



Ethical Charter and Code of Conduct (June 2020)

INTRODUCTION

Our Mission:

To protect, preserve and promote Nature's bounty and our clients' products with safe and effective metal packaging.

Our reason to believe: Metal packaging is nature's best armour, offering an array of advantages over other packaging materials: it is cost-efficient, simple to fill and simple to use, resistant over time and robust, as well as being endlessly recyclable (100% recyclable, and 79.7% recycled in Europe in 2017, according to Eurostat). It is the most effective packaging solution available, with a bright future ahead:

- to avoid wasting the world's precious food resources
- to protect, preserve and promote food products without consuming energy
- to preserve natural resources and foster the emergence of the circular economy
- and all while remaining affordable and practical for everybody, all of the time

Our Values:

Our fundamental, unwavering values are determined by our commitment to people first and foremost: our employees, our clients and their consumers of all ages.

Our goal is to be:

- **Humane**: We provide our employees with a working environment which is safe, pleasant and rewarding. We accept no compromises when it comes to the safety of our work stations. We strive to treat our employees openly and fairly, with respect for their dignity and integrity. We do not tolerate discrimination in any form. We are committed to nurturing the involvement and engagement of our employees, encouraging them to contribute to our improvement efforts.
- **United in our responsibility for the Safety and Quality of our packaging materials**: Our packaging solutions protect the products that consumers put on their plates, and the plates of their children. With this in mind we cannot afford the slightest defect, and each and every one of us bears a responsibility for ensuring the absolute safety, quality and non-toxicity of all of our products. Quality is the key to our future.
- **Committed and connected to our clients**: In a world which is constantly changing, we aim to set ourselves apart from the crowd with our responsiveness, our proximity and our flexibility, adapting to the requirements of our clients and consumers and working together in a spirit of sustainable collaboration.



- **Creating value internally and externally:** Our work is based on a commitment to continuous improvement and innovation, a philosophy which is non-negotiable as we seek to progress, to offer competitive prices to our clients and to retain our status as a major independent player in the market. We invest constantly in developing the skills of our employees, as well as optimising our production facilities.
- **Respecting the environment:** Our packaging solutions help to reduce food waste, and are made with metal which is 100%, endlessly recyclable. We do everything in our power to optimise our use of natural resources, reduce waste and drive down emissions and surplus materials in our factories, adhering to the principles of the circular economy.

Our Ambition:

We want to promote metal packaging and its benefits, making it the preferred solution of modern consumers and becoming the preferred supplier of our clients by guaranteeing them packaging solutions which are:

- 100% safe in terms of food security, hygiene and quality, protecting their products and their consumers
- Attractive tools for promoting their own products
- Cost-competitive, delivering sustainable profitability throughout the whole value chain
- Delivered with the shortest lead times on the market, keeping pace with new consumer trends
- Infinitely recyclable, designed and produced to minimise their environmental impact and protect our planet.

Massilly is a company with global ambition and means, combined with a local sensibility:

We have a high-powered, worldwide network of factories capable of meeting the needs of major international groups and local clients alike, with guaranteed safety, quality and competitiveness thanks to the most modern production tools on the market. We work constantly to develop new and effective forms of synergy that work for our clients (back-up production capacities, a broad range of products, cost reductions).

But we are also determined to remain a committed and reliable local partner, attuned to issues on the ground and the specificities of each market. Our superior flexibility allows us to adapt to change, offering more pertinent responses to the needs of clients of all sizes.

Our production facilities are part of the landscape in their respective territories, playing an active role in their local communities in keeping with our values and our commitment to sustainable development.



Why publish an Ethical Charter?

This Ethical Charter has been created in order to clearly set out the rules which apply to all employees, helping them to make responsible decisions in the performance of their daily duties and activities.

Above and beyond the importance of abiding by the law, the aim of this Charter is to help individuals to exercise their judgement and adopt the appropriate, apposite ethical position in all situations, embodying our vision, our values and our constant commitment to sustainable development.

Applying the Ethical Charter: awareness-raising efforts for all employees

Massilly is required to abide by the ethical principles of business and behave in a socially responsible manner towards all stakeholders (clients, suppliers, service providers, competitors, consumers, public authorities) and all employees.

The purpose of publishing this ethical charter is to formally express Massilly's ethical commitments and unite all employees in the pursuit of our shared values.

This charter should enable each and every one of us to reflect upon the best course of action to take in response to delicate situations which may arise in the course of internal and external relations.

Massilly has created a whistle-blowing system (described hereunder) which is open to all employees, allowing them to raise the alarm if they suspect a violation of the provisions contained in this charter, and to obtain help and advice regarding its content and implementation.

This system is in no way intended to replace the existing channels through which employees may express themselves: their managers, the human resources department and, in certain countries, their employee delegates.

OUR CODE OF CONDUCT

We attach particular importance to abiding by all of the laws and regulations which apply to our activities all over the world.

At all times, each and every employee has a responsibility to ensure that their initiatives and actions comply with:

- The applicable laws and regulations, as well as
- Our rules of conduct
- The values of our company



Safety:

Safety is a central priority for Massilly. We are committed to creating a healthy, safe working environment, minimising the incidence of workplace accidents, injuries and work-related illnesses.

Each and every employee should be able to work in an environment which poses no risk to their health and safety.

We strive to protect all concerned by constantly nurturing and promoting a culture of safety within our teams. This philosophy is put into practice across all of our locations in the form of specific safety policies which incorporate the applicable local standards.

We encourage all employees to share any observations they may have on this subject, in order to optimise safety efforts across the company. Our employees are responsible for reporting all malfunctions or incidents liable to represent a threat to their safety or the safety of their colleagues.

Environment:

Every decision we make is informed by our compliance with environmental standards, as we strive to reduce our impact on the environment. We are particularly committed to reducing our energy consumption, improving our management of waste and discharge materials, and evaluating our indirect impact. We work to minimise the environmental impact of our products by using fewer resources.

Quality:

The safety and quality of our products are essential priorities.

From fabrication through to distribution, we ensure that our products and processes comply with the leading international quality systems.

At every stage of the manufacturing process, we conduct tests in accordance with our internal procedures, the best practice guide for our profession and the various international reference systems.

Respect for people:

In the spirit of continuous improvement, Massilly invests in maintaining and developing the skills of all employees with a wide-ranging, tailored training policy.

Sensitive to the well-being of our employees, Massilly abides by all applicable labour laws and social standards, as well as major international texts such as the Conventions published by the International Labour Organization.

Each and every one of us has a right to be treated with respect and dignity, and we condemn all forms of sexual and psychological harassment. As such, we make it clear that we will not



accept any behaviour whose intention or effect is to undermine a person's dignity and create an environment which is intimidating, hostile, degrading, humiliating or offensive.

We make sure that each and every employee has the opportunity to thrive at work, without suffering any form of discrimination on the basis of their: physical appearance, age, health condition, association (or lack of association) with any supposed race or nationality, gender, gender identity, sexual orientation, pregnancy, family status, handicap, genetic characteristics, customs, family name, union activities, origins, place of residence, association (or lack of association) with any ethnicity, political opinions, choice of banking arrangements, loss of autonomy, religion, ability to speak a foreign language, vulnerabilities connected with economic circumstances or philosophical opinions.

Massilly is committed to respecting the privacy of all parties, and particularly to protecting the personal data of all employees, clients, suppliers and service providers. The data we collect are used for precise tasks, and cannot be hijacked for other purposes.

Commercial honesty:

Massilly approaches every aspect of its commercial activities - assistance, advice, training, breakdown repair, support, sale of materials etc. - with the utmost respect for the applicable regulations.

We take particular care to always provide up-to-date, accurate and objective information, backed up by evidence which is solid, reliable and sufficiently detailed to guarantee the best use of our products.

Massilly abides by the principles of fair competition and honesty in all commercial dealings. We work hard to develop commercial relationships which are profitable for all concerned, and which deliver lasting benefits for our partners.

We operate a responsible purchasing policy, incorporating clear requirements in terms of environmental protection, social progress and mutual economic development in partnership with our suppliers. We choose our suppliers objectively, and treat them equitably.

We honour all of our commitments to our partners, and expect the same degree of professionalism, honesty and ethical engagement in return.

Accuracy of financial information:

We guarantee that all of the financial information which we share in relation to our activities, in whatever format, is precise, honest and pertinent.

Massilly's account auditing procedures ensure that our order books, registers and accounts are not used to conceal acts of corruption.

We ensure that all accounting documents are in constant compliance with the applicable legislation. All payments and product shipments are entered transparently and correctly into our accounts and we fulfil all of our tax obligations with the utmost diligence.



OUR CORRUPTION PREVENTION SYSTEM

In accordance with the applicable laws and with reference to our ethical charter and code of conduct, Massilly has established a system for the prevention of corruption:

Exposure risk and evaluation of partners:

Buyers, sales reps and managers are the categories of employees most exposed to relationships with external partners which involve a degree of negotiation, a potential source of corruption or influence peddling. We evaluate the circumstances of our partners with reference to our risk mapping tool, which is regularly updated.

Massilly expects all employees to:

- Abide by all applicable laws and regulations on corruption, and in relation to accounting practices and publication.
- Never give or accept gifts or invitations with a view to obtaining or offering preferential treatment, or retaining certain contracts.
- Always scrupulously consider whether or not gifts, even modest ones, are acceptable, and always consult their managers if in doubt.
- Never pay or accept bribes.
- Ensure that all transactions of which they are aware are correctly recorded in the accounting books and registers.

Sanctions

Massilly is committed to taking all necessary disciplinary measures and legal proceedings in order to prevent or stop any action which constitutes an infraction of the rules contained in our Ethical Charter and Code of Conduct. Details of the applicable disciplinary regime are contained in our internal regulations.

Awareness-raising for staff and Training for those employees most exposed to such risks

Massilly will provide a copy of the present charter and its corresponding code of conduct to all employees, in order to ensure that they are aware of the company's values and principles.

A training programme for those employees most exposed to risks of corruption and influence peddling will be put in place in order to ensure respect for the relevant rules.

Managing this system

Every year, the CSR department presents an updated monitoring plan for our anti-corruption measures and reports all significant events to the executive committee.



THE WHISTLE-BLOWING SYSTEM

All violations of applicable laws and regulations, or of the provisions contained in the Ethical Charter and Code of Conduct, can be reported via the whistle-blowing system put in place for this purpose, in accordance with the applicable law (for France: Act No. 0216--1691 of 9 December 2016, known as the “Loi Sapin 2”).

As such, anybody who is aware of a situation or action which constitutes an actual or potential infringement of the applicable rules (*e.g.: accounting and financial regulations or internal monitoring measures; competition and anti-corruption laws; laws against discrimination and harassment in the workplace; hygiene standards, workplace health and safety regulations and environmental protection laws*) is encouraged to report this information to our compliance officers using the dedicated email address: ethic@massilly.com

This whistle-blowing system is covered by an internal procedure which sets out its scope of application, legal basis and practical implications, issued to all employees and published on the Massilly website.

The compliance officers responsible for running the whistle-blowing system are also on hand to assist any employee in need of help and guidance regarding the content of the Code of Conduct and its practical implementation.

Control system:

The compliance officers submit regular reports on their work, including an annual report to the Executive Committee containing details of all reports received, the reasons behind them and the actions they inspired. They also make any necessary suggestions for improvements to the anti-corruption policy in general and the whistle-blowing system in particular.

