and environmental risks. We require that each of our Suppliers conducts a suitable supply chain risk assessment and implement sufficient controls where applicable.

Conflict minerals (tinplate and tinplate component Suppliers as well as tinplate traders)

We require our Suppliers to comply with the EU Conflict Minerals Regulation 2017/821 and Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act on Conflict Minerals. Suppliers providing products containing tin are required to demonstrate traceability and accountability of the raw materials delivered, including the disclosure of the smelter base according to the Conflict Minerals Reporting Template (CMRT).

People

Human rights

Suppliers are expected to respect the Universal Declaration of Human Rights and to commit to respect the rights of individuals within their organization and throughout their supply chain.

Discrimination and Diversity, Equity, Inclusion & Belonging (“DEIB”)

We expect all places of work, including those of our Suppliers to be free of physical and mental harassment and violence and free of any form of discrimination on the basis of, but not limited to race, ethnicity, gender, sexual orientation, age, religion, disability, or any other characteristic. We urge our Suppliers to adopt equitable practices, as well as promote and report on their DEIB initiatives and progress within their own organizations and across their supply chain. We anticipate our Suppliers to implement a DEIB strategy to foster a more inclusive and equitable working environment. In order to accelerate the DEIB agenda, we encourage learning, collaborations and best practice sharing across the supply chain.

Child and forced labor

Suppliers must adhere to applicable employment laws. Suppliers do not use forced labor or child labor either directly or indirectly. Suppliers shall adhere to the minimum employment age limit defined by national law or regulation and shall comply with relevant International Labor Organization (ILO) standards and act in line with Convention 138 (Minimum Age) and Convention 182 (Worst Forms of Child Labor).

Right to collective bargaining

We expect Suppliers to respect the right of their employees to freedom of association and collective bargaining.

Fair remuneration

Suppliers pursue a fair remuneration policy with due recognition for performance and do not force their employees to work excessive hours. In case employees are asked to work overtime, their extra work is compensated in line with local laws.

Local community

Suppliers promote healthy and safe living conditions to local residents, support local job creation, local sourcing, education provisioning, and infrastructure development.

Health and safety

Suppliers implement strict policies with the aim of creating an incident- and injury-free work environment and of preventing the occurrence of occupational illness and health problems associated with its activities. At all levels, Suppliers play an active role in identifying and rectifying unsafe situations, and work on continuous improvement of the health situations. An OHSAS18001 / ISO45001/ MSHA certificate, or a comparable certification, is deemed sufficient.

10 Life-saving rules

Think Safe, Work Safe, Be Safe. When visiting our sites, Suppliers agree to follow our 10 Life Saving Rules. We are determined to protect people and aim for zero accidents by supporting each other in following these rules:

1. Work with a valid work permit/ license when required.
2. Use fall protection & follow guidelines when working at heights.
3. Do not operate unprotected machinery.
4. Do not work or walk under a suspended load.
5. Check equipment is isolated before you start working. LOTO: lock out tag out.
6. Wear PPE that is provided for the job.
7. Always comply with driving rules.
8. Obtain a permit before entry into a confined space.
9. Do not use alcohol or drugs at work or attend work while under the influence of alcohol or drugs.
10. Always comply with rules related to hazardous chemicals.

Customer

Business integrity

Our Suppliers must abide by all applicable international, national and local laws and regulations, including but not limited to anti-corruption, anti-bribery, anti-fraud, competition/antitrust, trade controls and sanctions. We require our Suppliers to have clear internal policies or guidance documents regarding compliance with these laws and regulations, and the ability to demonstrate that they have communicated them to relevant employees.

Trivium is an ethical business which expects all its employees to act with integrity. This is clearly communicated to employees within our company Code of Conduct, which can be found at: [click here](#)

Law and regulations

Suppliers operate in full compliance with international, national, and local laws and regulations that are applicable to their business operations and obtain all the necessary permits. Local industry standards prevail in cases where these are more stringent than local legal requirements.

No bribery and corruption

Suppliers will not engage in any form of bribery and corruption or otherwise offer any incentive or kickback to any Trivium employee, Trivium employee's family or friends, or other representative of Trivium in order to obtain or retain business or secure any business advantage with Trivium. Suppliers will comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and all other local, regional or otherwise applicable laws and regulations dealing with the bribery of government officials and commercial entities.

Open competition

Suppliers value open and fair competition throughout the world, and therefore comply with competition/antitrust laws in all areas in which they operate and have implemented strict policies in this respect.

Trade restrictions

Suppliers respect the applicable economic sanctions, trade laws and restrictions as imposed by the EU, the US, the UK, the United Nations or other national or supranational bodies or governments and have implemented strict policies to ensure compliance therewith.

Hospitality & gifts

Suppliers are prohibited from providing or offering any gift or favor that could compromise or raise doubts about the neutrality of the decisions made by Trivium or the Supplier. Suppliers are aware of and adhere to our requirements.

Conflict of interest

Suppliers will avoid any interaction with a Trivium employee that may conflict, or appear to conflict, with that employee acting in the best interests of Trivium. Suppliers will disclose to Trivium all available information about conflicts of interest, including financial interests of a Trivium employee in any of Suppliers' businesses.

Confidentiality and intellectual property

Suppliers protect all confidential information provided by Trivium and its respective business partners, by putting in place appropriate measures to prevent disclosure or unauthorized use. We expect our Suppliers to respect intellectual property rights, including those of Trivium.

Company resources

If Suppliers use or have access to Trivium assets, including people, systems, networks and facilities, Suppliers must use these resources appropriately, in accordance with our instructions and for their intended business purpose only.

Data protection

Suppliers must assist Trivium in complying with applicable data protection laws, including the European General Data Protection Regulation (GDPR). Suppliers must provide transparency regarding personal data processing activities that concern the products or services provided to Trivium and ensure adequate technical and organizational protection measures.

Cyber security

Suppliers must ensure that they have adequate security controls to ensure that they do not introduce any risks to Trivium's information or factory systems. Suppliers must also notify Trivium as soon as is reasonable should there be an incident that has the potential to impact Trivium.

No fraud and transparent accounting

We do not tolerate any incident of fraud, which refers to any action or omission, whether attempted or successful, which misleads or deceives, or which intends to mislead or deceive, any person for the purpose of obtaining an undue advantage and/or which results in an unjustified financial loss for Trivium. Suppliers must have internal controls designed to detect, prevent and respond to fraud and money laundering. Any potential fraud that may have an impact on Trivium must be reported to us immediately.

Suppliers will ensure complete, fair, timely and accurate accounting practices and will keep records which accurately reflect the nature of the underlying transactions.

Business continuity

Suppliers will maintain policies and plans that mitigate exposure to terrorism, crime, threats, pandemics, natural disasters and related major accidents.

Signatory

Supplier:
Supplier representative:
Date:
Signature:

TRIVIUM
PACKAGING